

Regional Planning Commission Transmittal Checklist

Hearing Date
6/17/2015

Agenda Item No.
9

Project Number: R2012-02386-(3)
Case(s): Coastal Development Permit No. 201500030
Planner: Joshua Huntington, AICP

- Project Summary
- Property Location Map
- Staff Analysis
- Draft Resolution / Draft Ordinance / 8.5x11 Map (ZC or PA)
- Draft Findings
- Draft Conditions
- Burden of Proof Statement(s)
- Environmental Documentation (Adopted MND and MMRP)
- Correspondence
- Photographs
- Aerial Image(s)
- Land Use/Zoning Map
- Tentative Tract / Parcel Map
- Site Plan / Floor Plans / Elevations
- Exhibit Map
- Landscaping Plan
- Coastal Development Permit No. 4-12-088
- ERB Materials
- Board of Supervisors Adoption of MND

Reviewed By: 



Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

PROJECT NUMBER

R2012-02386-(3)

HEARING DATE

June 17, 2015

REQUESTED ENTITLEMENTS

Coastal Development Permit No. 201500030

PROJECT SUMMARY

OWNER / APPLICANT

Los Angeles County / Los Angeles County Department of Public Works

MAP/EXHIBIT DATE

February 25, 2015

PROJECT OVERVIEW

The applicant is requesting approval of a major coastal development permit (CDP) to authorize the construction of Campus Kilpatrick, a replacement detention facility of approximately 65,000 square feet to accommodate up to 120 minors. The new design consists of five housing cottages (25,000 square feet overall) and one support building (41,000 square feet overall) with the following components: administration (10,300 square feet), support/education center (12,700 square feet), a commons building (3,000 square feet), a gym/multipurpose room (8,700 square feet), an ancillary building with laundry/maintenance/warehouse (2,700 square feet), new kitchen (2,100 square feet), and a culinary teaching kitchen (1,200 square feet). It also includes site improvements such as a recreational multipurpose field, interior fire lane access, staff and visitor surface parking, on-site utilities, and security perimeter fencing. Overall earthwork volumes include 4,500 CY of cut and 9,000 CY of fill. Repair to the existing perimeter fence will encroach upon a maximum of 13 oak trees, which will be protected in place. These encroachments will require the planting of mitigation trees.

LOCATION

427 Encinal Canyon Road, Malibu, CA 90265

ACCESS

Encinal Canyon Road

ASSESSORS PARCEL NUMBER(S)

4471-003-900

SITE AREA

66.1 Acres

GENERAL PLAN / LOCAL PLANS

Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program.

Santa Monica Mountains North Area Plan

ZONED DISTRICT

Malibu

LAND USE DESIGNATION

Coastal Zone: P (Public and Semi-Public Facilities)

North Area: P (Public and Semi-Public Facilities)

ZONE

Coastal Zone: IT (Institutional)

North Area: O-S (Open Space)

PROPOSED UNITS

N/A

MAX DENSITY/UNITS

N/A

COMMUNITY STANDARDS DISTRICT

Santa Monica Mountains North Area

ENVIRONMENTAL DETERMINATION (CEQA)

The Los Angeles County Board of Supervisors, at its hearing on November 26, 2013, adopted a Mitigated Negative Declaration (MND) for the project, and adopted the Mitigation Monitoring and Reporting Program (MMRP).

KEY ISSUES

- The proposed facility replaces a recently demolished facility in the same location. No undisturbed habitat is proposed to be disturbed or removed.
- Repair to the existing perimeter fence will encroach upon a maximum of 13 oak trees, which will be protected in place.
- The subject property is bisected by the coastal zone boundary. The vast majority of the project is proposed within the Coastal Zone. There will also be a small amount of brush clearance for fuel modification outside of the coastal zone. The area of brush clearance is not more than what has been cleared in the past.
- Compliance with Santa Monica Mountains Local Implementation Program.

CASE PLANNER:

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R2012-02386-(3): 427 Encinal Canyon Road

Property Location Map

ENTITLEMENT REQUESTED

- Major Coastal Development Permit (“CDP”) No. 20150030 to authorize the construction of Campus Kilpatrick, a juvenile detention facility, this is approximately 65,000 square feet to accommodate up to 120 minors, pursuant to Section 22.44.1780.

PROJECT DESCRIPTION

The applicant, Los Angeles County, as represented by the Department of Public Works (“applicant”), is requesting a major CDP pursuant to the Santa Monica Mountains Local Coastal Program (“LCP”) for the development of the Campus Kilpatrick project (“Project”). The Project includes the construction of a new juvenile detention facility, including:

- Five housing cottages (25,000 square feet overall)
- One support building (41,000 square feet overall) with the following components:
 - Administration (10,300 square feet),
 - Support/education center (12,700 square feet),
 - A commons building (3,000 square feet),
 - A gym/multipurpose room (8,700 square feet),
 - An ancillary building with laundry/maintenance/warehouse (2,700 square feet),
 - New kitchen (2,100 square feet), and
 - A culinary teaching kitchen (1,200 square feet).
- Accessory components:
 - A recreational multipurpose field,
 - Interior fire lane access,
 - Staff and visitor surface parking,
 - On-site utilities, and
 - Overall earthwork volumes include 4,500 CY of cut and 9,000CY of fill.
- Tenant Improvements, including fence replacement and restoration.
- Encroachments on a maximum of 13 oak trees.

The Project replaces Camp Kilpatrick, a recently demolished detention facility for minors located at 427 Encinal Canyon Road in the unincorporated Santa Monica Mountains Coastal Zone in Los Angeles County (“subject property”). The Project is clustered on top of the disturbed site previously occupied by Camp Kilpatrick (“Project Site”). The proposed buildings are all within the footprint of the recently demolished buildings, and there is no expansion of the footprint of the project. The subject property is located in

western Los Angeles County to the north of the City of Malibu and to the south of the Cities of Agoura Hills, Calabasas, Thousand Oaks, and Westlake Village.

The majority of the Project Site is located within the Santa Monica Mountains Coastal Zone; however, a small portion at the northern edge of the Project Site extends outside of the Coastal Zone. Access to the Project Site is provided by Encinal Canyon Road, an LCP designated Scenic Route, to the south of the Project Site. Emergency access is provided by Mulholland Highway to the northeast, via the Zuma Ridge Fire Road. Mulholland Highway near the Project Site is designated as an official County Scenic Highway.

The Project includes repairs to the detention facility's existing perimeter fence. This repair work will encroach upon a maximum of 13 oak trees, which are already being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in the LCP's Local Implementation Program (LIP). No oak trees will be removed as part of this project.

A portion of the Project Site, including the northern edge of the parking lot and a small portion of the fuel modification area, is located outside of the Coastal Zone and is within the Santa Monica Mountains North Area (SMMNA). This area is not subject to the policies and provisions of the LCP because it is not within the Coastal Zone. This area was previously disturbed, and the impacts to this area are the same or less than what they had been previously.

Now that the LCP has been certified, the Regional Planning Commission (Commission) has the authority to act on this CDP application. For the small amount of the Project that is outside of the Coastal Zone, Government Code Section 65402 still applies.

SITE PLAN DESCRIPTION

The subject property is on a County-owned property identified by Assessor Parcel Number (APN) 4471-003-900. The subject property contains approximately 67 acres, but the Project Site is a much smaller, 11.7-acre area of this property that is defined as the area that will be disturbed as part of the Project. The Project Site is located in the western portion of the property. The site plan shows five, 24-bed residential housing cottages that are each split into two, 12-bed units, a large support building, and the existing pool and kitchen clustered around a central sports field.

The fire lane that circles the interior perimeter of the site is 26 feet in width and extends to 26 feet where fire hydrants are located. The fire lane along the exterior of the support building is 26 feet wide for the full travel of said building.

The majority of the parking for the Project will be provided in a long parking lot on the eastern edge of the Project Site. A total of 132 parking spaces are proposed, with 110 spaces on pavement and 22 spaces on gravel. A parking matrix is not required for submission as this is a single tenant/single use complex.

EXISTING ZONING

The subject property is zoned IT (Institutional – Coastal Zone) and OS (Open Space – SMMNA).

Surrounding properties are zoned as follows:

- North: R-C-20 (Rural Coastal – 20 Acre Minimum Area Required), A-1-5 (Light Agriculture – 5 Acre Minimum Area Required),
- South: IT, O-S-P (Open Space – Parks)
- East: IT, R-C-20
- West: R-C-20, R-R (Resort and Recreation)

EXISTING LAND USES

The subject property currently contains a large cleared area where Camp Kilpatrick was recently demolished, and large areas of open space consisting of native habitat, significant ridgelines, and prominent rock outcrops.

Surrounding properties are developed as follows:

- North: Large lot rural residential development, vacant properties, and ranches/vineyards
- South: Camp Miller, another County owned and operated juvenile detention facility, is immediately to the south, with open space further to the south
- East: Open Space and vineyards.
- West: Malibu Institute/Malibu Country Club (currently closed)

PREVIOUS CASES/ZONING HISTORY

Camp Kilpatrick was established in 1962 as a Los Angeles County Juvenile Probation Camp. Therefore, all development on the campus site was legally established prior to the Coastal Act's effective date of January 1, 1977.

Prior to the certification of the LCP on October 10, 2015, the Coastal Commission reviewed County projects and issued CDP's. With the certification of the LCP, the

County is now responsible for issuing the CDP for County projects. Therefore, the replacement facility is being reviewed for compliance with the LCP.

The site was originally established prior to the effective date of the Coastal Act. For the replacement facility, the County received a CDP for the demolition and CEQA, but not for the construction of the replacement facility.

- CDP No. 4-12—088 was issued by the California Coastal Commission, for the demolition of Camp Kilpatrick on May 14, 2014. The environmental impacts of the demolition and the proposed re-construction of the facility were considered together as one project by the Board of Supervisors. On November 26, 2013, the Board of Supervisors adopted a Mitigated Negative Declaration ("MND") (State Clearinghouse No. 2012102002) for the demolition/re-construction project.

ENVIRONMENTAL DETERMINATION

A MND was prepared pursuant to CEQA and was duly noticed with the State Clearinghouse. On November 26, 2013, the Board of Supervisors adopted a Mitigated Negative Declaration (State Clearinghouse No. 2012102002), for both the demolition of Camp Kilpatrick and the Campus Kilpatrick construction project.

The MND identified potentially significant effects from the Project on the environment in the areas of air quality, biological resources, cultural resources, and noise. A Mitigation Monitoring and Reporting Program (MMRP) was prepared in conjunction with the MND. The MMRP identifies measures that will reduce the environmental impacts identified as "potentially significant" to a "less than significant" level. The MMRP will be incorporated into the construction documents to ensure compliance with mitigation measures that have been developed to address issues concerning biological resources, cultural resources, geology, and noise. A summary of the impacts and mitigation measures are as follows:

- Air quality: require that site preparation (clearing and grubbing) activities and site grading activities do not occur concurrently.
- Biological resources: implement corresponding mitigation measures, and obtain required jurisdictional delineation related approvals to avoid or minimize impact on grassland habitat, oak trees, special status plant species, potential nesting areas of migratory raptors, birds and roosting bats.
- Cultural resources: implement established protocols to be used in the event that archeological, paleontological and Native American artifacts are encountered.

- Noise: minimize construction-related noise through implementation of noise-abatement measures such as temporary noise barriers to reduce the noise level to acceptable levels.

Staff is of the opinion that the permit is within the scope of the project covered by the previously adopted MND and nothing further is necessary or required to comply with CEQA. Further, Staff is of the opinion that this MND and the associated MMRP adequately mitigate potential Project impacts on air quality, biological resources, cultural resources, and noise.

STAFF EVALUATION

The majority of the Project Site is designated Public and Semi-Public Facilities (P) land use category by the Santa Monica Mountains Land Use Plan (LUP), a component of the 1980 County of Los Angeles General Plan (General Plan).

The small portion of the Project Site that is located within the SMMNAP is also designated P land use category. Probation camps are specifically called out in the SMMNAP as a use that is a primary purpose of the P land use category. Therefore, the Project is consistent with the SMMNAP's P land use designation.

LUP Consistency

The Project is consistent with the LUP, and is specifically supported by the following policies:

- *Policy CO-4: Minimize impervious surfaces in new development, especially directly-connected impervious areas. Require redevelopment projects to increase the area of pervious surfaces, where feasible.*

The Project is designed to minimize impervious surface by clustering the new campus structures and reducing the overall impervious surface footprint of the site. In total, the Project includes 187,308 square feet of impervious surface, resulting in an impervious surface ratio (impervious surface/total property area) for the property of only 0.06. Therefore, only six percent of the property will be covered by impervious surfaces.

- *Policy CO-10: Limit grading, soil compaction and removal of locally-indigenous vegetation to the minimum footprint needed to create a building site, allow access, and provide fire protection for the proposed development. Monitor grading projects to ensure that grading conforms to approved plans.*

All grading activities would be limited to the already disturbed and/or developed portions of the Project Site. The proposed grading would not change the natural topography of the Project Site.

- *Policy CO-41: New non-resource-dependent development shall be prohibited in H1 habitat areas in order to protect these most sensitive environmental resource areas from disruption of habitat values. The only exception is that two uses may be approved in H1 habitat other than wetlands in very limited circumstances, as follows: (1) public works projects required to repair or protect existing public roads when there is no feasible alternative, as long as impacts to H1 habitat are avoided to the maximum extent feasible, and unavoidable impacts are minimized and mitigated; and (2) an access road to a lawfully-permitted use outside H1 habitat when there is no other feasible alternative to provide access to public recreation areas or development on a legal parcel, as long as impacts to H1 habitat are avoided to the maximum extent feasible, and unavoidable impacts are minimized and mitigated. Any new development approved for one of these two uses within woodland or savannah habitat shall protect native trees in accordance with Policy CO-99.*

The applicant has designed the project to avoid impacts to native habitats. In order to minimize grading and cluster the Project within the previously disturbed and/or developed portions of the property, the Project would be located within the same development footprint as the recently demolished Camp Kilpatrick. The Project's proposed development area is designated as H3 habitat. No other activities would occur within H1 Habitat. The oak trees that would be encroached upon are show on the LUP's Biological Resources Map as H3 habitat as well due to its status as a disturbed area due to required fuel modification. In addition, The Project would comply with all federal, state, regional, and county requirements relating to biological resources, including those set forth in the Clean Water Act, the federal Endangered Species Act, the California Endangered Species Act, and the California Fish and Game Code.

- *Policy CO-43: New development shall be sited in a manner that avoids the most biologically-sensitive habitat onsite where feasible, while not conflicting with other LCP policies, in the following order of priority: H1, H2 High Scrutiny, H2, and H3. Priority shall be given to siting development in H3 habitat, but outside of areas that contain undisturbed native vegetation that is not part of a larger contiguous habitat area. If infeasible, priority shall be given to siting new development in such H3 habitat. If it is infeasible to site development in H3 habitat areas, development may*

be sited in H2 habitat if it is consistent with the specific limitations and standards for development in H2 habitat and all other provisions of the LCP. New development is prohibited in H1 habitat unless otherwise provided in Policy

The Project would be sited entirely within existing developed/disturbed areas of the Project site, therefore avoiding the most biologically-sensitive habitat on the Project site. Fuel modification would only be required in existing disturbed areas.

The Project's proposed development area is not designated as H1, H2 "High Scrutiny", or H2. No new development would occur within H1 Habitat.

- *Policy CO-45: Place primary emphasis on preserving large, unbroken blocks of undisturbed natural open space and wildlife habitat areas. As part of this emphasis, all feasible strategies shall be explored to protect these areas from disturbance. Such strategies include, but are not limited to, purchasing open space lands, retiring development rights, clustering development to increase the amount of preserved open space, requiring the dedication of open space conservation easements in all CDPs that include approval of structures within H2 habitat, and minimizing grading and the removal of native vegetation.*

The majority of the property, approximately 55 acres, consists of undisturbed natural open space that is designated as H1 and H2 habitat. The Project will completely avoid these areas and is clustered only on the footprint of the existing disturbed area. The Project's proposed development area is designated as H3 habitat. No activities would occur within H1 habitat, and no native vegetation would be removed.

- *Policy CO-54: Use primarily locally-indigenous plant species in landscape areas within Fuel Modification Zones A and B of structure(s) requiring fuel modification. Non-locally-indigenous plants and gardens are allowed in Fuel Modification Zones A and B, with associated irrigation, provided that all efforts are made to conserve water. Invasive plants are strictly prohibited.*

The proposed plantings were cross referenced between the requirements listed in the Santa Monica Mountains LIP and the approved list of plantings provided by the LA County Fire Department: Fuel Modification division. The resultant planting schedule was then approved by a Department of Regional Planning staff biologist. The Project would incorporate native, drought-tolerant landscaping, and would not include any invasive plant species.

- *Policy CO- 124: The Santa Monica Mountains contain scenic resources of regional and national importance. The scenic and visual qualities of these resources shall be protected and, where feasible, enhanced.*

The Project's proposed structures would be designed to be sensitive to the surrounding environment and would work together as a cohesive whole. Buildings would be clustered within the already disturbed area of the property, and are well away from the protected zones of the mapped significant ridgelines both on the east portion of the property, and on the northwest corner of the property. The Project Site is also located more than 400 feet from the rock outcrops located in the northwest part of the property. Therefore, the Project Site is located in a natural bowl that is hardly visible from any offsite location. Furthermore, the development area is located at a much lower elevation than Mulholland Highway, so the proposed buildings would not interfere with public views from Mulholland Highway. And the buildings are set back far enough, more than 500 feet, from Encinal Canyon Road that they would not interfere with views from this road either.

The Project would not alter the "natural landscape". All grading would occur within previously disturbed areas. The proposed grading would not change the natural topography of the Project site.

- *Policy CO-135: Preserve topographic features of high scenic value in their natural state, including canyon walls, geological formations, creeks, ridgelines, and waterfalls.*

The Project would not alter the "natural landscape". None of the Project's structures would break a ridgeline view as seen from public places. High scenic value features such as significant ridgelines and rock outcrops would be preserved and protected.

- *Policy CO-144: New development shall incorporate colors and exterior materials that are compatible with the surrounding landscape. The use of highly-reflective materials shall be prohibited, with the exception of solar panels.*

The Project's proposed structures would be designed to be sensitive to the surrounding environment and would work together as a cohesive whole. Buildings would be clustered in the Project Site, and located within the already disturbed and developed area of the recently demolished Camp Kilpatrick. The proposed structures would incorporate design elements that blend the new building designs

with the surrounding topography and color palette. The Project structures would not exceed the height limitations indicated in the LUP.

- *Policy SN-20: Design and site new development in a manner that minimizes the threat of loss from wildland fires while avoiding the need for excessive vegetation clearance.*

The Project site is located in an area subject to high fire severity hazard; however, the Project's buildings would be designed pursuant to code for fire resistance, and would observe Fire Department required fuel modification zones. The Fire Department has reviewed and approved the preliminary fuel modification plan for the Project. Occupied buildings would be located in the middle of an area that has been subject to fuel modification disturbance for decades. Because of the Project's clustered design, no new fuel modification areas are required for this Project.

- *Land Use Policy Map: The Project Site is designated P (Public and Semi-Public Facilities).*

The P designation allows for the establishment of government offices and services. Other permitted uses include educational institutions, probation camps, public service facilities, public recreation areas and facilities, telecommunication facilities, and trails. The maximum land use intensity within this area is 0.3 floor-area ratio (FAR).

The Project would be consistent with the low-intensity development mandate of the LUP. The Project would create development that is far below the maximum allowable density. On this 67-acre property, an FAR of 0.3 would allow more than 875,000 square feet of building area. The Project proposes only 64,773 square feet of building area – only seven percent of the allowable building area.

- *Policy LU-2: Retain the area's natural setting, rural and semi-rural character, and scenic features.*

The subject property contains 67 acres, but the Project Site is clustered on only 12 acres. Furthermore, the Project's grading is confined to existing graded areas, and the topography of the site will not be altered significantly.

The Project's proposed structures would be designed to be sensitive to the surrounding environment and to work together as a cohesive whole. Buildings would

be clustered within the already disturbed area of the recently demolished Campus Kilpatrick. The proposed structures are predominately single-story structures that would incorporate design elements that blend the new building designs with the surrounding topography and color palette.

The Project would not significantly impact the area's scenic resources, and the Project is protected by undeveloped significant ridgelines and rock outcrops. With its proposed facilities clustered low on the subject property, the Project would be consistent with this Policy.

- *Policy CI-19: Limit the density and intensity of development in rural and mountainous areas to a level that can be accommodated by existing road capacity and without creating significant adverse impacts.*

Campus Kilpatrick would replace the recently demolished Camp Kilpatrick. The Project would retain its existing use while significantly improving the facility, all within the existing disturbed footprint of the original facility. The Project site is accessed primarily from Encinal Canyon Road via Pacific Coast Highway and/or Mulholland Highway. No change in access is anticipated, and no change in traffic is anticipated by this replacement project.

Zoning Ordinance, LIP, and Development Standards Compliance

The Project is required to comply with all applicable requirements of Los Angeles County's Zoning Ordinance, including the requirements of the LIP. Specifically, the Project complies with the development standards of the IT zone, as well as the standards and requirements of the LIP related to the following sections:

Vegetation Management and Landscaping (22.44.1240); Height Limits (22.44.1250); Grading (22.44.1260); Construction Colors, Materials, and Design (22.44.1320); Water Resources (22.44.1340); Hillside Management (22.44.1350); Visual Resource Protection (22.44.1440); Low Impact Development and Hydromodification (22.44.1510 et. Seq.); and the Area-Specific Development Standards for biological resources (22.44.1800 et. seq.), Scenic Resource Areas (22.44.1990 et. seq.), and Hazards Area (22.44.2050 et. seq.).

Oak Tree Encroachments

County Code Section 22.44.950 allows oak tree impacts to be evaluated and mitigated as part of the CDP. No separate oak tree permit is required.

The Project's proposed fence repairs would require encroach upon a maximum of 13 oak trees, all of which are already being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in County Code Section 22.44.950. These ratios require: 10 replacement trees be planted for each tree encroached upon more than 30 percent, five replacement trees be planted for each tree encroached between 10 and 30 percent, and only monitoring is required for encroachments of less than 10 percent. Therefore, the planting of up to 130 mitigation trees will be required as part of this project. The CDP Conditions of Approval require the applicant to submit a Revised Exhibit "A" detailing the final number and percentage of encroachments, as well as the location where the mitigation trees will be planted. Therefore, the Project is consistent with the applicable County Code oak tree protection requirements.

IT Zone

Pursuant to County Code Section 22.44.1780, the IT zone permits probation camps with the granting of a major CDP. Campus Kilpatrick is a probation camp and is allowed within the IT zoning with a major CDP.

The IT zone requires that the arrangement of buildings, architectural design and types of uses shall be such so as to minimize adverse impacts on adjoining properties. These impacts include, but are not limited to: noise, odors, fuel modification, maintenance of community character, and views. The Project is consistent with these requirements.

The IT zone requires a 20-foot setback from a road. The proposed Project Site is more than 500 feet from either Encinal Canyon Road or Mulholland Highway.

The IT zone also requires development to comply with a maximum FAR of 0.3. On this 67-acre property, an FAR of 0.3 would allow more than 875,000 square feet of building area. The Project proposes only 64,773 square feet of building area – only seven percent of the allowable building area.

Therefore, the Project complies with the development standards of the IT zone.

Environmental Review Board Compliance

Pursuant to County Code Section 22.44.1860, the proposed Project was reviewed by the Environmental Review Board (ERB) because much of the project site contains sensitive environmental resources that meet the definition of H1 and H2 habitat. The ERB reviewed the Project on April 20, 2015, and found the Project to be consistent, after modifications, with the resource protection policies and provisions of the LCP. At

this meeting, the ERB made several recommendations to mitigate potential resource impacts. These recommendations pertain to: water conservation, landscaping, oak tree mitigation planting location, watershed restoration, habitat impacts and mitigation, and oak tree protection. These recommendations have been incorporated into project design and the CDP Conditions of Approval. ERB materials from the April 20, 2015 meeting are attached to this staff report.

Parking Requirements

While the LIP does not specify a required parking ratio for probation camps, Section 22.44.1410 (CC) states that “where parking requirements for any use are not specified, parking shall be provided in an amount which the Director finds adequate to prevent traffic congestion and excessive on-street parking.” The applicant has proposed 132 parking spaces as part of the Project. Since the residents of Campus Kilpatrick will not have vehicles, the 132 spaces seems adequate to meet the needs of the staff and visitors without causing traffic congestion or requiring excessive on-street parking.

Project Impacts

The Project Site is located in an alluvial valley near the base of natural hillside terrain and the confluence of several natural drainages. Existing storm water drainage improvements serving the subject site include a concrete-lined trapezoidal channel that runs north to south, just to the east of the Project Site. This channel collects runoff from the drainages to the northeast and from within Campus Kilpatrick via a series of catch basins/drainage inlets, concrete V-ditches, and underground storm drain pipelines. This primary drainage channel continues to the south, and passes underground where it traverses the parking lot serving Camp Miller, an adjacent probation camp to the south, and Encinal Canyon Road, and eventually outlets immediately south of Encinal Canyon Road. A drainage structure that collects runoff from the canyon areas and associated drainages to the northwest is located immediately outside the demolition area to the northwest. The Project Site is restricted to dry-land areas within the existing facility. There will be no impacts from the construction on the adjacent portions of the channelized Zuma Canyon Creek drainage, which are entirely outside of the Project Site.

The Project includes repairs to the detention facility's existing perimeter fence. This repair work will encroach upon a maximum of 13 oak trees, which are already being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in the LIP. These ratios require: 10 replacement trees be planted for each tree encroached upon more than 30

percent, five replacement trees be planted for each tree encroached between 10 and 30 percent, and only monitoring is required for encroachments of less than 10 percent.

Where the perimeter fence can be salvaged, the applicant will replace the fabric on the existing fence itself. Only fencing that has been significantly damaged over time will be replaced. The fence repair work will encroach upon a maximum of 13 oak trees, all of which are currently being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in the LIP. According to the LIP, impacts to oak trees such as this are reviewed and mitigated as part of the CDP application. The area of brush clearance is not more than what has been cleared in the past.

The grading plan shows a net import of approximately 4,500 Cubic Yards of fill material (soil). The applicant will use this soil in an effort to maintain the grade as close to the existing grade as possible, with the exception of some necessary corrections to meet ADA code requirements and slope irregularities. The proposed retaining walls are within the Project Site and are more than 200 feet from any property lines. None of the proposed retaining walls will be more than 10 feet in height.

Campus Kilpatrick and Camp Miller utilize the same water supply and wastewater treatment systems. An existing 500,000-gallon potable water tank is located near the top of an approximate 100 foot-high slope to the west of Campus Kilpatrick, which provides water and ensures adequate fire flows and volumes at the camps. The water tank is owned and maintained by the County. In addition to the water tank, Camp Kilpatrick and Camp Miller are provided potable water via the Las Virgenes Municipal Water District water main connecting to the camps near the northeast corner of Camp Kilpatrick. Wastewater generated by both camps is conveyed via underground pipelines to a self-contained wastewater package plant located immediately south of Encinal Canyon Road, about 700-feet south of Camp Kilpatrick.

Coastal Development Permit Burden of Proof

The applicant is required to meet the CDP Burden of Proof. According to County Code Section 22.44.850, in addition to the information required in the permit application. The applicants Burden of Proof statement is attached.

Staff concludes and is of the opinion that the burden of proof for a CDP has been met by the applicant, subject to compliance with the attached conditions. The applicant's responses are also attached.

Neighborhood Impact/Land Use Compatibility

The proposed buildings are clustered within the footprint of the previous buildings on the site. The new buildings are similar in height to the previous buildings; however, the configurations/shapes of the new buildings have sloped roofs for several portions of the complex (whereas the previous facility included flat roofs throughout). There is a single 2-story portion of the building at the entry, serving as both administration and sleeping quarters for the staff. By stacking the functions, the applicant is able to feature a smaller building footprint, thus staying within the disturbed area of the site and avoiding impacts to the surrounding native habitats. This taller portion of the building serves as a cornerstone for the replacement Project and an entry feature for the facility. The Project will not be visible from a public road or street, will not adversely impact the scenic quality of the area, and will be a maximum of 31 feet tall. All building finishes will comply with County Code Section 22.44.1320 (Construction Colors, Materials, and Design).

Staff is of the opinion that the CDP conditions adequately address uses authorized by the CDP. The above recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing.

COUNTY DEPARTMENT COMMENTS AND RECOMMENDATIONS

County Department comments and conditions were received from the Departments of Public Works, Fire, and Public Health (attachment).

- The Department of Public Works, in its letter dated May 18, 2015, recommends approval of the Project and requires conditions regarding road, grading, drainage, and sewer.
- The Fire Department, in its letter dated June 3, 2015, recommends approval of the Project.
- The Department of Public Health, in its letter dated April 28, 2015, recommends approval of the Project and states that the Project will be subject to requirements regarding: potable water supply, the jail inspection program, sewage disposal, the plan check program, and the toxics-epidemiology program.

LEGAL NOTIFICATION AND PUBLIC OUTREACH

Pursuant to the provisions of Sections 22.44.970 and 22.44.990 of the County Code, the community was appropriately notified of a Commission Hearing by mail, newspaper, property posting, and on the Department's website. Newspaper notices were published

on May 18, 2015 and May 19, 2015 in the Los Angeles Daily News. Notices to property owners located within a 1,000-foot radius of the property boundaries were mailed on May 14, 2015. Notices were posted on the subject property on May 15, 2014 and were made available on the Department's website.

PUBLIC COMMENTS

Staff has not received any public comments regarding the pending CDP at the time of the writing of this report.

FEES/DEPOSITS

If approved, fees identified in the attached project conditions will apply unless modified by the Regional Planning Commission.

STAFF RECOMMENDATION

Staff recommends approval of Project No. R2012-02386-(3), Coastal Development Permit No. 201500030, subject to the attached conditions.

SUGGESTED APPROVAL MOTION

"I MOVE THAT THE REGIONAL PLANNING COMMISSION FIND THE PROJECT IS CONSISTENT WITH THE PREVIOUSLY ADOPTED MND."

"I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND APPROVE COASTAL DEVELOPMENT PERMIT NO. 201500030 WITH THE ATTACHED FINDINGS AND CONDITIONS."

Prepared by: Joshua Huntington, AICP, Principal Regional Planner
Reviewed by: Mi Kim, Supervising Regional Planner

Attachments:

Adopted MND including Final MND, Board of Supervisors Letter, and MMRP
CDP Findings
CDP Conditions
Applicant's CDP Burden of Proof and Project Narrative
Exhibit Maps
ERB Materials

MK:JSH:jsh
6/4/15

**DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION
AND ORDER
COUNTY OF LOS ANGELES
PROJECT NUMBER R2012-02386-(3)
COASTAL DEVELOPMENT PERMIT NUMBER 201500030**

1. The Los Angeles County ("County") Regional Planning Commission ("Commission") conducted a duly noticed public hearing in the matter of Coastal Development Permit No. 201500030 ("CDP") on June 17, 2015.
2. The permittee, Los Angeles County as represented by the Department of Public Works ("permittee"), requests the major Coastal Development Permit ("CDP") to authorize the construction of Campus Kilpatrick ("Project"), a replacement juvenile detention facility ("Project Site"), on a property located at 427 Encinal Canyon Road ("subject property") in the unincorporated community of the Santa Monica Mountains in the IT (Institutional) and O-S (Open Space) zones pursuant to Los Angeles County Code Section 22.44.1780.
3. The Project Site is an 11.7-acre portion of the 67-acre subject property. The Project Site is located in the western portion of the subject property, a flat area surrounded by steep slopes, and currently contains a large cleared area where Camp Kilpatrick was recently demolished. The remainder of the subject property contains large areas of open space consisting of native habitat, significant ridgelines, and prominent rock outcrops.
4. The Project Site is located in the Malibu Zoned District. The majority of the Project Site is within the Santa Monica Mountains Coastal Zone ("Coastal Zone") and is zoned IT. The small portion of the Project Site that is within the Santa Monica Mountains North Area ("SMMNA") is zoned O-S.
5. With the Coastal Commission's certification of the LCP on October 10, 2014, the Regional Planning Commission (Commission) has the authority to act on CDP applications.
6. Government Code Section 65402 still applies to the small amount of the Project that is outside of the Coastal Zone.
7. The project site is within the P (Public and Semi-Public Facilities) land use category both for the portion of the Project Site within the Coastal Zone where the Santa Monica Mountains Land Use Plan ("LUP") applies, and for the small portion of the project site within the SMMNA where the Santa Monica Mountains North Area Plan ("SMMNAP") applies.

8. Surrounding zoning within a 700-foot radius includes:
 - North: R-C-20 (Rural Coastal – 20 Acre Minimum Area Required), A-1-5 (Light Agriculture – 5 Acre Minimum Area Required),
 - South: IT, O-S-P (Open Space – Parks)
 - East: IT, R-C-20
 - West: R-C-20, R-R (Resort and Recreation)

9. Surrounding land uses include:
 - North: Large lot rural residential development, vacant properties, and ranches/vineyards
 - South: Camp Miller, another County owned and operated juvenile detention facility, is immediately to the south, with open space further to the south
 - East: Open Space and vineyards.
 - West: Malibu Institute/Malibu Country Club (currently closed)

10. The zoning and case history for the subject property is as follows:
 - Camp Kilpatrick was established in 1962 as a Los Angeles County Juvenile Probation Camp, prior to the Coastal Act's effective date of January 1, 1977.
 - The California Coastal Commission, issued CDP No. 4-12-088, for the demolition of Camp Kilpatrick on May 14, 2014.

11. The site plan depicts the Project Site with five, 24-bed residential housing cottages (25,000 square feet overall) that are each split into two, 12-bed units, a large support building, and the existing pool and kitchen clustered around a central sports field with an existing 75-foot tall mast light. The large support building (41,000 square feet overall) contains the following components: administration (10,300 square feet), support/education center (12,700 square feet), a commons building (3,000 square feet), a gym/multipurpose room (8,700 square feet), an ancillary building with laundry/maintenance/warehouse (2,700 square feet), new kitchen (2,100 square feet), and a culinary teaching kitchen (1,200 square feet). The site plan also depicts required repair work to the detention facility's existing perimeter fence on the west side of the Project Site. This repair work will encroach upon a maximum of 13 oak trees, which are already being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in the LIP. According to the LIP, impacts to oak trees such as this are reviewed and mitigated as part of the CDP application. No separate oak tree permit is required.

The new building cluster is very similar to that of the previous buildings on the site and will be constructed atop the footprint of the now demolished facility. The new buildings are similar in height to the previous buildings; however, the configurations/shapes of the new buildings have sloped roofs for several portions of the complex (whereas the previous facility included flat roofs throughout). There is a single 2-story portion of the building at the entry, serving as both administration and sleeping quarters for the staff. By stacking the functions, the applicant is able to feature a smaller building footprint, thus staying within the disturbed area of the site and avoiding impacts to the surrounding native habitats. This taller portion of the building serves as a cornerstone for the replacement Project and an entry feature for the facility. The Project will not be visible from a public road or street, will not adversely impact the scenic quality of the area, and will be a maximum of 31 feet tall. All building finishes will comply with Section 22.44.1320 (Construction Colors, Materials, and Design) of the LCP's Local Implementation Program ("LIP").

12. The Project Site is accessible via Encinal Canyon Road to the south. Emergency access is provided by Mulholland Highway to the northeast, via the Zuma Ridge Fire Road. Mulholland Highway near the Project Site is designated as an official County Scenic Highway. The LCP also designates Encinal Canyon Road as a Scenic Route.
13. The majority of the parking for the Project will be provided in a long parking lot on the eastern edge of the Project Site. A total of 132 parking spaces are proposed, with 110 spaces on pavement and 22 spaces on gravel.
14. The Project was reviewed by the Environmental Review Board (ERB) on April 20, 2015, and found the Project to be consistent, after modifications, with the resource protection policies and provisions of the LCP. Their review was required because much of the project site contains sensitive environmental resources that meet the definition of H1 and H2 habitat. The ERB made several recommendations to mitigate potential resource impacts. These recommendations pertain to: water conservation, landscaping, oak tree mitigation planting location, watershed restoration, habitat impacts and mitigation, and oak tree protection. These recommendations have been incorporated into project design and the CDP Conditions of Approval.
15. County Department comments and conditions were received from the Departments of Public Works, Fire, and Public Health:

- The Department of Public Works, in its letter dated May 18, 2015, recommends approval of the Project and requires conditions regarding road, grading, drainage, and sewer.
 - The Fire Department, in its letter dated June 3, 2015, recommends approval of the Project and requires conditions regarding access, gates, and the water system.
 - The Department of Public Health, in its letter dated April 28, 2015, recommends approval of the Project and states that the Project will be subject to requirements regarding: potable water supply, the jail inspection program, sewage disposal, the plan check program, and the toxics-epidemiology program.
16. The County prepared an Initial Study (IS) in accordance with CEQA and determined that a Mitigated Negative Declaration was the appropriate environmental document. On November 26, 2013, the Board of Supervisors adopted the Mitigated Negative Declaration (State Clearinghouse No. 2012102002) which considered the environmental impacts of the Campus Kilpatrick reconstruction project.

The IS identified potentially significant effects from the Project on the environment in the areas of air quality, biological resources, cultural resources, and noise. However, the Project was redesigned to avoid the effects or, with the implementation of the mitigation measures, the effects were reduced to a point where no significant effects would occur as follows:

- Air quality: require that site preparation (clearing and grubbing) activities and site grading activities do not occur concurrently.
- Biological resources: implement corresponding mitigation measures, and obtain required jurisdictional delineation related approvals to avoid or minimize impact on grassland habitat, oak trees, special status plant species, potential nesting areas of migratory raptors, birds and roosting bats.
- Cultural resources: implement established protocols to be used in the event that archeological, paleontological and Native American artifacts are encountered.
- Noise: minimize construction-related noise through implementation of noise-abatement measures such as temporary noise barriers to reduce the noise level to acceptable levels.

The adopted MND showed that there is no substantial evidence, in light of the whole record before the County, that the Project will have a significant effect on the environment.

A Mitigation Monitoring and Reporting Program (MMRP) was prepared in conjunction with the MND. The MMRP identifies measures that will reduce the environmental impacts identified as "potentially significant" to a "less than significant" level. The Project is required to comply with the MMRP and to ensure compliance, the mitigation measures will be incorporated into the construction documents.

17. Pursuant to the provisions of Sections 22.44.970 and 22.44.990 of the County Code, the community was appropriately notified of a Commission Hearing by mail, newspaper, property posting, and on the Department's website. Newspaper notices were published on May 18, 2015 and May 19, 2015 in the Los Angeles Daily News. Notices to property owners located within a 1,000-foot radius of the property boundaries were mailed on May 14, 2015. Notices were posted on the subject property on May 15, 2014 and were made available on the Department's website.
18. *To be inserted after the public hearing to reflect hearing proceedings.*
19. The Project is subject to the policies of the Santa Monica Mountains Land Use Plan (LUP). The Commission finds the Project to be consistent and supportive of the applicable goals and policies contained in the LUP.

The Project was analyzed for consistency with the LUP's allowable land uses. The majority of the Project Site is located within the P (Public and Semi-Public Facilities) land use category of the LUP, a component of the 1980 County of Los Angeles General Plan ("General Plan"). Therefore, the Project is also consistent with the General Plan.

The small portion of the project site that is located within the SMMNAP is also located within the P land use category. Since the development proposed in this small area is the same or less than what is existing on the property, the Commission finds this portion of the project to be consistent with the applicable SMMNAP goals and policies.

20. The LUP's P land use category allows for the establishment of government offices and services. Other permitted uses include educational institutions, probation camps, public service facilities, public recreation areas and facilities, telecommunication facilities, and trails. The maximum land use intensity within this land use category is 0.3 floor-area ratio (FAR). No floor area is proposed within the SMMNA.

21. The Project is consistent with the low-intensity development mandate of the LUP. The Project will create development that is far below the maximum allowable density. On this 67-acre property, an FAR of 0.3 would allow for more than 875,000 square feet of building area. The Project proposes only 64,773 square feet of building area – only seven percent of the allowable building area. The Project will contain less new development than would otherwise be allowed under the maximum development potential of the LCP and the SMMNAP.
22. The project is consistent with the overriding goals of the LCP, including protecting, maintaining, and when feasible, enhancing and restoring habitat. The project is re-constructing the campus on the previous footprint and therefore does not impact any new habitat or any sensitive habitat.
23. The majority of the subject property will remain as open space. Providing such open space is consistent with the overriding goals of the LCP, specifically to "Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and manmade resources." This open space is also consistent with the land use element's guiding principle to "Preserve and protect significant environmental resources."
24. The project supports LUP policies that encourage natural resource protection by clustering of development, and preservation of open space. The Project Site covers only 11.7 acres of the 67-acre property. The Project will replace the recently demolished Camp Kilpatrick and is proposed exclusively within the same area as was covered by Camp Kilpatrick. Development will occur entirely within the previously disturbed area, leaving 55 acres as intact open space which protects valuable habitat, significant ridgelines, and prominent rock outcrops.
25. The Commission further finds that the Project is compatible with the surrounding area in the unincorporated Santa Monica Mountains. The clustered project is set in an alluvial valley near the base of natural hillside terrain, in the center of the western portion of the subject property. It is not adjacent to any uses on the surrounding properties. The Project is designed to blend with the surrounding environment and topography, with consistent design, and appropriate materials and colors. The Project will provide sufficient parking and access to the Project site.
- 26.
27. The Project complies with development standards of IT zone as well as the Community-Wide Development Standards and Area-Specific Development

Standards sections of the LIP. A probation camp is allowed in the IT zone with a major CDP. The permittee has requested the major CDP for the above-mentioned development allowed in this zone.

28. The Project is consistent with the LCP's resource projection goals and policies because it is located entirely within H3 habitat, utilizes only the existing disturbed area, will not impact H1 or H2 habitat, and will minimize impacts to visual resources. Therefore, the project minimizes adverse effects to nearby sensitive environmental resources.
29. The Commission finds that pursuant to the provisions of Sections 22.44.970 and 22.44.990 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper, and property posting.
30. The Commission finds that the Project conditions are consistent with applicable provisions of Section 22.44.1010 of the County Code.
31. The Commission finds that the Project will encroach in the protected zone if 13 oak trees and requires oak tree mitigation measures as follows: condition requiring oak tree planting adequately mitigates the proposed fence repair work that will encroach upon a maximum of 13 oak trees. These trees are currently being encroached upon by the fence. These oak trees will be protected in place, and the encroachments will be mitigated according to the ratios required in the LCP's Local Implementation Program (LIP). These ratios require: 10 replacement trees to be planted for each tree where the protected zone is encroached upon more than 30 percent, five replacement trees to be planted for each tree where between 10 and 30 percent of the protected zone is encroached upon, and only monitoring is required for encroachments into the protected zone of less than 10 percent.
32. The Commission finds that the Project site is located at 427 Encinal Canyon Road, which is an improved highway providing east-west access to the area. Regional access to the Project site is available from Encinal Canyon Road via Mulholland Highway off U.S. Highway 101, or via Encinal Canyon Road, Decker Canyon Road, or Kanan Dume Road off Pacific Coast Highway. The Commission further finds that existing utility and water service providers and public safety agencies will have the capacity to serve the Project site without any significant burden and without creating deficiencies in service to adjacent residential areas. The subject property currently contains a 500,000-gallon water tank that is to remain. This tank serves the needs of the Project, and will be used for fire-fighting purposes for the Project Site and the surrounding area.

33. The Commission finds that Project impacts to the environment and the community are limited by clustering the development on 11.7 acres in the western portion of the 67-acre site. The Project balances the need for a juvenile probation facility, with the need to protect the surrounding rural environment.
34. The Commission finds that the project site is sufficiently buffered from the the surrounding area. Developments on the north, south, east, and west of the Project site are buffered from the site by rugged terrain and steep hillsides. The proposed buildings will not affect views from nearby residences because the development area is within the low-lying areas of the Project site. The Commission further finds that the Project will not significantly impact views or natural terrain features associated with Encinal Canyon Road and Mulholland Highway because the Project will blend with the existing natural contours and topography in the surrounding area. The Project will also reflect the existing mountainous and rustic character of the area through simple form, function, and architectural character, and by the use of existing vegetation to screen buildings from Encinal Canyon Road and Mulholland Highway.
35. The Commission finds that the proposed grading and engineering for the Project will ensure public safety during Project construction and operation because the Project Site is not located in a landslide zone or a liquefaction zone.
36. The Commission finds that the Project's design includes features to maximize fire safety. The Project will implement a fuel modification plan to minimize the risks of wildfires, establish buffer zones around the proposed structures, dictate the types of vegetation allowed within the buffer zones, be limited to existing disturbed areas, and include requirements regarding the removal of brush and dead plant materials. Furthermore, all structures within the Project site will be located along paved, all-weather and accessible roads, to allow easier access by fire fighting vehicles.
37. The Commission finds that the Project will comply with County development standards, including development standards in the LIP related to vegetation management and landscaping, height, grading, exterior lighting, signs, yards, walls, fences, parking and loading facilities, construction colors and, materials, and design, visual resource protection, biological resource protection policies and provisions, and other development features. Project landscaping will be required to comply with the requirements of the LIP and the County's drought-tolerant landscaping ordinances.

38. The Commission finds that the Project, as approved, is consistent with Section 22.44.1820 pertaining to the protection of sensitive environmental resources. The Project components will not encroach upon the physical extent of these habitats as they exist on the Project site, and during the review process of the CDP it was determined that no actual sensitive environmental resources will be deprived of the protection as required by the policies and provisions of the LCP.
39. The Commission finds that the Project Site, at 11.7 acres, is more than adequate to accommodate the Project structures and any yards, walls, fences, parking and loading facilities, landscaping, and other development features needed for the Project.
40. The Commission finds that the Project's proposed 132 spaces will be sufficient to address the needs of the Project's employees and visitors.
41. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Special Projects Section, Department of Regional Planning.

BASED ON THE FOREGOING, THE BOARD CONCLUDES THAT:

- A. The proposed uses with the attached conditions will be consistent with the adopted Santa Monica Mountains Local Coastal Program and the General Plan and that the proposed uses are not located between the nearest public road and the sea or shoreline of any body of water located within the Coastal Zone.
- B. The proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in the LIP, or as is otherwise required to integrate said use with the uses in the surrounding area.

- D. The proposed site contains adequate parking on-site for guest and employees of the Project; is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.
- E. The proposed uses will not adversely affect identified biological resources and would conform with the biological resource protection policies and provisions of the LCP.

THEREFORE, THE REGIONAL PLANNING COMMISSION:

1. Approves Coastal Development Permit No. 201500030, subject to the attached conditions.

ACTION DATE: June 17, 2015

**MKK:JSH
6/4/15**

c: Each Commissioner, Zoning Enforcement, Building and Safety

**DRAFT CONDITIONS OF APPROVAL
COUNTY OF LOS ANGELES
PROJECT NUMBER R2012-02386-(3)
COASTAL DEVELOPMENT PERMIT NO. 201500030**

PROJECT DESCRIPTION

The project is the construction of Campus Kilpatrick, a replacement juvenile detention facility ("Project Site"), on a property located at 427 Encinal Canyon Road ("subject property"); subject to the following conditions of approval:

GENERAL CONDITIONS

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the permittee, and the owner of the subject property if other than the permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning ("Regional Planning") their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and until all required monies have been paid pursuant to Condition No. 9. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 4, 5, and 8 shall be effective immediately upon the date of final approval of this grant by the County.
3. Unless otherwise apparent from the context, the term "date of final approval" shall mean the date the County's action becomes effective pursuant to section 22.44.1090 of the Los Angeles County Code ("County Code").
4. The permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code Section 65009 or any other applicable limitations period. The County shall promptly notify the permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. In the event that any claim, action, or proceeding as described above is filed against the County, the permittee shall within ten days of the filing make an initial

deposit with Regional Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to permittee or permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the permittee according to County Code Section 2.170.010.

6. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
7. Upon any transfer or lease of the property during the term of this grant, the permittee, or the owner of the subject property if other than the permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
8. This grant shall expire unless used within two (2) years from the date of final approval of the grant. A single one-year time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date.
9. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the permittee to cease any development or activity not in full compliance shall be a violation of these conditions. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The permittee shall deposit with the County the sum of **\$1,000.00**. The deposit shall be placed in a performance fund, which shall be used exclusively to compensate Regional Planning for all expenses incurred while inspecting the premises to determine the permittee's compliance with the conditions of approval. The fund

provides for biennial (one every other year) inspections for 10 years. Inspections shall be unannounced.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the permittee shall be financially responsible and shall reimburse Regional Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be \$200.00 per inspection, or the current recovery cost at the time any additional inspections are required, whichever is greater.

10. The permittee shall comply with all mitigation measures identified in the Mitigation Monitoring Program ("MMP"), which are incorporated by this reference as if set forth fully herein.
11. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to Section 22.44.690 of the County Code.
12. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of said department.
13. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works ("Public Works") to the satisfaction of said department.
14. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").
15. The permittee shall maintain the subject property in a neat and orderly fashion. The permittee shall maintain free of litter all areas of the premises over which the permittee has control.

16. All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by Regional Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the permittee shall remove or cover said markings, drawings, or signage within 24 hours of such occurrence, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

17. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **three (3) copies** of a modified Exhibit "A" shall be submitted to Regional Planning by **August 16, 2015**.
18. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the permittee shall submit **three (3) copies** of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A". All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

PERMIT SPECIFIC CONDITIONS - COASTAL DEVELOPMENT PERMIT

19. Outdoor lighting shall be the minimum lighting necessary for safety and security. The permittee shall submit a Revised Exhibit "A" for review and approval that shows how all proposed outdoor lighting conforms to this condition.
20. The permittee shall comply with the approved landscaping plan by using only plants native to the Santa Monica Mountains, compatible with Fire requirements. The plants shall not be cultivars. The permittee shall use the CNPS list for the Santa Monica Mountains and the Director's list that accompanied the LCP, and the permittee shall carefully consider plant traits so that choices are habitat-specific, as well as fire safety. Any changes to the landscape plan subject to review and approval of a Revised Exhibit "A."

21. The permittee shall manage Campus Kilpatrick in accordance with the approved Exhibit "A," with the goal of protecting natural resources and minimizing hazards such as flood, fire, and erosion.
22. In the event that an amendment to the approved CDP is required, the applicant shall comply with the amendment requirements of the LIP. Modifications to these conditions shall also require an amendment to the approved CDP.

PROJECT SITE SPECIFIC CONDITIONS

23. This grant shall authorize the construction and operation of a juvenile detention facility.
24. The permittee shall investigate ways to reduce irrigation with potable and reclaimed water, and strongly consider substituting grey water. Irrigation with grey water may need a subsurface system. Turf considerations should include a natural turf substitute that uses less water than grass.
25. To the maximum extent feasible, the permittee shall modify the existing planters that receive roof runoff to planters with cistern capacity, capable of capturing water from storms beyond the 3/4-in. storm capacity. Captured water should be retained and used for irrigation and for fire-fighting rather than directed into stormwater conveyance.
26. The permittee shall investigate the feasibility of adding scattered planting of native plants appropriate to the habitat and matching adjacent habitat within fuel modification zone C. This could serve as a shaded fuel break with separated fuels (scattered canopy) and clearing beneath. These plantings will need initial irrigation, but irrigation would be removed after plants are established. Reclaimed water could be used in this case.
27. The permittee shall investigate restoration of the subject property's concrete-lined channels to natural, vegetation-lined channels. While such a project is outside of the Project Site and beyond the scope of this project, such restoration is recommended by the Environmental Review Board for future consideration. If feasible, the applicant shall seek grant funding to accomplish this habitat restoration work with the probationers to restore upper watershed function and restore downstream resources. The channel restoration and habitat restoration could be integrated with relevant environmental education on conservation of watershed function.

28. The permittee shall supplement the sensitive plant surveys in areas where fence modification or other activities of the Project could impact sensitive plants that might not have been discovered in the drought year survey of 2012. This includes the Zone C area. The permittee shall conduct the surveys in May/June or earlier in the spring, when Lyon's pentachaeta is blooming. If sensitive plants are discovered, the permittee shall develop a mitigation plan to avoid impacting such plants.
29. The permittee shall comply with the oak tree encroachment mitigation requirements found in County Code section 22.44.950 (O). The permittee proposes to encroach upon the protected zone of up to 13 oak trees. Therefore, the permittee shall be required to mitigate this impact by planting up to 130 replacement trees. Prior to encroaching on an oak tree, the permittee shall be required to submit a Revised Exhibit "A" to the Director for review and approval. This Revised Exhibit "A" shall substantially conform to the approved Exhibit "A" and shall show the following additional details:
 - The location of the oak trees to be encroached upon;
 - The percentage of the protected zone to be encroached upon;
 - The number of mitigation trees to be planted; and
 - The location where the mitigation trees will be planted.
30. The permittee shall comply with the planting requirements and mitigation ratios found in County Code Section 22.44.950 (O): 10 replacement trees to be planted for each tree where the protected zone is encroached upon more than 30 percent, five replacement trees to be planted for each oak tree where between 10 and 30 percent of the protected zone is encroached upon, and only monitoring is required for encroachments into the protected zone of less than 10 percent.
31. The permittee shall calculate the area of encroachment on oak woodland, and two times this area shall be set aside for planting mitigation trees. This shall be protected as a conserved area in perpetuity through a legal instrument such as deed restriction. The cleared areas beyond the required fuel modification on the east and north would be appropriate for the conserved area.
32. The permittee shall prioritize areas on the north and east beyond the 200-ft. fuel modification and the 10-ft. clearing required next to fire roads for use as the oak tree mitigation area. To the maximum extent feasible, this area shall be restored to natural habitat, which will be riparian in cases of three tributaries to Zuma Canyon. This restoration may also include sycamores, mulefat, willows, and other riparian plants.

33. Fence replacement or modification activities in oak protected zones shall be done with hand tools for any excavation, and protection of roots shall be implemented with preservation of roots as possible and covering of exposed roots with moist cloth while they are exposed.
34. The permittee shall avoid impacts to bulb plants, such as mariposa-lilies. If impacts to bulb plants are required, such as through the replacement of fences, the permittee shall develop a mitigation plan in conjunction with consultation of CDFW for current best management practices of conservation and mitigation for these plants.
35. The permittee shall comply with all conditions set forth in the attached County Public Works Department letter dated May 18, 2015 to the satisfaction of the said department.
36. The permittee shall comply with all conditions set forth in the attached County Fire Department letter dated June 3, 2015 to the satisfaction of the said department.
37. The permittee shall comply with all conditions set forth in the attached County Public Health Department letter dated April 28, 2015 to the satisfaction of the said department.

Attachments:

Mitigation Monitoring Program

Fire Department Letter dated June 3, 2015

Public Works Department Letter dated May 18, 2015

Public Health Department Letter dated April 28, 2015

Environmental Review Board Minutes dated April 20, 2015



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (626) 458-5100
[http //dpw lacounty gov](http://dpw.lacounty.gov)

GAIL FARBER, Director

May 18, 2015

ADDRESS ALL CORRESPONDENCE TO
P O BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE **LD-2**

TO: Mi Kim
Zoning Permits West Section
Department of Regional Planning

Attention Joshua Huntington

FROM: Art Vander Vis
Land Development Division
Department of Public Works

COASTAL DEVELOPMENT PERMIT (CDP) NO. 201500030
PROJECT NO. R2012-02386
CAMPUS VERNON KILPATRICK-REPLACEMENT PROJECT
427 SOUTH ENCINAL CANYON ROAD
ASSESSOR'S MAP BOOK NO. 4471, PAGE 3, PARCEL NO. 900
UNINCORPORATED COUNTY AREA OF MALIBU

We reviewed the site plan for the proposed Campus Vernon Kilpatrick replacement project in the unincorporated County area of Malibu. The project consists of the construction of a new 64,773-square-foot Campus Vernon Kilpatrick Center. The project will construct five, 24-bed residential housing cottages that are each split into two, 12-bed units. Each unit will have a core support of dayrooms, restrooms, laundry, janitorial, and meeting spaces. The primary support building consists of several components that include an administration area, classrooms, staff services, a public lobby, control center, medical facilities, a food-service kitchen with culinary art classrooms, a gymnasium, an educational courtyard, small storage, and a warehouse. The project grading will include approximately 4,500 cubic yards of cut, 9,000 cubic yards of fill, 4,500 cubic yards of import, and 12,900 cubic yards of overexcavation.

- Public Works recommends approval of this CDP.
- Public Works does **NOT** recommend approval of this CDP.

Upon approval of the site plan, we recommend the following conditions. Comply with these conditions or as otherwise modified by Public Works:

1. Road

- 1.1 Obtain an encroachment permit from Public Works' Land Development Division, Permit Section, for any construction within the public right of way. For additional information and procedures, please contact Lana Radle of Land Development Division's Permit Section at (626) 458-4958 or lradle@dpw.lacounty.gov.

For questions regarding the road condition, please contact Ruben Cruz of Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

2. Grading

- 2.1 Submit a grading and drainage plan for review and approval. The drainage plan should show the proper distribution of drainage including contributory drainage from adjoining properties. The applicant is required to show and call out all existing easements on the grading plan and obtain the easement holder approvals.
- 2.2 Agency/regulatory permits or letters of nonjurisdiction may be required prior to grading plan approval. This includes, but is not limited to, the California Department of Fish and Wildlife, etc.
- 2.3 Provide soil/geology approval of the grading plan from Public Works' Geotechnical and Materials Engineering Division, as applicable.

For questions regarding the grading conditions, please contact Jessica Bunker of Public Works' Building and Safety Division at (626) 458-3164 or jbunker@dpw.lacounty.gov.

3. Drainage

- 3.1 Submit a drainage concept to Building and Safety Division for review and approval prior to issuance of any grading permits. The drainage concept shall show the extent of drainage impacts including contributory drainage from adjoining properties.

- 3.2 Comply with Low-Impact Development (LID) standards, per County Code Section 12.84.460, to the satisfaction of Public Works. The LID Standards Manual can be found at <http://dpw.lacounty.gov/lid/web/>.

For questions regarding the drainage conditions, please contact Ms. Bunker at (626) 458-3164 or jbunker@dpw.lacounty.gov.

4. Sewer

- 4.1 Prior to issuance of any building permit, sewer and water distribution systems shall be approved by Public Works in compliance with the Los Angeles County Plumbing Code. The existing sewer treatment plant and associated disposal fields shall be approved by the State of California Regional Water Quality Board for the proposed sewer-load increase. If the existing sewer disposal system is found to have insufficient capacity, an upgrade of the sewer disposal system is required to the satisfaction of the State of California Regional Water Quality Board.

For questions regarding the sewer condition, please contact Madjid Hashemi of Building and Safety Division at (626) 458-3182 or mhashemi@dpw.lacounty.gov.

If you require additional information, please contact Mr. Cruz at (626) 458-4910 or rcruz@dpw.lacounty.gov.

RC:tb

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**COUNTY OF LOS ANGELES FIRE DEPARTMENT
FIRE PREVENTION DIVISION**

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

PROJECT: R2012-02386 MAP DATE: 06/03/2015
LOCATION: 427 Encinal Canyon, Road, Malibu (APN 4471-003-900)
PLANNER: Josh Huntington

REVISED CONDITIONS: Supersedes Fire Dept. Conditions Dated April 17, 2015

THE FIRE DEPARTMENT RECOMMENDS CLEARANCE OF THIS PROJECT TO PROCEED TO PUBLIC HEARING AS PRESENTLY SUBMITTED WITH THE FOLLOWING CONDITIONS OF APPROVAL.

CONDITIONS OF APPROVAL – ACCESS

1. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
2. Fire Department vehicular access roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4
3. All fire lanes shall be clear of all encroachments, and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.
4. The edge of the fire access roadway shall be located a minimum of 5 feet from the building or any projections there from.
5. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
6. Provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. Fire Code 503.1.1 & 503.2.2



COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

PROJECT: R2012-02386 MAP DATE: 06/03/2015
LOCATION: 427 Encinal Canyon, Road, Malibu (APN 4471-003-900)
PLANNER: Josh Huntington

12. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000, and shall be surfaced so as to provide all-weather driving capabilities. Fire apparatus access roads having a grade of 10 percent or greater shall have a paved or concrete surface. Fire Code 503.2.3
13. The gradient of Fire Department vehicle access roads shall not exceed 15 percent unless approved by the fire code official. Fire Code 503.2.7
14. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE". Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3
15. A minimum 5 foot wide approved firefighter access walkway leading from the fire department access road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Fire Code 504.1
16. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4
17. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1
18. Security barriers, visual screen barriers or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Fire Code 504.5



CYNTHIA A. HARDING, M.P.H.
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

ANGELO J. BELLOMO, REHS, QEP
Director of Environmental Health

TERRI S. WILLIAMS, REHS
Assistant Director of Environmental Health

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BOARD OF SUPERVISORS

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Fifth District

April 28, 2015

TO: Joshua Huntington
Principal Regional Planning Assistant
Department of Regional Planning

FROM: Michelle Tsiebos, REHS, DPA (M.T.)
Environmental Health Division
Department of Public Health

SUBJECT: **CDP CONSULTATION**
PROJECT NO. R2012-02386/CDP 201500030
Camp Vernon Kilpatrick Replacement Project
427 Encinal Canyon Road, Malibu

- Public Health recommends approval of this CDP.
- Public Health does NOT recommend approval of this CDP.

The Department of Public Health-Environmental Health (EH) Division has reviewed the information provided for the project identified above. The Coastal Development Permit (CDP) is for the construction of a new replacement camp of approximately 65,000 square feet to accommodate up to 120 minors. It will remain a juvenile correction facility. The Department does not have any objection about this project.

Potable Water Supply

A sustainable source of potable water supply will be provided by Las Virgenes Municipal Water District. A will serve letter will be required prior to the approval of the project.

Jail Inspection Program

The Jail Inspection Program of this Division will be responsible for the inspection of the juvenile correction & treatment facility. The applicant will have to comply with the rules and regulations governing juvenile correction facilities.

Sewage Disposal

The project will be connected to a sewage treatment plant for sewage disposal. The plant is under the jurisdiction of the state of California Water Quality Control Board.

Plan Check Program

The project is proposing a kitchen. The Plan Check program will be responsible for the review and approval of plans. The Program will also conduct the final inspection of the food facilities. The project shall comply with all Public Health requirements relating to the construction and operation of food establishments.

Toxics-Epidemiology Program

Staff from Toxics Epidemiology Program (TEP) reviewed the project's documentation, which includes the Zoning Permit Application, Project Modifications, Site Plan and Environmental Assessment Information Form. We do not anticipate any significant Air Quality or Noise impacts associated with the construction and operation of the above facility. Additionally, the expected Green House Gases Emissions (GHG) are expected not to exceed 14 MTCO₂e/year, which is much lower than the South Coast Air Quality Management District (SCAQMD) Tier 3 screening threshold of 3,000 MTCO₂e/year.

For questions regarding this report, please contact me at (626) 430-5382 or at mtsiebos@ph.lacounty.gov.



SANTA MONICA MOUNTAINS COASTAL DEVELOPMENT PERMIT BURDEN OF PROOF

Pursuant to Zoning Code Section 22.44.850, the applicant shall substantiate the following:

(Do not repeat the statement or provide Yes/No responses. If necessary, attach additional pages.)

<p>A. That the proposed development is in conformity with the certified local coastal program.</p>
<p>The Camp Kilpatrick Replacement Project is a new juvenile rehabilitation campus which replaces the already demolished facility, previously located on the same site. the project will utilize appropriate materials, colors, configurations and plantings as necessary to conform to the Santa Monica</p>
<p>LIP. The site is not visible from public right-of-ways, lies within the limits of the property and will not impact the adjacent sensitive habitat areas. The site is configured as to avoid the toes</p>
<p>of sloped surfaces. Oak trees that are encroached upon as a result of construction activities will be protected per local ordinances and mitigated accordingly.</p>
<p>B. That any development located between the nearest public road and the sea or shoreline of any body of water located within the Coastal Zone, is also in conformity with the public access and public recreation policies of Chapter 3 of Division 20 of the Public Resources Code.</p>
<p>The Camp Kilpatrick Replacement Project does not impede any views of or access to the coastline, nor does it contain any waterfront acreage. The land use, zoning and previous occupancy of the site remain unchanged. The buildings that have been removed will be replaced by those bearing a slightly</p>
<p>new configuration and moderately larger footprint (as to meet the requirements of the owner's program).</p>
<p> </p>
<p> </p>

Project Narrative

Camp Vernon Kilpatrick Replacement Project

Project Address: 427 South Encinal Canyon Road, Malibu, CA

Assessor Parcel No.: 4471-003-900

Owner: Los Angeles County

Agent/Applicant: Vince Yu, Department of Public Works

Contractor: Ben Caras, Bernards Construction

Architect: Pete Obarowski, DLR Group

Project Description

Building construction SF: approx. 64,773 SF

New Impervious surfaces (inclusive of buildings): 187, 308 sf - (exclusive of buildings): 122,535

Parcel Gross and Net Acreage: total parcel is 67 acres. Site subset is 11.7 acres (area of work)

Camp Vernon Kilpatrick Replacement Project Description:

Design Concept

With the Camp Vernon Kilpatrick Replacement project, Los Angeles County is taking a giant step forward as a leader in juvenile correction & treatment which will serve as a model for future LA County facilities, the State of California and the nation. By taking this giant step forward, we have developed a vision for a new paradigm in juvenile justice that focuses on care & treatment in a safe and secure environment that moves away from a model based on custody & control. The new model will focus on the individual and small group treatment in a holistic manner that addresses the mental, physical, emotional and educational needs of the resident youth and, moreover, continued after-care upon returning to the community. Getting all stakeholders -- Probation, Education, Mental Health and the Department of Public Works -- actively involved in the process, helped focus our explorations on evidenced-based best practices for the development of small, safe, youth and community centered facilities that reflect the vision of the new LA model.

Modeled after similar efforts in Missouri and the District of Columbia, the new Camp Kilpatrick is based on small, safe, community oriented and youth-focused programming & operations. To accomplish these goals we implemented the following concepts within our planning and design.

First, we utilized the buildings as a means to secure the campus; minimizing visual interference of the traditional fencing (spatial variety also enhances visibility). Electronic control systems facilitate communications, provide for life safety, deter potential escapees and ensure a safe environment for staff and youth alike. To further reduce the institutionalized perception, elements of a familiar residential scale were proposed. Some of these elements include gabled roofs at the housing units, a variety of different textured materials, finishes and warm earth tones. By differentiating campus elements, we reduced the "sameness" associated with institutional architecture.

The building components provide variety both indoors and out, encouraging small staff and resident group interaction. The main program building is organized around a well-lit commons area as opposed to corridors and enclosed rooms (more like a modern school than a secure institution). Throughout the

facility both visual and physical elements connect the space to the central campus. The commons, gym, amphitheater and recreational fields accommodate interscholastic competitions, community activities and outside exhibitions. The gym stage and amphitheater will be used for events and presentations for students, family and visitors.

As we explored ideas and building typology, our team looked beyond juvenile and adult correctional models and toward other building types for clues as to the organizational parity. We realized that a major focus of this facility would be programming – and mandated education and alternative education programs would be a significant component of the design. Using other schools as a model and exploring their typology, we determined that a student commons could be the key focal point for social interaction, meals and public events. We saw this as an opportunity to increase the visual and physical connection between the indoors and the outdoors. Also, from investigating educational building typology we developed the concept of an “educational courtyard” which created an additional internal focus for the school program and curriculum.

From this initial idea, the organizational and architectural parity for the support building evolved. At its heart is the student commons, which acts as the central focus for many social activities.

Exterior Building Design

There are two primary building types on the replacement project; a cottage building (replicated 5 times) and the support building, which contains all the components that assist the juveniles; from administration to dining, exercise to education, maintenance and security.

The overall design of the buildings will be more residential in construction. The cottages will have a cement tile sloped roof with screened, roof top HVAC equipment. The exterior finish will be two-colored stucco, which will blend with the site aesthetic and meet the requirements of the Santa Monica Coastal Zone LIP. There will be an accent tile medallion at each building used to differentiate the cottages and the distinct living area therein.

The support buildings will be similar, but have more of an educational construction typology and theme about them. Exterior finishes will be stucco in most locations with both glazed and cement block accents. Glazing activity includes storefront as well as glass block. Stucco finishes will share similar color families to the cottages, but with a secondary contrasting color to differentiate them from the educational nature of the support building. The roofing material of the support building will range from cement tile at the staff support area (the 2-story component at the south end) to EPDM flat roofing for the long span structures between staff support and the education wing (near the north end of the building). A variety of patterns, featuring both vertical and horizontal expressions, is being developed and will further define the support building elevations.

Planting Design

The proposed plant materials are drought tolerant, low-maintenance trees, shrubs and ground covers that are native to the Santa Monica Mountains. They blend seamlessly with the existing planting and proposed building design. We recognize the importance of introducing shade trees in the school courtyard, parking areas and providing a mixture of deciduous and evergreen trees along walkways, patios and other people-gathering spaces. This will stimulate visual interest and comfort amongst occupants as well as offering a heat reduction effect. The forms and layouts of these plantings will aid staff & security surveillance measures.

The landscape design will also consider the importance of utilizing plants in the bioswales that can tolerate wet soil conditions and incorporate sustainability practices per the County of Los Angeles Low Impact Development standards.

The large turf area at the center of the site is a multi-purpose area for field sports and large group activities. The turf will be sodded and selected to tolerate low water, foot traffic and low-maintenance requirements.

Irrigation Design

The proposed irrigation system consists of a fully automatic, low maintenance, water efficient system and is compliant to the California AB 1881 requirements and the County's Water Efficiency Ordinance.

Location, Vicinity, & Surrounding Development

The project site, Camp Kilpatrick, is located on a 67-acre parcel at 427 South Encinal Canyon Road, in the Santa Monica Mountains area of unincorporated Los Angeles County (APN 4471-003-900)

Camp Kilpatrick had been in use since 1962 as a Los Angeles County Juvenile Probation Camp. A similar facility, Camp Miller (APN 4471-004-902), is located immediately adjacent to and just south of the subject site. Three adjacent parcels (APN's 4471-004-903, -904, -905) are physically connected by shared infrastructure to the Camp Kilpatrick parcel (APN 4471-003-900) and all five-parcels are owned and operated by Los Angeles County Probation Department. Collectively, these five-parcels comprise nearly 142-acres of an alluvial valley near the base of natural hillside terrain and the confluence of several natural drainages within the upper reaches of the Zuma Canyon watershed. Within this valley, Camps Kilpatrick and Miller and the associated shared infrastructure (roads, drainage channels, and on-site wastewater treatment) are the sole developments.

The buildings and structures on the Camp Kilpatrick site have subsequently been removed to make way for the replacement project. Demolition work was completed in February of 2015. The property has been prepared for the replacement project work activities, infrastructure and buildings.

The surrounding area is largely undeveloped (i.e., undisturbed hillsides) with variable slopes. Parcels of National Park Service, State Parks, County, and private lands are interspersed throughout the surrounding area. The Zuma/Trancas Canyons area, under the jurisdiction of the National Park Service, is located approximately 0.25-mile south of the Project site boundary at the closest point. Developed land uses within approximately 0.5-mile of the developed portion of Camp Kilpatrick include an equestrian facility (0.25 mile to the north); scattered large-lot single-family residences (0.2-mile to the northeast); viticulture beginning approximately 0.3-mile to the northeast; and the Malibu Country Club, a public 18-hole golf course, which is 0.4-mile to the west at the closest point.

Existing Site Items:

- The height of existing structures (now demolished) measured between 12 and 22 feet.
- Fence heights are 14' (existing. Fence fabric to be replaced). Repairs to be made to small portions of damaged framing.
- There is an existing 75' high mast light in the center of the playfield area. The replacement project design leaves this fixture in its existing location.
- Walls. There are no retaining walls remaining on the site.

- Trees. Oak trees are indicated in the oak tree report and on the drawings. All existing oak trees will remain in place.
- Other significant site features are as listed in site characteristics, below.

Building and Site information

- Location and Area of Buildings: See plans.
- Conceptual Landscape Plans: See plans.
- Protected Zone of On-site Trees: See plans.
- Setbacks: The project property lines as more than 325' from the closest existing fence line (refer to the ALTA Survey information). Otherwise, all buildings are still back from the site property area by more than 50' on three sides, but close to the front property line as there is a connection fence between Camp Kilpatrick and Camp Miller.
- Conceptual Grading Plan: See plans.
- Existing Easements: There are no existing easements on the project site, other than a public easement for the use of the site through SB-81 financing.
- Parking Spaces: There are 132 parking spaces provided in the Camp Vernon Kilpatrick Replacement Project. Parking spaces are 9'x18' wide at 90 and 45 degree angles. There is a 26' wide fire lane (pathway) looping across the front of the support building and the parking lot area outside the complex. Drive aisles at the 45 degree, one way parking are 15' wide, and 2-way drive aisles range from 24' to 26' wide (see plans for more information).
- Vehicular circulation and travel flow (see plans)
- Loading Docks: There are two loading docks, both located at the support building. The main loading dock is internal to the building and primarily receives deliveries of food. This loading dock is located about a third of the way along the support building from the south end. The loading dock can accommodate a vehicle up to 30' in length, with back-in and pull-out clearances. Deliveries requiring a vehicle greater than 30' in length will occur in the driveway perpendicular to the loading dock. Pallets will be removed from the vehicle and placed in the loading dock. Then the larger vehicle can use the fire lane to loop through the parking lot and back out the main entrance. The other loading dock is at the far north end of the support building. This loading dock will serve to off-load vehicles from the drive aisle and bring materials stored on pallets into the warehouse via forklift.
- Pedestrian Circulation: See plans.
- Property Lines: See site plans and vicinity map.
- Dimensions for Driveways: See plans.
- Waste and Recycle Screening: the waste and recycling containers are located in the loading dock and concealed by the roll down door/gate.
- Sign Location: There is an existing sign for the complex at South Encinal Canyon Road. There is a sign on the building at the front of the new replacement project which uses 12" high metal letters featuring the name of the facility.
- Boundaries of Constrained Areas or Hazardous Slopes: Please refer to the attached Initial Study / Mitigated Negative Declaration report
- Habitat Areas: There is an H1 habitat area, but it is more than 200' from the support building (see plans) and more than 100' away from a County-maintained fire road connection

Property Use

Current property use and proposed property use will change. The site is zoned for public facilities. Camp Kilpatrick is a "replacement project" which had demolished the previous structures to make way for the new design.

The Camp Kilpatrick replacement project is a juvenile facility that is operated on a 24/7, 365 day per year program. As many as 120 juveniles may be housed on site. Staffing will be comprised of two, 12-hour shifts. The day shift is expected to include 20 security staff personnel, 20 administrative staff, 20 teaching staff, and 5 maintenance staff members (for a total of 65). That number will decrease during the night shift to 20 security personnel and one member of the maintenance crew.

The facility will schedule visitation days for guests. This may bring an influx of 20 to 40 people at a maximum on specified days only. The average number of visitors on a regular basis is expected to range between five and ten.

On-campus activities will include those that are educational and athletic in nature in addition to dining and sleeping. All functions are intended for the juvenile occupants and staff of the facility on a daily basis.

Products will be delivered on a regular basis to the kitchen which serves only the Kilpatrick facility. A single large truck on a weekly basis will provide the bulk of the deliveries, while smaller vans/trucks may provide consumables for daily use.

How project is consistent with General Plan and applicable Community Plan

The new building cluster is very similar to that of the previous buildings on site and will be constructed atop the footprint of the now demolished facility. The building heights are consistent with the maximum height requirements and both planting and building materials have been selected to match the general and community plans for the region.

The new buildings are similar in height to the previous buildings; however, the configurations/shapes of the new buildings have sloped roofs for several portions of the complex (whereas the previous facility included flat roofs throughout). There is a single 2-story portion of the project at the entry, serving as both administration and sleeping quarters for the staff. By stacking the functions, we were able to feature a smaller building footprint, thus limiting our impact to the surrounding environmentally sensitive habitats. This taller portion of the project will not be visible from a public road or street and only serves as a cornerstone for the replacement project and entry to the facility. The projected height of the roof of this portion of the project is 31'.

Where the perimeter fence can be salvaged, we plan to replace the fabric on the existing fence itself. Only fencing that has been significantly damaged over time will be replaced in its entirety. We expect to encroach upon upwards of ten (10) trees during the construction of the fence. No oak trees will be removed or relocated as a result of construction activities and we will mitigate in accordance with local requirements for those upon which we encroach.

Retaining walls on the project are will within property limits. It is expected that no new on-site retaining walls will exceed 10' in height.

The current site and grading plan has a net import of approximately 4,500 Cubic Yards. We chose to import dirt and raise select areas of the site in an effort to maintain the grade as close to existing as possible, with the exception of some necessary corrections to meet ADA code requirements and slope irregularities.

The fire lane that circles the interior perimeter of the site is 20' in width and extends to 26' where fire hydrants are located. The fire lane along the exterior of the support building is 26' wide for the full travel of said building.

The proposed plantings were cross referenced between the requirements listed in the Santa Monica Mountains LIP and the approved list of plantings provided by the LA County Fire Department: Fuel Modification division. The resultant planting schedule was then approved by a Department of Regional Planning staff biologist.

Building finishes comply with section 22.44.1320 of the Santa Monica Mountains LIP.

Parking on the project is per our scoping document (87 parking stalls with an alternate for 5 more stalls to a total of 92 parking spaces). The current site plan shows 110 spaces on pavement and 22 spaces on gravel. The total amount of available parking is 132 parking spaces. A parking matrix is not required for submission as this is a single tenant/single use complex.

Physical Site Characteristics

The subject site is located in an alluvial valley near the base of natural hillside terrain and the confluence of several natural drainages. Existing storm water drainage improvements serving the subject site include a concrete-lined trapezoidal channel that runs north to south; located at the east property limits, this channel collects runoff from the drainages to the northeast and from within Camp Kilpatrick via a series of catch basins/drainage inlets, concrete V-ditches, and underground storm drain pipelines. This primary drainage channel continues to the south, and passes underground where it traverses the parking lot serving Camp Miller and Encinal Canyon Road, and eventually outlets immediately south of Encinal Canyon Road. A drainage structure that collects runoff from the canyon areas and associated drainages to the northwest is located immediately outside the demolition area to the northwest. The Biological Constraints Survey referenced in the Substantial Documents identifies 1,873-sf (0.043-ac) of the dry-bottom channelized drainage as possessing sufficient criteria to meet Coastal Commission requirements for wetland designation. This assessment is based upon the presence of wetland hydrology and the presence of an identifiable streambed and bank, and the presence of hydrophilic vegetation within and along portions of the concrete drainage channels north of Encinal Canyon Road (species identified was Mulefat, *Baccharis Salicifolia*, at 60% cover). Camp Kilpatrick's demolition area is restricted to dry-land areas within the existing facility. No impacts from the demolition project are expected on the adjacent portions of the channelized Zuma Canyon Creek drainage, which are entirely outside of the site limits.

Camp Kilpatrick and Camp Miller utilize the same water supply and wastewater treatment systems. A 500,000-gallon potable water tank is located near the top of an approximate 100 foot-high slope to the west of Camp Kilpatrick, which provides water and ensures adequate fire flows and volumes at the camps. The water tank is owned and maintained by the County. In addition to the water tank, Camp

Kilpatrick and Camp Miller are provided potable water via the Las Virgenes Municipal Water District water main connecting to the camps near the northeast corner of Camp Kilpatrick. Wastewater generated by both camps is conveyed via underground pipelines to a self-contained wastewater package plant located immediately south of Encinal Canyon Road, about 700-feet south of Camp Kilpatrick.

Trails on Property or in Vicinity

Consistent with the Camp Kilpatrick's location within the Santa Monica National Recreation Area, there are existing trails nearby. No bicycle or hiking trails are present within or connecting directly to, either Camp Kilpatrick or Camp Miller. However, approximately 250-ft southwest of Camp Miller is the Zuma Ridge trailhead, which is 0.4-mi from the Backbone Trailhead (BB18) and managed by the Santa Monica National Recreation Area. The Camp Kilpatrick replacement project will not impact this trail.

Visibility from Public Viewing Location

No officially designated or eligible State or County scenic highways are in the vicinity of the subject site. The subject site is not visible from the nearest scenic highway, SR-23, due to distance and intervening topography. The probation camps are briefly visible from a few sections of the nearby Backbone Trail as well as one spot atop Mulholland Dr. (where it intersects with the Zuma Ridge fire road) on a steep downhill with no designated pull-out area. This information is also stated in section 4.1.1 of the IS / MND. As such, we anticipate requesting a waiver of the story pole requirement outlined in section 22.44.1440 of the Santa Monica Mountains LIP.

Environmentally Sensitive Habitat

In addition to the asphalt & concrete paving and the buildings themselves, the previously developed portions of the prior facility were landscaped with mostly non-native turf lawns, ornamental shrubbery, and several non-native trees (e.g., pines, Modesto ash). The new Camp Kilpatrick facility will be constructed atop the footprint of the previous facility and will avoid the removal or relocation of the existing oak trees nor will it encroach on any environmentally sensitive habitat areas. The closest new structure is located approximately 278' feet from the H1 classified riparian vegetation and no construction activities will occur within the 100' buffer zone.

Both the Santa Monica Mountains LIP and the Los Angeles County Fire Department require a 200-ft fuel modification (on-site) and/or brush clearance (off-site) zone from combustible structures. In this case, the fuel modification/brush clearance requirement has been established and maintained for annually. Additionally, the construction project will not modify the existing fuel modification boundary. Therefore fuel modification/brush clearance required for the proposed project will not result in impacts to environmentally sensitive habitat areas that are located on the site outside of the construction area.



**MINUTES OF THE ENVIRONMENTAL REVIEW BOARD (ERB)
Unincorporated Coastal Zone, Santa Monica Mountains, Los Angeles County
Meeting of 20 April 2015**

(Approved as amended, 18 May 2015)

Persons in Attendance

ERB Members

Rosi Dagit
Ron Durbin
Suzanne Goode
Margot Griswold, Ph.D.

Regional Planning Staff

Joshua Huntington, Planner
Shirley Imsand, Ph.D, Biologist
Mi Kim, Planner
Gina Natoli, Planner, ERB pro tempore
Marie Pavlovic, Planner, ERB Coordinator

CAMPUS KILPATRICK, R2012-02386, 427 Encinal Road, Malibu 90265

Marc Blain
Fernando Canon
Ben Caras
Sebastian Choularton
David Hughes
Jeremy Judd
Pete Obarowski
Vince Yu

Pagination

Campus Kilpatrick, R2012-02386, p.1-6

MINUTES

A. Minutes of 16 March 2015 meeting were approved as amended.
Motion to approve: Suzanne Goode, 2nd Gina Natoli, Ayes: Unanimous

B. Campus Kilpatrick, Probation Learning Center

Project No. R2012-02386
Permit No. CDP 201500030
APN: 4471-003-900, 4471-004-902, -903, -905
Location: 427 Encinal Road, Malibu 90265
Planner: Joshua Huntington
Applicant: Los Angeles County, Dept. Public Works (LACPW) / Pete Obarowski, PCR Group
Biologists: Marc Blain, David Hughes, Psomas
USGS Quad: Point Dume

Proposal: The project is a replacement of the oldest Los Angeles County probation camp's residential and service buildings with new buildings. The Campus Vernon Kilpatrick Replacement Project consists of construction totaling approximately 66,000 sq.ft. to accommodate up to 120 minors. The new Campus design consists of 5 housing cottages (25,000 sq.ft. overall) and 1 support building (41,000 sq.ft. overall) with the following components: administration (10,300 sq.ft.), support/education center (12,700 sq.ft.), a commons building (3,000 sq.ft.), a gym/multipurpose room (8,700 sq.ft.), an ancillary building with laundry/maintenance/warehouse (12,700 sq.ft.), new kitchen (2,100 sq.ft.) and a culinary teaching kitchen 1,200 sq.ft.). It also includes site improvements such as a recreational multipurpose field, interior fire land access, staff and visitor surface parking, on-site utilities, and security perimeter fencing. The Campus is located in the OS (Open Space) and IT (Institutional) zones of the Local Coastal Plan (LCP). The Land Use Policy designation is Mountain Lands P (Public and Semi-Public Facilities) of the LCP. Water will be provided by an existing County-owned 500,000-gallon potable water tank located near the top of an approximately 100-ft.-high slope to the west of Campus Kilpatrick. The Las Virgenes Municipal Water District also provides water via a water main that connects at the northeast corner of Campus Kilpatrick. Sewage is conducted to and treated in an onsite treatment plant south of Encinal Road on the project parcels. Grading will total

13,500 cu.yd. (4500 cu.yd. cut, 9000 cu.yd.fill, including 4500 cu.yd. import) on a 67.29-acre parcel (4471-003-900) with some construction of facilities on parcels 4471-004-902 (28.95 acres), -903 (27.83 ac.) and 4471-004-905 (27.82). The property is in a Very High Fire Hazard Zone, but not in a flood zone. Standard fuel modification would extend within the property lines into Habitats H1, the H1 buffer, the H1 quiet zone, and H2. The buildings will be in H3 habitat, but also in the H1 quiet zone.

Resources: The Project is at a headwaters area for three major drainages of the Santa Monica Mountains. The Project parcel has **two significant ridgelines:** the western one divides the watersheds of **Trancas and Zuma Canyons**; the eastern one touches the northeast corner and divides the watersheds of **Zuma Canyon and Malibu Creek**. The Project water tank is on the significant ridgeline between Trancas and Zuma Canyons. The seasonally-dry drainages across the building sites are directed into concrete-lined channels and flow eventually to the southern parcel and Zuma Canyon upstream of the Upper Zuma Canyon Falls. Sewage is treated in an onsite treatment plant south of Encinal Road that is also upstream of Upper Zuma Canyon Falls. The project development is near the dividing line between jurisdiction of the Santa Monica Mountains North Area Plan and the Local Coastal Program of the Santa Monica Mountains, and fuel modification will extend into both areas in the headwaters of Zuma Canyon. Previous buildings have been removed, and new structures have been designed to have similar footprints. The building sites proposed are on H3 habitat (disturbed). Operations for replacement of the fence mesh will pass through **coast live-oak woodland**. Fuel modification will impact **oak woodland and H1 riparian habitat and stream courses**, but it chiefly overlays old fuel modification areas. Impacts to oak woodland have been analyzed as not significant, but analysis and mitigation need to be revised to accord with the County Management Plan and the LCP requirements for mitigation. A summary of the oak woodland analysis is on p.40-41 and in mitigation MM4.4-2 of the Mitigation Plan Document. The parcel has a **volcanic rock outcrop with lichens** and perhaps bryophytes adjacent and north of the north fence. The Project parcel is mapped as having zones that may have **Santa Susana tarplant (*Deinandra minthornii*)** and **slender mariposa-lily (*Calochortus clavatus* var. *gracilis*)**. Adjacent to the north of the parcel is **critical habitat for Lyon's pentachaeta (*Pentachaeta lyonii*)**. In the near vicinity of the Malibu Country Club property are occurrences of **Plummer's mariposa lily (*Calochortus plummerae*)**, **Lyon's pentachaeta**, and the whiptail lizard, (*Aspidoscelis tigris stejnegeri*). **Plummer's mariposa-lily and Catalina mariposa-lily occur on the development site and elsewhere on Project parcels.** Mitigation for the mariposa-lilies includes pre-construction seed and bulb collection of mariposa-lilies with a revegetation plan. These data were not provided for ERB review, but a summary of the plan is in MM4.4-3. Results of preconstruction surveys for birds and bats are unknown, and grading may have taken place outside the prescribed nesting and maternity seasons. Pre-demolition surveys would have been required for bats (MM4.4-4). Tree removal described in MM4.4-4 is not according to current CDFW recommendations to preserve bats. The eastern approximate one-third of the development parcel is natural land that has **H1 habitat of a tributary stream course to Zuma Canyon with oak, sycamore, and willow riparian woodland**. Another tributary to Zuma in the North Area Plan section of the parcel has habitat with a stream course and **oak, sycamore and willow woodland** in a fuel-modified area. **Natural, potentially-protected land is directly adjacent** to the Los Angeles County parcel of development and in the parcel itself, 4471-003-900. The east side is bordered by natural Los Angeles County land. The west side has natural land of the Malibu Country Club, that is proposed to become part of federal lands of the **Santa Monica Mountains National Recreation Area (SMMNRA)**. To the south of County lands are parcels of the SMMNRA.

Request: Review the proposed development under zoning and land use policy of the 2014 LCP and North Area Plan for areas north of the Coastal Zone boundary that are in the chief development parcel. Provide recommendations to be used as guidelines for the Director's Review, which will also require a Minor Coastal Development Permit (CDP). This is part of necessary environmental review of the project under the California Environmental Quality Act (CEQA). Projects normally exempt from CEQA are subject to environmental review when in sensitive locations [PRC §15300.2(a)].

Materials are available on the ERB webpage under the meeting date:

<http://planning.lacounty.gov/case/view/r2012-02386/>

Applicant's presentation: The Los Angeles County Department of Public Works is responsible for delivering the Project to the Probation Department and has hired contractors to do the replacement of Camp Vernon Kilpatrick, built in 1962, converting it into Campus Kilpatrick. The new configuration is to repurpose the Campus structure from probation and correction for teen-age males into a teaching facility for rehabilitation and job preparation, focusing on individual potential. Funding is provided through a grant from the State (Senate Bill SB-81) and Los Angeles County funds. Guidelines and security needed to be the driving forces for the design, however. Fire lanes increased from 11.5-ft. to 20-26-ft. width, which was a constraint on where buildings could be located. The LEED Silver Project replaces 2 dormitories for 120 persons total into 5 residential style cottages of 24-beds each. Infrastructure is chiefly new. Roof water is captured into planters for filtration and then passes to culverts. The commons area will be chiefly passively cooled and heated with tree placement for this function. Glazing types were carefully considered and low-E glass and fritted glass will be used on the large commons area window. The central lawn area of about 1.5 acres is of a drought-resistant turf, and the use is for exercise work. The waste-water system on site sends all waste-water to the treatment facility on the south side of Encinal Road. Facilities will include a culinary kitchen and garden plots for the probationers as in a community-type garden. Buildings are located over 200-ft. away from designated H1, and they are also chiefly outside the H1 buffer zone. Parking on the northeast does not require fuel modification; is on previously disturbed ground; and is also outside the H1 buffer. DG is being used wherever required expansion of parking did not include a fire lane. H2 is not affected by the new building sites, which releases some H2 from fuel modification required for former portable buildings.

Planner's presentation and outline of concerns: This is a County project. If it had been located principally in the North Area Plan, recommendations would be based on consistency with the General Plan only, according to the government code §65402. The position of the Project principally in the Coastal Zone enables closer

review because of the Santa Monica Mountains Local Coastal Program (SMM LCP), and thus, it comes to ERB for review and will have a Coastal Development Permit (CDP).

County Biologist's presentation and outline of concerns: The location of the Project means it has extensive biological resources. The Campus is at the headwaters of Zuma Canyon (and peripherally, Trancas Canyon and Malibu Canyon), which means that the Project's implementation will have important consequences for one of the largest, chiefly natural watersheds of the Santa Monica Mountains. ERB recommendations are important for these consequences. Fuel modifications can affect H1 habitat in the Coastal Zone and riparian habitat in the North Area, which are really the same kind of riparian habitat. A recommendation is made that cleared area beyond the prescribed 200-ft. fuel modification zones and beyond the 10-ft. clearance required along the fire roads be considered for re-vegetation, since it is probably not necessary to clear such an extensive area, and much of this "scalped" land would probably revert to sensitive, riparian habitat. There is a good possibility that sensitive plants such as the federally- and state-endangered Lyon's pentachaeta could occur in habitat along the north fence line, since federally-designated critical habitat is directly adjacent and the north fence line has reasonable habitat for this plant among others. The sensitive plant survey was done in a drought year 2012, and could have missed this and other plants that should be conserved. Redoing the survey might locate the plant, and then protective measures could be prescribed to avoid impact. Although Plummer's mariposa-lily and Catalina mariposa-lily are not considered sensitive in some contexts, all of the Santa Monica Mountain natural vegetation is considered sensitive by the LCP, and measures should be taken to preserve these bulbs as much as possible. (Applicants state that they will know more about what needs to be done with respect to the mariposa-lilies when plans for the fence renovation are consolidated.) Fence repair will pass through oak woodland. The LIP mitigations should be followed to calculate oak encroachments. (Encroachments of 10% and over should be mitigated with planting; oaks with encroachments less than 10% must be surveyed for 10 years and mitigation trees planted for any worsening condition that may have been a result of the encroachment.) Twice the area of the oak woodland encroachment should be set aside for conservation in perpetuity, using an instrument such as deed restriction, and the mitigation oaks should be planted in this permanently-conserved area in best areas for oak growth. Bats were not found in existing buildings pre-demolition, but tree removal needs a preliminary bird and bat survey in the nesting and/or maternity season. Tree removal in any season should follow the CDFW-prescribed method of gradual push-over and delay of tree disassembly for 2 days to allow birds and bats to escape from foliage hide-outs. Natural, protected land is adjacent to the Project site, and all measures to protect natural habitat onsite and integrate to these protected areas should be taken.

ERB Comments:

- 1. The residential cottages and other buildings should be designed for solar power collection on roofs, which could probably generate all needed power for the Project. This is the environmentally-responsible way for a public County project to design and operate. It is the best design in this period of climate change concerns. It could also be used to provide an introduction to the probationers on integrating with their environment by presenting potential environmentally-responsible construction and maintenance jobs for current and future times. In addition to considering passive factors such as building orientation and the minimal shading the probation Campus generally requires, generation of power by PVC panels should have been strongly considered and adopted.**
- 2. ERB states that the Project needs to practically incorporate environmentally-responsible methods of conserving water and preserving or restoring ecosystem function to really integrate the students with an ecological perspective. In order to have integrity that reinforces this vision, the project needs to state an objective of integrating to ecologically responsible living and then demonstrate by implementation of the best possible design for achieving environmental responsibility.**
- 3. ERB states that a gray-water system should be used for irrigation, rather than reclaimed water. As indicated by the PCR Group planner, a gray-water system for this Project would not be a single-tank system, but would need to be distributed.**
- 4. ERB made multiple suggestions to promote having a landscape plan with all native plants that would be appropriate for the overall theme of integrating with the natural environment. Lists of native plants may be found on the ERB website, <http://planning.lacounty.gov/agenda/erb/> under "Plant Lists." The Director's list is found under the "Recommended" list of 2012. Avoid plants on the**

invasive lists—these are all non-native and damage the environment. In general, use plants native to the Santa Monicas—substitute native species of the same genus for non-natives. An example is that *Sisyrinchium californicum* should not be used. Instead use *Sisyrinchium bellum*. Color can be added with natives. Toyon (*Heteromeles arbutifolia*) is good for evergreen leaves, white flowers in summer, and red berries in late fall-early winter. Acceptable plants for County Fire are not all on their list. Have some alternatives in mind for the non-natives now on the plan. Fire review will give you a substitute suggestion for unacceptable plants. Mr. Condon will be able to help you, since he approved the initial plan.

5. To minimize irrigation, substitute something like Flowering Ash (*Fraxinus dipetala*) for Sycamores (*Platanus racemosa*) in landscape plants. Sycamores are an exclusively riparian species and need a lot of water, while Flowering Ash can be an upland plant and requires less water.

6. ERB recommends use of some kind of system that would retain runoff stormwater from all hardscape such as roofs and paving onsite rather than routing it into the stormwater conveyance culverts. ERB recommends retention of at least the water from a 3/4-in. storm (or greater amounts if Public Works LID standards using isohyetal lines are greater). Employ the necessary infrastructure to use retained runoff for irrigation and for fire-fighting purposes. This could be in a combined planter-cistern. Look at the website of Oasis (www.oasisdesign.net) for ideas on cistern structures and locations.

7. The location of the Project at the headwaters of Zuma Creek means that it is important for the Project to consider every possible means of diminishing impact to this important watershed. Zuma Creek is a habitat in which water quality is of extreme importance to endangered species, including the southern steelhead (*Oncorhynchus mykiss irideus*), a federally- and state-endangered species. For restoration grant money investigate NOAA NMFS, USFWS, CDFW, and Santa Monica Bay Restoration Commission, all of which award grants for many kinds of restoration projects that will result in fish habitat improvement. Fish habitat improvement will have broad ramifications for the entire watershed. Watershed restoration should be part of the education curriculum at Campus Kilpatrick.

8. ERB states that restoration of fuel modification Zone C to scattered plantings and restoration of cleared area beyond required fuel break (recommendations #5 and 6) would be required of any private development. It would not be a matter of choice for private development. County should set an example by aggressively pursuing implementation of this recommendation to improve watershed filtration, groundwater replenishment, and numerous ramifying aspects of watershed functionality.

9. Mitigation oaks shall be calculated according to LIP requirements: Encroachment of 10% or more into protected zones will require mitigation trees; trees with less than 10% encroachment shall be followed for 10 years, and mitigation oaks planted if condition of these trees worsens due to effects of the encroachment.

10. Bats migrate back and forth from the Santa Monica Mountains, including probably the Project site, to an area near Port Hueneme Naval Base for breeding, and then return to the Santa Monicas for maternity. Vigilance for bat presence and avoiding impacts to them is important. Follow guidelines for tree removal to have least impact to bats and birds.

11. Bat and bird surveys shall be done before initiation of grading and/or construction activities (including after significant lulls in activity) during the bird breeding season, December 1-August 31, and the bat maternity season, March 1-September 30.

12. Minimization of night lighting is very important to conservation of ecosystems, and ERB thanks the Project for observing measures of dark skies policy.

ERB RECOMMENDATIONS:

1. As part of the Project effort to have environmental integrity at this site, the planning must investigate ways to reduce irrigation with potable and even reclaimed water, and strongly consider substituting grey water. Irrigation with grey water may need a subsurface system. Turf considerations should include a natural turf substitute that uses less water than grass.

Recommendation/2nd: Rosie Dagit/Gina Natoli, Ayes: Unanimous

Applicant: A gray-water tank was considered for irrigation, but it would need to be 50,000 gal. capacity and fit into a space of 3-5 feet above bedrock that underlies the Project site. The cost of new piping for a distributed gray water system would be a considerable expense that was deemed not cost-effective. Artificial turf was considered (not natural turf alternatives), and past experience shows it has many problems including eventual unsightliness and need to irrigate due to heat factors. The reclaimed water is not sufficiently processed to be used for irrigation in a place with human presence. Irrigation necessary for the proposed landscaping is reduced to the minimum requirement of the County.

2. ERB recommends that trees used to shade the common building on the east and west sides should be evergreen. Coast live-oak would be the best plant for this purpose, and would not need irrigation after establishment of a few years.

Recommendation/2nd: Ron Durbin/Rosi Dagit, Ayes: Unanimous

3. Plants used in the landscape plans shall all be natives of the Santa Monica Mountains, shall be compatible with Fire requirements, and shall not be cultivars. Use the CNPS list for the Santa Monica Mountains and the Director's list that accompanied the LCP. Carefully consider plant traits so that choices are habitat-specific. Get confirmation on fire safety by calling County Fire.

Recommendation/2nd: Suzanne Goode/Margot Griswold, Ayes: Unanimous

4. ERB recommends that the planters that receive the roof runoff be modified to planters with cistern capacity for storms beyond the 3/4-in. storm capacity. Captured water should be retained and used for irrigation and for fire-fighting, rather than directed into stormwater conveyance. Irrigation use could be particularly high in summer and could be supplemented by captured water.

Recommendation/2nd: Rosi Dagit/Gina Natoli, Ayes: Unanimous

5. ERB recommends that Zone C have scattered planting of native plants appropriate to the habitat and matching adjacent habitat. It will be a shaded fuel break with separated fuels (scattered canopy) and clearing beneath. These plantings will need initial irrigation, but irrigation shall be removed after plants are established. Reclaimed water could be used in this case.

Recommendation/2nd: Ron Durbin/Suzanne Goode, Ayes: Unanimous

6. Areas on the north and east beyond the 200-ft. fuel modification and the 10-ft. clearing required next to fire roads shall be restored to natural habitat, which will be riparian in cases of three tributaries to Zuma Canyon. This will be a good area to conserve for the oak and oak-woodland mitigations, with planning to consider aspect for the oaks, sycamores, mulefat, willows, and other riparian plants that can be used there.

Recommendation/2nd: Rosie Dagit/Ron Durbin, Ayes: Unanimous

7. Onsite concrete-lined channels should be restored and converted to natural, vegetation-lined channels. This can be part of an MS-4 permit (addressing stormwater through natural means, especially using green infrastructure) for restoration of natural habitat and facilitating stormwater handling. For the future, LACDPW shall seek grant funding for doing this work with the probationers to restore upper watershed function and to restore downstream resources. The channel restoration and habitat restoration should be integrated with relevant environmental education on conservation of watershed function.

Recommendation/2nd: Suzanne Goode/Ron Durbin, Ayes: Unanimous

8. Redo the sensitive plant surveys in areas where fence modification or other activities of the Project could impact sensitive plants that might not have been discovered in the drought year survey of 2012. This includes the Zone C area. Now would be a good time to survey, since usual flowering is in May for Lyon's pentachaeta but could be earlier this year, which has had more rainfall than a drought year.

Develop a mitigation plan to avoid impacting sensitive plants if they are discovered. Endangered and threatened plant impacts may require a take permit from CDFW.

Recommendation/2nd: Suzanne Goode/Rosi Dagit, Ayes: Unanimous

8. Fence replacement or modification activities in oak protected zones shall be done with hand tools for any excavation, and protection of roots shall be implemented with preservation of roots as possible and covering of exposed roots with moist cloth while they are exposed .

Recommendation/2nd: Ron Durbin/Suzanne Goode, Ayes: Unanimous

9. Area of encroachment on oak woodland shall be calculated, and two times this area shall be set aside for planting mitigation trees. This shall be protected as a conserved area in perpetuity through a legal instrument such as deed restriction. The cleared areas beyond the required fuel modification on the east and north would be appropriate for the conserved area.

Recommendation/2nd: Rosi Dagit/Ron Durbin, Ayes: Unanimous

Applicant stated they are already planning mitigation in conjunction with the Mountains Restoration Trust (MRT). There is a tentative plan to use the MRT area. ERB stated that mitigation for this project should be on project land and not elsewhere.

13. If bulb plants such as mariposa-lilies are impacted by Project activities such as fence replacement, then a mitigation plan should be developed in conjunction with consultation of CDFW for current best management practices of conservation and mitigation for these plants. Rancho Santa Ana Botanic Garden will be a good source of information and can store and/or propagate plants.

Recommendation/2nd: Margot Griswold/Gina Natoli, Ayes: Unanimous

14. ERB recommends that the Project is consistent with resource protection of biological resources under the 2014 LCP with incorporation of the recommended modifications.

Recommendation/2nd: Rosi Dagit/Gina Natoli, Ayes: unanimous

Approval:

ERB Meeting Date: April 20, 2015

ERB Evaluation: Consistent X Consistent after Modifications
 Inconsistent No decision

Staff Biologist Consistent X Consistent after Modifications
 Recommendation: Inconsistent No decision
 Suggested Modifications: Comply with all ERB recommendations and draft recommendations.

OTHER MATTERS

C. Public comment pursuant to Section 54954.3 of the Government Code.

No Public Comment was made.



WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

"To Enrich Lives Through Effective And Caring Service"

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November 05, 2014

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

36 November 5, 2014

Dear Supervisors:


SACHIA HAMA
EXECUTIVE OFFICER

**DEPARTMENT OF PUBLIC WORKS:
CAMP VERNON KILPATRICK REPLACEMENT PROJECT
APPROVE APPROPRIATION ADJUSTMENT AND
REVISED TOTAL PROJECT BUDGET
AWARD DESIGN-BUILD CONTRACT
SPECS. 7175; CAPITAL PROJECT NO. 77295
(THIRD DISTRICT)
(3 VOTES)**

SUBJECT

This is a joint recommendation with the Chief Probation Officer to approve an appropriation adjustment, revise the total Project budget, award a design-build contract with Bernards Bros. Inc., and authorize the Department of Public Works to execute the design-build contract with Bernards Bros. Inc., for completion of the Camp Vernon Kilpatrick Replacement Project.

IT IS RECOMMENDED THAT THE BOARD:

1. Find that the award and execution of the design-build contract are within the scope of the previously adopted Mitigated Negative Declaration for the Camp Vernon Kilpatrick Replacement Project.
2. Approve the appropriation adjustment, which transfers \$4,019,000 in appropriation from Provisional Financing Uses-Services and Supplies, to the Fiscal Year 2014-15 Capital Projects/Refurbishments Budget, under Capital Project No. 77295, to fully fund the Camp Vernon Kilpatrick Replacement Project.
3. Approve the revised total Project budget of \$52,241,456 for the Camp Vernon Kilpatrick

Replacement Project, and authorize the Director of Public Works, or her designee, to carry out the Project.

4. Find that Bernards Bros. Inc., is the responsive and responsible bidder that submitted the most advantageous and best value proposal to the County for design and construction of the Camp Vernon Kilpatrick Replacement Project using the design build project delivery method, based on the best value criteria stated in the Request for Proposals, including qualifications, technical design, construction expertise, proposed delivery plan, price, skilled labor force availability, design excellence, acceptable safety record, and lifecycle cost.

5. Award a design-build contract to Bernards Bros. Inc., and authorize the Director of Public Works, or her designee, to execute the design-build contract with Bernards Bros. Inc., for a contract sum of \$33,274,100, and a maximum contract sum of \$34,674,100 (inclusive of a design completion allowance of \$1,400,000), subject to receipt by the County of acceptable Faithful Performance and Payment for Labor and Materials Bonds and evidence of required contract insurance filed by the design-build entity.

6. Authorize the Director of Public Works, or her designee, to exercise control of the design completion allowance, including the authority to reallocate the allowance into the contract sum, as appropriate, to resolve cost issues with Bernards Bros. Inc., that are identified during the design phase of the Project, such as changes resulting from unforeseen conditions, including construction related impacts.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions will approve an appropriation adjustment, revise the total Project budget, and award a design-build contract to Bernards Bros. Inc., and authorize the Department of Public Works (Public Works) to execute the design-build contract with Bernards Bros. Inc., to complete design and construction of the Camp Vernon Kilpatrick Replacement Project (Project). The Project site is located at 427 South Encinal Canyon Road, Malibu, California 90265.

Project Background and Description

The Project will design and construct a new, approximately 65,000 square-foot facility on approximately 11 acres of the greater 142 plus acres of County-owned land in Malibu. The new facility will provide approximately 120 beds and provide housing and program space for moderate to high-risk juvenile offenders.

The housing space will consist of approximately 25,000 square feet and will include five buildings (living units) with open dormitory style housing. These buildings will contain two semi-autonomous dormitories of 12 residents each. Each living unit will include personal laundry, administration and support, and counseling rooms. Each dormitory, within the living unit, will have a toilet/shower space, a group meeting room, a recreation/activity room, and an outside patio.

The facility includes an administration building with administration and Probation Department (Probation) staff offices; security administration that includes conference rooms, central control, communications room, intake/release/transportation, and public waiting; staff support space that includes staff sleeping rooms, restrooms, and showers; and medical and mental health services space that includes nurses station/offices, medical observation room, exam room, telemedicine exam room, and medical storage. The facility also includes a maintenance/warehouse building that

will provide storage, laundry, network/communications room, and trash/recycling holding.

In addition, the facility includes a support building that will provide education and vocational services, multipurpose space, which includes an indoor gymnasium, a dining area, and a kitchen. The educational space will provide curriculum for General Education Development (GED) testing, comprehensive high school, vocational training, and college-bound students.

The Project scope will include, but not be limited to, electrical; plumbing; mechanical; heating, ventilation, and air conditioning; perimeter fencing; fire protection systems; parking lots; sally port; landscaping; outdoor recreation courts and multi-purpose recreation field with running track; and emergency access roads.

On August 4, 2014, the Board awarded and authorized Public Works to execute an agreement with National Demolition Contractors to provide demolition/abatement services for the Project. Demolition activities are currently underway at the site to prepare for the Project's construction. Upon demolition and design completion, the Project's construction is anticipated to take 20 months to complete.

Revised Project Budget

Between June through September 2014, Public Works issued a Request for Proposals (RFP) and initiated an evaluation process to select a firm for design-build services for the Project. During the prequalification process and evaluation of interested design-build firms, it was determined that Bernards Bros. Inc.'s design-build proposal was found to have submitted the best value and most advantageous proposal to perform these services in accordance with the evaluation criteria stated in the RFP; however, the proposal cost was \$4.0 million over the previously estimated construction allocation.

Upon Project scope and budget evaluation by Public Works, Probation, and the Chief Executive Office (CEO), it was determined that significantly curtailing Project scope would be detrimental to the Project because the proper facility infrastructure and amenities would not be in place to allow Probation, the Los Angeles County Office of Education, and the Department of Mental Health (DMH) to effectively deliver a new rehabilitative treatment model to the incarcerated youth. Therefore, it is recommended that the Project budget be supplemented with additional funding to maintain the existing scope of work for the Project. Approval of the recommended actions is needed to initiate final design and construction of the Project.

Design Completion Allowance

The \$1,400,000 design completion allowance is intended to facilitate the resolution of issues identified only during the design phase of the Project, including issues concerning the County's scoping documents or changes required by jurisdictional agencies or due to unforeseen conditions discovered during design, including any increased design or construction costs associated therewith. The inclusion of the design completion allowance will facilitate the design decision process and minimize potential delays that could occur with design phase issues.

The use of the design completion allowance will be controlled by Public Works, with concurrence from the CEO, to reallocate funds from the design completion allowance into the contract sum.

Green Building/Sustainable Design Program

The proposed Project will support the Board's Green Building/Sustainable Design Program by incorporating into the Project design and construction sustainable features to optimize energy and water use, enhance the sustainability of the site, improve indoor environmental quality, and maximize the use and reuse of sustainable and local resources.

Implementation of Strategic Plan Goals

The Countywide Strategic Plan directs that we provide Operational Effectiveness/Fiscal Sustainability (Goal 1), by maximizing the effectiveness of process, structure, operations, and strong fiscal management, to support timely delivery of customer oriented and efficient public services. It also directs us to provide Integrated Service Delivery (Goal 3), by maximizing opportunities to measurably improve client and community outcomes and leverage resources through the continuous integration of health, community, and public safety services to provide a facility that enhances operations and the delivery of Probation youth rehabilitative services.

FISCAL IMPACT/FINANCING

The revised total Project budget is \$52,241,456, which includes plans and specifications, plan check, demolition, construction, equipment, consultant services, Arts Commission fee, miscellaneous expenditures, and County services. The Project Budget Summary is included in Attachment A.

Approval of the attached appropriation adjustment will transfer \$4,019,000 in appropriation from Provisional Financing Uses-Services and Supplies, to the Fiscal Year (FY) 2014-15 Capital Projects/Refurbishments Budget, under Capital Project No. 77295, to fully fund the Project.

The Project is funded with \$28,728,000 of State revenue from the Construction, Expansion, or Renovation of Local Youth Offender Rehabilitative Facilities Construction Program authorized under Senate Bill (SB) 81, and \$19,495,000 of prior year net County cost currently appropriated within the FY 2014-15 Capital Projects/Refurbishments Budget, under Capital Project No. 77295. Upon Board approval of the attached appropriation adjustment, the net County cost allocation will increase to \$23,514,000 from \$19,495,000.

Operating Budget Impact

An additional \$1,565,000 in ongoing operational costs is required to fund 13.0 positions (1.0 Assistant Probation Director, 6.0 Deputy Probation Officer (DPO) II's and 6.0 Group Supervisor Nights (GSN)) for the Project. The 6.0 DPO II positions are needed to address the increased workload associated with implementing the Integrated Treatment Model (ITM) which includes Dialectical Behavior Training. These positions will work directly with juveniles, on either a 4/40 or 5/40 shift, providing treatment services only. Since their duties are not custodial in nature, staff will not be eligible for the 56-hour work program. The treatment based DPO II will be a special assignment. Only those staff agreeing to the 4/40 or 5/40 shift will be approved for the position. The 6.0 GSN positions are needed to maintain a supervision ratio of 1:30 and address the change in dormitory design from an open single building concept to multiple smaller buildings, which increases the number of dormitories requiring supervision during sleep hours. The 1.0 Assistant Probation Director position will provide additional management oversight of the camp's operations.

For the ITM program by DMH and the Department of Health Services (DHS), an additional \$1,027,000 is needed to fund positions. DMH will need \$717,000 to fund 7.0 positions (1.0 Mental Health Clinical Supervisor, 5.0 Psychiatric Social Workers, and 1.0 Intermediate Typist Clerk), and

DHS will need \$310,000 to fund 3.0 positions (3.0 Registered Nurse I) once Camp Kilpatrick reopens. Additionally, furniture, fixtures, and equipment (FF&E) one-time costs estimated at \$1,500,000 is needed to furnish the replacement camp in FY 2015-16 (i.e., one year prior to opening of the new camp). Funding would offset the costs to furnish the Probation, DMH, and DHS offices, DPO sleeping quarters, classrooms for educational and vocational studies, and various other items.

Funding for these additional positions as well as one-time FF&E costs has not been identified. However, the Project will not be completed and fully operational until FY 2016-17. In the interim, the CEO and Probation will continue to work together to identify a funding source; as well as indicate the \$1,565,000 in ongoing funding for Probation, \$1,027,000 in ongoing funding for ITM services (both adjusted annually as needed), and \$1,500,000 in one-time costs; as a funding requirement in its Multi-Year Forecast.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The design-build contract with Bernards Bros. Inc., contains terms and conditions supporting the Board's ordinances and policies, including but not limited to: County Code Chapter 2.200, Child Support Compliance Program; County Code Chapter 2.202, Contractor Responsibility and Debarment; County Code Chapter 2.203, Contractor Employee Jury Service Program; County Code Chapter 2.206, Defaulted Property Tax Reduction Program; Board Policy No. 5.050, County's Greater Avenues for Independence (GAIN) and General Relief Opportunities for Work (GROW) Programs; Board Policy No. 5.060, Reporting of Improper Solicitations; Board Policy No. 5.110, Contract Language to Assist in Placement of Displaced County Workers; and Board Policy No. 5.135, Notice to Contract Employees of Newborn Abandonment Law (Safely Surrender Baby Law).

As required by the Board, language will be incorporated into the Project specifications stating that the contractor shall notify its employees, and shall require each subcontractor to notify its employees, that they may be eligible for the Federal Earned Income Credit under the Federal Income Tax Law (Federal Income Tax Law, Internal Revenue Service Notice 1015).

As required by the Board, the Project budget includes 1 percent of design and construction costs to be allocated to the Civic Art Fund per the Board's Civic Art Policy adopted on December 7, 2004, and subsequently amended on December 15, 2009.

Further, various SB 81 grant-related agreements are currently being executed with the State. The execution of these agreements will allow the County, upon contract award, to request approval from the California Department of Finance and the Pooled Money Investment Board, which will allow the County to finalize the Contract with the selected Design Builder and to issue a Notice to Proceed.

ENVIRONMENTAL DOCUMENTATION

On November 26, 2013, the Board adopted the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) for the Project. Approval of the award and execution for the design-build contract are within the scope of the Project in the adopted MND.

CONTRACTING PROCESS

On June 5, 2014, Public Works issued a RFP for design-build services for the Project. This contract opportunity was listed in the County's "Doing Business with Us" website.

The first phase of the RFP process was the submittal of a prequalification questionnaire (Part A) by all interested design-build firms. On June 24, 2014, four prequalification questionnaires were received for evaluation. The prequalification questionnaires were reviewed by an evaluation committee made up of members from the CEO, Probation, and Public Works. The evaluation was made based on responses to questions concerning the business type and ownership of each design build entity, evidence of the design-builder's experience and capacity to perform projects of similar size and complexity, licenses, registration, credentials, violations of State and Federal labor codes and safety regulations, debarment, default, bankruptcy, lawsuits on public works projects in the preceding five years, and other relevant criteria. Based on the review and evaluation of the prequalification questionnaires, three firms were determined to be prequalified. In accordance with the shortlisting requirements in the RFP, the top three firms were shortlisted and invited to submit technical and cost proposals (Part B) for the Project.

On September 25, 2014, the top three design-build firms submitted technical and cost proposals for evaluation. The technical and cost proposals were evaluated by the evaluation committee based on technical design and construction expertise, proposed delivery plans, price, life cycle costs, skilled labor force availability, acceptable safety record, design excellence, and design-build team personnel and organization. Final ranking of the proposers is listed in Attachment B. Bernards Bros. Inc., in its design-build proposal was found to have submitted the best value and most advantageous proposal to perform these services under the design-build delivery method, in accordance with the evaluation criteria stated in the RFP. These evaluations were completed without regard to race, creed, color, or gender.

The contract requires the contractor to pay its employees applicable prevailing wages in accordance with the California Labor Code.

Bernards Bros. Inc., Community Business Enterprises participation data and three-year contracting history with the County are on file with Public Works.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There will be no impact on current County services or projects during the performance of the recommended service. However, there will be impacts on the current County services related to Probation's operations during the course of construction while Camp Kilpatrick is temporarily vacated.

The Sports Program at Camp Kilpatrick was suspended for the spring 2014 sports season. The Sports Program has resumed its fall 2014 sports season at Probation's Challenger Memorial Youth Center.

CONCLUSION

Please return one adopted copy of this Board letter to the Chief Executive Office, Facilities and Asset Management Division; and to the Department of Public Works, Project Management Division II.

The Honorable Board of Supervisors

11/5/2014

Page 7

Respectfully submitted,



WILLIAM T FUJIOKA
Chief Executive Officer

WTF: JEP:SHK
DJT:TJ:AH:zu

Enclosures

c: Executive Office, Board of Supervisors
County Counsel
Arts Commission
Auditor-Controller
Probation
Public Works



JERRY E. POWERS
Chief Probation Officer

ATTACHMENT A

**DEPARTMENT OF PUBLIC WORKS:
CAMP VERNON KILPATRICK REPLACEMENT PROJECT
APPROVE APPROPRIATION ADJUSTMENT AND
REVISED TOTAL PROJECT BUDGET
AWARD DESIGN-BUILD CONTRACT
SPECS. 7175; CAPITAL PROJECT NO. 77295
(THIRD DISTRICT)
(3 VOTES)**

I. PROJECT SCHEDULE

Project Activity	Scheduled Completion Date
Project Scoping Document	January 2014
Design and Construction Award	November 2014
Construction Substantial Completion Occupancy Acceptance	October 2016 January 2017 June 2017

II. PROJECT BUDGET SUMMARY

Budget Category	Project Budget	Impact of This Action	Project Budget
Land Acquisition	\$0	\$0	\$0
Construction			
Make Ready Work	\$2,340,000	(\$488,177)	\$1,851,823
Construction Contract	\$27,977,800	(\$27,977,800)	\$0
DB Contract	\$0	\$33,274,100	\$33,274,100
Design Completion Allowance	\$0	\$1,400,000	\$1,400,000
Change Orders	\$3,109,000	\$403,592	\$3,512,592
Civic Art	\$313,500	\$26,741	\$340,241
Subtotal	\$33,740,300	\$6,638,456	\$40,378,756
Programming/Development	\$0	\$0	\$0
Plans and Specifications	\$3,370,000	(\$2,620,000)	\$750,000
Consultant Services			
Deputy Inspection	\$500,000		\$500,000
Hazardous Materials	\$150,000		\$150,000
Geotech/Soils Test	\$150,000		\$150,000
Material Testing	\$120,000		\$120,000
Cost Estimating	\$0		\$0
Topographic Surveys	\$350,000		\$350,000
Construction Management	\$2,800,000		\$2,800,000
Environmental	\$220,000		\$220,000
Subtotal	\$4,290,000	\$0	\$4,290,000
Miscellaneous Expenditures			
Countywide Contract Compliance	\$30,000	\$80,000	\$110,000
Printing	\$210,000	(\$80,000)	\$130,000
Subtotal	\$240,000	\$0	\$240,000
Jurisdictional Review/Plan Check/Permit			
Regional Planning	\$35,000		\$35,000
Fire Department	\$70,000		\$70,000
Health Department	\$30,000		\$30,000
Air Quality Management District (AQMD)	\$35,000		\$35,000
State Water Resources Board	\$35,000		\$35,000
Building and Safety Plan Check	\$270,000		\$270,000
Subtotal	\$475,000	\$0	\$475,000
County Services			
Code Compliance and Quality Control	\$1,400,000		\$1,400,000
Design Review	\$120,000		\$120,000
Contract Administration	\$250,000		\$250,000
Project Management	\$2,640,000	(\$1,059,777)	\$1,580,223
Project Management Support Services	\$1,104,700	\$375,022	\$1,479,722
ISD ITS Communications	\$120,000		\$120,000
Consultant Contract Recovery	\$0	\$684,755	\$684,755
Project Technical Support	\$473,000		\$473,000
Subtotal	\$6,107,700	\$0	\$6,107,700
Total	\$48,223,000	\$4,018,456	\$52,241,456

November 5, 2014

ATTACHMENT B

**DEPARTMENT OF PUBLIC WORKS:
CAMP KILPATRICK REPLACEMENT PROJECT
APPROVE APPROPRIATION ADJUSTMENT AND
REVISED TOTAL PROJECT BUDGET
AWARD DESIGN-BUILD CONTRACT
SPECS. 7175; CAPITAL PROJECT NO. 77295
(THIRD DISTRICT)
(3 VOTES)**

The Camp Vernon Kilpatrick Replacement Project will design and construct a new probation camp on approximately 11 acres of the greater 142 plus acres of County owned land in Malibu. The new facility will provide approximately 120 beds and provide housing and program space for moderate to high-risk juvenile offenders. The Project site is located at 427 South Encinal Canyon Road, Malibu, California 90265.

Request for Proposal Date: June 5, 2014

Proposer Ranking from Most Advantageous to Least:

	<u>Informed Average</u>	<u>Proposed Cost</u>
1. Bernards Bros. Inc.	770	\$34,996,100
2. Balfour Beatty Construction	589	\$41,402,869
3. Pankow	527	\$45,041,132

The design-build agreement for the construction of the Camp Kilpatrick Replacement Project will be issued to Bernards Bros. Inc., for a total of \$34,674,100 (including a \$1,400,000 design completion allowance).



**FINAL INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

RESPONSE TO COMMENTS AND ERRATA

**CAMP VERNON KILPATRICK
REPLACEMENT PROJECT
COUNTY OF LOS ANGELES, CALIFORNIA**

**CAPITAL PROJECT NO. 77295
SCH No. 2012102002**

Prepared for | County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803

Prepared by | BonTerra Consulting
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

November 2013

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SECTION 1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed County of Los Angeles (County) Camp Vernon Kilpatrick Replacement Project (Project) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (IS/MND) (SCH No. 2012102002) dated September 2012.

Section 15074(b) of the CEQA Guidelines states that, prior to approving a project, the lead agency must consider the proposed IS/MND together with any comments received during the public review process. The lead agency must adopt the proposed IS/MND, only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project would have a significant effect on the environment and that the IS/MND reflects the lead agency's independent judgment and analysis.

1.1 CEQA AND PUBLIC REVIEW OF THE IS/MND

In accordance with Section 15073 of the CEQA Guidelines, the Draft IS/MND was distributed on September 27, 2012, for a 30-day public review period from September 28, 2012, through October 30, 2012. Consistent with Sections 15072(b) and 15072(d) of the CEQA Guidelines, the Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) was mailed directly to the owners and occupants of contiguous property as shown on the last assessor rolls; was posted both on the Project site and off-site in the Project area; and is on file at the Los Angeles County Registrar-Recorder/County Clerk in the City of Norwalk. The Draft IS/MND and NOI or the NOI only was provided to 13 interested agencies and/or groups and to 18 individuals, comprised of contiguous property owners and/or occupants; it was also made available for review at the County of Los Angeles Department of Public Works (LACDPW) offices in the City of Alhambra and the Malibu Library during normal business hours and online at <ftp://dpwftp.co.la.ca.us/pub/PMD/CampKilpatrick/>. A total of five comment letter, four from agencies and one standard receipt letter from Governor's Office of Planning and Research were received during and after the public review period. The County's responses to comments contained in these letters are provided in Section 2.0 below, and any errata associated with these responses to comments are provided in Section 3.0 below.

The County has reviewed all comments received from agencies, organizations and/or individuals to determine whether any substantial new environmental issues have been raised. Based on the evaluation in the Draft IS/MND together with all comments received, the County has determined that no substantial new environmental issues have been raised that have not been adequately addressed in the Draft IS/MND and/or in this Responses to Comments and Errata. All potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the proposed Project would not result in any significant impacts, and a Mitigated Negative Declaration in accordance with CEQA is the appropriate environmental document for the proposed project.

Therefore, this document, combined with the Draft IS/MND, constitutes the Final IS/MND for the proposed Camp Vernon Kilpatrick Replacement Project. This document includes all public comment letters; the County responses; and the State Clearinghouse letter that documents compliance with CEQA review requirements. The County of Los Angeles Board of Supervisors will consider the proposed MND together with the comments received during the public review process, and can consider adoption of the Camp Vernon Kilpatrick Replacement Project Final IS/MND and approval of the proposed Project.

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SECTION 2.0 PUBLIC COMMENT LETTERS AND COUNTY RESPONSES

Letters commenting on the information and analysis in the Draft MND were received from the following parties during and subsequent to the public review period:

State

- Native American Heritage Commission, October 12, 2012.
- State of California, Governor's Office of Planning and Research, October 31, 2012.

County

- County of Los Angeles Department of Regional Planning, October 2, 2012.
- County of Los Angeles Fire Department, October 22, 2012.
- County of Los Angeles Sheriff's Department, November 5, 2012.

Each letter listed above is included in this document, followed by the County response to each comment. Each comment letter has been divided into sequential numbered comments (i.e., 1, 2, 3, etc.), as shown on the enclosed letters. Each numbered comment corresponds to a matching numbered response.

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EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

October 31, 2012

RECEIVED
NOV 06 2012

Vincent Yu
Los Angeles County
900 S. Fremont, PMD II, 5th Floor
Alhambra, CA 91803

DEPT. PUBLIC WORKS
PROJECT MANAGEMENT DIVISION II

Subject: Camp Vernon Kilpatrick Replacement Project
SCH#: 2012102002

SCH

Dear Vincent Yu:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 30, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,


Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2012102002
Project Title Camp Vernon Kilpatrick Replacement Project
Lead Agency Los Angeles County

Type MND Mitigated Negative Declaration
Description The existing Camp Kilpatrick accommodates up to 125 detainee occupants and is comprised of 44,878 square feet (sf) of buildings; 86,325 sf of outdoor facilities, surface parking (39 spaces); and hardscape and landscape. The County is proposing to demolish all existing structures and outdoor facilities at Camp Kilpatrick (with the exception of the swimming pool and kitchen/dining hall) and construct a replacement camp that would accommodate up to 120 detainee occupants and have approximately 47,000 sf of new buildings; 65,095 sf of outdoor facilities, surface parking (up to 180 spaces); and hardscape and landscape. The proposed structures and related facilities would be located generally in the same footprint as the existing Camp Kilpatrick facilities. The dining hall would repurpose through interior remodeling to manage food carts for the camp.

Lead Agency Contact

Name Vincent Yu
Agency Los Angeles County
Phone 826 300 3275
email
Address 900 S. Fremont, PMD II, 5th Floor
City Alhambra
Fax
State CA **Zip** 91803

Project Location

County Los Angeles
City Malibu
Region
Lat / Long 34° 05' 35" N / 118° 50' 16" W
Cross Streets 427 Encinal Canyon Road, Malibu, CA
Parcel No. 4471-003-900
Township **Range** **Section** **Base**

Proximity to:

Highways SR 23
Airports N/A
Railways N/A
Waterways N/A
Schools N/A
Land Use Camp Kilpatrick is an existing County Juvenile residential treatment facility / P (public and Semi-public Facilities)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Corrections; Native American Heritage Commission

Date Received 09/28/2012 **Start of Review** 10/01/2012 **End of Review** 10/30/2012

State of California – Governor's Office of Planning and Research

October 31, 2012

This comment is acknowledged. The Office of Planning and Research (OPR) is simply indicating that the County has complied with State Clearinghouse public review requirements. Because this comment does not address the content of the Draft MND, no further response is required.

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STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 384
SACRAMENTO, CA 95814
(916) 653-8231
Fax (916) 657-6388
Web Site www.nahc.ca.gov
ca_nahc@pacbell.net



RECEIVED
OCT 22 2012

October 12, 2012

Mr. Vincent Yu, Project Planner
County of Los Angeles Public Works Department
900 South Fremont Avenue, PMD II, 5th Floor
Alhambra, CA 91803

DEPT. PUBLIC WORKS
PROJECT MANAGEMENT DIVISION II

Re: SCH#2012102002; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the "Camp Vernon Kilpatrick Replacement Project;" located three miles south of the City of Malibu; Los Angeles County, California

NAHC

Dear Mr. Yu:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that lead agencies conduct a Sacred Lands File search of the proposed 'area of potential effect' (APE) as part of their due diligence.

The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §8254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

1

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

1
(Cont.)

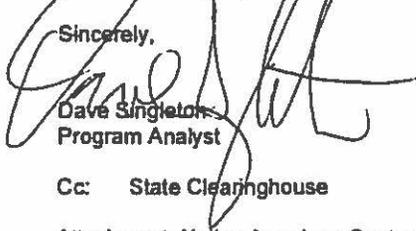
2

3

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 853-6257.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

} 3
(Cont.)

07/24/2012 09:11 FAX 916 857 5390

NAHC

001

Native American Contacts
Los Angeles County
July 13, 2012

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell

Chumash
Tataviam
Fernandeño

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley, CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennsle, Chairwoman
365 North Poli Ave
Ojai, CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Randy Guzman - Folkes
8471 Cornell Circle
Moorpark, CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell

Chumash
Fernandeño
Tataviam
Shoshone Palute
Yaqui

Patrick Tumamait
992 El Camino Corto
Ojai, CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Coastal Band of the Chumash Nation
Toni Cordero, Chairwoman
P.O. Box 4464
Santa Barbara CA 93140
cordero44@charter.net
805-984-3447

Chumash

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach CA 93433
(805) 481-2461
(805) 474-4729 - Fax

Chumash

Richard Angulo
P.O. Box 935
Salome, AZ 85348

Chumash

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed Camp Replacement Project; located at Camp Kilpatrick in the Santa Monica Mountains near Malibu; Los Angeles County, California for which a Sacred Lands File search and Native American Contacts list were requested.

07/24/2012 09:11 FAX 916 657 5390

NAHC

005

Native American Contacts
Los Angeles County
July 13, 2012

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Aylisha Diane Marie Garcia Napoleone
33054 Decker School Road Chumash
Malibu , CA 90265

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964
(805) 248-8463 cell

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Palms Verdes CA 90275
310-831-5295

Frank Arredondo
PO Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
805-987-5314

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Consint
P.O. Box 365 Chumash
Santa Ynez , CA 93460
freddyromero1959@yahoo.
805-688-7997, Ext 37

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7090.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed Camp Replacement Project; located at Camp Kilpatrick in the Santa Monica Mountains near Malibu; Los Angeles County, California for which a Sacred Lands File search and Native American Contacts list were requested.

Print form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Teuth Street, Sacramento, CA 95814

SCH# 2012102002

Project Title: Camp Vernon Kilpatrick Replacement Project
 Lead Agency: County of Los Angeles Contact Person: Vincent Yu
 Mailing Address: 900 S. Fremont Avenue, PMD II, 5th Floor Phone: (626) 300-3276
 City: Alhambra, CA Zip: 91803 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Malibu (~3 miles to the south)
 Cross Street: 427 Encinal Canyon Road, Malibu, CA Zip Code: 90265

Longitude/Latitude (degrees, minutes and seconds): 34° 05' 35.04" N / 118° 53' 16.27" W Total Acres: 11.7 (Project Site)
 Assessor's Parcel No.: 4471-003-900 Section: _____ Top: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy # SR 23 Waterways: N/A Railways: N/A Schools: N/A
 Airports: N/A

Document Type:
 CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent (Prior SCH No.) EA Draft EIS Final Document
 Neg Dec Other: _____ CEQA Other: _____
 Mkt Neg Dec (Prior SCH No.) CEQA Other: _____

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Local Action Type:
 General Plan Update Specific Plan Reszone Annexation
 General Plan Amendment Master Plan Redevelopments
 General Plan Element Planned Unit Development Use Permit Casual Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

Development Type:
 Residential: Units _____ Acres _____ Employees _____
 Office: Sq. ft. _____ Acres _____ Employees _____
 Commercial: Sq. ft. _____ Acres _____ Employees _____
 Industrial: Sq. ft. _____ Acres _____ Employees _____
 Educational: _____
 Recreational: _____
 Water Facilities: Type _____ MGD _____
 Other: Institutional - see Project Description for details

Project Issues Discussed in Document:
 Aesthetics/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plains/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: Greenhouse Gas

Present Land Use/Zoning/General Plan Designation:
 Camp Kilpatrick is an existing County Juvenile residential treatment facility / P (Public and Semi-public Facilities)
 Project Description: (please use a separate page if necessary)
 The existing Camp Kilpatrick accommodates up to 125 detainee occupants and is comprised of 44,878 square feet (sf) of buildings; 86,325 sf of outdoor facilities; surface parking (39 spaces); and hardscape and landscape. The County is proposing to demolish all existing structures and outdoor facilities at Camp Kilpatrick (with the exception of the swimming pool and kitchen/dining hall) and construct a replacement camp that would accommodate up to 120 detainee occupants and have approximately 47,000 sf of new buildings; 65,095 sf of outdoor facilities; surface parking (up to 180 spaces); and hardscape and landscape. The proposed structures and related facilities would be located generally in the same footprint as the existing Camp Kilpatrick facilities. The dining hall would be repurposed through interior remodeling to manage food carts for the camp.

State Clearinghouse Contact: (916) 445-0613

State Review Begins: 10-1-2012

SCH COMPLIANCE 10-30-2012

Please note State Clearinghouse Number (SCH#) on all Comments

SCH# 2012102002
 Please forward late comments directly to the Lead Agency

AQMD/APCD 33
 (Resources: 10, 6)

Project Sent to the following State Agencies

- | | |
|---|--------------------------------|
| <input checked="" type="checkbox"/> Resources | State/Consumer Svcs |
| <input checked="" type="checkbox"/> Boating & Waterways | General Services |
| <input checked="" type="checkbox"/> Coastal Comm | Cal EPA |
| <input checked="" type="checkbox"/> Colorado Rvr Bd | ARB: Airport/Energy Projects |
| <input checked="" type="checkbox"/> Conservation | ARB: Transportation Projects |
| <input checked="" type="checkbox"/> Fish & Game # 5 | ARB: Major Industrial Projects |
| <input checked="" type="checkbox"/> Delta Protection Commu | SWRCB: Div. Financial Assist. |
| <input checked="" type="checkbox"/> Cal Fire | SWRCB: Wtr Quality |
| <input checked="" type="checkbox"/> Historic Preservation | SWRCB: Wtr Rights |
| <input checked="" type="checkbox"/> Parks & Rec | X Reg. WQCB # 4 |
| <input checked="" type="checkbox"/> Central Valley Flood Prot. | Toxic Sub Cntl CTC |
| <input checked="" type="checkbox"/> Bay Cons & Dev Comm. | Yth/Adlt Corrections |
| <input checked="" type="checkbox"/> DWR | X Corrections |
| <input checked="" type="checkbox"/> Cal EMA | |
| <input checked="" type="checkbox"/> Resources, Recycling and Recovery | |
| <input checked="" type="checkbox"/> Bus Transp Hours | Independent Comm |
| <input checked="" type="checkbox"/> Aeronautics | Energy Commission |
| <input checked="" type="checkbox"/> CHP | X NAHC |
| <input checked="" type="checkbox"/> Caltrans # 7 | Public Utilities Comm |
| <input checked="" type="checkbox"/> Trans Planning | State Lands Comm |
| <input checked="" type="checkbox"/> Housing & Com Dev | Tahoe Rgl Plan Agency |
| <input checked="" type="checkbox"/> Food & Agriculture | |
| <input checked="" type="checkbox"/> Public Health | |
| | Conservancy |
| | Other: _____ |

Native American Heritage Commission (NAHC)

October 12, 2012

NAHC-1. It is noted that this comment letter does not address the content of the Draft MND, but provides a broad overview of the "state and federal statutes" relating to Native American resources. As such, these responses summarize the compliance of the Draft IS/MND and the Project with the applicable statutes.

A Phase I Cultural Resources Assessment was prepared for the proposed Project and is provided as Appendix C to the Draft IS/MND. As stated on page 4-47 of the Draft IS/MND, Native American consultation was initiated with a request to the NAHC for a Sacred Lands File Search and contact list on July 11, 2012. A response was received from the NAHC on July 13, 2012, and letters were sent to Native American tribes and individuals on July 13, 2012. The results of the Native American consultation (i.e., those that do not indicate the location of identified sites and can therefore be released to the public) are provided in Appendix C to the Phase I Cultural Resources Assessment. Based on this consultation, there are no known Native American cultural resources on the Project site. The Project will not cause a "significant effect" on Native American cultural resources and, therefore, an Environmental Impact Report is not required pursuant to the California Environmental Quality Act (CEQA).

NAHC-2. Regulatory Requirement (RR) 4.5-1 on page 4-52 of the Draft IS/MND describes the necessary process to follow pursuant to Section 7050.5 of the *California Health and Safety Code* and Section 5097.98 of the *California Public Resources Code* in the event human remains are discovered on the Project site.

NAHC-3. Please refer to Response NAHC-1 above.

Fernando



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

October 2, 2012

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OCT 17 2012

County of Los Angeles Department of Public Works
900 South Fremont Avenue
PMD II, 5th Floor
Alhambra, CA 91803

DEPT. PUBLIC WORKS
PROJECT MANAGEMENT DIVISION II

Attention: Mr. Vincent Yu

Dear Mr. Yu,

**CAMP VERNON KILPATRICK REPLACEMENT PROJECT CONSULTATION
PROCESS**

DRP

Thank you for the opportunity to comment on the Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the Camp Vernon Kilpatrick Replacement project, located at 427 South Encinal Canyon Road, within the unincorporated Santa Monica Mountains. The Department of Regional Planning concurs that an MND is the appropriate environmental determination for the proposed project. Nevertheless, there are details of the Initial Study that require correction:

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1. Projects within the Coastal Zone are exempt from the requirement for an SEA-CUP and from consideration by SEATAC. All areas designated as SEAs in the 1980 County General Plan were subsequently designated Sensitive Environmental Resource Areas (SERAs) in the Land Use Plan (LUP) of the 1986 Local Coastal Plan. If necessary, any second-party review is provided by the Environmental Review Board (ERB), which reviews all new development within designated SERAs. One SERA is present on a portion of the site, the Zuma/Ramirez Canyon Significant Watershed; it is coterminous with SEA 3A, identified in the Initial Study. The only portion of the proposed project that appears to be affected by this designation is the driveway, which according to the project description would remain unchanged with project implementation. Please confirm that the existing driveway is not being resurfaced, curbed, or in any other way modified (such as by trimming of trees to improve access). If no such modifications are required, the project is exempt from ERB review.
2. The discussions of oak tree and sensitive habitat impacts should also analyze impacts relevant to the State Oak Woodlands Law (PRC Section 21083). This analysis must consider impacts to the habitat values of oak woodland vegetation; likewise, any mitigation proposed for impacts to oak woodland must compensate

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320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • Fax: 213-626-0434 • TDD: 213-617-2292

for impacts to woodland habitat rather than to individual oak trees (which are addressed by the Oak Tree Ordinance). As stated in Section 21083.4(b), acceptable mitigation for impacts to oak woodland may include the following:

- a. Conserve oak woodlands, through the use of conservation easements;
 - b. plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees. The requirement to maintain trees terminates seven years after the trees are planted. This mitigation cannot account for more than one-half of the mitigation requirement for the project. This mitigation may be used to restore former oak woodlands;
 - c. contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of Section 1363 of the Fish and Game Code, for the purpose of purchasing oak woodlands conservation easements, as specified under paragraph (1) of subdivision (d) of that section and the guidelines and criteria of the Wildlife Conservation Board; or
 - d. other mitigation measures developed by the county.
3. The discussion of conflict with local policies or ordinances on page 4-38 is in error:
- a. The MBTA is not a local policy; it is federal law. Discussion of impacts to nesting birds should therefore be included under impacts to sensitive species or wildlife nursery sites (i.e., active nests). This impact should also be analyzed with reference to the applicable California Fish and Game Code section (3503).
 - b. SEA regulations do not apply in the coastal zone; refer to the LCP and any applicable ERB review that may be required due to the site's location within a SERA (see comment #1, above).
4. We recommend the removal of MM 4.4-7 and 4.4-8. Consultation with responsible agencies or advisory bodies, as proposed in MM 4.4-7 and 4.4-8, is part of the required environmental review of projects and does not count as mitigation. Consultation may result in the identification of previously unrecognized impacts and may illuminate the need for further mitigation which must be proposed prior to project entitlement.

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(Cont.)

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Once again, our department thanks you for allowing us a chance to take part in this process. If you have any questions, please feel free to contact Joseph Decruyenaere, Biologist, at (213) 974-1448, Monday through Thursday from 6:30 a.m. to 5:00 p.m., or email him at jdecruyenaere@planning.lacounty.gov. Our offices are closed on Fridays.

Sincerely,



Paul McCarthy
Section Head, Impact Analysis

PM:JD:lm

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County of Los Angeles Department of Regional Planning (DRP)

October 2, 2012

- DRP-1. This comment is acknowledged. The DRP concurs that an MND is the appropriate determination based on the Initial Study analysis of the proposed Project.
- DRP-2. This comment is acknowledged and, as set forth in Section 3.0, Errata, revisions shall be made to the IS/MND reflecting the role of the Environmental Review Board (ERB) in lieu of the Significant Ecological Area Technical Advisory Committee (SEATAC). Regarding the requested clarification on modifying the driveway (which is assumed to be Miller Probation Camp Drive leading from Encinal Canyon Drive to Camp Kilpatrick) there is the potential for installation of a new fiber optic line via shallow trenching and/or repaving of the driveway (refer to page 3-13 of the Draft IS/MND). The revisions to the IS/MND will include the requirement for ERB consultation if any land modification within the Significant Environmental Resource Area (which is coterminous with SEA No. 3A) is contemplated. These revisions do not result in a new or more significant impact to biological resources than disclosed in the Draft IS/MND.
- DRP-3. The analysis presented under the header "Coast Live Oak Woodland/Oak Trees" (beginning on page 4-35 of the Draft IS/MND) has been expanded to encompass Section 21083.4 et. seq. of the *California Public Resources Code*, "Counties; Conversion of Oak Woodlands; Mitigation Alternatives; Oak Woodlands Conservation Act Grant Use; Exemptions", as presented in Section 3.0, Errata. In summary, there would be a less than significant impact related to oak woodland conversion and no mitigation would be required. Also, existing Mitigation Measure (MM) 4.4-2—which requires that impacts to oak trees be avoided or minimized to the extent practicable and requires receipt of an Oak Tree Permit in compliance with the County of Los Angeles Oak Tree Ordinance prior to Project implementation—is consistent with the intent of oak woodland mitigation described under Section 21083.4(b) of the *California Public Resources Code*. These revisions do not result in a new or more significant impact to biological resources than disclosed in the Draft IS/MND.
- DRP-4. As set forth in Section 3.0, Errata, the analysis of impacts pursuant to the Migratory Bird Treaty Act shall be moved from Threshold 4.4(e) to Threshold 4.4(d), and the remaining analysis under Threshold 4.4(e) shall be revised to describe the role of the ERB in lieu of SEATAC (refer to Response DRP-1). These revisions do not result in a new or more significant impact to biological resources than disclosed in the Draft IS/MND, or otherwise represent substantial revisions necessitating recirculation of the Draft IS/MND pursuant to Section 15073.5 of the CEQA Guidelines.
- DRP-5. As set forth in Section 3.0, Errata, MMs 4.4-7 and 4.4-8 have been removed from the IS/MND and described as regulatory requirements of the Project, including the role of the ERB in lieu of SEATAC (refer to Response DRP-1). These revisions do not result in a new or more significant impact to biological resources than disclosed in the Draft IS/MND, or otherwise represent substantial revisions necessitating recirculation of the Draft IS/MND pursuant to Section 15073.5 of the CEQA Guidelines.

Fernando



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

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OCT 30 2012

October 22, 2012

DEPT PUBLIC WORKS
PROJECT MANAGEMENT DIVISION II

Vincent Yu, Staff Member
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
PMD II, 5th Floor
Alhambra, CA 91803

Dear Mr. Yu:

MITIGATED NEGATIVE DECLARATION, NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, CAMP VERNON KILPATRICK REPLACEMENT PROJECT, PROPOSING TO DEMOLISH ALL EXISTING STRUCTURES AND OUTDOOR FACILITIES AND CONSTRUCT A REPLACEMENT CAMP, 427 SOUTH ENCINAL CANYON ROAD IN THE SANTA MONICA MOUNTAINS (FFER #201200136)

The Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

LACFD

PLANNING DIVISION:

- 1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

- 1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
- 2. This property is located within the area described by the Forester and Fire Warden as Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for brush clearance and fuel modification plans must be met.

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SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MESA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKEWOOD | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENORA | IRVINDALE | LAWDALE | PALOS VERDES ESTATES | ROSEMEAD | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAGE |
| BRADBURY | | | | | | | WHITTIER |

Vincent Yu, Staff Member
October 22, 2012
Page 2

3. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches.
4. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade. In such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, shall be no more than 17%. Grade breaks shall not exceed 10% in ten feet.
5. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
6. All on-site driveways shall provide a minimum unobstructed width of 26 feet, clear-to-sky. When buildings exceed 35 feet in height, the minimum on-site driveway width shall increase to a minimum width of 28 feet. The driveway width does not allow for parking, and shall be designated as a "Private Driveway and Fire Lane" with appropriate striping and signage. The centerline of the on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
7. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
8. All limited access devices and gates shall comply with the County of Los Angeles Fire Code and with the Fire Department Regulation #5.
9. The development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of the buildings and the type of construction used.
10. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
11. An approved automatic fire sprinkler system will be required for this development in compliance with Los Angeles County Building and Fire Codes.

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(Cont.)

Vincent Yu, Staff Member
October 22, 2012
Page 3

12. Specific fire and life safety requirements for the construction phase of this development will be addressed during the architectural plan review by the Fire Department prior to building permit issuance. There may be additional requirements during this time.
13. Prior to occupancy, an inspection shall be performed by the County of Los Angeles Fire Department, Schools and Institution Unit, to ensure compliance of state and county codes and regulations.
14. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project. Should any questions arise, please contact Juan Padilla, at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance.
2. We have not received an Oak Tree Permit application or report for review. An Oak Tree Permit is required for this project.
3. If there are any deviations in the trees to be removed or encroached upon, the applicant will be required to file a new Oak Tree Report for review and pay all associated fees. All physical work being performed around the Oak trees will not be permitted until the new review and new Conditions of Approval are complete. Additionally, these requirements will also be implemented if it is found that the information provided by the applicant is inaccurate (i.e. maps, missing trees, etc).

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HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:ij

County of Los Angeles Fire Department (LACFD)

October 22, 2012

LACFD-1. This comment is acknowledged. It is noted that this comment letter does not address the content of the Draft MND, but provides the specific fire and life safety standards and permitting requirements applicable to the Project. The Project shall incorporate all applicable requirements of the Los Angeles County Fire Code (Title 32), as per RR 4.8-2 on page 4-75 of the Draft IS/MND, and adhere to all requirements of the County of Los Angeles Oak Tree Ordinance, before, during and after Project construction, as per MM 4.4-2 beginning on page 4-40 of the Draft IS/MND.



Erny D. Barron, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



November 5, 2012

James Kearns, Assistant Deputy Director
Department of Public Works
Project Management Division II
900 South Fremont Avenue, Fifth Floor
Alhambra, California 91803

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DEPT. PUBLIC WORKS
PROJECT MANAGEMENT DIVISION II

Attention: Vincent Yu

LACSD

Dear Mr. Kearns:

REVIEW COMMENTS
NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION
CAMP VERNON KILPATRICK REPLACEMENT PROJECT
427 SOUTH ENCINAL CANYON ROAD, LOS ANGELES COUNTY
CAPITAL PROJECT NO. 77295

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for the Camp Vernon Kilpatrick Replacement Project (Project). The proposed Project will replace an existing juvenile residential treatment facility located at 427 South Encinal Canyon Road in unincorporated Los Angeles County.

The proposed Project was reviewed by the Department's Malibu/Lost Hills Station (see attached correspondence, dated October 9, 2012, from Captain Joseph H. Stephen, Jr.). In summary, the proposed Project, as it is described in the MND, is not expected to impact the Department's resources or operations. However, the Station recommends incorporating various security measures to prevent unauthorized movement into or out of the facility.

Thank you for including the Department in the environmental review process for the proposed Project.

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A Tradition of Service Since 1850

Mr. Kearns

-2-

November 5, 2012

Should you have any questions regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Project No. 12-058. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF



Gary T.K. Tse, Director
Facilities Planning Bureau

1
(cont.)

Mr. Kearns

-3-

November 5, 2012

GTKT:LM:lm/jh

Attachment

c: Joseph H. Stephen, Jr., Captain, Malibu/Lost Hills (MLH) Station
Philip D. Brooks, Sergeant, MLH Station
Lester Miyoshi, Project Manager, Facilities Planning Bureau
Chrono
(EIR-RvwCmntsCampVernonKilpatrickCP77295)

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(cont.)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service"

DATE: October 9, 2012



OFFICE CORRESPONDENCE

FROM: JOSEPH H. STEPHEN JR., CAPTAIN TO: GARY T. K. TSE, DIRECTOR
MALIBU/LOST HILLS STATION FACILITIES PLANNING BUREAU

SUBJECT: **CAMP VERNON KILPATRICK REPLACEMENT PROJECT**
DRAFT INITIAL STUDY MITIGATED NEGATIVE DECLARATION

This project entails the demolition and replacement of the existing Los Angeles County Probation Department's juvenile residential treatment facility. The Malibu/Lost Hills Sheriff's Station provides law enforcement services for this location. The current response times for this area for emergency, priority, and routine calls are ten, eighteen, and thirty-nine minutes, respectively.

As this is simply a replacement of an existing facility, the project would not result in a need to expand existing Sheriff Facilities, nor would it require additional staffing or equipment to maintain acceptable service ratios and response times. There are not any mutual aid agreements with the Sheriff's Department that would impact this project.

As with all probation camps, it is imperative that adequate procedures are in place to prevent the inevitable attempts of camp residents to leave the facility without authorization. This includes infrastructure and perimeter security measures that also exclude unauthorized individuals from entering the facility as well.

Should you have any additional questions regarding this matter, please contact Sergeant Philip D. Brooks at (818) 878-5555, or by e-mail at pdbrooks@lasd.org.

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JHS:pb

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OCT 16 2012

Orig July CC: Gary Lester

FACILITIES PLANNING BUREAU
ADMINISTRATIVE SERVICES DIVISION

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County of Los Angeles Sheriff's Department (LACSD)

November 5, 2012

LACSD-1. This comment is acknowledged. This comment letter affirms the IS/MND findings regarding law enforcement services.

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SECTION 3.0 ERRATA

The purpose of this errata to the Draft IS/MND is to: (1) address revisions to the proposed Project subsequent to public distribution (Section 3.1) and (2) make minor changes to the text of the Draft IS/MND to further substantiate conclusions and/or clarify aspects of the previously circulated document (Section 3.2). Neither the Project revisions nor the text changes reflect a determination of a new or more significant environmental impact than disclosed in the Draft IS/MND and recirculation of the Draft IS/MND is not necessary.

3.1 ASSESSMENT OF PROJECT REVISIONS

The purpose of this section of the errata is to assess and document the revisions to the Camp Kilpatrick Project contemplated by the County subsequent to public distribution of the Draft IS/MND prepared for the Project, but prior to the County Board of Supervisors' consideration of the Project and the IS/MND. The discussion below provides a summary of the anticipated Project revisions;¹ a comparative impact analysis for each of the 17 environmental topics addressed in the IS/MND based on these revisions; and a determination of whether the revised Project components represent a "substantial revision" to the Draft IS/MND pursuant to Section 15073.5 of the California Environmental Quality Act (CEQA) Guidelines, thereby requiring recirculation of the IS/MND. Section 15073.5(b) defines a substantial revision as:

- (1) A new, avoidable significant effect is identified and mitigation measures or project revisions² must be added in order to reduce the effect to insignificance, or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

As evidenced by the analysis below, construction and operation of the revised Camp Kilpatrick Replacement Project would not result in a "substantial revision" to the IS/MND, and recirculation of the IS/MND is not necessary.

Summary of Project Revisions

The Project revisions focus on the size (i.e. square footage) and distribution of the proposed buildings. For the purposes of comparison, Exhibit 1, Conceptual Site Plan (September 2012), was included in the IS/MND and provides a graphical representation of the Project Description. Exhibit 2, Revised Conceptual Site Plan (July 2013), provides a graphical representation of the revised site plan. Table 1 presents the summary of the Project as described in the IS/MND, and Table 2 summarizes the revised Project. Shaded line items in Table 2 represent a revision from the IS/MND Project in Table 1.

¹ Per the Draft Space Program dated May 21, 2013 and associated e-mail correspondence to BonTerra Consulting from the County Department of Public Works (F. Canon) dated July 27, 2013.

² In this context, "project revisions" refer only to project design features intended to reduce or eliminate a significant effect identified subsequent to public review and prior to lead agency adoption of a negative declaration.

**TABLE 3-1
IS/MND PROJECT SUMMARY (SEPTEMBER 2012)**

**TABLE 3-2
REVISED PROJECT SUMMARY (JULY 2013)**

Proposed Land Use	Approximate Size (square feet)	Comments
Buildings		
Cottages (4)	22,450 (total)	Accommodates up to 120 residents
Support Center/Education	12,200	
Administration	7,025	
Gymnasium/Chapel/Visiting	4,200	With ½ basketball court; optional full court
Maintenance/Warehouse	1,540	
Optional Kitchen	Up to ~2,000	Potential stand-alone building that would be constructed in the future and would serve Camp Kilpatrick only
Subtotal Proposed Buildings	~ 47,000	
Outdoor Facilities		
Multi-purpose Field and Track	47,070	
Sports Courts (paved)	12,800	
Swimming Pool and Deck	5,225	Existing facility to remain
Subtotal Outdoor Facilities	~ 65,095	
Other Land Uses		
Kitchen and Dining Hall	6,371	Existing use to remain; dining hall to be repurposed through interior remodeling
Surface Parking	71,500 (up to 180 spaces)	34,500 sf/92 spaces comprised of gravel parking area for overflow in location of existing ball field; remaining parking areas paved
Hardscape and Landscape	138,500	Includes interior paved service roads
Undeveloped Open Space ^a	179,115	
Subtotal Other Land Use	~ 395,486	
Project Site Total	~ 507,581 (11.7 acres)	

^a Undeveloped open space within Project site boundary/impact footprint defined for purposes of this IS/MND.

Proposed Land Use	Approximate Size (square feet)	Comments
Buildings		
Cottages (4)	22,092 (total)	Accommodates up to 120 residents
Support Center/Education	12,557	
Administration	7,389	
Multi-purpose/Visiting	8,505	Full basketball court
Maintenance/Warehouse	1,540	
CVK Kitchen (Not Optional)	2,300	Food delivery and dining would occur here rather than within cottages
Subtotal Proposed Buildings	54,383	Increased by 7,383 square feet
Outdoor Facilities		
Multi-purpose Field and Track	47,070	
Sports Courts (paved)	12,800	
Swimming Pool and Deck	5,225	Existing facility to remain
Subtotal Outdoor Facilities	~ 65,095	
Other Land Uses		
Kitchen and Dining Hall	6,371	Existing use to remain; dining hall to be repurposed through interior remodeling
Surface Parking	71,500 (up to 180 spaces)	34,500 sf/92 spaces comprised of gravel parking area for overflow in location of existing ball field; remaining parking areas paved
Hardscape and Landscape	138,500	Includes interior paved service roads
Undeveloped Open Space ^a	171,732	Decreased by 7,383 square feet
Subtotal Other Land Use	~ 388,103	Decreased by 7,383 square feet
Project Site Total	~ 507,581 (11.7 acres)	

^a Undeveloped open space within Project site boundary/impact footprint defined for purposes of this IS/MND.

As shown in Table 2, the planned building development has been increased by a total of 7,383 square feet (sf), or approximately 16 percent, with a commensurate decrease in undeveloped open space. However, while the building density would increase, the approximate 11.7-acre impact footprint, defined as the area of potential physical disturbance, would remain the same (refer to Exhibit 3-5 of the IS/MND). As shown, the revised plan would continue to accommodate up to 120 residents, even with a 358-sf reduction in total cottage space. The IS/MND description of the Project included 4 identical cottages with each housing up to 30 residents, either in 2 groups of 15 or 3 groups of 10 residents with in-cottage food service. The revised Project would have two "2 x 12" cottages each housing 24 residents and two "3 x 12" cottages each housing 36 residents. The previously proposed in-cottage facilities for processing food deliveries from the existing shared-use kitchen and resident dining have been moved to a separate, 2,300-sf kitchen that would serve only Camp Kilpatrick. The increase in development generally involves the proposed buildings along the access road (Miller Probation Camp Drive), including, but not limited to, the proposed kitchen.

In addition to the revisions to proposed buildings, there would be minor modifications to the path of the interior service road, although the overall "U-shape" of the path is the same. Specifically, the portion of the service road along the north side of the existing kitchen is planned to be widened with no service road along the rear of the cottages. As shown on Exhibits 1 and 2, the total amount of paving would be reduced from 22,000 sf to 20,850 sf due to proposed revisions to the interior service road. As the interior service roads are included in the category of hardscape and landscape areas in Tables 1 and 2, this change is not reflected in the total size for this land use because the reduction in paved area would become landscaped area.

Comparative Impact Analysis

The following presents a comparative analysis of the revised Project for each topic addressed in the IS/MND and focuses on those revisions that have the potential to alter the conclusions of the IS/MND without unnecessary repetition of the IS/MND analysis. For instance, there would be no change to the Project's lighting plan; therefore, there is no need for a comparative analysis of nighttime light and glare. The comparative analysis assumes implementation of all mitigation measures identified in the IS/MND. For each topic, a finding regarding any new significant impacts is made.

Aesthetics

Construction of the revised Project would result in the same temporary views as described in the IS/MND. Consistent with the analysis in the IS/MND, the revised Project buildings would be one to two stories in height and within essentially the same development footprint as the existing Camp Kilpatrick. The larger buildings occupy the available land between the service and access roads, but would not demonstrably change the overall camp layout or land use pattern. As such, the visual character of the revised Project from public vantage points would be materially the same as anticipated in Section 4.1 of the IS/MND, and would continue to represent a beneficial aesthetic impact. Therefore, the revised Project would not result in substantial revisions related to aesthetics.

Agriculture and Forest Resources

There are no agricultural or forest resources on or near the Project site or zoning for these uses, as discussed in Section 4.2 of the IS/MND. Therefore, construction and operation of the revised Project would not result in substantial revisions related to agriculture and forest resources.

Air Quality

The approximate 16 percent increase in building development is not anticipated to substantially increase the overall construction schedule because the 7,383 sf of additional space, and associated larger grading footprints for the buildings, would not warrant the use of additional pieces of heavy construction trucks/equipment. Rather, it is anticipated that the timeframe required to complete each construction activity (e.g. grading, building construction, painting/finish work) would be slightly extended.

The IS/MND analysis of construction-related emissions for each year of construction activity (i.e., 2013, 2014, 2015) is based on SCAQMD maximum daily emissions thresholds. Because the peak daily construction activity would remain unchanged, the regional and local air quality analysis presented in the IS/MND would remain the same (refer to Tables 4-5 through 4-7 of the IS/MND). There would be no change in operational characteristics of the proposed Project that would affect air quality. Therefore, the revised Project would not result in substantial revisions related to air quality.

Biological Resources

The IS/MND assumes that the entire 11.7-acre impact footprint would be subjected to earth-moving activities. As such, the analysis of biological resources assumes a worst-case scenario and provides associated mitigation measures for disturbance of all existing resources within the impact footprint. The revised Project would not alter the impact footprint and would not affect additional jurisdictional resources or oak trees compared to the IS/MND Project. There would be no change in operational characteristics of the proposed Project that would affect biological resources. Therefore, the revised Project would not result in substantial revisions related to biological resources.

Cultural Resources

The revised Project would not alter the 11.7-acre impact footprint or the anticipated grading depths. As such, the potential to encounter unknown archaeological resources, human remains, and/or paleontological resources would remain the same as discussed in Section 4.5 of the IS/MND. There would be no change in operational characteristics of the proposed Project that would affect cultural resources. Therefore, the revised Project would not result in substantial revisions related to cultural resources.

Geology and Soils

The revised Project would continue to be comprised of 1- and 2-story buildings and within essentially the same development footprint as the existing condition and as set forth in the IS/MND conceptual plan. The 7,383 sf of additional building space and slight adjustment in building locations would not affect the conclusions of the Preliminary Geotechnical Evaluation prepared by Ninyo & Moore, which provides a preliminary evaluation of geotechnical constraints. The County of Los Angeles Building Code requires additional geotechnical investigation to fully define the geotechnical recommendations applicable to the Project, as stated in RR 4.6-1 of the IS/MND. As such, the revised Project will be assessed by a Geotechnical Engineer and recommendations specific to the proposed structures will be developed as the Project continues to move through the design process. There would be no change in operational characteristics of the proposed Project that would affect geology and soils. Therefore, the revised Project would not result in substantial revisions related to geology or soils.

Greenhouse Gas Emissions

As discussed in Section 4.7 of the IS/MND, the Project's estimated net increase in annual GHG emissions—which includes amortized construction emissions and subtracts the site's existing emissions—would be approximately 14 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr). This value is far less than the proposed South Coast Air Quality Management District Tier 3 screening threshold of 3,000 MTCO₂e/yr for all land use types applied in the IS/MND. The approximate 16 percent increase in building development (i.e. 7,383 sf of additional space) would result in a slight increase in construction emissions.

As described in the IS/MND, because the Project would replace an existing facility with no increase in capacity, operational GHG emissions are not expected to increase and are slightly lower than existing emissions due to implementation of green building features. Although the revised Project would have greater operational space, the facility would continue to serve up to 120 residents. The estimated emissions for the IS/MND Project is many orders of magnitude below the applicable screening threshold, and the slight increase in emissions during building construction would have a negligible increase in the amortized 30-year annual emissions. Therefore, the revised Project would not result in substantial revisions related to GHG emissions.

Hazards and Hazardous Materials

The sole hazard-related impact identified in the IS/MND for the Project is the presence of asbestos-containing materials, lead-based paint, polychlorinated biphenyl-containing fixtures, and/or mercury-containing fixtures within the existing buildings to be demolished. The demolition phase of the Project would not be altered due to the Project revisions, and the same regulatory requirements for abatement of these materials would be implemented. There would be no change in operational characteristics of the proposed Project that would affect hazards and hazardous materials. Therefore, the revised Project would not result in substantial revisions related to hazards and hazardous materials.

Hydrology and Water Quality

The approximate 16 percent increase in building development represents an approximate 7,383-sf increase in impervious surfaces with implementation of the revised Project, compared to the IS/MND Project. As discussed in Section 4.9 of the IS/MND, the Project site is not a designated groundwater recharge area and, as such, this increase in impervious surface area would not affect groundwater recharge. The increased impervious surface area would slightly increase the generation of storm water runoff. However, the overall drainage pattern would remain the same, with runoff collected and conveyed to the existing trapezoidal channel along the eastern Project site boundary. To meet the County's Low Impact Development (LID) requirements per RR 4.9-2, storm water must be retained on site, either underground or aboveground, and released at a rate consistent with the existing hydrologic conditions. As such, the pre- and post-redevelopment flow rates and volumes and the required on-site infrastructure would be determined based on the revised Project and drainage infrastructure would be sized accordingly. Finally, the increased building development would not extend into any identified jurisdictional resources.

As required by RR 4.9-2, the revised Project would also be required to comply with the County's Standard Urban Stormwater Mitigation Plan (SUSMP) and LID standards, which would likely result in an improvement in water quality compared to the existing condition. Therefore, the revised Project would not result in substantial revisions related to hydrology and water quality.

Land Use and Planning

The Project revisions would not affect land use plans or policies addressed in Section 4.10 of the IS/MND. Per MM 4.4-7 and MM 4.4-8, the Project plans must be submitted to the Significant Ecological Area Technical Advisory Committee and the California Coastal Commission for consistency review. Therefore, construction and operation of the revised Project would not result in substantial revisions related to land use and planning.

Mineral Resources

There are no mineral resources or mining activities on or near the Project site, as discussed in Section 4.11 of the IS/MND. Therefore, construction and operation of the revised Project would not result in substantial revisions related to mineral resources.

Noise

The approximate 16 percent increase in building development is not anticipated to substantially increase the overall construction schedule because the 7,383 sf of additional space, and associated larger grading footprints for the buildings, would not warrant the use of additional pieces of heavy construction trucks/equipment. Rather, it is anticipated that the timeframe required to complete each construction activity (e.g. grading, building construction, painting/finish work) would be slightly extended.

The IS/MND assessed noise impacts based on a maximum daily construction noise level, assuming simultaneous operation of three pieces of heavy construction equipment producing the maximum noise level. Because the peak daily construction activity, including the type and mix of construction equipment used, would remain unchanged, the noise analysis presented in the IS/MND would remain the same. There would be no change in operational characteristics of the proposed Project that would affect noise. Therefore, the revised Project would not result in substantial revisions related to noise.

Population and Housing

The revised Project could result in a slight increase in the number of construction workers per day on the project site. To provide a conservative analysis, this Memorandum assumes there would be approximately 10 percent more resulting in an estimated maximum of 110 workers per day increased from 100 as analyzed in the IS/MND. As discussed in Section 4.13 of the IS/MND, it is anticipated that the local population could provide the estimated 10 additional skilled construction-related workers. Additionally, the temporary presence of the additional construction crew would not change the permanent demand for housing, goods, and services in the surrounding area. The revised Project would not alter the anticipated long-term staffing increase (10 to 25 positions), as the Project would continue to serve up to 120 residents. Therefore, the revised Project would not result in substantial revisions related to population and housing.

Public Services

The revised Project would not alter the number of juvenile residents, the on-site staffing, or the general provision of buildings and outdoor facilities assessed in the IS/MND. As discussed in Section 4.14 of the IS/MND, there would be no additional buildings, infrastructure, or other facilities that could generate demand for fire and police protection services such that new or physically altered facilities would be required to provide service to the revised Project. As with the existing Camp Kilpatrick and the IS/MND Project, the revised Project would not generate a

demand for public school services, parks, libraries, or other public facilities. Therefore, the revised Project would not result in a new significant impact related to public services.

Recreation

The revised Project would not alter the analysis set forth in the IS/MND that anticipated a resident population (120 residents) and the anticipated staffing increase of 10 to 25 positions, and there would be no permanent change to the population that could use recreational facilities. Also, as discussed in the IS/MND, the Camp Kilpatrick residents have access solely to on-site recreation features. Therefore, construction and operation of the revised Project would not result in substantial revisions related to recreation.

Transportation/Traffic

The revised Project could slightly increase the maximum construction worker round trips during peak construction activity, from 100 to 110 round trips per day, as discussed under "Population and Housing" above. The maximum of 24 trips per day for other construction traffic (i.e., materials delivery, haul trucks) is not anticipated to change. As discussed in Section 4.16 of the IS/MND, the anticipated increase in daily trips (including workers trips and other construction traffic) would be within the same range as the currently level of traffic generated by operation of Camp Kilpatrick that would be absent during construction activity. An increase of approximately 10 daily (i.e., Monday through Saturday) construction worker trips would continue to be within the range of existing average daily traffic from Camp Kilpatrick operations. The revised project also would not alter the addition of 10 to 25 round-trip vehicle trips related to additional staff. Also, like the IS/MND Project, the revised Project would not affect the existing pattern of ingress, egress and interior circulation. Therefore, the revised Project would not result in substantial revisions related to transportation and traffic.

Utilities and Service Systems

The revised Project would not alter the analysis set forth in the IS/MND that anticipated a resident population (120 residents) and the anticipated staffing increase of 10 to 25 positions. The extent of irrigated landscape would be reduced due to the increased building development. Therefore, the long-term demand for water and energy and generation of wastewater and solid waste would be the essentially same as the IS/MND Project. The approximate 16 percent increase in building development would provide the same type and range of services, and therefore have the same effect on utilities. There would be no change in the construction scenario of the proposed Project that would affect utilities and service systems. Therefore, the revised Project would not result in substantial revisions related to utilities and service systems.

Conclusions

As described in the analysis above, construction and operation of the revised Camp Kilpatrick Replacement Project would not result in any new, avoidable significant impacts not disclosed in the Draft IS/MND, and the revised Project would not represent a substantial revision pursuant to Section 15073.5 of the CEQA Guidelines. Therefore, recirculation of the IS/MND is not required. This Memorandum is meant to accompany the CEQA documentation as a summary of the Project revisions and as evidence that appropriate consideration of the potential environmental effects of the revised Project was made by the County prior to consideration of the Camp Kilpatrick Replacement Project by the County Board of Supervisors.

3.2 DRAFT IS/MND TEXT CHANGES

The following text changes are made to the Initial Study and incorporated as part of the Final IS/MND. Changes to the text are noted with **bold** (for added text) or ~~strikeout~~ type (for deleted text).

Page 1-2 (Section 1.0 Executive Summary)

1.3 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Prior to implementation of mitigation measures (MMs), implementation of the proposed Camp Kilpatrick Project would result in potentially significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, ~~Land Use and Planning,~~ and Noise.

Page 2-2 (Section 2.0 Introduction)

Prior to application of mitigation measures, implementation of the proposed Camp Kilpatrick Replacement Project would result in potentially significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, ~~Land Use and Planning,~~ and Noise. Implementation of the MMs, as detailed in each environmental analysis presented in Section 4.0 of this IS/MND, would reduce all of the potentially significant impacts to a less than significant level.

Page 3-2 (Section 3.0 Environmental Setting and Project Description)

3.1.3 PROJECT SITE CHARACTERISTICS

The Los Angeles County Probation Department (Probation Department) provides detention for delinquent minors in juvenile halls and in residential treatment programs called "camps". Camp Kilpatrick is 1 of 19 existing camps operated by the County Probation Department. Camp Kilpatrick, and the adjacent Camp Miller, were established in 1962 within portions of a total of five contiguous County-owned parcels³ that occupy approximately 142 acres. Camp Kilpatrick is almost entirely located within the 67.29-acre Assessor Parcel Number (APN) 4471-003-900. For purposes of this IS/MND, the Project site is defined as the approximate 11.7-acre area that has been developed for operation of Camp Kilpatrick as well as the potential impact footprint (see Exhibit 3-5, Proposed Project Impact Footprint). Camp Kilpatrick has a rated bed capacity of up to 125 minors and consists of 13 single-story buildings totaling 44,878 square feet (sf); approximately 86,325 sf of outdoor facilities (i.e., swimming pool, sports courts, multi-purpose field, ball field); hardscape and landscape areas (e.g., sidewalks, paved roads, ornamental vegetation, trees, **one wooden totem pole created and donated by a local artist approximately 15 years ago**); surface parking; and undisturbed natural open space areas, generally limited to the northern and eastern boundaries of the site. Table 3-1 summarizes the existing land uses on the Project site.

Page 3-11 (Section 3.0 Environmental Setting and Project Description)

Hardscape materials would include asphalt and concrete paving, and pervious paving materials, such as at the running track surrounding the multi-purpose field (e.g., decomposed granite) and overflow parking area (e.g., gravel). The net coverage of pervious surfaces (including buildings and hardscape, and vegetated and/or natural areas) with proposed Project implementation

³ Assessor Parcel Numbers 4471-003-900, 4471-004-902, 4471-004-903, 4471-004-904 and 4471-004-905.

would be similar to the existing condition because the proposed replacement Camp Kilpatrick would be constructed within the same general footprint and with a comparable breakdown of buildings, hardscape (e.g., roads, sidewalks), and landscape areas as the existing Camp Kilpatrick. **The wooden totem pole would be removed prior to demolition activities to be retained by the County Probation Department and eventually re-installed within the replacement Camp Kilpatrick.** The net change in pervious surface coverage would not be expected to cause substantive changes in stormwater runoff volumes or rates. The potential replacement of selected grass areas (i.e., the grass-covered portion of the proposed 47,070-sf multi-purpose field and track) with artificial turf would be the only substantive net reduction of vegetated area associated with the Project; however, this would have the benefit of reduced water demand.

Page 3-17 (Section 3.0 Environmental Setting and Project Description)

**TABLE 3-3
DISCRETIONARY APPROVALS**

Agency	Discretionary Approval Required
U.S. Army Corps of Engineers	Issuance of a Section 404 Permit
California Department of Fish and Game	Issuance of a Streambed Alteration Agreement
State Water Resources Control Board	Coverage under National Pollutant Discharge Elimination System (NPDES) General Construction Activity Storm Water Permit
Los Angeles Regional Water Quality Control Board	Issuance of a Water Quality Certification (Section 401 Permit)
California Coastal Commission	Approval of Coastal Development Permit pursuant to the Santa Monica Mountains Local Coastal Program
California Department of Corrections and Rehabilitation	Approval of interim Project phases (e.g., design, request for proposals, construction) pursuant to SB 81 grant conditions; Land ownership transaction with County of Los Angeles.
Significant Ecological Area Technical Advisory Committee	
County of Los Angeles Fire Department, Forestry Division	Issuance of an Oak Tree Permit

Page 4-2 (Section 4.0 Environmental Checklist Form)

10. Other Public Agencies Whose Approval is Required: California Department of Corrections and Rehabilitation (CDCR), California Coastal Commission (CCC), California Department of Fish and Game (CDFG), **County of Los Angeles Department of Regional Planning, Environmental Review Board (ERB)**, Los Angeles Regional Water Quality Control Board (RWQCB), ~~Significant Ecological Area Technical Advisory Committee (SEATAC)~~, State Water Resources Control Board (SWRCB), and U.S. Army Corps of Engineers (USACE).

Page 4-3 (Section 4.0 Environmental Checklist Form)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated on the following pages.

Aesthetics

Agriculture and Forest Resources

- | | |
|--|--|
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Biological Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities and Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Page 4-32 (Section 4.4 Biological Resources)

Significant Ecological Areas/Sensitive Environmental Resource Areas

Significant Ecological Areas (SEAs) were established in 1976 by Los Angeles County to designate areas with sensitive environmental conditions and/or resources in order to preserve biological diversity. SEA boundaries are general in nature, and broadly outline the biological resources of concern. **As discussed below, the Project site is within the Santa Monica Mountains Coastal Zone. In 1986, all SEAs within the Land Use Plan of the Santa Monica Mountains Local Coastal Plan were designated Sensitive Environmental Resource Areas (SERAs).**

The survey area is located within the **Zuma/Ramirez Canyon Significant Watershed SERA, which is coterminous with Buffer Area for SEA No. 3 – Zuma Canyon**, as shown below on Exhibit 4-8, Regional Plans, under Section 4.2.2, Project Impacts. Zuma Canyon was protected because it is one of the last major drainages in the Santa Monica Mountains that has a perennial stream and remains in an undeveloped condition and without roads. It supports a mix of coastal sage scrub and chaparral on the upper slopes and a rich riparian community in the canyon bottom. ~~The survey area is located in Buffer Area No. 3A.~~ Buffer Areas are protected in order to protect downstream resources within the SEA/SERA. If development occurs in these areas, it should be at very low intensity to ensure that natural drainage through the watershed will not be disrupted.

Page 4-35 (Section 4.4 Biological Resources)

Coast Live Oak Woodland/Oak Trees

The proposed Project would impact up to 0.76 acre of coast live oak woodland that is located immediately to the northwest and west of the primary dormitories in the western portion of the site. **As discussed above, there are not enough oak trees located within and scattered around the edges of the site to be considered an extensive forest or woodland. Individual oak trees do provide high habitat value to native wildlife. The coast live oak woodland-designated areas are defined for purposes of vegetation mapping rather than inferred habitat value. The scattered groups of oak trees contain little to no understory vegetation. Where present, the understory vegetation is non-native and is generally limited to poison ivy (*Toxicodendron radicans*). Also, the groups of oaks and individual oak trees are located within and adjacent to an existing built environment that has a round-the-clock human presence as well as night lighting. For these reasons, the coast live oak woodland areas within the survey area are considered to have very low habitat value. Also, as discussed further below, the County anticipates the need to remove a**

total of three existing oaks, which are located in the southeast corner of the site and behind the gymnasium.

Because of the low habitat value of the coast live woodland areas and because it is anticipated that the majority of existing oak trees would be preserved in place, implementation of the Project would result in a less than significant impact related to oak woodland conversion and no mitigation would be required. Also, MM 4.4-2, which requires that impacts to oak trees be avoided or minimized to the extent practicable and requires receipt of an Oak Tree Permit in compliance with the CLAOTO, is consistent with the intent of oak woodland mitigation described under Section 21083.4(b) of the *California Public Resources Code*.

Page 4-25 (Section 4.4 Biological Resources)

3.3 BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Page 4-38 through 4-39 (Section 4.4 Biological Resources)

d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

~~**No Impact-Less than Significant with Mitigation.**~~ There would be no impact related to wildlife movement, and there would be less than significant impacts related to nesting birds and raptors protected under the MBTA with implementation of MM 4.4-6, as discussed below.

Wildlife Movement

The overall landscape around the survey area consists primarily of undeveloped open space within the Santa Monica Mountains National Recreation Area. Local wildlife movement is expected to occur along ridgelines surrounding the facilities and drainages on the slopes outside the facilities and along Zuma Canyon Creek. Wildlife is not expected to move through the facilities due to the fencing that surrounds the facility. The proposed Project would be located within the existing facility and therefore would not be expected to impact wildlife movement. No mitigation is required.

Nesting Birds/Raptors

Bird species have potential to nest in native and non-native vegetation on the Project site and some species can also nest on building structures. Raptor species have potential to nest in the coast live oak woodland and a limited potential to nest in ornamental trees on the Project site. Active nests of birds and raptors are protected by the MBTA and the *California Fish and Game Code*. As described in MM 4.4-6, if possible, vegetation removal should occur outside the peak nesting season (peak nesting bird season is between February 1 and September 15) to avoid impacts on nesting birds and raptors. If vegetation removal would occur during the peak nesting seasons for birds and raptors, Project activities could impact an active nest. Any direct impact on an active bird nest and any direct or indirect impact on an active raptor nest would be considered significant. Implementation of MM 4.4-6—which requires a pre-construction survey for nesting birds and raptors and describes a methodology for managing any active nest sites encountered during the survey(s)—would reduce this impact to a less than significant level.

- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

~~**Less than Significant-with Mitigation.**~~ There would be less than significant impacts related to nesting birds and raptors protected under the MBTA and related to the site's location within an SERASEA and the Coastal Zone with implementation of MMs 4.4-6 through 4.4-8, as discussed below. Exhibit 4-8, Regional Plans, illustrates the location of the Project site relative to the SERA, which is coterminous with the SEA, and the Coastal Zone boundaries. Oak trees on the Project site subject to the CLAOTO are addressed under Threshold 4.4(a) above.

Nesting Birds/Raptors

~~Bird species have potential to nest in native and non-native vegetation on the Project site and some species can also nest on building structures. Raptor species have potential to nest in the coast live oak woodland and a limited potential to nest in ornamental trees on the Project site. Active nests of birds and raptors are protected by the MBTA and the *California Fish and Game Code*. As described in MM 4.4-6, if possible, vegetation removal should occur outside the peak nesting season (peak nesting bird season is between February 1 and September 15) to avoid impacts on nesting birds and raptors. If vegetation removal would occur during the peak nesting seasons for birds and raptors, Project activities could impact an active nest. Any direct impact on an active bird nest and any direct or indirect impact on an active raptor nest would be~~

~~considered significant. Implementation of MM 4.4.6, which requires a pre-construction survey for nesting birds and raptors and describes a methodology for managing any active nest sites encountered during the survey(s), would reduce this impact to a less than significant level.~~

Significant Ecological Areas/Sensitive Environmental Resource Areas

The Project site is located **within the Zuma/Ramirez Canyon Significant Watershed SERA, which is coterminous with Buffer Area No. 3A of the Zuma Canyon SEA** designated by the County of Los Angeles. Buffer Areas are protected in order to protect downstream resources in the SEA/SERA. If development occurs in these areas it should be at very low intensity to ensure that natural drainage through the watershed will not be disrupted. Because the proposed Project consists of replacement of the existing facility with substantially the same facilities and footprint, it would not change the amount of physical development or the land use within the **SERASEA**. As such, impacts related to location within the **Zuma/Ramirez Canyon Significant Watershed SERA Buffer Area No. 3A of the Zuma Canyon SEA** would be considered less than significant. However, **any projects that involve land development or modifications within an SERA SEA (including buffers) must be reviewed by the County of Los Angeles Department of Regional Planning's Environmental Review Board (ERB) of the to ensure biological resource considerations relevant to the SERA are part of the County's planning process. Significant Ecological Area Technical Advisory Committee (SEATAC) to confirm the findings that the development is consistent with the SEA guidelines, as required by MM 4.4.7.** There would be less than significant impacts related to location within an **SERASEA Buffer Area with implementation of MM 4.4.7.**

Santa Monica Mountains Coastal Zone Plan

The Coastal Zone in the Santa Monica Mountains extends approximately five miles inland from the coast and encompasses the Project site. Development applications must be submitted to the CCC and must be found consistent with the LCP in order to be issued a coastal development permit (CDP). Therefore, a CDP obtained from the CCC would be required before Project construction could be initiated, ~~as per MM 4.4.8.~~ The CDP for the proposed Project would need to address impacts on 0.043 acre of wetlands, impacts on Plummer's mariposa lily, and impacts on Catalina mariposa lily outside existing fuel modification areas. There would be less than significant impacts related to location within the Coastal Zone **through required compliance with notification and/or permitting processes of the CCC with implementation of MM 4.4.8.**

Page 4-39 through 4-46 (Section 4.4 Biological Resources)

4.4.3 MITIGATION MEASURES

MM 4.4-1 Impacts on native grassland habitat shall be avoided or minimized to the extent practicable based on the final Project design. **The determination of impacts to native grassland shall be made by the County of Los Angeles Department of Public Works (LACDPW) through comparison of the demolition footprint and Project design footprint (as shown on construction plans) with the vegetation map of the site presented in the IS/MND. If there are no anticipated impacts to native grassland, this mitigation measure is not required. Otherwise, aAny native grassland areas impacted shall be revegetated with needlegrass species (*Stipa* spp.) and other plant species typical of local native grassland habitats (wildflowers and other herbs, grasses, etc.). A Native Grassland Restoration Program shall be prepared by a qualified Restoration Ecologist and shall be submitted to the County of Los Angeles Department of Public Works (LACDPW) for**

review and approval. The Native Grassland Revegetation Program shall be approved prior to issuance of grading permits. The restoration program shall contain the items listed below.

- a) **Summary of Project Impacts and Required Restoration.** The habitat impact and restoration sites shall be described and location(s) of the sites shall be depicted in graphical exhibits.
- b) **Responsibilities and Qualifications of the Personnel to Implement and Supervise the Plan.** The responsibilities of the landowner, specialists, and maintenance personnel that will supervise and implement the plan shall be specified.
- c) **Native Plant and Seed Sources.** A program of advance seed collection and/or container plant propagation shall be specified to provide materials of local origin for restoration purposes (e.g., watershed-specific collection).
- d) **Site Selection.** The native grassland area to be revegetated (i.e., the impacted area) shall be identified.
- e) **Site Preparation and Plant and/or Seed Installation.** Site preparation shall include (1) protection of existing native species and habitats; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (e.g., imprinting, decompacting); (5) fully bio-degradable erosion-control measures (i.e., rice or willow wattles); (6) irrigation system installation (as needed); (7) container planting; and (8) seed mix application.
- f) **Schedule.** Installation of the revegetation sites shall be conducted between October 1 and December 31 following the completion of site preparation tasks (e.g., preliminary weed abatement). Native plants/seeds shall be installed while the sites are in good condition for plant establishment (e.g., weed-free, non-compacted soils, etc.).
- g) **Maintenance Plan/Guidelines.** The maintenance plan shall include (1) protection of native species, including sensitive species and habitats; (2) weed-control materials and methods; (3) irrigation system operation and maintenance; (4) herbivory control; (5) trash removal; (6) maintenance training, including native and non-native plant and seedling identification; and (7) remedial measures (e.g., replacement planting, re-seeding).
- h) **Monitoring Plan.** The monitoring plan shall specify (1) qualitative monitoring methods (i.e., photographs and general observations); (2) quantitative monitoring methods (i.e., randomly placed transect[s]); (3) documentation to include monthly reports for the first year, quarterly reports thereafter, and annual reports which will be submitted to the County for three years or until the performance criteria are achieved. The annual reports shall include a summary of quantitative site performance and compliance with Project performance criteria.

Performance standards (e.g., percent native plant coverage) shall be developed based on quantitative assessment of a suitable reference site in the Project vicinity. The habitat restoration program shall be considered successful after three years if the percent coverage and plant species diversity of the revegetated habitat areas are comparable to the selected reference site(s).

MM 4.4-2 Project design shall avoid or minimize impacts on oak trees currently shown within or adjacent to the Project footprint, particularly the heritage oak (Tree No. 719) and oak trees within the CDFG jurisdiction (Tree Nos. 87, 88, 721, and 741). Prior to final construction plan preparation, a Certified Arborist shall review the final plans; shall determine the final number of trees that will be impacted by the proposed Project; and shall conduct a detailed assessment of the health of each tree to remain within the facility to ensure that these trees are structurally sound and will not become a hazard.

Any trees located within or adjacent to the impact area that would not be removed for Project construction shall be protected with fencing placed five feet outside the tree's dripline and at least 15 feet from the trunk. Any earth-disturbing work or vehicle operation within the protected zone of an oak tree shall be monitored by a Certified Arborist to minimize the impact of construction activities.

Prior to Project implementation, an Oak Tree Permit (or other appropriate authorization) shall be obtained from the County of Los Angeles Forester for any oak trees that would be impacted (including removal) in the final design plans. According to the minimum 2:1 replacement ratio specified by the County's Oak Tree Ordinance, a minimum of up to 40 replacement trees would be required for impacts on the 20 total oaks currently within the impact footprint. The County Forester may require additional replacement trees, up to a ratio of 10:1, to mitigate the removal of the heritage oak tree (Tree No. 719). Additional replacement trees may also be necessary if any encroachment trees (trees located within or adjacent to the impact area) die as a result of Project construction activities. Encroached-upon trees shall be monitored for a period of two years by a Certified Arborist to determine if construction activities have resulted in the death of the tree. Trees that die as a result of encroachment within their protected zone shall require the same mitigation as impacted trees. A Project Site Plan that includes the proposed location(s) for replacement tree establishment shall be provided with the oak tree permit application.

Protective fencing, as required by CLAOTO, shall be placed five feet outside the outer canopy of any oak tree (i.e., the "protected zone") within the Project's impact footprint that the LACDPW plans to preserve. Protective fencing shall also be placed around the protected zone of the ten trees located immediately adjacent to the impact footprint. Operating outside the protected zone of these trees will avoid the need for additional monitoring or mitigation. Any earth-disturbing work or vehicle operation within the protected zone of an oak tree should be monitored by a Certified Arborist to minimize the impact of construction activities.

Replacement oak trees will be no smaller than a 15-gallon container, and will be indigenous to the Project region. CLAOTO defines "indigenous" as being within Los Angeles or Ventura Counties, though BonTerra Consulting recommends that the seed source for replacement trees be within 10 miles and 500 feet of elevation of the Project site. Tree relocation or transplantation is not recommended due to the increased cost and care needed by transplanted oak trees and the expected high mortality rate.

At the conclusion of Project construction, a Post-Construction Oak Tree Report shall be prepared by a Certified Arborist that confirms the impacts listed in the Oak Tree Permit or authorization. Any trees listed for removal or encroachment that were subsequently avoided during construction activities shall be noted and the required mitigation shall be reduced accordingly. The Post-Construction Oak Tree Report shall also identify any trees that had their protected zone encroached upon so that

these trees can be monitored for two years. A Final Memorandum shall be prepared by a Certified Arborist two years after construction to report on the post-construction health of any trees that were encroached upon during construction; any additional replacement trees necessary shall be identified in this Final Memorandum. The Post-Construction Oak Tree Report and Final Memorandum shall be submitted to the County Forester.

- MM 4.4-3** Project design shall avoid impacts on Plummer's mariposa lily and Catalina mariposa lily to the extent practicable. The determination of impacts to these lily species shall be made by the County of Los Angeles Department of Public Works (LACDPW) through comparison of the demolition footprint and Project design footprint (as shown on construction plans) with the vegetation map of the site presented in the IS/MND. If there are no anticipated impacts to these lily species, this mitigation measure is not required. Otherwise, if lily impacts cannot be avoided, a Coastal Development Permit (CDP) shall be obtained from the California Coastal Commission (CCC) that authorizes impacts to Environmentally Sensitive Habitat (ESH) (i.e., lilies located outside existing fuel modification areas) prior to impacting Plummer's mariposa lily and Catalina mariposa lily to construct the Project improvements.

Pre-construction surveys for Catalina mariposa lily and Plummer's mariposa lily shall be conducted by a qualified Biologist during the peak flowering period for each species (approximately March through June, but varies depending on weather conditions), prior to initiation of a construction activity that would affect lilies outside the existing fuel modification area. The limits of each lily location within the impact area shall be clearly delineated with lath and brightly colored flagging during the pre-construction surveys. If the lily is located in the impact area, the loss of the Catalina mariposa lily and/or Plummer's mariposa lily shall be mitigated by seed and bulb collection and re-vegetated into a suitable mitigation site in the undeveloped portion of the survey area or an alternative mitigation site identified in consultation with the CCC and County of Los Angeles Department of Public Works (LACDPW). A qualified Biologist (i.e., one with experience with these plant species and their transplantation) shall be selected by the Applicant to prepare and implement the mitigation plan. The detailed mitigation plan will include the requirements listed below:

- a) The existing locations of lily shall be monitored every two weeks by a qualified Biologist selected by the Applicant to determine when the seeds are ready for collection. A qualified Seed Collector shall collect all seeds from the impacted plants when the seeds are ripe, generally between April and August (but varies depending on weather conditions). The seeds shall be cleaned and stored by a qualified nursery or institution with appropriate storage facilities.
- b) Following seed collection, the bulbs shall be removed by bulb collection or block transplantation method in the fall (generally September and October). The bulbs shall either be transplanted directly or stored by a qualified nursery or institution with appropriate storage facilities. If the bulbs are collected and the block transplantation method is not used, then the top 12 inches of topsoil from the lily locations shall be scraped, stockpiled, and used at the selected mitigation site.
- c) The mitigation site shall be located in dedicated open space in the Project area or at an off-site mitigation site. The site should not attempt to enhance existing populations and shall not be impacted by any pesticides or herbicides used on adjacent properties.

- d) The lily mitigation site shall be prepared for seeding, as described in a Conceptual Restoration Plan.
- e) The topsoil shall be re-spread in the selected location as approved by a qualified Biologist. Approximately 60 percent of the seeds and bulbs collected shall be spread and/or placed in the fall or winter (generally September through February) following soil preparation. Forty percent of the seed and bulbs shall be kept in storage for subsequent seeding, if necessary.
- f) A detailed Maintenance and Monitoring Plan shall be developed by a qualified Biologist as part of the CDP process. The Plan shall include detailed descriptions of maintenance appropriate for the site, monitoring requirements, and annual report requirements.
- g) Performance criteria shall be developed in the Maintenance and Monitoring Plan and shall be approved by the CCC and LACDPW. The performance criteria shall include percent cover, density, and seed production requirements, and shall be developed by a qualified Biologist following habitat analysis of an existing high-quality lily population. This information shall be recorded by a qualified Biologist.
- h) If the germination goal is not achieved following the first season, remediation measures shall be implemented prior to seeding with the remaining 40 percent of seed and bulbs. Remedial measures shall include, at a minimum, soils testing; invasive species control; soil amendments; and physical disturbance (to provide scarification of the seed) of the planted areas by raking or similar actions. Additional measures may be suggested, as determined appropriate by a qualified Biologist.

Potential seed sources from additional donor sites shall also be identified in case it becomes necessary to collect additional seed for use on the site following performance of remedial measures.

MM 4.4-4 A pre-construction survey for roosting bats shall be conducted by a qualified Biologist prior to demolition of existing structures and removal of trees. If bats are roosting in buildings (**which occurs at night**), measures (such as blocking entrances) shall be implemented **during the daytime** to exclude the bats from potential roosts prior to the commencement of demolition activities. If bats are roosting in trees that will be removed, tree removal shall occur in two phases: (1) during the first day, all branches shall be removed, leaving the main trunk standing overnight; (2) the following day, the main trunk shall be removed. This methodology would allow any roosting bats to relocate during the night. However, exclusion from buildings and tree removal shall not occur during hibernation (December through February) or during the breeding season (May through August) unless it is determined that the building is not being used by roosting bats.

If demolition and/or construction activities are scheduled to begin during the hibernation and breeding seasons, the pre-construction survey for roosting bats shall be performed in advance of initial demolition or subsequent construction activities during a time outside the hibernation and breeding seasons (i.e., March, April, and September through January) and measures implemented, as described above, to both prevent bat roosting in any buildings and to remove trees, as identified by LACDPW. ~~The pre-construction survey can be performed in advance of initial construction activity (i.e., demolition; site preparation) during a time outside the hibernation and breeding seasons (i.e., March, April, and September through January) and measures implemented, as described above, to both prevent bat roosting in any buildings and to remove trees, as identified by LACDPW.~~

MM 4.4-5 The LACDPW shall obtain all necessary approvals from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and Game (CDFG), and the California Coastal Commission (CCC) for resources within their respective jurisdictions. The CDFG also regulates the removal of trees greater than three inches in diameter at breast height (dbh) that overhang streambeds. Four encroachment oak trees (Numbers 87, 88, 721, and 741) are under CDFG jurisdiction. As required by MM 4.4-2, impacts to oak trees shall be avoided or minimized to the maximum extent practicable. Impacts to these trees under CDFG jurisdiction may require replacement at a ratio up to 20:1.

Mitigation for the loss of jurisdictional resources (i.e., drainages) shall consist of one of the following three options: (1) payment of an in-lieu mitigation fee to the Santa Monica Mountain Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; (2) preservation of existing jurisdictional resources (preferably within or near Zuma Canyon) and dedication to Santa Monica Mountains Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; or (3) restoration of riparian habitat (preferably within or near Zuma Canyon) and dedication to the County of Los Angeles, the Santa Monica Mountains Conservancy, or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC. Jurisdictional resources shall be mitigated with the purchase or restoration of equivalent or superior quality habitat at no less than 1:1. The resource agencies shall review the proposed acquisition during resource agency permitting to ensure that the lands to be acquired by the Applicant are of equivalent or superior quality to the resources impacted by the proposed Project.

If the proposed Project would mitigate through restoration of riparian habitat (via selection of option 3 above), a detailed restoration program shall be prepared by a qualified Biologist for approval by the USACE and the CDFG prior to initiation of construction and will contain the following items:

- a) **Responsibilities and qualifications of the personnel to implement and supervise the plan.** The responsibilities of the Applicant, specialists, and maintenance personnel that will supervise and implement the plan shall be specified.
- b) **Site selection.** Site selection for restoration and enhancement mitigation shall be determined in coordination with the LACDPW and the resource agencies. The mitigation site(s) shall be located in a dedicated open space area.
- c) **Site preparation and planting implementation.** Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species, if appropriate.
- d) **Schedule.** A schedule shall be developed which includes planting to occur in late fall and early winter, between October 1 and January 30.
- e) **Maintenance plan/guidelines.** The maintenance plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; (6) replacement planting; and (7) biological monitoring during maintenance activities that occur during the breeding season.

- f) **Monitoring Plan.** The monitoring plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria as approved by the resource agencies; (4) monthly reports for the first year, quarterly reports for following years; and (5) annual reports for three to five years, which shall be submitted to the resource agencies annually. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas; however, if there is successful coverage prior to five years, the Applicant may be released from monitoring requirements with the approval of the resource agencies.
- g) **Long-Term Preservation.** Long-term preservation of the site shall also be outlined in the Conceptual Mitigation Plan to ensure the mitigation site is not impacted by future projects.

In addition, earth-moving equipment shall avoid maneuvering in jurisdictional areas outside the identified grading limits. Prior to grading, the jurisdictional resource areas to be avoided shall be clearly marked by the Construction Contractor. The Monitoring Biologist shall take pre- and post-construction photographs at key locations to record the existing and post-construction conditions. No earth-moving equipment shall be allowed within jurisdictional areas located outside the Project's disturbance limits.

- MM 4.4-6** Construction shall occur outside the nesting season for birds/raptors (the nesting bird season is between February 1 and September 15), if possible. If construction would be initiated during this time period, the measures described below would apply.

Nesting Raptors: Seven days prior to construction activities, a qualified Biologist shall conduct a survey to determine if any raptors are nesting in or adjacent to the impact area. If nesting is not occurring, construction work can proceed. If an active nest is present, construction work shall be restricted within 250 feet of the nest (or as otherwise determined by the Project Biologist) until fledglings have left the nest. Results of the surveys shall be provided to the California Department of Fish and Game (CDFG).

If nesting activity is present, the active site shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the *California Fish and Game Code*. Nesting activity for raptors in the region normally occurs from February 1 to June 30. To protect any nest site, construction activities and access shall not be allowed within 250 feet from any occupied nest during the nesting season (or until nests are no longer active, as determined by a qualified Biologist). Any encroachment into the buffer area around the known nest shall only be allowed if it is determined by a qualified Biologist that the proposed activity will not disturb the nest occupants.

Nesting Birds: If vegetation clearing would be conducted during the nesting season (March 15 to September 15), a qualified Biologist shall conduct a survey no more than three days prior to construction to determine if any birds are nesting in or adjacent to the impact area. If nesting is not occurring, construction work can proceed. If an active nest is present, construction work shall be restricted within a protective buffer area (buffer size determined by the Project Biologist based on the sensitivity of the species and location of the nest) until fledglings have left the nest. Any encroachment into the buffer area around the known nest shall only be allowed if it is determined by a qualified Biologist that the proposed activity will not disturb the nest occupants.

If demolition and/or construction activities are scheduled to begin during the nesting season, a survey for nesting raptors and birds shall also be performed in advance of initial demolition or subsequent construction activities that involve vegetation removal in the nesting seasons or vegetation and tree removal outside the nesting season and nesting deterrent measures implemented to reduce the likelihood of nesting within and near the demolition and construction footprint. Performance of the advance survey and implementation of nesting deterrent measures does not negate the requirement for the nesting bird and raptor pre-construction surveys immediately in advance of construction activity, as described above. ~~The pre-construction survey(s) for nesting raptors and birds can be performed in advance of initial construction activity that involves vegetation removal in the nesting seasons or vegetation and tree removal outside the nesting season.~~

~~MM 4.4-7~~ The LACDPW shall submit the Biological Constraints Report and Project plans to the Significant Ecological Area Technical Advisory Committee (SEATAC) for review to verify that the Project is consistent with the Significant Ecological Area (SEA) design compatibility criteria. The determination of when the Project design is sufficiently defined for determination of SEA compatibility (subsequent to selection of the Design-Build Contractor) shall be made through coordination among the LACDPW, the Los Angeles County Chief Executive Office, and SEATAC.

~~MM 4.4-8~~ The LACDPW shall submit Project plans and the Biological Resources Report to the California Coastal Commission for review to verify that the Project is consistent with the Santa Monica Mountains Local Coastal Program.

Page 4-54 (Section 4.5 Cultural Resources)

As discussed in Section 3.0, the existing wooden totem pole was donated by a local artist approximately 15 years ago. As such, it has not reached, nor is it near the age for consideration as a historical resource pursuant to CEQA. Regardless, the totem pole would be removed prior to demolition activities to be retained by the County Probation Department and eventually re-installed within the replacement Camp Kilpatrick. Also, it is noted that a carved wooden bear, donated by the same artist at the same time as the totem pole, is located at the entrance to Camp Miller and would not, therefore, be affected by proposed Project implementation.

In summation, the Camp Kilpatrick complex is not eligible for listing in the NRHP or the CRHR as a significant historic resource. Therefore, no impacts to known historical resources would occur with implementation of the proposed Project and no mitigation is required.

Page 4-86 (Section 4.9 Hydrology and Water Quality)

4.9.3 MITIGATION MEASURES

The following Mitigation Measures from Section 4.4, Biological Resources, also applies to Hydrology and Water Quality.

MM 4.4-5 *The LACDPW shall obtain all necessary approvals from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and Game (CDFG), and the California Coastal Commission (CCC) for resources within their respective jurisdictions. The CDFG also regulates the removal of trees greater than three*

inches in diameter at breast height (dbh) that overhang streambeds. Four encroachment oak trees (Numbers 87, 88, 721, and 741) are under CDFG jurisdiction. As required by MM 4.4-2, impacts to oak trees shall be avoided or minimized to the maximum extent practicable. Impacts to these trees may require replacement at a ratio up to 20:1.

Mitigation for the loss of jurisdictional resources (i.e., drainages) shall consist of one of the following three options: (1) payment of an in-lieu mitigation fee to the Santa Monica Mountain Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; (2) preservation of existing jurisdictional resources (preferably within or near Zuma Canyon) and dedication to Santa Monica Mountains Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; or (3) restoration of riparian habitat (preferably within or near Zuma Canyon) and dedication to the County of Los Angeles, the Santa Monica Mountains Conservancy, or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC. Jurisdictional resources shall be mitigated with the purchase or restoration of equivalent or superior quality habitat at no less than a 1:1 ratio. The resource agencies shall review the proposed acquisition during resource agency permitting to ensure that the lands to be acquired by the Applicant are of equivalent or superior quality to the resources impacted by the proposed Project.

If the proposed Project would mitigate through restoration of riparian habitat (via selection of option 3 above), a detailed restoration program shall be prepared by a qualified Biologist for approval by the USACE and the CDFG prior to initiation of construction and will contain the following items:

- a) **Responsibilities and qualifications of the personnel to implement and supervise the plan.** The responsibilities of the Applicant, specialists, and maintenance personnel that will supervise and implement the plan shall be specified.
- b) **Site selection.** Site selection for restoration and enhancement mitigation shall be determined in coordination with the LACDPW and the resource agencies. The mitigation site(s) shall be located in a dedicated open space area.
- c) **Site preparation and planting implementation.** Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species, if appropriate.
- d) **Schedule.** A schedule shall be developed which includes planting to occur in late fall and early winter, between October 1 and January 30.
- e) **Maintenance plan/guidelines.** The maintenance plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; (6) replacement planting; and (7) biological monitoring during maintenance activities that occur during the breeding season.

- f) **Monitoring Plan.** The monitoring plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria as approved by the resource agencies; (4) monthly reports for the first year, quarterly reports for following years; and (5) annual reports for three to five years, which shall be submitted to the resource agencies annually. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas; however, if there is successful coverage prior to five years, the Applicant may be released from monitoring requirements with the approval of the resource agencies.
- g) **Long-Term Preservation.** Long-term preservation of the site shall also be outlined in the Conceptual Mitigation Plan to ensure the mitigation site is not impacted by future projects.

In addition, earth-moving equipment shall avoid maneuvering in jurisdictional areas outside the identified grading limits. Prior to grading, the jurisdictional resource areas to be avoided shall be clearly marked by the Construction Contractor. The Monitoring Biologist shall take pre- and post-construction photographs at key locations to record the existing and post-construction conditions. No earth-moving equipment shall be allowed within jurisdictional areas located outside the Project's disturbance limits.

~~MM 4.4-8 — The LACDPW shall submit Project plans and the Biological Resources Report to the California Coastal Commission for review to verify that the Project is consistent with the Santa Monica Mountains Local Coastal Program.~~

Page 4-87 through 4-88 (Section 4.10 Land Use and Planning)

- b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact-with-Mitigation. The proposed Project would not require a General Plan amendment or zone change. The proposed Project would also not conflict with regional plans, policies, or regulations related to land use, including the Regional Comprehensive Plan (RCP), the Regional Housing Needs Assessment (RHNA), and the Regional Transportation Plan (RTP) by SCAG since the proposed Project would not require a land use change and would not generate additional population, housing, or employment for the area.

Also, as discussed in Section 4.4, Biological Resources, the Project site within the Coastal Zone under the jurisdiction of the Santa Monica Mountains Local Coastal Program (LCP) and within the Zuma/Ramirez Canyon Significant Watershed SERA, which is coterminous with Buffer Area for SEA No. 3 – Zuma Canyon, as shown on Exhibit 4-8 and discussed further in Section 4.4, Biological Resources. As discussed above, there would be less than significant impacts related to location within an SERA SEA Buffer Area with implementation of MM 4.4-7, and less than significant impacts related to location and within the Coastal Zone through required compliance with notification and/or permitting processes of the applicable regulatory agencies with implementation of MM 4.4-8. These mitigation measures ensure compliance with notification and/or permitting processes with the applicable agencies.

4.10.3 MITIGATION MEASURES

There would be no significant impacts related to land use and planning, and no mitigation is required.

~~The following Mitigation Measures from Section 4.4, Biological Resources, also apply to Land Use and Planning:~~

~~**MM 4.4.7** — The LACDPW shall submit the Biological Constraints Report and Project plans to the Significant Ecological Area Technical Advisory Committee (SEATAC) for review to verify that the Project is consistent with the Significant Ecological Area (SEA) design compatibility criteria. The determination of when the Project design is sufficiently defined for determination of SEA compatibility (subsequent to selection of the Design-Build Contractor) shall be made through coordination among the LACDPW, the Los Angeles County Chief Executive Office, and SEATAC.~~

~~**MM 4.4.8** — The LACDPW shall submit Project plans and the Biological Resources Report to the California Coastal Commission for review to verify that the Project is consistent with the Santa Monica Mountains Local Coastal Program.~~

~~Implementation of these mitigation measures would reduce impacts to less than significant levels.~~

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MITIGATION MONITORING AND REPORTING PROGRAM

CAMP VERNON KILPATRICK
REPLACEMENT PROJECT
COUNTY OF LOS ANGELES, CALIFORNIA

CAPITAL PROJECT NO. 77295
SCH NO. 2012102002

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MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed County of Los Angeles (County) Camp Vernon Kilpatrick Replacement Project (Project) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (IS/MND) (SCH No. 2012102002) dated September 2012.

Section 15074(d) of the CEQA Guidelines states that, when adopting a mitigated negative declaration, the lead agency shall adopt a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to reduce or avoid significant environmental effects. Section 21081.6 of CEQA and Section 15097 of the CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during project implementation shall be adopted simultaneously with final Project approval by the responsible decision making body. The MMRP provided in this document describes the mitigation program to be implemented by the County of Los Angeles (County).

The MMRP for the Camp Vernon Kilpatrick Replacement Project consists of Mitigation Measures (MMs) that will reduce or avoid significant environmental effects associated with Project implementation, and reflect any errata to mitigation measures in the Final MND. The MMs for the Project are listed in the first column in the Table below, along with the timeframe for implementing the MM in the second column; the agency or party with primary responsibility for implementing the MM in the third column; and the agency or party with responsibility for monitoring compliance in the fourth column. Implementation of the MMs for the Project would primarily be the responsibility of the County of Los Angeles, as the Lead Agency under CEQA, and its consultants/contractors.

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Air Quality (Section 4.3 of the Draft IS/MND)			
<p>MM 4.3-1 The County shall include in the Contractor specifications that site preparation (clearing and grubbing) activities and site grading activities do not occur concurrently, but occur sequentially. This shall be verified by the County of Los Angeles Department of Public Works prior to issuance of a grading permit.</p>	<p>During construction activities (refers to all construction phases, unless otherwise noted)</p>	<p>Construction Contractor in accordance with Contractor Specifications</p>	<p>County of Los Angeles Department of Public Works</p>
Biological Resources (Section 4.4 of the Draft IS/MND)			
<p>MM 4.4-1 Impacts on native grassland habitat shall be avoided or minimized to the extent practicable based on the final Project design. The determination of impacts to native grassland shall be made by the County of Los Angeles Department of Public Works (LACDPW) through comparison of the demolition footprint and Project design footprint (as shown on construction plans) with the vegetation map of the site presented in the IS/MND. If there are no anticipated impacts to native grassland, this mitigation measure is not required. Otherwise, any native grassland areas impacted shall be revegetated with needlegrass species (<i>Stipa</i> spp.) and other plant species typical of local native grassland habitats (wildflowers and other herbs, grasses, etc.). A Native Grassland Restoration Program shall be prepared by a qualified Restoration Ecologist and shall be submitted to the County of Los Angeles Department of Public Works (LACDPW) for review and approval. The Native Grassland Revegetation Program shall be approved prior to issuance of grading permits. The restoration program shall contain the items listed below.</p> <p>a) Summary of Project Impacts and Required Restoration. The habitat impact and restoration sites shall be described and location(s) of the sites shall be depicted in graphical exhibits.</p> <p>b) Responsibilities and Qualifications of the Personnel to Implement and Supervise the Plan. The responsibilities of the landowner, specialists, and maintenance personnel that will supervise and implement the plan shall be specified.</p> <p>c) Native Plant and Seed Sources. A program of advance seed collection and/or container plant propagation shall</p>	<p>During Project design (resource avoidance) and Prior to issuance of grading permit (Native Grassland Revegetation Program)</p>	<p>County of Los Angeles Department of Public Works and Qualified Restoration Ecologist</p>	<p>County of Los Angeles Department of Public Works</p>

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>be specified to provide materials of local origin for restoration purposes (e.g., watershed-specific collection).</p> <p>d) Site Selection. The native grassland area to be revegetated (i.e., the impacted area) shall be identified.</p> <p>e) Site Preparation and Plant and/or Seed Installation. Site preparation shall include (1) protection of existing native species and habitats; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (e.g., imprinting, decompacting); (5) fully bio-degradable erosion-control measures (i.e., rice or willow wattles); (6) irrigation system installation (as needed); (7) container planting; and (8) seed mix application.</p> <p>f) Schedule. Installation of the revegetation sites shall be conducted between October 1 and December 31 following the completion of site preparation tasks (e.g., preliminary weed abatement). Native plants/seeds shall be installed while the sites are in good condition for plant establishment (e.g., weed-free, non-compacted soils, etc.).</p> <p>g) Maintenance Plan/Guidelines. The maintenance plan shall include (1) protection of native species, including sensitive species and habitats; (2) weed-control materials and methods; (3) irrigation system operation and maintenance; (4) herbivory control; (5) trash removal; (6) maintenance training, including native and non-native plant and seedling identification; and (7) remedial measures (e.g., replacement planting, re-seeding).</p> <p>h) Monitoring Plan. The monitoring plan shall specify (1) qualitative monitoring methods (i.e., photographs and general observations); (2) quantitative monitoring methods (i.e., randomly placed transect[s]); (3) documentation to include monthly reports for the first year, quarterly reports thereafter, and annual reports which will be submitted to the County for three years or until the performance criteria are achieved. The annual reports shall include a summary of quantitative site performance and compliance with</p>			

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>Project performance criteria.</p> <p>Performance standards (e.g., percent native plant coverage) shall be developed based on quantitative assessment of a suitable reference site in the Project vicinity. The habitat restoration program shall be considered successful after three years if the percent coverage and plant species diversity of the revegetated habitat areas are comparable to the selected reference site(s).</p>			
<p>MM 4.4-2 Project design shall avoid or minimize impacts on oak trees currently shown within or adjacent to the Project footprint, particularly the heritage oak (Tree No. 719) and oak trees within the CDFG jurisdiction (Tree Nos. 87, 88, 721, and 741). Prior to final construction plan preparation, a Certified Arborist shall review the final plans; shall determine the final number of trees that will be impacted by the proposed Project; and shall conduct a detailed assessment of the health of each tree to remain within the facility to ensure that these trees are structurally sound and will not become a hazard.</p> <p>Any trees located within or adjacent to the impact area that would not be removed for Project construction shall be protected with fencing placed five feet outside the tree's dripline and at least 15 feet from the trunk. Any earth-disturbing work or vehicle operation within the protected zone of an oak tree shall be monitored by a Certified Arborist to minimize the impact of construction activities.</p> <p>Prior to Project implementation, an Oak Tree Permit (or other appropriate authorization) shall be obtained from the County of Los Angeles Forester for any oak trees that would be impacted (including removal) in the final design plans. According to the minimum 2:1 replacement ratio specified by the County's Oak Tree Ordinance, a minimum of up to 40 replacement trees would be required for impacts on the 20 total oaks currently within the impact footprint. The County Forester may require additional replacement trees, up to a ratio of 10:1, to mitigate the removal of the heritage oak tree (Tree No. 719). Additional replacement trees may also be necessary if any encroachment trees (trees located within or adjacent to the impact area) die as a result of Project</p>	<p>During Project design (resource avoidance) and Prior to construction activities (fencing around protected trees) and Subsequent to construction activities (Oak Tree Permit)</p>	<p>County of Los Angeles Department of Public Works and Certified Arborist</p>	<p>County of Los Angeles Department of Public Works and County of Los Angeles Forester</p>

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>construction activities. Encroached-upon trees shall be monitored for a period of two years by a Certified Arborist to determine if construction activities have resulted in the death of the tree. Trees that die as a result of encroachment within their protected zone shall require the same mitigation as impacted trees. A Project Site Plan that includes the proposed location(s) for replacement tree establishment shall be provided with the oak tree permit application.</p> <p>Protective fencing, as required by CLAOTO, shall be placed five feet outside the outer canopy of any oak tree (i.e., the "protected zone") within the Project's impact footprint that the LACDPW plans to preserve. Protective fencing shall also be placed around the protected zone of the ten trees located immediately adjacent to the impact footprint. Operating outside the protected zone of these trees will avoid the need for additional monitoring or mitigation. Any earth-disturbing work or vehicle operation within the protected zone of an oak tree should be monitored by a Certified Arborist to minimize the impact of construction activities.</p> <p>Replacement oak trees will be no smaller than a 15-gallon container, and will be indigenous to the Project region. CLAOTO defines "indigenous" as being within Los Angeles or Ventura Counties, though BonTerra Consulting recommends that the seed source for replacement trees be within 10 miles and 500 feet of elevation of the Project site. Tree relocation or transplantation is not recommended due to the increased cost and care needed by transplanted oak trees and the expected high mortality rate.</p> <p>At the conclusion of Project construction, a Post-Construction Oak Tree Report shall be prepared by a Certified Arborist that confirms the impacts listed in the Oak Tree Permit or authorization. Any trees listed for removal or encroachment that were subsequently avoided during construction activities shall be noted and the required mitigation shall be reduced accordingly. The Post-Construction Oak Tree Report shall also identify any trees that had their protected zone encroached upon so that these trees can be monitored for two years. A Final Memorandum shall be prepared by a Certified Arborist two years after construction to report on the post-construction health of any trees that were encroached</p>			

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>upon during construction; any additional replacement trees necessary shall be identified in this Final Memorandum. The Post-Construction Oak Tree Report and Final Memorandum shall be submitted to the County Forester.</p>			
<p>MM 4.4-3 Project design shall avoid impacts on Plummer's mariposa lily and Catalina mariposa lily to the extent practicable. The determination of impacts to these lily species shall be made by the County of Los Angeles Department of Public Works (LACDPW) through comparison of the demolition footprint and Project design footprint (as shown on construction plans) with the vegetation map of the site presented in the IS/MND. If there are no anticipated impacts to these lily species, this mitigation measure is not required. Otherwise, if lily impacts cannot be avoided, a Coastal Development Permit (CDP) shall be obtained from the California Coastal Commission (CCC) that authorizes impacts to Environmentally Sensitive Habitat (ESH) (i.e., lilies located outside existing fuel modification areas) prior to impacting Plummer's mariposa lily and Catalina mariposa lily to construct the Project improvements.</p> <p>Pre-construction surveys for Catalina mariposa lily and Plummer's mariposa lily shall be conducted by a qualified Biologist during the peak flowering period for each species (approximately March through June, but varies depending on weather conditions), prior to initiation of a construction activity that would affect lilies outside the existing fuel modification area. The limits of each lily location within the impact area shall be clearly delineated with fath and brightly colored flagging during the pre-construction surveys. If the lily is located in the impact area, the loss of the Catalina mariposa lily and/or Plummer's mariposa lily shall be mitigated by seed and bulb collection and re-vegetated into a suitable mitigation site in the undeveloped portion of the survey area or an alternative mitigation site identified in consultation with the CCC and County of Los Angeles Department of Public Works (LACDPW). A qualified Biologist (i.e., one with experience with these plant species and their transplantation) shall be selected by the Applicant to prepare and implement the mitigation plan. The detailed mitigation plan will include the requirements listed below:</p>	<p>During Project design (resource avoidance) and Between approximately March through June prior to construction activities (pre-construction surveys) and Concurrent with or subsequent to construction activities (mitigation plan)</p>	<p>County of Los Angeles Department of Public Works and qualified Biologist</p>	<p>California Coastal Commission</p>

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>a) The existing locations of lily shall be monitored every two weeks by a qualified Biologist selected by the Applicant to determine when the seeds are ready for collection. A qualified Seed Collector shall collect all seeds from the impacted plants when the seeds are ripe, generally between April and August (but varies depending on weather conditions). The seeds shall be cleaned and stored by a qualified nursery or institution with appropriate storage facilities.</p> <p>b) Following seed collection, the bulbs shall be removed by bulb collection or block transplantation method in the fall (generally September and October). The bulbs shall either be transplanted directly or stored by a qualified nursery or institution with appropriate storage facilities. If the bulbs are collected and the block transplantation method is not used, then the top 12 inches of topsoil from the lily locations shall be scraped, stockpiled, and used at the selected mitigation site.</p> <p>c) The mitigation site shall be located in dedicated open space in the Project area or at an off-site mitigation site. The site should not attempt to enhance existing populations and shall not be impacted by any pesticides or herbicides used on adjacent properties.</p> <p>d) The lily mitigation site shall be prepared for seeding, as described in a Conceptual Restoration Plan.</p> <p>e) The topsoil shall be re-spread in the selected location as approved by a qualified Biologist. Approximately 60 percent of the seeds and bulbs collected shall be spread and/or placed in the fall or winter (generally September through February) following soil preparation. Forty percent of the seed and bulbs shall be kept in storage for subsequent seeding, if necessary.</p> <p>f) A detailed Maintenance and Monitoring Plan shall be developed by a qualified Biologist as part of the CDP process. The Plan shall include detailed descriptions of maintenance appropriate for the site, monitoring requirements, and annual report requirements.</p> <p>g) Performance criteria shall be developed in the</p>			

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>Maintenance and Monitoring Plan and shall be approved by the CCC and LACDPW. The performance criteria shall include percent cover, density, and seed production requirements, and shall be developed by a qualified Biologist following habitat analysis of an existing high-quality lily population. This information shall be recorded by a qualified Biologist.</p> <p>h) If the germination goal is not achieved following the first season, remediation measures shall be implemented prior to seeding with the remaining 40 percent of seed and bulbs. Remedial measures shall include, at a minimum, soils testing; invasive species control; soil amendments; and physical disturbance (to provide scarification of the seed) of the planted areas by raking or similar actions. Additional measures may be suggested, as determined appropriate by a qualified Biologist.</p> <p>i) Potential seed sources from additional donor sites shall also be identified in case it becomes necessary to collect additional seed for use on the site following performance of remedial measures.</p>			
<p>MM 4.4-4 A pre-construction survey for roosting bats shall be conducted by a qualified Biologist prior to demolition of existing structures and removal of trees. If bats are roosting in buildings (which occurs at night), measures (such as blocking entrances) shall be implemented during the daytime to exclude the bats from potential roosts prior to the commencement of demolition activities. If bats are roosting in trees that will be removed, tree removal shall occur in two phases: (1) during the first day, all branches shall be removed, leaving the main trunk standing overnight; (2) the following day, the main trunk shall be removed. This methodology would allow any roosting bats to relocate during the night. However, exclusion from buildings and tree removal shall not occur during hibernation (December through February) or during the breeding season (May through August) unless it is determined that the building is not being used by roosting bats.</p> <p>If demolition and/or construction activities are scheduled to begin during the hibernation and breeding seasons, the pre-</p>	<p>Prior to demolition activities, including outside hibernation and breeding season</p>	<p>County of Los Angeles Department of Public Works and qualified Biologist</p>	<p>County of Los Angeles Department of Public Works</p>

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>construction survey for roosting bats shall be performed in advance of initial demolition or subsequent construction activities during a time outside the hibernation and breeding seasons (i.e., March, April, and September through January) and measures implemented, as described above, to both prevent bat roosting in any buildings and to remove trees, as identified by LACDPW.</p>			
<p>MM 4.4-5 The LACDPW shall obtain all necessary approvals from the U.S. Army Corps of Engineers (USACE), the California Department of Fish and Game (CDFG), and the California Coastal Commission (CCC) for resources within their respective jurisdictions. The CDFG also regulates the removal of trees greater than three inches in diameter at breast height (dbh) that overhang streambeds. Four encroachment oak trees (Numbers 87, 88, 721, and 741) are under CDFG jurisdiction. As required by MM 4.4-2, impacts to oak trees shall be avoided or minimized to the maximum extent practicable. Impacts to these trees under CDFG jurisdiction may require replacement at a ratio up to 20:1.</p> <p>Mitigation for the loss of jurisdictional resources (i.e., drainages) shall consist of one of the following three options: (1) payment of an in-lieu mitigation fee to the Santa Monica Mountain Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; (2) preservation of existing jurisdictional resources (preferably within or near Zuma Canyon) and dedication to Santa Monica Mountains Conservancy or another conservation agency determined in coordination with the USACE, the CDFG, and the CCC; or (3) restoration of riparian habitat (preferably within or near Zuma Canyon) and dedication to the County of Los Angeles, the Santa Monica Mountains Conservancy, or another conservation agency determined in coordination with the UCACE, the CDFG, and the CCC. Jurisdictional resources shall be mitigated with the purchase or restoration of equivalent or superior quality habitat at no less than 1:1. The resource agencies shall review the proposed acquisition during resource agency permitting to ensure that the lands to be acquired by the Applicant are of equivalent or superior quality to the resources impacted by the proposed Project.</p>	<p>Prior to construction activities</p>	<p>County of Los Angeles Department of Public Works and qualified Biologist (for restoration plan preparation, if applicable)</p>	<p>U.S. Army Corps of Engineers and California Department of Fish and Game and California Coastal Commission</p>

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>If the proposed Project would mitigate through restoration of riparian habitat (via selection of option 3 above), a detailed restoration program shall be prepared by a qualified Biologist for approval by the USACE and the CDFG prior to initiation of construction and will contain the following items:</p> <p>a) Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Applicant, specialists, and maintenance personnel that will supervise and implement the plan shall be specified.</p> <p>b) Site selection. Site selection for restoration and enhancement mitigation shall be determined in coordination with the LACDPW and the resource agencies. The mitigation site(s) shall be located in a dedicated open space area.</p> <p>c) Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species, if appropriate.</p> <p>d) Schedule. A schedule shall be developed which includes planting to occur in late fall and early winter, between October 1 and January 30.</p> <p>e) Maintenance plan/guidelines. The maintenance plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; (6) replacement planting; and (7) biological monitoring during maintenance activities that occur during the breeding season.</p> <p>f) Monitoring Plan. The monitoring plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria as approved by the resource agencies; (4) monthly reports for the first year, quarterly reports for following years; and (5) annual</p>			

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>reports for three to five years, which shall be submitted to the resource agencies annually. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas; however, if there is successful coverage prior to five years, the Applicant may be released from monitoring requirements with the approval of the resource agencies.</p> <p>g) Long-Term Preservation. Long-term preservation of the site shall also be outlined in the Conceptual Mitigation Plan to ensure the mitigation site is not impacted by future projects.</p> <p>In addition, earth-moving equipment shall avoid maneuvering in jurisdictional areas outside the identified grading limits. Prior to grading, the jurisdictional resource areas to be avoided shall be clearly marked by the Construction Contractor. The Monitoring Biologist shall take pre- and post-construction photographs at key locations to record the existing and post-construction conditions. No earth-moving equipment shall be allowed within jurisdictional areas located outside the Project's disturbance limits.</p>			
<p>MM 4.4-6 Construction shall occur outside the nesting season for birds/raptors (the nesting bird season is between February 1 and September 15), if possible. If construction would be initiated during this time period, the measures described below would apply.</p> <p>Nesting Raptors: Seven days prior to construction activities, a qualified Biologist shall conduct a survey to determine if any raptors are nesting in or adjacent to the impact area. If nesting is not occurring, construction work can proceed. If an active nest is present, construction work shall be restricted within 250 feet of the nest (or as otherwise determined by the Project Biologist) until fledglings have left the nest. Results of the surveys shall be provided to the California Department of Fish and Game (CDFG).</p> <p>If nesting activity is present, the active site shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the <i>California Fish and Game Code</i>. Nesting activity for raptors in the region normally occurs from</p>	<p>Prior to construction activities</p>	<p>County of Los Angeles Department of Public Works and qualified Biologist</p>	<p>County of Los Angeles Department of Public Works</p>

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>February 1 to June 30. To protect any nest site, construction activities and access shall not be allowed within 250 feet from any occupied nest during the nesting season (or until nests are no longer active, as determined by a qualified Biologist). Any encroachment into the buffer area around the known nest shall only be allowed if it is determined by a qualified Biologist that the proposed activity will not disturb the nest occupants.</p> <p>Nesting Birds: If vegetation clearing would be conducted during the nesting season (March 15 to September 15), a qualified Biologist shall conduct a survey no more than three days prior to construction to determine if any birds are nesting in or adjacent to the impact area. If nesting is not occurring, construction work can proceed. If an active nest is present, construction work shall be restricted within a protective buffer area (buffer size determined by the Project Biologist based on the sensitivity of the species and location of the nest) until fledglings have left the nest. Any encroachment into the buffer area around the known nest shall only be allowed if it is determined by a qualified Biologist that the proposed activity will not disturb the nest occupants.</p> <p>If demolition and/or construction activities are scheduled to begin during the nesting season, a survey for nesting raptors and birds shall also be performed in advance of initial demolition or subsequent construction activities that involve vegetation removal in the nesting seasons or vegetation and tree removal outside the nesting season and nesting deterrent measures implemented to reduce the likelihood of nesting within and near the demolition and construction footprint. Performance of the advance survey and implementation of nesting deterrent measures does not negate the requirement for the nesting bird and raptor pre-construction surveys immediately in advance of construction activity, as described above.</p>			

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Cultural Resources (Section 4.5 of the Draft IS/MND)			
<p>MM 4.5-1 Should archaeological resources be found during ground-disturbing activities for the Project, the ground-disturbing activity shall halt in the vicinity of the location such that the potential resource is left intact and in place and a qualified Archaeologist shall be retained to first determine whether an archaeological resource uncovered during construction is a "unique archaeological resource" pursuant to Section 21083.2(g) of the <i>California Public Resources Code</i> (PRC) or a "historical resource" pursuant to Section 15064.5(a) of the CEQA Guidelines. If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a mitigation plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed sections. Potential mitigation would include, at a minimum, one of the following approaches: planning construction to avoid the resource; protection and preservation in place; data recovery excavation of a representative sample of the site's constituents; and/or another approach that equally satisfies the County of Los Angeles and the PRC.</p> <p>If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County of Los Angeles and to the California Historical Resource Information System (CHRIS) at the South Central Coastal Information Center (SCCIC).</p>	<p>During ground-disturbing activities</p>	<p>Construction Contractor in accordance with Contractor Specifications and qualified Archaeologist</p>	<p>County of Los Angeles Department of Public Works</p>

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>MM 4.5-2 Prior to the commencement of ground-disturbing activities in native soils on the Project site, a qualified Paleontologist shall be retained to monitor excavations into the older Quaternary alluvium that lies below the younger Quaternary alluvium exposed at the surface. The schedule and extent of monitoring activities shall be established by the Supervising Paleontologist in coordination with Contractor and County staff at the Project's pre-grade meeting and as grading activities commence. Because it is often difficult to distinguish between older and younger Quaternary alluvium on sight, for the purposes of this mitigation measure, a qualified Paleontologist shall be retained to monitor excavations into native soils five feet below ground surface or deeper (i.e., grading and excavation for footings and utility trenches). It shall be the responsibility of the Supervising Paleontologist to demonstrate, to the satisfaction of the County, the appropriate level of monitoring necessary based on the on-site soils and final grading plans, when approved by the County and prior to initiation of grading activities. All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If a fossil discovery occurs during grading operations when a Paleontological Monitor is not present, grading shall be diverted around the area until the Monitor can survey the area. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to the County of Los Angeles or other appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.</p>	<p>Prior to ground-disturbing activities and During excavation activities in native soils deeper than five feet below ground surface</p>	<p>Construction Contractor in accordance with Contractor Specifications and qualified Paleontologist</p>	<p>County of Los Angeles Department of Public Works</p>
<p>Noise (Section 4.12 of the Draft IS/MND)</p>			
<p>MM 4.12-1 The County of Los Angeles Public Works shall include the following requirement into the contractor specifications:</p> <ul style="list-style-type: none"> At the commencement of concrete crushing operations, if necessary to implement the proposed Project, the contractor shall measure the crusher noise level at a distance of 50 feet from the crusher in the direction of the single-family residences northeast of the Project Site. 	<p>At commencement of concrete crushing operations, if necessary</p>	<p>Construction Contractor in accordance with Contractor Specifications</p>	<p>County of Los Angeles Department of Public Works</p>

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Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>For the measurement, the crusher shall be operated under maximum anticipated concrete crushing load conditions. If the noise level exceeds 86 dBA, the contractor shall implement noise-abatement measures to reduce the noise level to 86 dBA or less. The measures may include but are not limited to reorientating the crusher; adding enclosures on some crusher components; and constructing a temporary noise barrier, such as a plywood wall or acoustical blankets on a frame. If a temporary barrier is used, the barrier shall be solid from the ground to the top, and the top of the barrier shall break the line of sight between the crusher and the residences. A report of the noise measurements and noise abatement measures, if needed, shall be filed with the County of Los Angeles Public Works Director.</p>			
<p>MM 4.12-2 The County of Los Angeles Department of Public Works shall include the following requirements into the contractor specifications:</p> <ul style="list-style-type: none"> • Prior to any demolition, grading or heavy construction activities within 100 feet of Camp Miller, a 10-foot-high temporary noise barrier shall be constructed between the disturbance area and the nearest noise receiver at Camp Miller. The noise barrier shall be constructed of material with a minimum weight of three pounds per square foot with no gaps or perforations. The noise barrier may be constructed of, but is not limited to, 5/8-inch-thick plywood or 5/8-inch-oriented strand board. The noise barrier shall remain in place until the end of demolition and heavy construction activities; • Alternatively, prior to and during any demolition, grading, or heavy construction activities within 100 feet of Camp Miller, the County shall ensure that controls are in place at Camp Miller that would restrict persons from being within 100 feet of the Camp Kilpatrick construction areas. 	<p>Prior to any specified construction activities within 100 feet of Camp Miller</p>	<p>Construction Contractor in accordance with Contractor Specifications</p>	<p>County of Los Angeles Department of Public Works</p>

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>MM 4.12-3 The County of Los Angeles Public Works Director shall include the following requirements into the contractor specifications:</p> <ol style="list-style-type: none"> 1. All construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, which shall be periodically inspected to ensure compliance. 2. Stationary equipment, such as generators and air compressors, shall be located at least 250 feet from Camp Miller. If the noise barrier described in MM 4.12-2 is in place, or if Camp Miller persons are restricted to being 100 feet from the construction areas, then, stationary equipment may be located within 100 feet of Camp Miller. 3. Equipment maintenance and staging areas and crushing equipment shall be located at least 450 feet from Camp Miller. If the noise barrier described in MM 4.12-2 is in place, then the crusher may be located within 250 feet of Camp Miller. <p>The contractor's compliance with these requirements shall be performed to the satisfaction of the County Department of Public Works.</p>	<p>During construction</p>	<p>Construction Contractor in accordance with Contractor Specifications</p>	<p>County of Los Angeles Department of Public Works</p>

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
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W22a

Filed: 3/26/2014
 180th Day: 8/22/2014
 Staff: N.D. Doberneck -V
 Staff Report: 4/24/2014
 Hearing Date: 5/14/2014

STAFF REPORT: REGULAR CALENDAR

Application No.: 4-12-088

Applicant: Vincent Yu, County of Los Angeles Department of Public Works

Agent: Mark Peterson, STV Inc.

Project Location: 427 Encinal Canyon Rd., Santa Monica Mountains, Los Angeles County (APN: 4471-003-900)

Project Description: Demolition of the existing Los Angeles County Probation Department's juvenile detention camp called Camp Kilpatrick. All building components, structures, and foundations of the existing School Building (7,782-sf), two-Sheds (220-sf total), Administration Building (5,115-sf), 3 Dormitories (16,219-sf total), Maintenance Building (1,740-sf), Laundry/Warehouse Building (2,160-sf), and Gymnasium (3,321-sf) will be completely removed. All utilities, mechanical and electrical equipment, piping, conduit, etc. feeding to these structures will also be removed.

Additionally, all hardscape (approximately 45,796-sf.) will be removed, including the existing 39-space parking lot; internal service road, sports courts; 9 brick planters; and walkways. Approximately 190-cy of fill will be imported to level the grade where foundations are removed.

Also, the project proposes the addition of 14-ft high perimeter fencing where the project abuts an adjacent youth probation facility, Camp Miller. Demolition activities will have minor encroachment into the protected zones of four oak trees that have branches overhanging the security perimeter fence.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends **approval** of the proposed development with conditions.

The proposal is a LA County Public Works project for the demolition of the existing juvenile detention camp called Camp Kilpatrick at 427 Encinal Canyon Road, Malibu, CA (Exhibits 1 and 2). This permit application is for the removal of 44,878-sf of existing Camp Kilpatrick facility buildings and outdoor recreation areas, paved parking lot areas and roadways, erosion control measures, removal of onsite vegetation, the addition of 14-ft high perimeter fencing where the project abuts Camp Miller, and removal or termination of various utilities and systems. Other activities within the demolition work limits will include the removal of chain link fencing, a steel gate, and baseball field back stops. Heavy equipment will be operated within the demolition limits to perform the work items listed above. A storage and staging area will be established on the existing baseball field located in the northeastern portion of the project site. The swimming pool will remain in place as will the kitchen facilities that currently serve both Camp Miller and Camp Kilpatrick. The fencing is proposed to be added to ensure security around Camp Miller after buildings between the two camps are removed.

The proposed demolition of all buildings and hardscape along with placement of fill material within excavation areas will increase the risk of erosion and downstream sedimentation due to the disturbed areas and loose, bare soil being exposed such that it can be removed from the site by wind and runoff. Additionally, during the implementation of the project, building materials, concrete, debris, trash, and toxic substances could be introduced to the watershed by wind or runoff. Special Condition No. 1 addresses these issues by requiring the applicant to implement interim erosion control measures to ensure that erosion and sedimentation is avoided during the demolition activities. Further, interim erosion control measures must be maintained on the project site after the demolition is completed and before future development is constructed on the site, including permanent drainage facilities. Additionally, Special Condition No. 1 requires the applicant to seed all areas of the site disturbed by the proposed demolition with native grass or annual species within 30-days of the completion of demolition and grading, unless construction of new facilities has commenced. Finally, Special Condition No. 1 requires the applicant to implement construction best management practices during demolition to ensure that all materials are handled properly in order to avoid impacts to water quality

There is no environmentally sensitive habitat within the demolition area, although there is oak woodland and other ESHA on the project site. There are 88-oak trees within 200-feet of the demolition area. The project includes encroachments within the protected zone(s) of four-oak trees on the site in order to carry out the demolition, including excavation and removal of slab foundations and utilities. The applicant does not propose to remove or prune any oak branches as part of the demolition project. Further, the applicant proposes to avoid impacts to oak tree roots to the maximum extent feasible by using equipment outside of the protected zone to pull down structures away from the trees, and using hand tools to remove the portions of the foundations nearest each oak tree.

Given the location of the individual oak trees on the site, there are no siting or design alternatives that can be feasibly employed to completely avoid encroachment impacts to the trees. In this case, the proposed encroachment(s) are relatively minor and no permanent development is now proposed within the protected zones, so impacts to oak trees from the demolition project have been minimized to the greatest feasible extent..

While the encroachment(s) may adversely impact the oak trees, it is unlikely that it will significantly injure the trees' health or result in their death. However, such health and vigor effects may take several years to reveal themselves. In order to minimize such impacts and to provide mitigation for the loss or diminished health of any of the impacted trees, Special Condition No. 2 requires the applicant to provide monitoring of the four oak trees, for a period of no less than 10-years. If the monitoring reveals that any of these four trees die or suffer reduced health or vigor, replacement trees must be provided as mitigation. Additionally, Special Condition No. 2 requires the applicant to install temporary protective barrier fencing or flagging around the protected zones (5-feet beyond dripline or 15-feet from the trunk, whichever is greater) of all oak trees and retained during all construction operations. Finally, Special Condition No. 2 requires that a biological consultant, arborist, or other resource specialist shall be present on-site during all demolition, grading or other operations on site that are located within 25 feet of any oak tree and shall be directed to immediately notify the Executive Director if unpermitted activities occur or if any oak trees are damaged, removed, or impacted beyond the scope of the work allowed by this coastal development permit.

As conditioned, the proposed project will be consistent with the applicable policies of the Coastal Act. The standard of review for the proposed project is the Chapter Three policies of the Coastal Act. In addition, the policies of the certified (1986) Malibu – Santa Monica Mountains Land Use Plan (LUP) serve as guidance.¹

¹ Please note that the Coastal Commission has approved Local Coastal Program Amendment No. LCP-4-LAC-14-0108-4 with suggested modifications (April 10, 2014) to approve the 2014 Land Use Plan. The County of Los Angeles has not yet accepted the suggested modifications. Additionally, the 2014 Local Implementation Program has not yet been considered by the Coastal Commission. As such, the policies of the 1986 Malibu – Santa Monica Mountains Land Use Plan continue to serve as guidance, as of this date.

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APPENDICES

Appendix 1 Substantive File Documents

EXHIBITS

1. Table of Existing Camp Kilpatrick Land Uses
2. LA County Assessor's Parcel Map: Camp Kilpatrick
3. LA County Assessor's Parcel Map: Camp Miller & WWTP
4. Regional Location Map
5. Local Area Map
6. USGS Topographic Map
7. Proposed Demolition Plan
8. Biological Resources
9. Project Location
10. Oak Tree Impacts – Demolition
11. Aerial View of Survey
12. USACE & CDFW Jurisdictional Resources
13. California Coastal Commission Jurisdictional Resources
14. National Wetlands Inventory
15. Annotated Aerial Image
16. Project Site View
17. Site Photographs (#1 - #36)
18. Off-Site Photographs (#1 - #7)

LOCAL APPROVALS RECEIVED:

none

I. MOTION AND RESOLUTION

The staff recommends that the Commission adopt the following resolution:

Motion:

I move that the Commission approve Coastal Development Permit No. 4-12-088 pursuant to the staff recommendation.

Staff recommends a YES vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Interim Erosion Control Plans and Construction Responsibilities

A. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director an Interim Erosion Control and Construction Best Management Practices Plan, prepared by a qualified, licensed professional. The qualified, licensed professional shall certify in writing that the Interim Erosion Control and Construction Best Management Practices (BMPs) plan are in conformance with the following requirements:

1. Erosion Control Plan

- (a) The plan shall delineate the areas to be disturbed by demolition or grading activities and shall include any temporary access roads, staging areas and stockpile areas. The natural areas on the site shall be clearly delineated on the plan and on-site with fencing or survey flags.
- (b) Include a narrative report describing all temporary run-off and erosion control measures to be used during construction.
- (c) The plan shall identify and delineate on a site or grading plan the locations of all temporary erosion control measures.
- (d) The plan shall specify that should demolition or grading take place during the rainy season (November 1 – March 31) the applicant shall install or construct temporary sediment basins (including debris basins, desilting basins or silt traps); temporary drains and swales; sand bag barriers; silt fencing; stabilize any stockpiled fill with geofabric covers or other appropriate cover; install geotextiles or mats on all cut or fill slopes; and

close and stabilize open trenches as soon as possible. Basins shall be sized to handle not less than a 10-year, 6-hour duration rainfall intensity event.

- (e) The erosion control measures shall be required on the project site prior to or concurrent with the initial demolition or grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during demolition and grading. All sediment should be retained on-site, unless removed to an appropriate, approved dumping location either outside of the coastal zone or within the coastal zone to a site permitted to receive fill.
- (f) The plan shall also include temporary erosion control measures should demolition, grading or site preparation cease for a period of more than 30 days, including but not limited to: stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.
- (g) All temporary, construction related erosion control materials shall be comprised of bio-degradable materials (natural fiber, not photo-degradable plastics) and must be removed when permanent erosion control measures are in place. Bio-degradable erosion control materials may be left in place if they have been incorporated into the permanent landscaping design.
- (h) The plan shall also include temporary erosion control measures that will be implemented and maintained on site in the interim period after demolition of all development and before the commencement of the construction of new facilities. The plan shall include measures to minimize erosion and sedimentation. All disturbed areas shall be seeded with native grasses or annuals within 30-days of the completion of demolition and grading, unless construction of new facilities has commenced. The plan shall specify the species to be used for the seeding. The plan shall include additional measures designed to minimize erosion from the disturbed areas, and designed to convey runoff off-site in a non-erosive manner. These temporary erosion control measures and plantings shall be monitored and maintained until such time as new camp facilities and/or permanent drainage and erosion control are constructed pursuant to a new coastal development permit.

2. Construction Best Management Practices

- (a) No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion.
- (b) No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers.
- (c) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24-hours of completion of the project.
- (d) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.

- (e) All trash and debris shall be disposed in the proper trash and recycling receptacles at the end of every construction day.
- (f) The applicant shall provide adequate disposal facilities for solid waste, including excess concrete, produced during demolition or construction.
- (g) Debris shall be disposed of at a permitted disposal site or recycled at a permitted recycling facility. If the disposal site is located in the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place unless the Executive Director determines that no amendment or new permit is legally required.
- (h) All stock piles and construction materials shall be covered, enclosed on all sides, shall be located as far away as possible from drain inlets and any waterway, and shall not be stored in contact with the soil.
- (i) Machinery and equipment shall be maintained and washed in confined areas specifically designed to control runoff. Thinners or solvents shall not be discharged into sanitary or storm sewer systems.
- (j) The discharge of any hazardous materials into any receiving waters shall be prohibited.
- (k) Spill prevention and control measures shall be implemented to ensure the proper handling and storage of petroleum products and other construction materials. Measures shall include a designated fueling and vehicle maintenance area with appropriate berms and protection to prevent any spillage of gasoline or related petroleum products or contact with runoff. The area shall be located as far away from the receiving waters and storm drain inlets as possible.
- (l) Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designed to prevent spillage and/or runoff of demolition or construction-related materials, and to contain sediment or contaminants associated with demolition or construction activity, shall be implemented prior to the on-set of such activity
- (m) All BMPs shall be maintained in a functional condition throughout the duration of construction activity.

B. The final Interim Erosion Control and Construction Best Management Practices Plan shall be in conformance with the site/ development plans approved by the Coastal Commission. Any necessary changes to the Coastal Commission approved site/development plans required by a qualified, licensed professional shall be reported to the Executive Director. No changes to the Coastal Commission approved final site/development plans shall occur without an amendment to the coastal development permit, unless the Executive Director determines that no amendment is required.

2. Oak Tree Monitoring

To ensure that all other oak trees located on the subject parcel and along the proposed access road are protected during construction activities, temporary protective barrier fencing shall be installed around the protected zones (5-feet beyond dripline or 15-feet from the trunk, whichever is greater) of all oak trees and retained during all construction operations. If required demolition or grading operations cannot feasibly be carried out in any location with the protective barrier fencing in place, then flagging shall be installed on trees to be protected. The permittee shall also follow the oak tree preservation recommendations that are enumerated in the Oak Tree Report referenced in the Substantive File Documents.

The applicant shall retain the services of a biological consultant or arborist with appropriate qualifications acceptable to the Executive Director. The biological consultant or arborist shall be present on site during construction of all development within 25-feet of any oak tree. The consultant shall immediately notify the Executive Director if unpermitted activities occur or if habitat is removed or impacted beyond the scope of the work allowed by this Coastal Development Permit. This monitor shall have the authority to require the applicant to cease work should any breach in permit compliance occur, or if any unforeseen sensitive habitat issues arise.

The applicant shall retain the services of a biological consultant or arborist with appropriate qualifications acceptable to the Executive Director to monitor all oak trees that will be encroached upon (Oak Trees #701, #703, #707, and #722), to determine if the trees are adversely impacted by the encroachment. An annual monitoring report shall be submitted for the review and approval of the Executive Director for each of the ten years. Should any of these trees be lost or suffer worsened health or vigor as a result of this project, the applicant shall plant replacement trees on the site at a rate of 10:1. If replacement plantings are required, the applicant shall submit, for the review and approval of the Executive Director, an oak tree replacement planting program, prepared by a qualified biologist, arborist, or other qualified resource specialist, which specifies replacement tree locations, planting specifications, and a ten-year monitoring program with specific performance standards to ensure that the replacement planting program is successful. An annual monitoring report on the oak tree replacement area shall be submitted for the review and approval of the Executive Director for each of the 10 years. Upon submittal of the replacement planting program, the Executive Director shall determine if an amendment to this coastal development permit, or an additional coastal development permit is required.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND SITE VICINITY

1. Detailed Project Description

The applicant proposes to demolish the existing Los Angeles County Probation Department's juvenile detention camp called Camp Kilpatrick. All demolition activities will be carried out within the approximately 7.1-acre developed area of the project site. All building components, structures, and foundations of the existing School Building (7,782-sf), two-Sheds (220-sf total), Administration Building (5,115-sf), 3 Dormitories (16,219-sf total), maintenance Building (1,740-sf), Laundry/Warehouse Building (2,160-sf), and Gymnasium (3,321-sf) will be completely removed. All utilities, mechanical and electrical equipment, piping, conduit, etc. feeding to these structures will also be removed. Additionally, existing asphalt concrete pavement used for the parking lot and the internal service road, as well as the asphalt concrete for the sports courts will be removed. A total of 39-parking spaces on the parking lot will be removed during this demolition. All other hardscape including 9-brick planters and remaining walkways will be removed. The cumulative paved area to be demolished is approximately 45,796-sf. Approximately 190-cy of fill will be imported to level the grade where foundations are removed. Also the project proposes the addition of 14-ft high perimeter fencing where the project abuts an adjacent youth probation facility, Camp Miller. Vegetation communities within the 7.1-acre demolition area include ornamental plantings (3.1-ac), non-native grasslands (0.1-ac), ruderal (0.1-ac), in addition to developed areas (3.1-ac). Demolition will not impact any Environmentally Sensitive Habitat Areas (ESHAs) or sensitive wildlife species. Demolition activities will have minor encroachment into the protected zones of four California live oak trees that have branches overhanging the security perimeter fence.

A storage and staging area will be established on the existing baseball field located in the northeastern portion of the project site. The swimming pool will remain in place as will the kitchen facilities that currently serve both Camp Miller and Camp Kilpatrick. The fencing is proposed to be added to ensure security around Camp Miller after buildings between the two camps are removed.

The development considered herein is the first phase of a larger project. After all facilities are demolished and the site is cleared, the second phase is planned for the development of a new camp facility in the same footprint. A subsequent coastal development permit application will be filed for the second phase. After demolition activities have been completed, the LACDPW will hire a design-builder who will be responsible for preparing detailed grading and construction plans and building new facilities for Camp Kilpatrick.

2. Location, Vicinity, & Surrounding Development

The project site, Camp Kilpatrick, is located on a 67-acre parcel at 427 Encinal Canyon Road, in the Santa Monica Mountains area of unincorporated Los Angeles County (APN 4471-003-900) (Exhibits 1-3). Camp Kilpatrick has been in use since 1962 as a Los Angeles County Juvenile Probation Camp. A similar facility, Camp Miller (APN 4471-004-902), is located immediately adjacent to and just south of the subject site. Three adjacent parcels (APN's 4471-004-903, -904, -905) are physically connected by shared infrastructure to the Camp Kilpatrick parcel (APN 4471-003-900) and all five-parcels are owned and operated by Los Angeles County Probation Department. Collectively, these five-parcels comprise nearly 142-acres of an alluvial valley near the base of natural hillside terrain and the confluence of several natural drainages within the upper reaches of the Zuma Canyon watershed. Within this valley, Camps Kilpatrick and Miller and the associated shared infrastructure (roads, drainage channels, on-site wastewater treatment) are the sole developments.

The surrounding area is largely undeveloped (i.e., undisturbed hillsides) with variable slopes. Parcels of National Park Service, State Parks, County, and private lands are interspersed throughout the surrounding area. The Zuma/Trancas Canyons area, under the jurisdiction of the National Park Service, is located approximately 0.25-mile south of the Project site boundary at the closest point. Developed land uses within approximately 0.5-mile of the developed portion of Camp Kilpatrick include an equestrian facility (0.25 mile to the north); scattered large-lot single-family residences (0.2-mile to the northeast); viticulture beginning approximately 0.3-mile to the northeast; and the Malibu Country Club, a public 18-hole golf course, which is 0.4-mile to the west at the closest point.

3. Physical Site Characteristics

The subject site is located in an alluvial valley near the base of natural hillside terrain and the confluence of several natural drainages. Existing storm water drainage improvements serving the subject site include a concrete-lined trapezoidal channel that runs north to south; located immediately to the east of the demolition area, this channel collects runoff from the drainages to the northeast and from within Camp Kilpatrick via a series of catch basins/drainage inlets, concrete V-ditches, and underground storm drain pipelines. This primary drainage channel continues to the south, and passes underground where it traverses the parking lot serving Camp Miller and Encinal Canyon Road, and eventually outlets immediately south of Encinal Canyon Road. A drainage structure that collects runoff from the canyon areas and associated drainages to the northwest is located immediately outside the demolition area to the northwest. The Biological Constraints Survey referenced in the Substantial Documents identifies 1,873-sf (0.043-ac) of the dry-bottom channelized drainage as possessing sufficient criteria to meet Coastal Commission requirements for wetland designation. This assessment is based upon the presence of wetland hydrology and the presence of an identifiable streambed and bank, and the presence of hydrophytic vegetation within and along portions of the concrete drainage channels north of Encinal Canyon Road (species identified was Mulefat, *Baccharis salicifolia*, at 60% cover). Camp Kilpatrick's demolition area is restricted to dry-land areas within the existing facility. No impacts from the demolition project are expected on the adjacent portions of the channelized Zuma Canyon Creek drainage, which are entirely outside of the demolition limits.

Camp Kilpatrick and Camp Miller utilize the same water supply and wastewater treatment systems. A 500,000-gallon potable water tank is located near the top of an approximate 100-foot-high slope to the west of Camp Kilpatrick, which provides water and ensures adequate fire flows and volumes at the camps. The water tank is owned and maintained by the County. In addition to the water tank, Camp Kilpatrick and Camp Miller are provided potable water via the Las Virgenes Municipal Water District water main connecting to the camps near the northeast corner of Camp Kilpatrick. Wastewater generated by both camps is conveyed via underground pipelines to a self-contained wastewater package plant located immediately south of Encinal Canyon Road, about 700-feet south of Camp Kilpatrick.

4. *Trails on Property or in Vicinity*

Consistent with the Camp Kilpatrick's location within the Santa Monica National Recreation Area, there are existing trails nearby. There are no existing bicycle or hiking trails within or connecting directly to either Camp Kilpatrick or Camp Miller. However, approximately 250-ft southwest of Camp Miller is the Zuma Ridge trailhead, which is 0.4-mi from the Backbone Trailhead (BB18), managed by the Santa Monica National Recreation Area.

5. *Visibility from Public Viewing Location*

There are no officially designated or eligible State or County scenic highways near the subject site vicinity. The subject site is not visible from the nearest scenic highway, SR-23, due to distance and intervening topography. The probation camps are briefly visible from a few sections of the nearby Backbone Trail.

6. *Environmentally Sensitive Habitat*

The existing developed portions of Camp Kilpatrick's demolition site are landscaped with mostly non-native turf lawns, ornamental shrubbery, and several non-native trees (e.g., pines, Modesto ash). There are no oak trees or significant stands of native vegetation within the proposed demolition area(although there are four oak trees just outside the footprint). The vast majority of the Camp Kilpatrick's grounds not developed as buildings are either lawn or asphalt. Moreover, because the subject site demolition footprint avoids oak trees and other native vegetation, the demolition site does not, therefore, contain any environmentally sensitive habitat areas (ESHA). In addition, proposed demolition will not result in any new vegetation clearance in offsite areas and will not result in any loss of ESHA. The proposed demolition will remove 11-trees (2-pine trees, less than 12-in. diameter, and 9 other non-native trees, less than 12-in. diameter).

In the Santa Monica Mountains, the Los Angeles County Fire Dept. requires a 200-ft fuel modification (on-site) and/or brush clearance (off-site) zone from combustible structures. In this case, the fuel modification/brush clearance requirement has been established and maintained for decades. Additionally, the demolition project will not modify the existing fuel modification boundary. Therefore fuel modification/brush clearance required for the proposed project will not result in impacts to environmentally sensitive habitat areas that are located on the site outside of the demolition area.

Past Commission Action

The subject site has no prior Coastal Commission permitting activity.

B. WATER QUALITY

Section 30231 of the Coastal Act states that:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, minimizing alteration of natural streams.

The Commission recognizes that new development in the Santa Monica Mountains has the potential to adversely impact coastal water quality and aquatic resources because changes such as the removal of native vegetation, the increase in impervious surfaces, and the introduction of new residential uses cause increases in runoff, erosion, and sedimentation, reductions in groundwater recharge, and the introduction of pollutants such as petroleum, cleaning products, pesticides, and other pollutants, as well as effluent from septic systems.

The subject property is located within a defined watershed, the Zuma Canyon watershed. Implementation of the proposed project, while not the construction of new development, would result in the removal of foundations and paving (i.e., impervious surfaces) and vegetation, thus exposing more pervious surfaces. This would allow for more infiltration of runoff than can currently occur on the site as developed. However, the demolition of all buildings and hardscape along with placement of fill material within excavation areas will increase the risk of erosion and downstream sedimentation due to the disturbed areas and loose, bare soil being exposed such that it can be removed from the site by wind and runoff. Additionally, during the implementation of the project, building materials, concrete, debris, trash, and toxic substances could be introduced to the watershed by wind or runoff.

Therefore, in order to minimize the potential for such adverse impacts to water quality and aquatic resources resulting from runoff both during construction and in the post-demolition stage, the Commission requires the incorporation of interim erosion control measures to ensure that erosion and sedimentation is avoided during the demolition activities. Further, interim erosion control measures must be maintained on the project site after the demolition is completed and before future development is constructed on the site, including permanent drainage facilities. Additionally, the Commission requires the applicant to seed all areas of the site disturbed by the proposed demolition with native grass or annual species within 30-days of the completion of demolition and grading, unless construction of new facilities has commenced. Finally, the Commission requires the applicant to implement construction best management practices during demolition to ensure that all materials are handled properly in order to avoid impacts to water quality.

The following special conditions are required, as determined in the findings above, to assure the project's consistency with Section 30231 of the Coastal Act:

Special Condition 1: Interim Erosion Control Plans and Construction Responsibilities

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Section 30231 of the Coastal Act.

C. OAK TREE PROTECTION

Section 30240 states:

- (a) *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.*
- (b) *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.*

Section 30250(a) of the Coastal Act states:

New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of the surrounding parcels.

Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

1. Protection of Oaks

As previously described, the area of the site where the demolition will be carried out is extensively developed. There are no oak trees located within the demolition area. As such, the proposed demolition will not be within oak woodland ESHA. However, just outside of the Camp's 14-foot tall security perimeter fence and beyond the demolition area, there are 88 California live oaks (*Quercus agrifolia*) within 200-feet of the impact footprint. Given the relatively undisturbed nature of this oak woodland, it meets the Coastal Act definition of environmentally sensitive habitat area. As such, pursuant to Section 30240 of the Coastal Act, any development adjacent to this area must be sited and designed to prevent impacts which would significantly degrade the oak woodland. Additionally, as required by Section 30250, development can only be approved where it will not have impacts on coastal resources. Further, oak trees are an important component of the visual character and scenic quality of the area and must be protected in order to ensure that the proposed project is consistent with that visual character, as required by Section 30251 of the Coastal Act.

Each of the 88-oak trees has been identified and assessed as part of the biological survey. Of these 88-oak trees, only four oaks are in close enough proximity to potentially be harmed during demolition activities. These four oak trees are identified as #701, #703, #707, and #722 by the Oak Tree Report referenced in the Substantive File Documents. These four oaks all have trunks in excess of 8-in. diameter, and #701, #703, and #722 are listed as having a "Good" or "Excellent" rating, while #707 has a "Poor" rating in the Oak Tree Report.

Per Los Angeles County Department of Regional Planning's Oak Tree Ordinance, the protected zone is 5-feet beyond the drip line or 15-feet from the trunk, whichever is greater. For the four-oak trees #701, #703, #707, and #722 closest to the demolition area, portions of the leaf canopy of these oak trees arc over the 14-foot security fence and some branches overhang a small fraction of a few Camp building roofs. This means that portions of the protected zones of the four-oak trees #701, #703, #707, and #722 extend above the footprint of buildings proposed to be removed. As proposed, demolition and removal of the buildings and their concrete slab foundations will be carried out within the protected zone of these four-oak trees. Thus, a minor encroachment within the protected zone of these four coast live oak trees will occur during demolition activities, but no construction of permanent development is proposed within any oak protected zone. The provision of an ESHA buffer of no less than 100 feet from the oak woodland ESHA on the project site will need to be addressed in the design of the future replacement structures planned for the project site.

Oak trees are easily damaged. They are shallow-rooted and require air and water exchange near the surface. The oak tree root system is extensive, stretching as far as 50-feet beyond the spread of the canopy, although the area within the "protected zone" (the area around an oak tree that is five feet outside the dripline or fifteen feet from the trunk, whichever is greater) is the most important. Oaks are therefore sensitive to surrounding land uses, grading or excavation at or near the roots and irrigation of the root area particularly during the summer dormancy. Improper watering and disturbance to root areas are the most common causes of tree loss. Oak trees in residentially landscaped areas often suffer decline and early death due to conditions that are preventable. Damage can take years to become evident and by the time the tree shows obvious signs of disease it is usually too late to restore the health of the tree.

Obviously, the removal of an oak tree results in the total loss of the habitat values of the tree. Encroachments into (in other words, portions of the proposed structures, or grading will be located within) the protected zone of an oak tree can also result in significant adverse impacts. Encroachments of development will result in impacts including, but not limited to: root cutting or damage, compaction, trunk or branch removal or trimming, changes in drainage patterns, and excess watering. Changes in the level of soil around a tree can affect its health. Excavation can cut or severely damage roots and the addition of material affects the ability of the roots to obtain air or water. Soil compaction and/or pavement of areas within the protected zone will block the exchange of air and water through the soil to the roots and can have serious long term negative effects on the tree. Further, the introduction of development within an oak woodland will interrupt the oak canopy coverage and will lessen the habitat value of the woodland as a whole. The impacts to individual oak trees range from minor to severe lessening of health, (including death) depending on the location and extent of the encroachments.

In order to ensure that oak trees are protected so that development does not have impacts on coastal resources and so that the development is compatible with the visual character of the area, the Commission has required, in past permit actions, that the removal of native trees, particularly oak trees, or encroachment of structures into the root zone be avoided unless there is no feasible alternative for the siting of development.

2. Project Consistency

The Oak Tree Report, listed in the Substantive File Documents, indicates that no oak trees are present on the demolition site and 88-oak trees are located off-site in the immediate vicinity of the proposed project. The proposed project includes encroachment into four-oak tree protected zones (5-feet from the outer limits of the tree dripline or 15-feet from the trunk, whichever is greater) during demolition.

a. Oak Tree Encroachment

The project includes encroachments within the protected zone(s) of four-oak trees on the site in order to carry out the demolition, including excavation and removal of slab foundations and utilities.

Two dormitories are located within the protected zone of trees #701, #703, #722. The applicant does not propose to remove or prune any oak branches as part of the project. Further, the applicant proposes to avoid impacts to oak tree roots to the maximum extent feasible. According to the project consultants:

...the roots of those trees are assumed to grow up to the foundations, but likely do not penetrate the concrete building foundations. Equipment used for building removal will be stationed to the east of the buildings well outside of the oak tree protected zones. Buildings will be demolished by pulling them down toward the east, away from the oak trees that border the dormitories to the west. Similarly, removal of the foundations will be accomplished by breaking up concrete with a jackhammer and carefully pulling pieces of the concrete out of the area with a front loader (or similar piece of construction equipment) that has a back hoe attachment. To the extent practicable, portions of the foundation that may touch tree roots will be broken up and removed using hand-held jackhammers (rather than a jackhammer attachment on a heavy construction vehicle) and

removing the broken pieces by hand. Removal of the foundations in this manner is expected to have a minimal effect on the overall health of the adjacent oaks.

With respect to tree #722, its protected zone extends into the demolition limits on the eastern side of the site. However, an 8-foot deep, 19-foot wide trapezoidal concrete storm drain channel separates the tree and the demolition area which is assumed to prevent any roots from extending to the west of the storm drain. Therefore, due to the presence of this storm drain channel between the tree and work area, no impacts to the actual root zone of the tree is expected.

Given the location of the individual oak trees on the site, there are no siting or design alternatives that can be feasibly employed to avoid or reduce encroachment impacts to the trees. In this case, the proposed encroachment(s) are relatively minor and no permanent development is now proposed within the protected zones. Further, the existing structures on site are barriers that have likely retarded oak tree root extension into the demolition limits. As such, no significant tree roots are expected to be encountered in the removal of these barriers.

While the encroachment(s) may adversely impact the oak trees, it is unlikely that it will significantly injure the trees' health or result in their death. However, such health and vigor effects may take several years to reveal themselves. In order to minimize such impacts and to provide mitigation for the loss or diminished health of any of the impacted trees, the Commission requires the applicant to provide monitoring of oak trees on the site where development will encroach within their protected zones, for a period of no less than 10 years. If the monitoring reveals that any of these four trees die or suffer reduced health or vigor, replacement trees must be provided as mitigation.

b. Oak Tree Protection Measures and Monitoring

Finally, the Commission finds that impacts to oak trees on the project site will be minimized by employing protective measures during project construction. The applicant shall follow the oak tree preservation recommendations contained in the Oak Tree Report referenced in the substantive file documents. Additionally, the Commission requires the applicant to install temporary protective barrier fencing around the protected zones (5-feet beyond dripline or 15-feet from the trunk, whichever is greater) of all oak trees and retained during all construction operations. If required construction operations cannot feasibly be carried out in any location with the protective barrier fencing in place, then temporary flagging must be installed on all oak trees to ensure protection during construction. Further, the Commission requires that a biological consultant, arborist, or other resource specialist shall be present on-site during all demolition, grading or other operations on site that are located within 25-feet of any oak tree and shall be directed to immediately notify the Executive Director if unpermitted activities occur or if any oak trees are damaged, removed, or impacted beyond the scope of the work allowed by this coastal development permit. This monitor will have the authority to require the applicant to cease work should any breach in permit compliance occur, or if any unforeseen sensitive habitat issues arise.

The following special conditions are required, as determined in the findings above, to assure the project's consistency with Sections 30240, 30250, and 30251 of the Coastal Act:

Special Condition 2: Oak Tree Monitoring

Therefore, the Commission finds that the proposed project, as conditioned, is consistent with Sections 30240, 30250, and 30251 of the Coastal Act with regard to oak tree protection.

D. LOCAL COASTAL PROGRAM (LCP) PREPARATION

Section 30604(a) of the Coastal Act states that:

a) Prior to certification of the local coastal program, a coastal development permit shall be issued if the issuing agency, or the commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local coastal program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

Section 30604(a) of the Coastal Act provides that the Commission shall issue a Coastal Development Permit only if the project will not prejudice the ability of the local government having jurisdiction to prepare a Local Coastal Program, which conforms to Chapter 3 policies of the Coastal Act. The preceding sections provide findings that the proposed projects will be in conformity with the provisions of Chapter 3 if certain conditions are incorporated into the projects and are accepted by the applicant. As conditioned, the proposed development will avoid or minimize adverse impacts and is found to be consistent with the applicable policies contained in Chapter 3. The following special conditions are required to assure the project's consistency with Section 30604 of the Coastal Act:

Special Conditions 1 and 2

Therefore, the Commission finds that approval of the proposed development, as conditioned, will not prejudice the County of Los Angeles' ability to prepare a Local Coastal Program for this area which is also consistent with the policies of Chapter 3 of the Coastal Act, as required by Section 30604(a).

E. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096(a) of the Commission's administrative regulations requires Commission approval of a Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the activity may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. As discussed above, the proposed development, as conditioned, is consistent with the policies of the Coastal Act. Feasible mitigation measures, which will minimize all adverse environmental effects, have been required as special conditions. The following special conditions are required to assure the project's consistency with Section 13096 of the California Code of Regulations:

Special Conditions 1 and 2

As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse impact that the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, can be found to be consistent with the requirements of the Coastal Act to conform to CEQA.

APPENDIX 1: SUBSTANTIVE FILE DOCUMENTS

1. General Plan for the County of Los Angeles; prepared by Los Angeles County Dept. of Regional Planning, dated 1980
 2. Real Estate Due Diligence Report, Initial County Package; prepared by Towill Surveying, Mapping, and GIS Services, dated May 2012
 3. Phase I Environmental Site Assessment; prepared by Ninyo & Moore, Geotechnical and Environmental Sciences Consultants, dated July 26, 2012
 4. Initial Study / Mitigated Negative Declaration, Screencheck; prepared by BonTerra Consulting, dated Aug. 2012
 5. Initial Study / Mitigated Negative Declaration, Draft; prepared by BonTerra Consulting, dated Sep. 2012
 - a. Appendix A: Air Quality and Greenhouse Gas Analysis: CalEEMod DATA
 - b. Appendix B-1: Biological Constraints Report
 - c. Appendix B-2: Plant Report
 - d. Appendix B-3: Jurisdictional Delineation
 - e. Appendix B-4: Oak Tree Survey Report
 - f. Appendix C: Phase I Cultural Resources Assessment
 - g. Appendix D: Preliminary Geotechnical Evaluation
 - h. Appendix E-1: Phase I Environmental Site Assessment
 - i. Appendix E-2: Pre-Demolition Asbestos Abatement Report
 - j. Appendix E-3: Lead-Based Paint Inspection Report
 - k. Appendix E-4: Hazardous Materials Demolition Report
 6. Notice of Intent to Adopt a Mitigated Negative Declaration; prepared by Los Angeles County Dept. of Public Works, dated Sep. 2012
 7. Initial Study / Mitigated Negative Declaration, Final, Mitigation Monitoring and Reporting Program, Response to Comments, and Errata; prepared by BonTerra Consulting, dated Nov. 2012
 8. Geotechnical Investigation, Updated Preliminary Report; prepared by Ninyo & Moore, Geotechnical and Environmental Sciences Consultants, dated Nov. 15, 2012
 9. Technical Project Drawings, Make-Ready Set; prepared by Los Angeles County Dept. of Public Works, dated Sep. 7, 2012
 10. Technical Project Drawings, Make-Ready Set; prepared by Los Angeles County Dept. of Public Works, dated Jan. 14, 2014
 11. Summary of Biological Studies and Impact Analysis for the Camp Kilpatrick Replacement Project; prepared by BonTerra Consulting, dated March 6, 2014
 12. Response to Notice of an Incomplete Application; prepared by BonTerra Consulting, dated March 24, 2014
 13. Section 1602 Streambed Alteration Notification; prepared by BonTerra Consulting, dated Feb. 5, 2014
 - a. Notification of Lake or Streambed Alteration; prepared for California Dept. of Fish & Wildlife
 - b. Application for Department of the Army Permit; prepared for U.S. Army Corps of Engineers
 - c. Section 401 Water Quality Certification Application Form; prepared for Los Angeles Regional Water Quality Control Board
 14. Oak Tree Survey for the Camp Kilpatrick Replacement Project; prepared by BonTerra Consulting, dated Sep. 7, 2012
-

**TABLE
EXISTING CAMP KILPATRICK LAND USES**

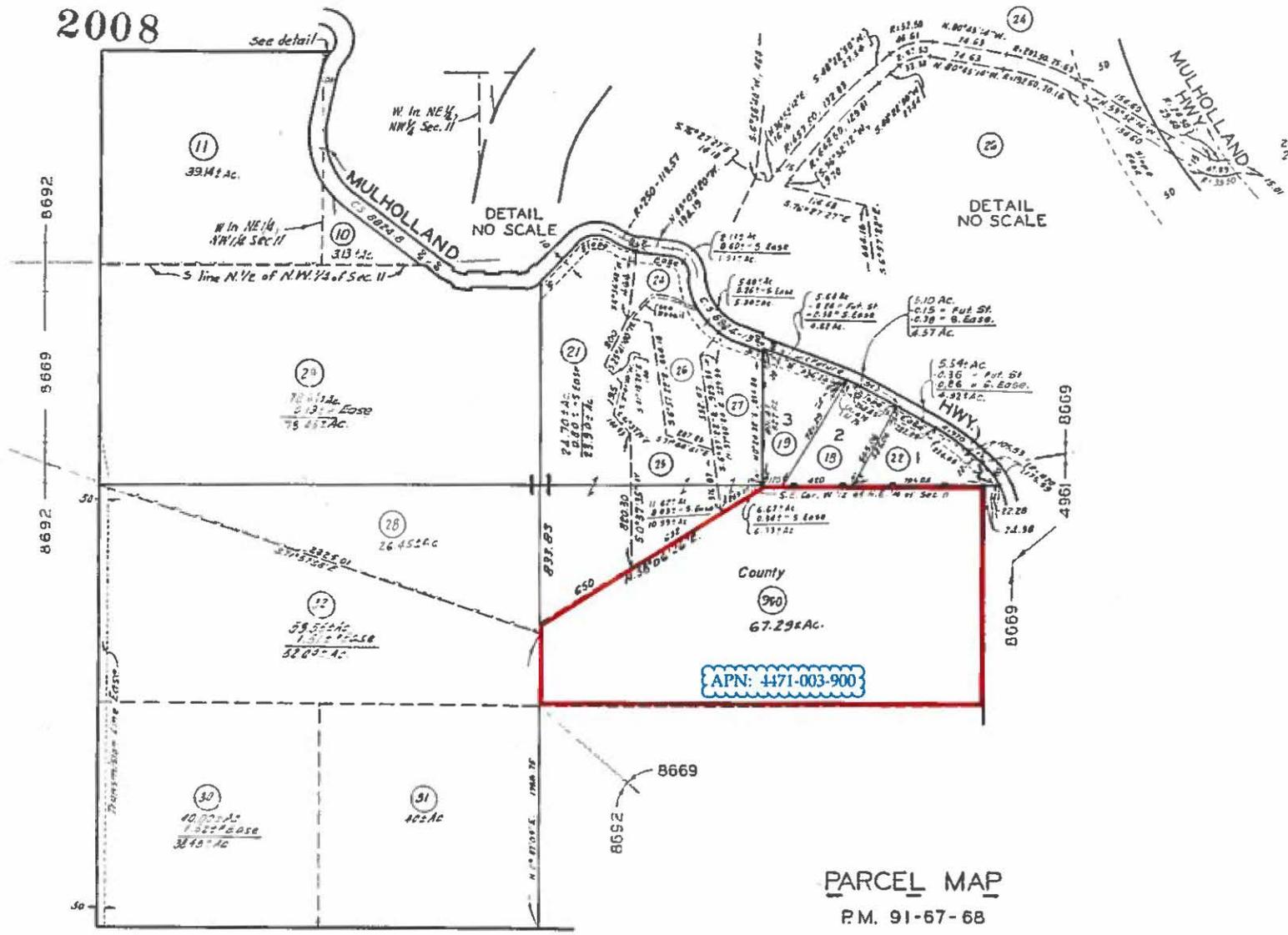
Existing Land Use	Size (sf)	Comments
Buildings		
Dormitories (3 ^a)	16,219 (total)	Accommodates up to 125 minor detainees
Administration	5,115	
Gymnasium	3,321	Building is yellow-tagged (unfit for occupation)
School	7,782	Classrooms and office space
Modular Classrooms (2)	1,950 (total)	
Laundry and Warehouse	2,160	
Maintenance	1,740	
Sheds (2)	220 (total)	
Kitchen and Dining Hall	6,371	Shared use by Camp Kilpatrick and Camp Miller
Subtotal Existing Buildings	44,878	
Outdoor Facilities^b		
Multi-purpose Field	47,000	Irregularly shaped grass area
Sports Court	12,720	Asphalt paved
Swimming Pool and Deck	5,225	Existing facility to remain
Ball Field	21,380	
Subtotal Outdoor Facilities	~86,325	
Other Land Uses		
Surface Parking	18,200 (39 spaces)	Asphalt paved
Hardscape and Landscape	138,050	
Undeveloped Open Space ^c	220,128	
Subtotal Other Land Use	~376,378	
Project Site Total	~507,581 (11.7 acres)	
sf: square feet ^a Includes two main dormitories located along the western side of the Project site and one dormitory for residents with medical and other special needs located along the eastern side of the site. ^b Size of existing outdoor facilities measured on current aerial photographs with ArcGIS, a geographic information system. ^c Undeveloped open space within 11.7-acre Project site boundary defined for purposes of this IS/MND. Sources: Ninyo & Moore 2012a; Anderson Environmental 2012a		



4471 | 3
 SCALE 1" = 600'

2008

7-20-66
 860616
 670-59
 Revised
 2-5-59
 4-16-64
 730-0641C
 750221
 780307
 78047503
 7905-08211
 29062002204001-07
 36090310002001-07
 3610307001001-07
 20010806070001-07
 2001100301001-07



CODE
 8669
 8692
 4961

FOR PREV. ASSMT. SEE:
 4471-3

PARCEL MAP
 P.M. 91-67-68

T. 15S., R. 19W.

Parcel Map - north of Encinal Canyon Road
 Camp Kilpatrick (-900)

Exhibit 2



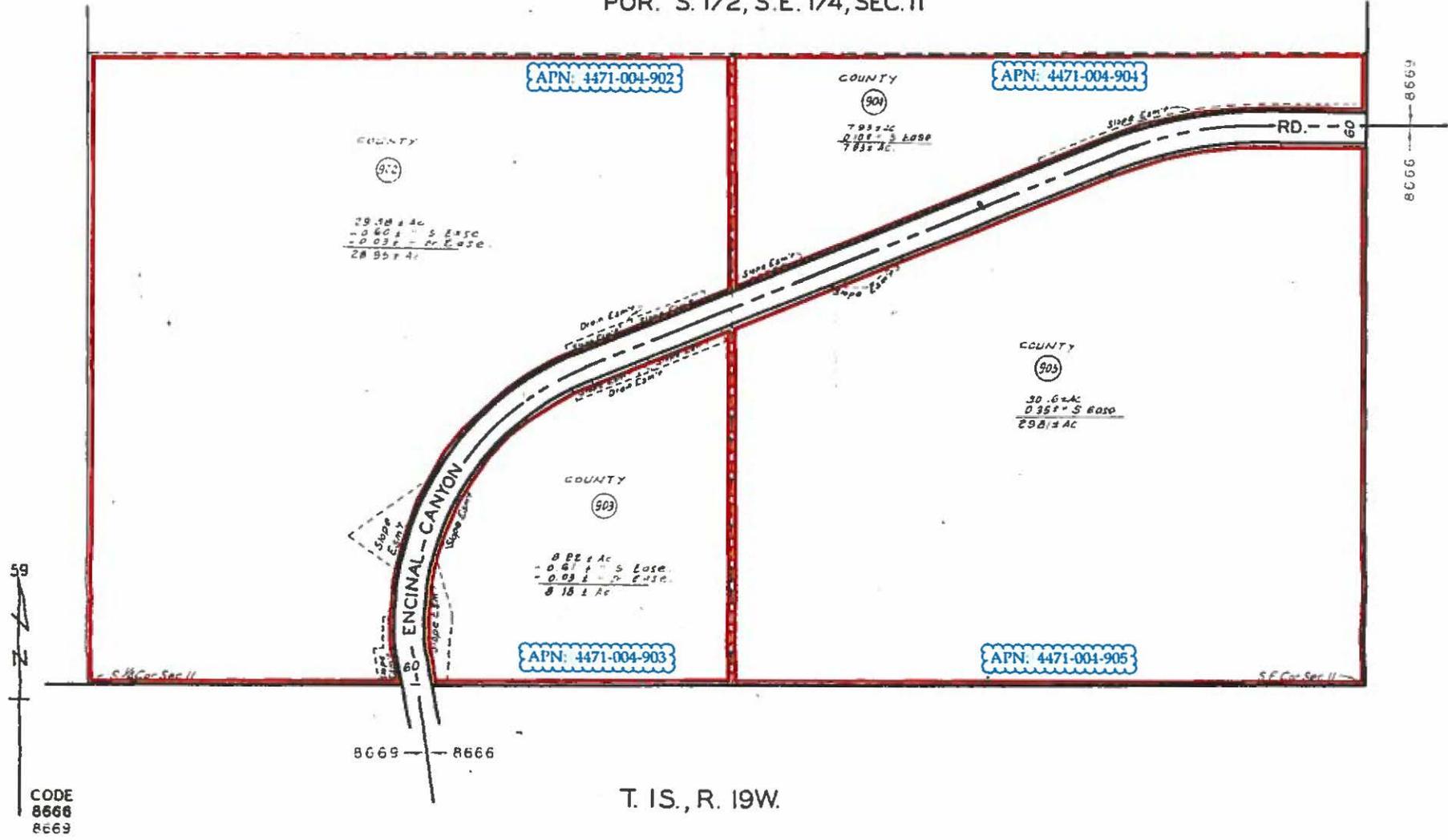
CALIFORNIA
 COASTAL
 COMMISSION

ASSESSOR'S MAP
 COUNTY OF LOS ANGELES, CALIF.

4471 | 4
 SCALE 1" = 200'

Revised
 2-5-59
 4-16-64
 720307
 78232170
 742512

POR. S. 1/2, S.E. 1/4, SEC. II



FOR PREV. ASSMT. SEE:
 4471 - 4

Parcel Map - north and south of Encinal Canyon Road
 Camp Miller (-902), WWTP (-903)

Exhibit 3



CALIFORNIA COASTAL COMMISSION
 ASSESSOR'S MAP
 COUNTY OF LOS ANGELES, CALIF.



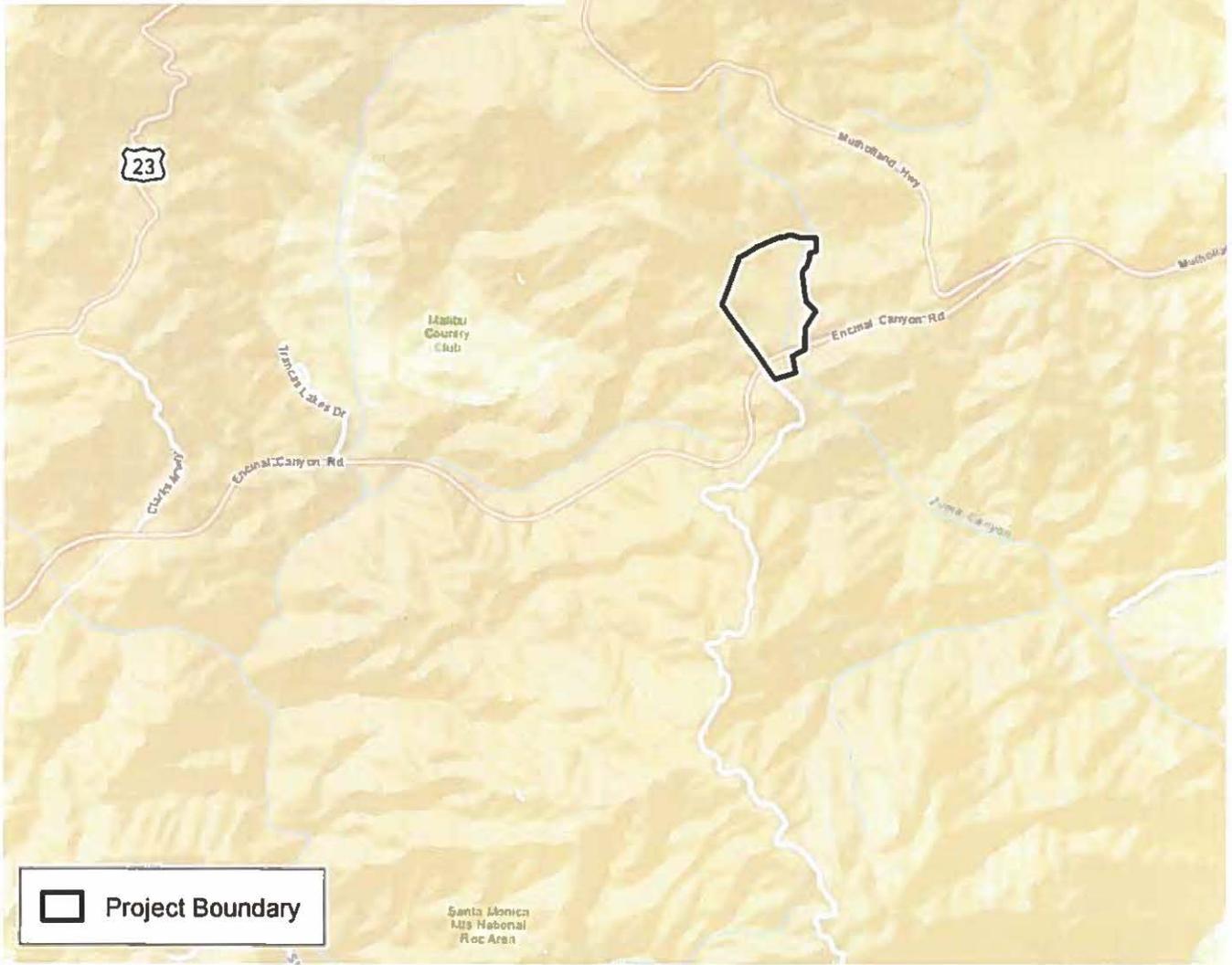
Regional Location

Exhibit 4

Camp Kilpatrick Demolition Project



**CALIFORNIA
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COMMISSION**



Local Vicinity

Camp Kilpatrick



Exhibit 5



**CALIFORNIA
COASTAL
COMMISSION**



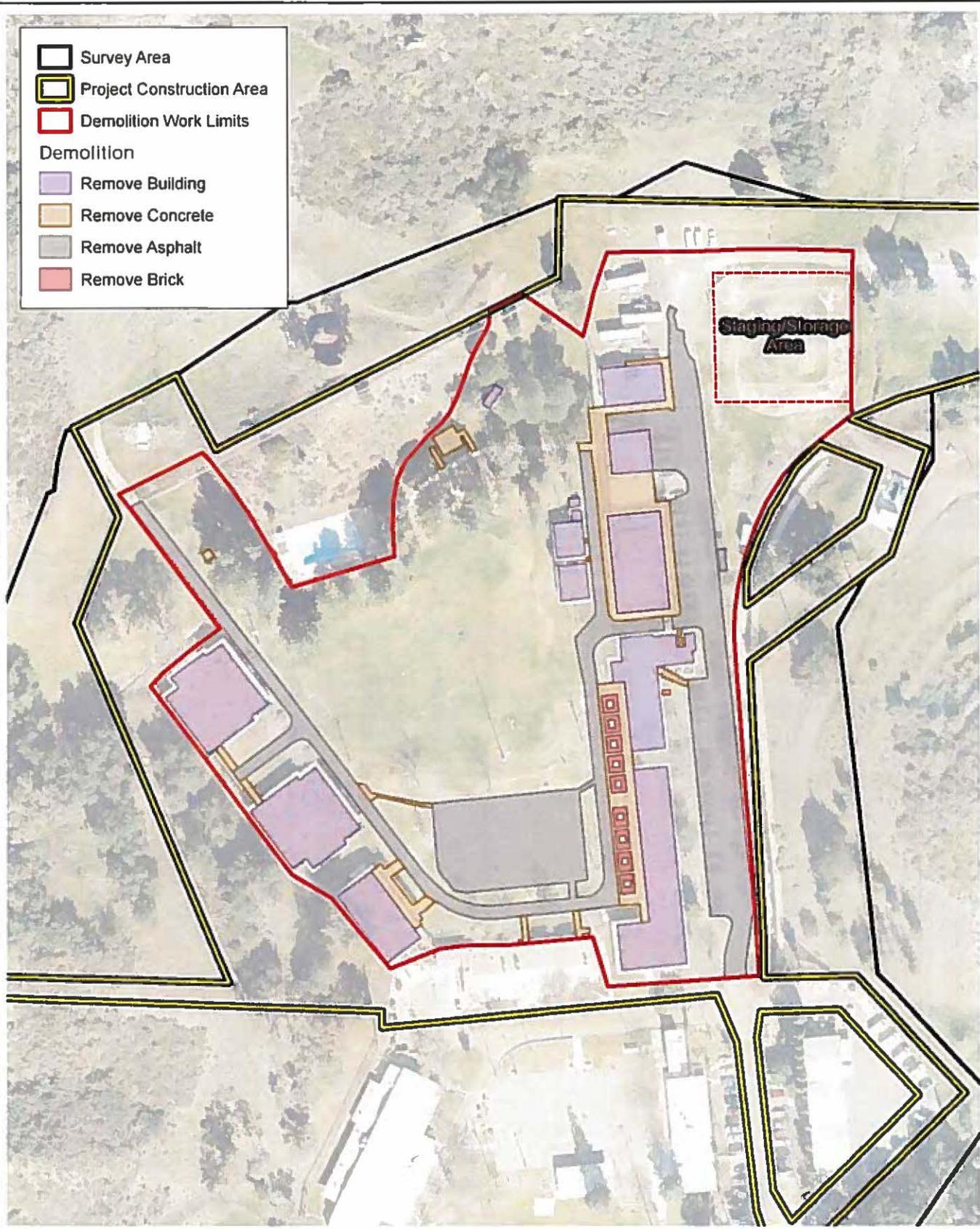
Local Area USGS Topographic Map

Exhibit 6

Camp Kilpatrick



-  Survey Area
 -  Project Construction Area
 -  Demolition Work Limits
- Demolition
-  Remove Building
 -  Remove Concrete
 -  Remove Asphalt
 -  Remove Brick

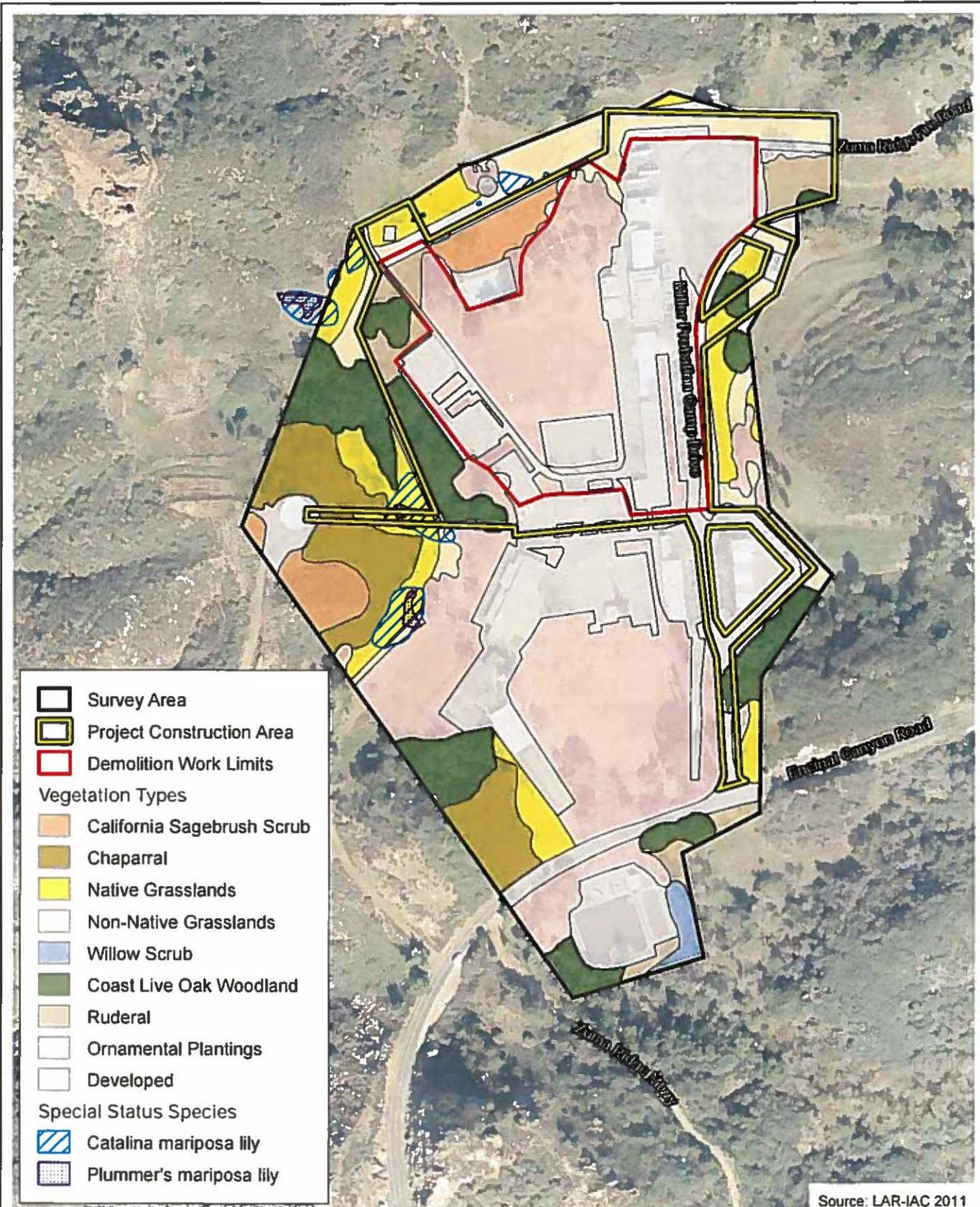


Proposed Demolition Plan

Exhibit 7

Camp Kilpatrick





Biological Resources

Camp Kilpatrick Demolition Project

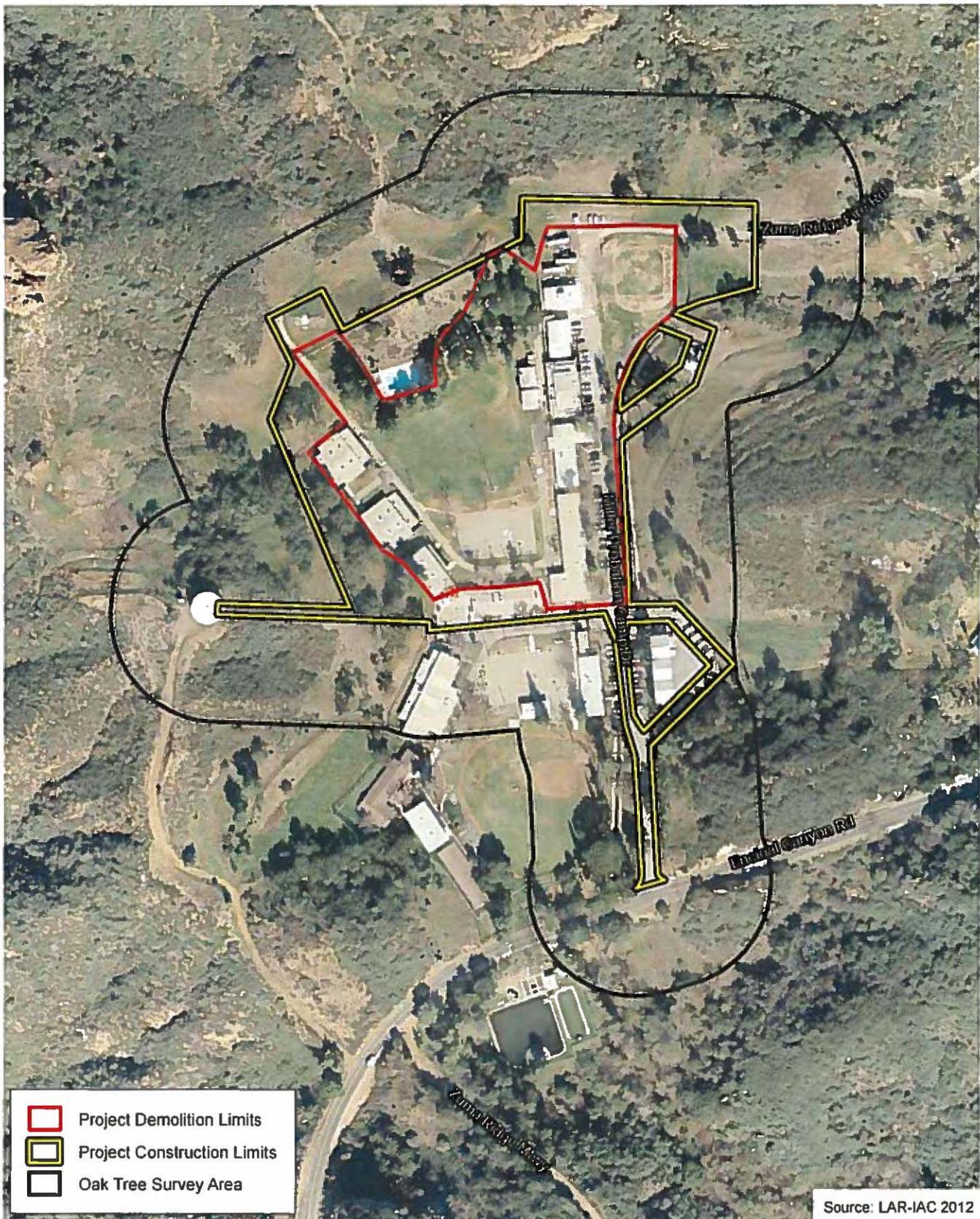


250 125 0 250 Feet

Exhibit 8



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COMMISSION



Source: LAR-IAC 2012

Project Location

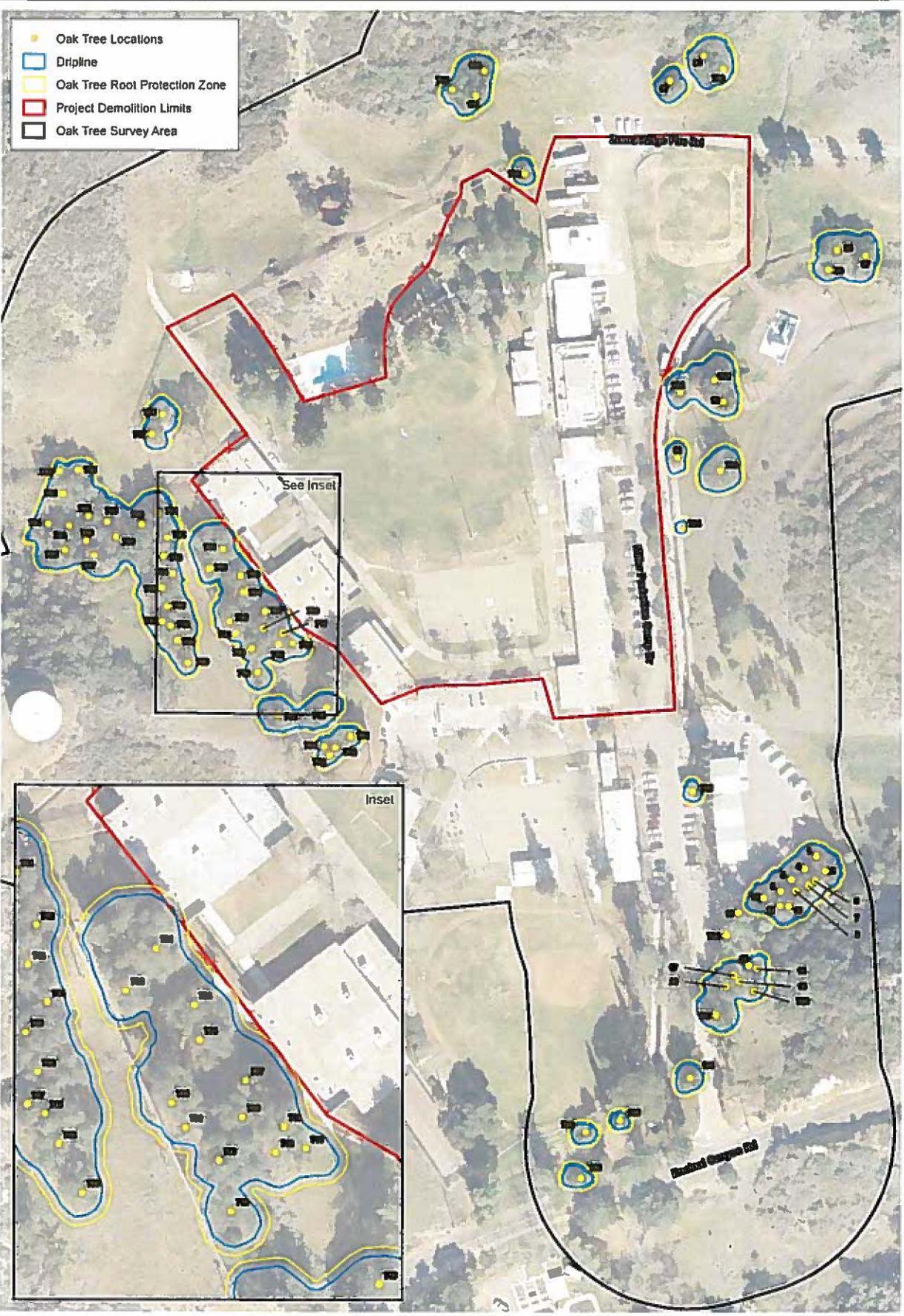
Exhibit 9

Camp Kilpatrick



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- Oak Tree Locations
- Dripline
- Oak Tree Root Protection Zone
- Project Demolition Limits
- Oak Tree Survey Area



Oak Tree Impacts - Demolition

Exhibit 10

Camp Kipatrick





Aerial View

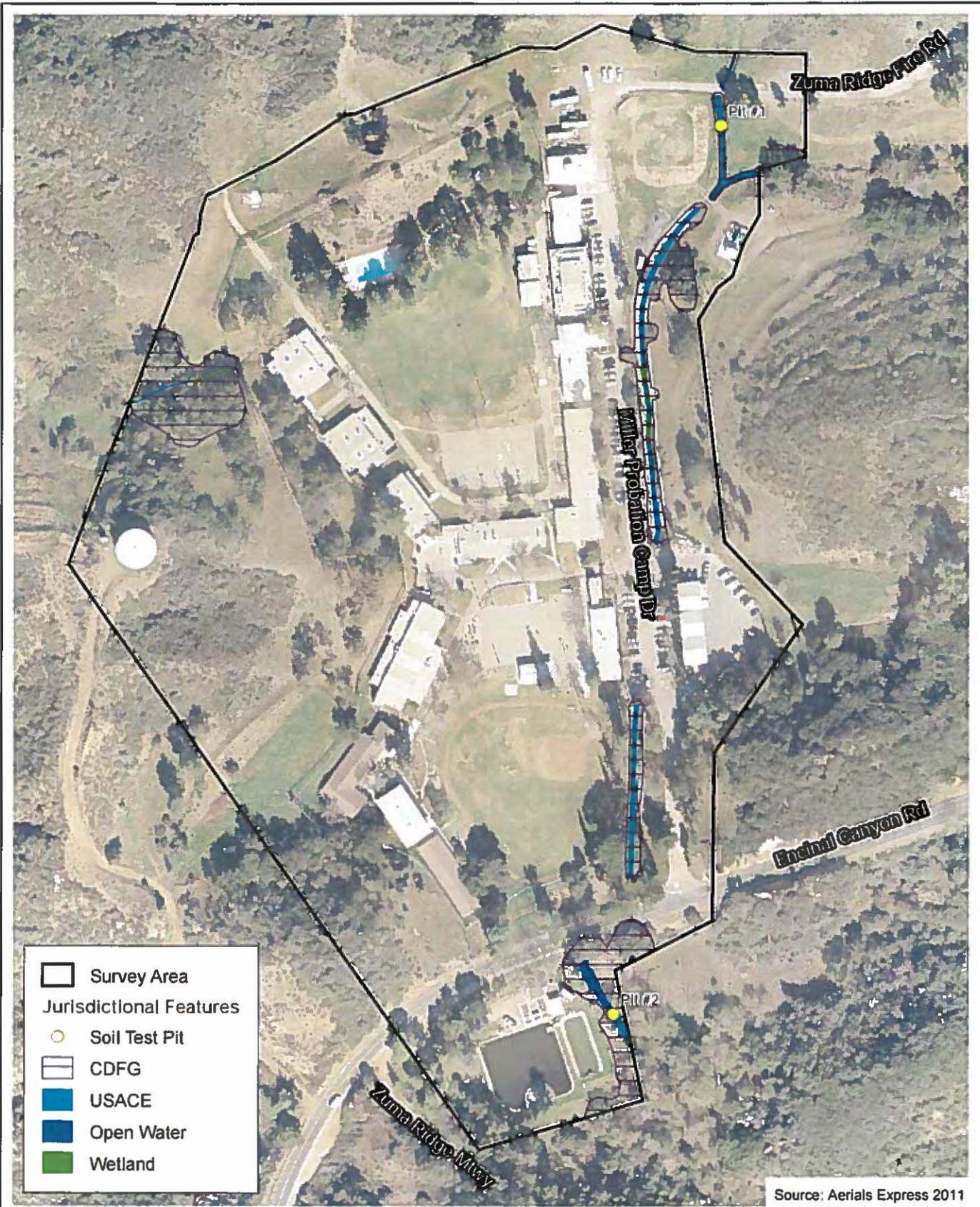
Camp Kilpatrick



Exhibit 11



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COMMISSION**



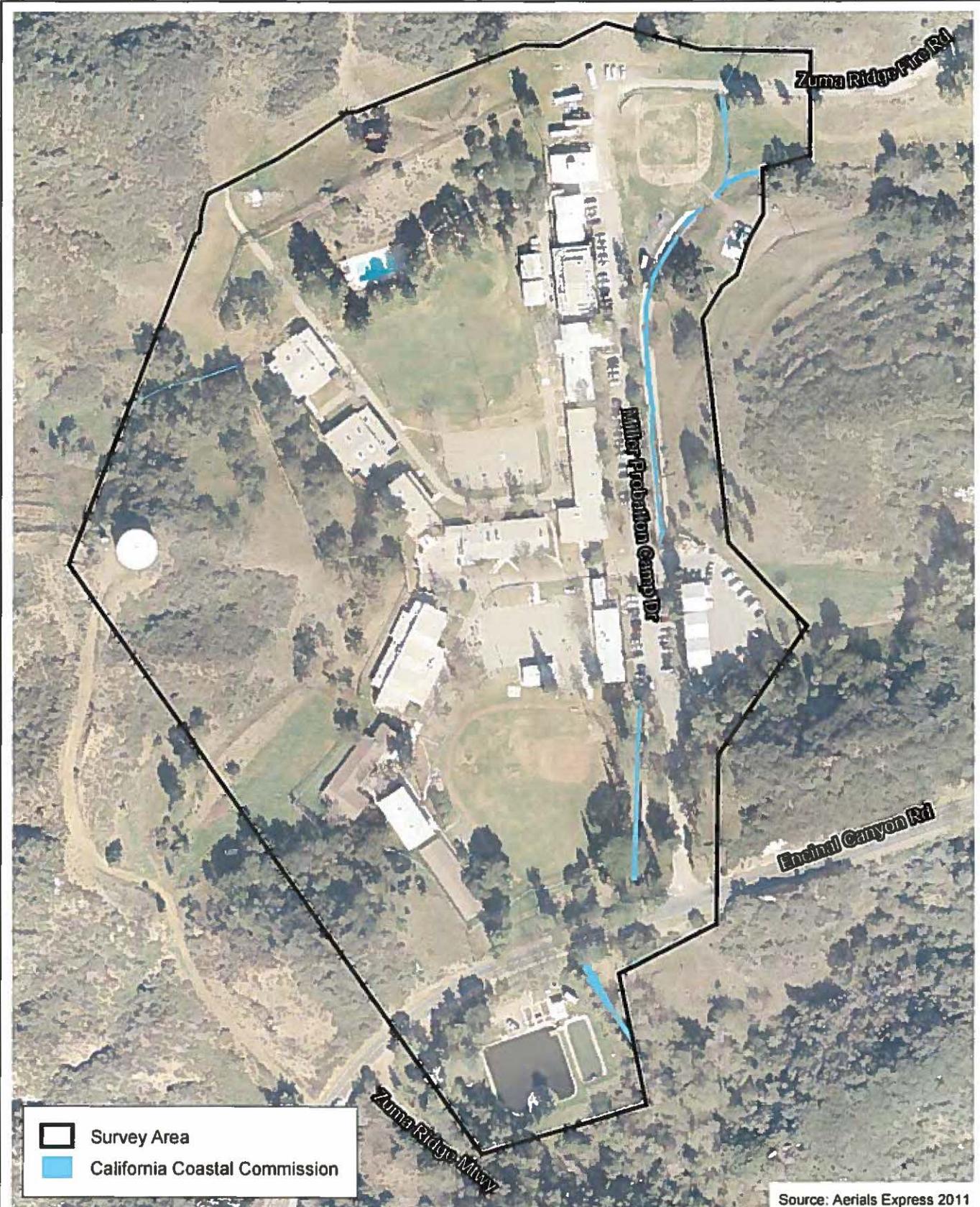
USACE and CDFG Jurisdictional Resources

Exhibit 12

Camp Kilpatrick



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California Coastal Commission Jurisdictional Resources

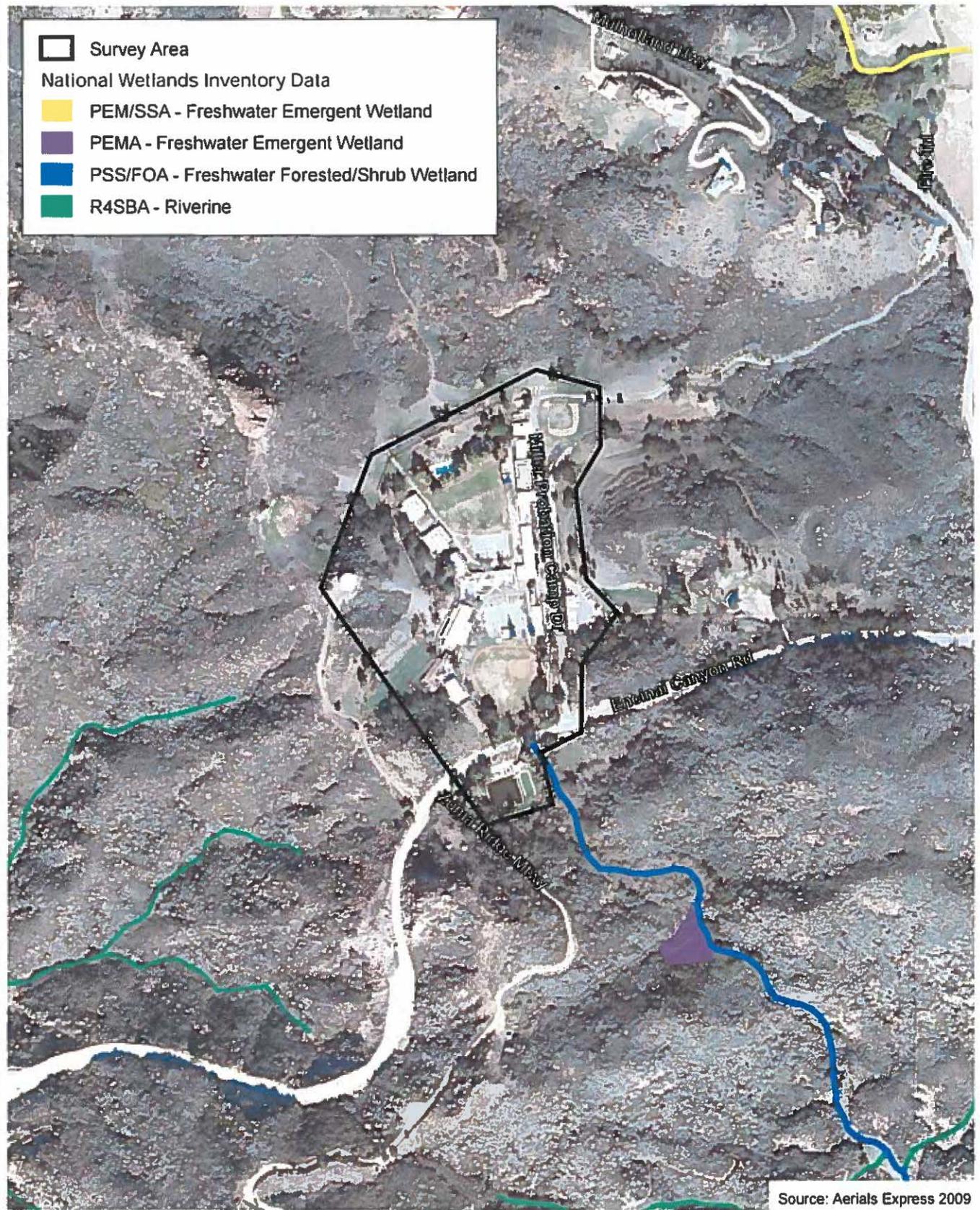
Exhibit 13

Camp Kilpatrick



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-  Survey Area
- National Wetlands Inventory Data
-  PEM/SSA - Freshwater Emergent Wetland
-  PEMA - Freshwater Emergent Wetland
-  PSS/FOA - Freshwater Forested/Shrub Wetland
-  R4SBA - Riverine



National Wetlands Inventory

Exhibit 14

Camp Kilpatrick



200 100 0 200
Feet



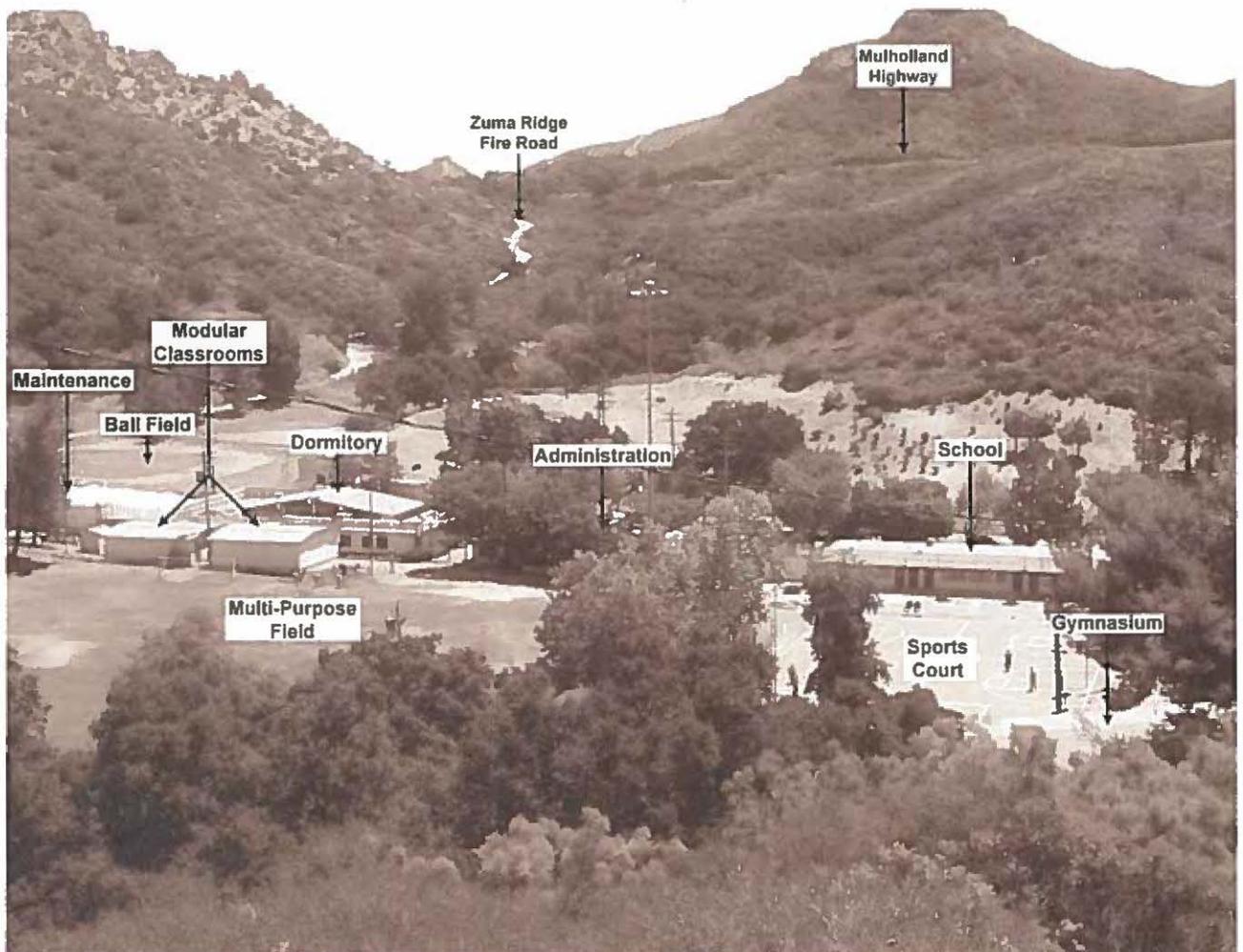
CALIFORNIA
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COMMISSION

Site Plan of Camp Kilpatrick Juvenile Detention Center



1. A Dormitory
2. B Dormitory
3. Gymnasium (Yellow Tag)
4. Kitchen/Cafeteria Building (Excluded from Demo Scope)
5. School Building
6. Administrative/Control Building
7. Special Housing Unit (SHU)
8. Modular Classroom 6
9. Modular Classroom 7
10. Maintenance Building
11. Laundry/Warehouse Building
12. Shed
13. Shed





View looking east from watertank hill.

Project Site Views

Exhibit 16

Camp Kilpatrick



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COMMISSION**



Photograph 1: View facing northwest of Camp Kilpatrick administration building.

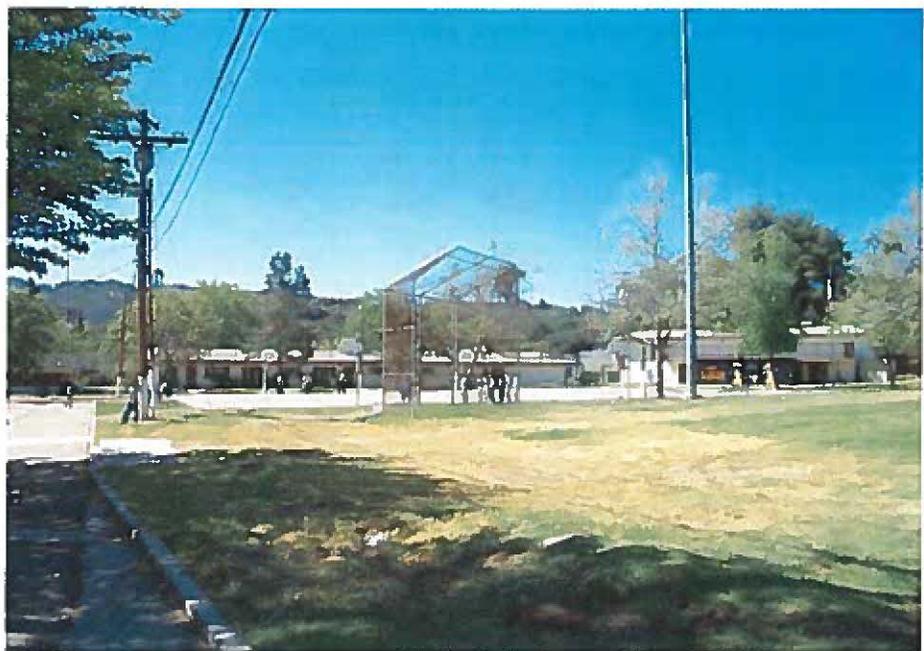


Photograph 2: View facing north of site buildings, parking areas, and driveways.





Photograph 3: View facing south of site buildings, parking areas, and driveways.



Photograph 4: View facing south at site buildings and central softball field.



Photograph 5: View facing southwest of the kitchen and dining building.



Photograph 6: View of the interior of a typical dorm structure.



Photograph 7: View facing west of the site across the central softball field.



Photograph 8: View of the interior hallway of the administration building.



Photograph 9: View facing west at the swimming pool.



Photograph 10: View of pole mounted transformer on site.

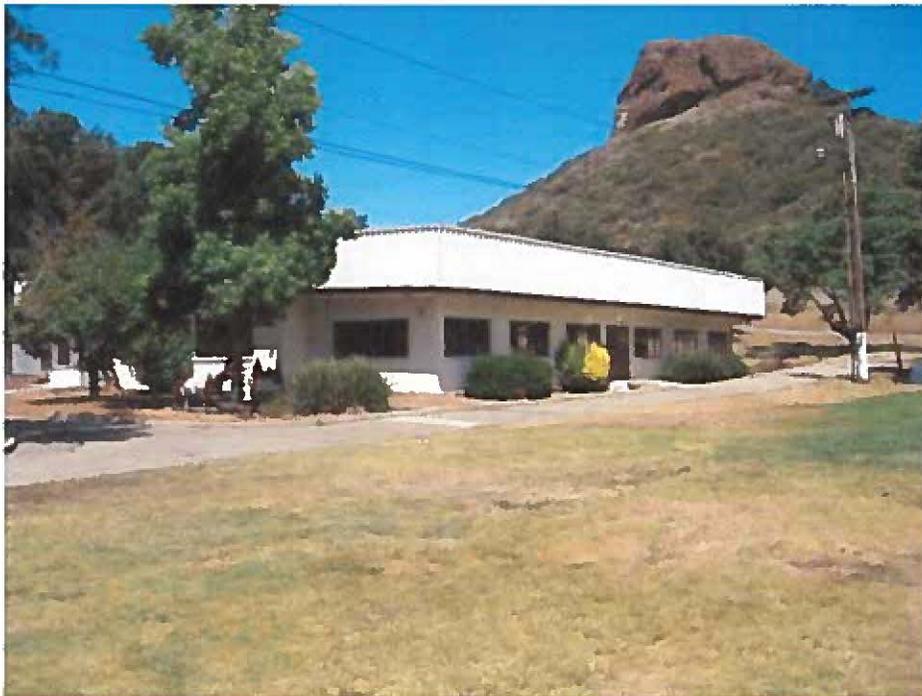


Photograph 11: Gymnasium. View looking southwest.



Photograph 12: Shared Kitchen and Mess Hall. View looking west.





Photograph 13: View facing west of the site across the central softball field.



Photograph 14: View facing west of the site across the central softball field.





Photograph 15: Counselor offices in Administration Building, added in 1963. View looking southeast.



Photograph 16: Administration Building. The original Administration building is the left wing, the right wing was added in 1973. View from main driveway, looking northwest.





Photograph 17: Camp driveway east side: looking north.



Photograph 18: Slope east of camp: looking east.



Eastern drainage: Looking south from a culvert at the drainage feature located just east of the ball field.



Culvert at eastern drainage: Looking north at a culvert/drainage feature located just east of the ball field.



Ball field drainage: Looking east from a culvert adjacent to the ball field.



Culvert trap channel: Looking south from a culvert at the concrete trapezoidal channel adjacent to the ball field.





Just north of the Encinal Road and Miller Probation Camp Drive intersection.



South of Encinal Road and east of the wastewater treatment facility.

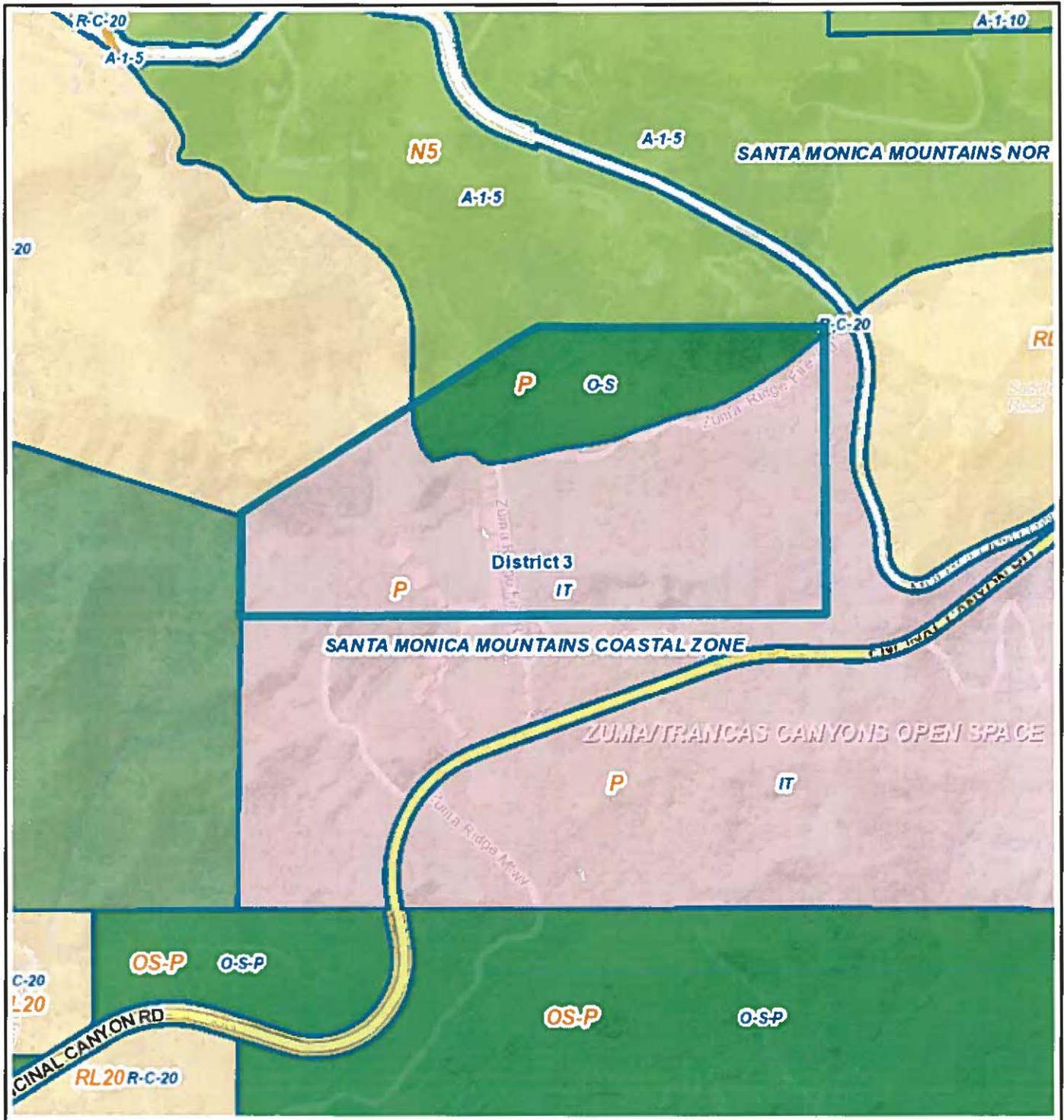
Off-Site Photographs #6

Camp Kilpatrick

Exhibit 18



CALIFORNIA
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COMMISSION



R2012-02386-(3): 427 Encinal Canyon Road

Land Use/Zoning Map

Printed: Jun 04, 2015



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R2012-02386-(3): 427 Encinal Canyon Road Aerial Image showing Coastal Zone Boundary

Printed: Jun 04, 2015



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MAP OF THE SITE

PHOTO KEYMAP OF CAMP KILPATRICK REPLACEMENT FACILITY

