



U.S. Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area



ENVIRONMENTAL ASSESSMENT

Woolsey Fire Disaster Recovery Project



TABLE OF CONTENTS

Section	Page
LIST OF ABBREVIATIONS	III
1 PURPOSE AND NEED	1
1.1 Background	1
1.2 Purpose of and Need for the Action	4
1.3 Environmental Issues and Impact Topics	5
2 ALTERNATIVES	13
2.1 Introduction	13
2.2 Existing Conditions	13
2.3 Description of Alternatives	20
2.4 Alternatives Considered but Dismissed	32
3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	33
3.1 Historic Structures and Cultural Landscapes	33
3.2 Visitor Experience	43
3.3 Threatened and Endangered Species and Critical Habitat	48
4 CONSULTATION AND COORDINATION	60
4.1 Project Scoping History	60
4.2 Consultation with Traditionally Associated American Indian Tribes and Groups	60
4.3 Consultation with Federal Agencies	61
4.4 Consultation with State Agencies	62
4.5 Public Review of The environmental Assessment	62
5 REFERENCES	63

Appendices

Appendix A Resource Protection Measures

Figures

Figure 1-1 Project Location 2

Figure 2-1 Paramount Ranch Existing Conditions 15

Figure 2-2 Rocky Oaks Existing Conditions 17

Figure 2-3 Peter Strauss Ranch Existing Conditions 19

Figure 2-4 Paramount Ranch Site Plan 21

Figure 2-5 Rocky Oaks Site Plan 25

Figure 2-6 Peter Strauss Ranch Site Plan 29

Figure 3-1 Paramount Ranch Historic Properties 35

Figure 3-2 Rocky Oaks Historic Properties 37

Figure 3-3 Peter Strauss Ranch Historic Properties 39

Figure 3-4 Biological Study Area for Paramount Ranch 49

Figure 3-5 Biological Study Area for Rocky Oaks 50

Figure 3-6 Biological Study Area for Peter Strauss Ranch 51

Figure 3-7 Mitigation for the Loss of Lyon’s pentachaeta Critical Habitat at Rocky Oaks 58

Tables

Table 3-1 Public Visitation within the Santa Monica Mountains National Recreation Area from 2016 to 2020 44

Table 3-2 Threatened and Endangered Species Dismissed from Further Analysis 53

LIST OF ABBREVIATIONS

ABAAS	Architectural Barriers Act Accessibility Standard
ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act
APE	area of potential effects
BMP	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLI	Cultural Landscapes Inventory
E.O.	Executive Order
EA	Environmental Assessment
FESA	Federal Endangered Species Act
IBC	International Building Code
IPaC	Information for Planning and Consultation
IWUIC	International Wildland Urban Interface Code
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PCE	primary constituent elements
PEPC	Planning, Environment, and Public Comment
RWQCB	Regional Water Quality Control Board
SHPO	California State Historic Preservation Officer
SMMNRA	Santa Monica National Recreation Area
SWPPP	stormwater pollution prevention plan
UCLA	University of California, Los Angeles
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone

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1 PURPOSE AND NEED

1.1 BACKGROUND

1.1.1 Introduction

The Woolsey Fire of November 2018 burned approximately 21,000 of the 23,595 acres (88 percent) of National Park Service (NPS) land within the Santa Monica Mountains National Recreation Area (SMMNRA) in Los Angeles County, California. NPS manages 12 separate developed areas within SMMNRA, of which seven burned. A total of 26 structures within these areas were a total loss. The NPS has already taken actions to replace seven minor structures: four vault restrooms and three trail bridges.

To reestablish essential visitor and administrative functions that were lost in the 2018 Woolsey Fire, the NPS proposes to replace the 19 lost structures with only nine structures at three developed areas within SMMNRA: Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch (proposed action) (Figure 1-1). The proposed action would create more functional and efficient facilities that better serve the public interest and park operations. The proposed structures would meet current design codes and standards for accessibility and fire safety, including International Building Code (IBC), Architectural Barriers Act Accessibility Standard (ABAAS)/Americans with Disabilities Act (ADA) standards, and International Wildland Urban Interface Code (IWUIC) and National Fire Protection Association (NFPA) codes. In addition, the new structures would improve visitor experience and the efficiency of park operations from pre- and post-fire conditions. The proposed action is intended to redevelop the burned areas in a manner that better aligns with the NPS mission of conserving natural and cultural resources and providing high-quality outdoor recreation opportunities for the public.

This environmental assessment (EA) analyzes the environmental impacts of a no action alternative and the proposed action alternative. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended; regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] 1500–1508 [CEQ 1978]); and the NPS Director’s Order 12, Conservation Planning, Environmental Impact Analysis, and Decision-Making (NPS 2011), and its accompanying NPS NEPA Handbook (NPS 2015).

Public scoping for the proposed action was completed in accordance with 43 CFR Section 46.305. NPS used the scoping process to confirm and define the project purpose and need and to identify issues and impact topics associated with the proposed action. During the scoping process, NPS received comments related to the following environmental issue areas: visitor experience, health, and safety; cultural resources; water resources; traffic volume and circulation; and non-native or exotic plant species. Section 4.0, Consultation and Coordination, includes further information on NPS’ public scoping efforts.

In tandem with preparation of this EA, NPS has initiated consultation with the State Historic Preservation Officer (per 36 CFR Section 800.8) to coordinate compliance with Section 106 of the National Historic Preservation Act of 1966 for Paramount Ranch and Rocky Oaks; however, consultation for Peter Strauss Ranch will be initiated if/when funding is identified. NPS has also notified the Native American Heritage Commission and Native American tribes traditionally associated with the SMMNRA. In addition, NPS has initiated Section 7 consultation with U.S. Fish and Wildlife Service (USFWS) regarding occurrences of Lyon’s pentachaeta (*Pentachaeta lyonii*) in the vicinity of the project sites, and the critical habitat for this species at Rocky Oaks, to evaluate the effect of the proposed action on this species and its critical habitat. Section 4.0, Consultation and Coordination, includes further information on NPS’ consultation and coordination with federal agencies.



Source: Adapted by Ascent in 2021

Figure 1-1 Project Location

1.1.2 Site History

The Woolsey Fire burned through portions of Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch. The damage from the fire resulted in reduced site visitation levels and greatly diminished visitor experiences, as well as reduced efficiency of NPS operations through the destruction of facilities and displacement of employee housing. In addition, the fire resulted in the damage or destruction of cultural features that were important for NPS interpretation, as well as damage or destruction of venues and outdoor assembly areas that provided revenue to offset the costs of site maintenance and operation. A description of the site history at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch is provided in the following sections.

PARAMOUNT RANCH

Paramount Ranch was established as a movie ranch in 1927 and continued to be used for filming movies and television shows throughout the years despite ownership changes. NPS purchased a portion of the property in 1980 and an additional parcel in 1994. Since its acquisition, Paramount Ranch has been the only NPS site that interprets film history and storytelling through film. Prior to the Woolsey Fire, it was a working movie ranch that allowed the public to experience filmmaking in process. The property has been determined eligible for listing as a cultural landscape in the National Register of Historic Places (NRHP).

Pre-fire, filming and special events occurred in the area west of Medea Creek. This area consisted of historic Paramount Ranch-era buildings, non-historic film sets, and a park ranger residence. Pre-fire, the buildings west of Medea Creek were served by utilities, which included a water line, sanitary sewer line, and electrical line attached to the side of the Medea Creek Bridge. The underground electrical line from Cornell Road went to an underground transformer on the west side of Medea Creek, which served the buildings, event lawn, and film sets.

The Woolsey Fire burned through portions of the Paramount Ranch property and destroyed all but two structures in the western portion of the site, including four permanent historic structures, six non-permanent film set buildings, one restroom building, one park ranger residence, and the western area movie set that incorporated these structures. Two non-historic film-set structures in the western portion of the site remain standing (Train Station/Building 214 and Chapel set). Three historic buildings dedicated to administrative functions on the eastern portion of the site were not affected by the fire. All existing utilities serving the western portion of the site were damaged in the fire. Debris from the burned structures was removed from the site in 2020.

The property was closed to the public immediately following the Woolsey Fire and subsequently reopened to visitors in late November 2018 with fencing around areas of ash and debris. Special events and filming activities have ceased due to the loss of structures, assembly areas, and utilities. However, recreational activities, such as the use of trails and picnic areas, have resumed since the fire. Post-fire site visitation levels at Paramount Ranch decreased from pre-fire levels, with approximately 260,163 visitors in 2019 and 191,567 visitors in 2020 (NPS 2021d). In addition, NPS experienced a loss in revenue from \$112,000 in the 2017 fiscal year to \$17,400 in the 2020 fiscal year at Paramount Ranch associated with the loss of rentable event space (Szymanski, pers. comm., 2021).

ROCKY OAKS

Beginning in 1910, the land comprising Rocky Oaks was used for ranching and orchards, and then as a small-scale gentleman's ranch. From the 1920s to 1954, much of the land encompassing the main ranch development was cleared for agricultural use. Substantial grading has occurred and has altered the ground surface, terrain, and vegetation. NPS acquired the property in 1980. Prior to the Woolsey Fire, portions of the Rocky Oaks property were primarily used for administrative functions of NPS and the La Kretz Center for California Conservation Science Field Station (La Kretz Center), a science and education center operated through a partnership between NPS and the University of California, Los Angeles (UCLA).

The Woolsey Fire burned through portions of the Rocky Oaks project site, destroying the Brandenberger-Brown House, as well as a housing unit and the park's curatorial facility. The fire also damaged vegetation and the electrical, sanitary sewer, and water utilities throughout the project site. The La Kretz Center, a separate building constructed in 2017-18 that contains a necropsy laboratory and small dormitory for visiting researchers, survived the fire undamaged. Utilities serving the La Kretz Center are functioning. Landscape features associated with the ranch, such as stone retaining walls, remain extant.

The project site was cleared of debris and hazardous materials were abated. The La Kretz Center was reopened to NPS staff and visitors by appointment only and continues to be used infrequently. The Woolsey Fire did not contribute to any loss in revenue associated with the Rocky Oaks project site. Site visitation in the public use areas dropped from approximately 9,713 visitors in 2017 to 548 visitors in 2020 at Rocky Oaks (NPS 2021).

PETER STRAUSS RANCH

Established by Harry Miller as a rural retreat in the 1920s with a ranch house (not extant) and several ancillary structures, the property was transformed into a recreation and entertainment venue known as Lake Enchanto in the 1930s and continued as such until the 1960s. The site was later purchased by actor and producer Peter Strauss, who resided on the property and restored several of the structures. The ranch was sold to the Santa Monica Mountains Conservancy in 1983 and acquired by NPS in 1987 for inclusion in the SMMNRA.

Portions of the Peter Strauss Ranch property were burned in the Woolsey Fire. The historic Peter Strauss Ranch House/Harry Miller House (Ranch House) was entirely burned in the fire, leaving only the concrete foundation, surrounding concrete porches and walkways, the fireplace/chimney, and some portions of the stone wall veneer. The remaining material was demolished and removed in July 2020. The Ranch House had a rectangular footprint of approximately 1,590 square feet, with covered porches and walkways along the west, north, and east of the building that totaled about 675 square feet. The historic radio house, storage shed, swimming pool, amphitheater, dance floor, and several other historic landscape features were spared by the fire. The aviary was not damaged by the fire but was damaged by a falling tree limb in spring 2020, which caused many of the framing members to bend. Several mature trees were also damaged in the fire.

The property was previously open from 8:00 a.m. to sunset for visitation. However, the Peter Strauss Ranch property has been closed to the public due to the extent of fire damage. In addition, the property is currently being used as a staging area for the reconstruction of the nearby Mulholland Highway bridge that was lost in the fire (separate non-NPS action). Site visitation dropped from approximately 26,932 visitors in 2016 and 23,127 in 2017 to 0 visitors in 2020 at Peter Strauss Ranch (NPS 2021d). The site also functioned as a gathering place where NPS hosted 10,000 annual student visits and art programs. When not in use for public programs, the property was available for a fee for permitted private events. The Ranch House and outdoor assembly areas were used for public programs, park outreach programs, Sunday concerts, art installations, private weddings, birthdays, retirement parties, and other special events. Peter Strauss Ranch was considered the primary site for medium-sized events (200 to 400 attendees), with an upper limit of approximately 1,000 to 1,200 attendees. Had the Woolsey Fire not occurred, NPS projected a revenue of \$91,000 in the 2019 fiscal year, based on an estimated 30 events and \$18,000 in the 2020 fiscal year due to the COVID-19 pandemic (Szymanski, pers. Comm., 2021).

1.2 PURPOSE OF AND NEED FOR THE ACTION

The purpose of the proposed action is to replace NPS facilities and functions lost within the SMMNRA due to the Woolsey Fire. The proposed action is needed to reestablish visitor services, cultural features, employee housing, and administration buildings that were destroyed in the Woolsey Fire. In addition, the proposed action is needed to create more functional and efficient facilities that better serve the public interest and park operations, to consolidate NPS administrative functions and housing, and to reestablish event venues. The proposed action is intended to redevelop the burned areas in a manner that better aligns with the NPS mission of conserving natural and cultural resources and providing high-quality outdoor recreation opportunities for the public.

The proposed action would achieve the following objectives:

- ▶ Enhance visitor experience at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch.
- ▶ Enhance accessibility at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch to meet current IBC, ABAAS, and ADA design codes and standards.
- ▶ Improve fire resiliency at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch to meet current IWUIC and NFPA standards.
- ▶ Decrease maintenance costs and increase efficiency of NPS operations.
- ▶ Reduce the environmental footprint of NPS facilities within the SMMNRA to allow for greater public use of spaces that were previously restricted to employee housing.
- ▶ Reestablish pre-fire special event venues and outdoor assembly areas at Paramount Ranch and Peter Strauss Ranch so that the public continues to enjoy these spaces. These event venues also generate revenue to fund NPS operations and maintenance.
- ▶ Reestablish cultural features at Paramount Ranch that were essential for NPS interpretation of film history, and cultural features at Peter Strauss Ranch that were essential for NPS interpretation of the site's history as an amusement park and ranch.
- ▶ Accommodate anticipated growth in overall visitation within SMMNRA over time.

1.3 ENVIRONMENTAL ISSUES AND IMPACT TOPICS

1.3.1 Impact Topics Evaluated in this Environmental Assessment

NPS considered existing studies and data, public comments, and agency consultations to determine the key resource topics related to the scope of the proposed action. The following topics are carried forward for further analysis in this EA because (1) the environmental impacts are central to the proposal or of critical importance; (2) detailed analysis of the environmental impacts are necessary to make a reasoned choice between alternatives; (3) the environmental impacts are a point of contention among the public or other agencies; or (4) there are potentially significant impacts to that resource topic.

Historic Structures and Cultural Landscapes: No known cultural landscapes were identified in connection with the Area of Potential Effects (APE) for Rocky Oaks. However, historic structures and cultural landscapes were identified in the APEs for Paramount Ranch and Peter Strauss Ranch. The proposed action involves replacement of historic buildings and redevelopment of structures that contribute to the cultural landscapes at these two sites. Therefore, this EA evaluates the proposed action's potential effects on historic structures and cultural landscapes.

Visitor Experience, Health, and Safety. The proposed action is intended to replace NPS functions and structures lost in the Woolsey Fire, to rehabilitate damaged cultural features that are important to NPS interpretation, to reestablish rentable venues and outdoor assembly areas, to restore site visitation levels and improve visitor experience, as well as improve the efficiency of NPS operations. Concerns about ongoing wildland fire risk were raised during the public scoping period. The SMMNRA is identified by the California Department of Forestry and Fire Protection (CAL FIRE) as a Federal Responsibility Area and not under local jurisdiction; however, the entire park is surrounded by areas identified as a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). Although recent fires, including the Woolsey Fire, have resulted in the temporary reduction of fuels within the SMMNRA, the accumulation of fuels is anticipated over time with vegetation regrowth. The proposed action is intended to improve visitor experience, health, and safety; therefore, this is a key topic for the proposed action and is evaluated in this EA.

Threatened and Endangered Species and Critical Habitat. Lyon's pentachaeta (*Pentachaeta lyonia*), a federally listed, endangered annual plant species has the potential to be found within two of the project sites, and designated critical habitat for this species extends over portions of the Rocky Oaks project site. Therefore, this EA evaluates the

proposed action's potential impacts on threatened and endangered species and critical habitat for Lyon's pentachaeta.

1.3.2 Impact Topics Considered But Dismissed from Further Analysis

The following impact topics have been considered, but are not analyzed further because they are either not present within the project sites, would not be affected by the proposed action, or the likelihood of impacts are not reasonably expected with the application of resource protection measures (provided in Appendix A), which the NPS will follow if the proposed action is implemented. Therefore, there would be no potential for significant effects related to these topics. In addition, these topics were not raised as points of contention during the public and agency scoping process.

TRAFFIC VOLUME AND CIRCULATION

The SMMNRA is within the greater Los Angeles area and in proximity to the second largest metropolitan region in the United States. Public use areas within the SMMNRA, excluding beaches, receive approximately 8 to 10 million visitors each year. In addition, major thoroughfares in proximity to the project site experience high traffic volumes. In 2019, the annual average daily traffic volume was 160,000 to 162,000 vehicles at the U.S. Route 101/Kanan Road interchange and 28,000 to 29,500 vehicles at the U.S. Route 1/Kanan Dume Road interchange (Caltrans 2019).

The proposed action is anticipated to result in an increase of approximately 110,000 visitors to SMMNRA from existing post-fire conditions. The increase in visitation would result in an insignificant increase in existing background traffic volumes. In addition, the increase in visitation to the project site would represent 1.4 percent of overall park-wide visitation. Furthermore, the proposed action is intended to reestablish pre-fire visitation to the project sites. Therefore, operational impacts related to traffic volumes would be insignificant. This issue is dismissed from further analysis.

The proposed action would include the closure of public ingress and egress locations at Paramount Ranch and Peter Strauss Ranch to improve sight distances and reduce the potential for collisions (see Section 2.3.2 for additional information). Therefore, operational impacts related to circulation would be beneficial. This issue is dismissed from further analysis.

During construction, traffic flow and vehicle access on roads in proximity to construction areas would be temporarily restricted. Traffic may be periodically subject to alternating, one-way flow. If the proposed action is implemented, NPS will implement a traffic control plan with standard measures (e.g., using flaggers during work hours to control traffic and informing visitors of construction activities and associated delays) to maintain safe and efficient traffic flow during the construction period (Appendix A). Construction-related impacts related to traffic and circulation would be insignificant. This issue is dismissed from further analysis.

AIR QUALITY AND CLIMATE CHANGE

The project site is in the greater Los Angeles region within the South Coast Air Basin. As described above, the proposed action would increase site visitation levels at the project site from post-fire conditions, which would result in insignificant increases in traffic volumes at nearby major interchanges. In addition, the proposed action would not generate new permanent jobs. Therefore, any increases in air pollutant and greenhouse gas emissions from mobile-source emissions would be insignificant in the context of the existing regional setting. In addition, the proposed action would not introduce new permanent, stationary sources that would generate measurable air pollutants or greenhouse gas emissions (e.g., industrial facilities). Furthermore, the proposed action is intended to reestablish pre-fire visitation and structures to the project sites, but facilities would be consolidated within fewer buildings that are more efficient. Therefore, the proposed action is not anticipated to measurably increase air pollutant or greenhouse gas emissions and the project impact would be insignificant. This issue is dismissed from further analysis.

Construction would include operating mechanized equipment, hauling materials, and ground disturbance, which would result in temporary increases in emissions of vehicle exhaust, inhalable particulate matter, fugitive dust, and greenhouse gases. If the proposed action is implemented, construction will comply with standard dust abatement measures, which include stabilizing soils with water or other dust palliatives, covering loads on haul trucks, employing speed limits on unpaved roads, minimizing areas of vegetation clearing, and revegetating disturbed areas after construction (Appendix A). If implemented, dust-generating activities will be suspended during high winds to prevent visible dust clouds from affecting nearby sensitive receptors (e.g., houses and schools). Due to prevailing winds and air circulation patterns in the project site, air pollutant emissions or airborne particulates created by fugitive dust plumes would rapidly dissipate from the source. Overall, there would be localized, short-term degradation of air quality during construction activities; however, adverse effects outside of the construction sites would not be anticipated. Temporary construction emissions would be insignificant in the context of the existing regional setting and would cease following construction. This issue is dismissed from further analysis.

BIOLOGICAL RESOURCES

Non-Native or Exotic Plant Species: The three project sites are developed areas within SMMNRA, which have been exposed to non-native or exotic plant species due to previous development, maintenance activities, and visitor use. Construction activities that involve earth moving would create conditions for the establishment of new invasive plant populations. If the proposed action is implemented, contractors will adhere to the SMMNRA *Invasive Plant Management Plan* (NPS 2017), which would require (1) removing invasive plants from construction areas prior to commencing construction and (2) utilizing best management practices (BMPs) to prevent the spread or introduction of invasive plants. BMPs include using certified weed-free materials, inspecting equipment for non-native or exotic plant material, and cleaning equipment and vehicles as they enter and exit the project sites. If warranted, revegetation seed mixes will be chosen in consultation with NPS staff and spread in affected areas after construction. If the proposed action is implemented, the NPS will (1) monitor project sites and surrounding areas for invasive plants for five years after project construction is complete and (2) continue to follow existing management practices for preventing the spread of non-native or exotic plant species after the five-year period (Appendix A). With implementation of these measures and compliance with the SMMNRA *Invasive Plant Management Plan* (NPS 2017), impacts associated with non-native or exotic plant species would be insignificant; therefore, this issue is dismissed from further analysis.

Vegetation: The three project sites are developed areas within SMMNRA that burned in the Woolsey Fire. The proposed redevelopment of structures would utilize the previously disturbed sites to minimize areas of new disturbance. However, the proposed action would require the removal of two 6-inch coast live oak trees along the western side of the existing entry road at Rocky Oaks. If the proposed action is implemented, the following measures would be implemented: (1) trees and vegetation will either be protected in place or replaced on site; (2) Protected Zones will be established around native oaks, sycamores, walnuts, ashes, and other trees of historic or cultural value during construction, as specified in Appendix A; (3) NPS will adhere to the Los Angeles County Oak Tree Ordinance (Section 22.56.2050 of the Los Angeles County Code of Ordinances) for tree protection; (4) oak trees requiring removal will be replaced at a 3:1 ratio; (5) non-tree vegetation will be replaced with native, NPS-approved species; and (6) disturbed areas will be revegetated. With implementation of these measures (which are listed in Appendix A), impacts to vegetation within SMMNRA would be insignificant; therefore, vegetation has been dismissed from further analysis.

Wetlands: The proposed actions would comply with Executive Order (E.O.) 11990: "Protection of Wetlands" (42 Fed. Reg. 26961), Director's Order #77-1: Wetland Protection, and the Clean Water Act. If the proposed action is implemented, the NPS will clearly demarcate construction limits with fencing in spot locations to minimize the potential for wetland disturbance or fill outside of the project disturbance area (Appendix A). The proposed action would require limited actions where impacts to wetlands cannot be avoided; however, these actions would not require the completion of a wetlands statement of findings because they would be exempt under Sections 4.2.1.5 and 4.2.1.7 of the NPS Procedural Manual #77-1: Wetland Protection Manual (NPS 2016), as described below.

- ▶ At Paramount Ranch, improvements at Cooper Ditch would include installation of new utility lines and replacement of the existing culvert. Cooper Ditch is an ephemeral man-made drainage ditch created for flood control in the western area of Paramount Ranch. As an ephemeral feature, Cooper Ditch is not a jurisdictional water of U.S. regulated by the U.S. Army Corps of Engineers (USACE). However, the USFWS National Wetlands Inventory (NWI) identifies riverine wetland associated with Cooper Ditch (USFWS 2021a). All improvements would occur within the pre-disturbed footprint. These actions would be exempt under Section 4.2.1.7 of NPS Procedural Manual #77-1, which applies to actions involving the maintenance, repair, or renovation of currently serviceable facilities or structures. If the proposed action is implemented, the NPS will reconfirm applicable permitting requirements related to temporary construction impacts for repair/rehabilitation of the culvert and limited bank stabilization at Cooper Ditch to ensure compliance prior to construction. The construction disturbance to Cooper Ditch would be temporary, insignificant, and result in no net loss to wetland resources.
- ▶ At Paramount Ranch, the USFWS NWI identifies riverine and freshwater forested/shrub wetland associated with Medea Creek (USFWS 2021a), which flows adjacent to this project site. Improvements at Medea Creek would include installation of new utilities at the existing bridge crossing within the defined bed and bank. These actions would be exempt under Section 4.2.1.5 of Procedural Manual #77-1, which applies to actions involving minor stream crossings for underground utility lines if the cumulative wetland disturbance totals 0.1 acre or less.
- ▶ At Rocky Oaks, the proposed action would include widening of the entrance road, which is adjacent to seasonal wetlands and spans over an existing culvert. The road widening at Rocky Oaks has been designed to minimize disturbance. Improvements would disturb less than 0.1 acre and would be exempt under Section 4.2.1.5 of Procedural Manual #77-1, as described above.

Impacts on wetlands would be insignificant; therefore, this issue is dismissed from further analysis.

Wildlife and Wildlife Habitat: The primary threats to wildlife populations in the SMMNRA are from the effects of habitat loss and fragmentation. Habitat types within the project site are described in Section 3.1.1. The proposed redevelopment of structures would be located within the three previously developed, disturbed, and burned sites. If the proposed action is implemented, areas of disturbance will be fenced during construction to prevent disturbance of surrounding habitat. Therefore, the proposed action would not alter or adversely affect habitat nor contribute to habitat loss and fragmentation.

The habitat adjacent to the project sites may serve as wildlife corridors, particularly along Medea Creek at Paramount Ranch and Triunfo Creek at Peter Strauss Ranch. Except in those spot locations mentioned above under “Wetlands,” construction activities would not occur in the creeks or wetland areas. Construction activities adjacent to these creeks has potential to result in a temporary disruption to wildlife movement. Following construction, public visitation would be reestablished at these sites, including occasional special events, which also has potential to affect wildlife movement. However, the three sites have been developed and have been historically high-use areas within SMMNRA, and therefore, the redevelopment of structures and visitation at these sites would not be anticipated to measurably affect wildlife movement. Furthermore, NPS will implement the following BMPs to prevent accidental harm to wildlife if the proposed action is implemented: conducting safety protocols to manage rattlesnakes and other dangerous wildlife without lethal means, covering any excavations left overnight or provide escape ramps to prevent wildlife from becoming trapped, using wildlife-proof garbage containers, inspecting work areas, and contacting a qualified biologist to relocate wildlife if found at the construction site (Appendix A).

Migratory birds and raptors, including those listed on the USFWS Birds of Conservation Concern 2021 List (USFWS 2021b), have the potential to nest, forage, and pass through all three project sites (see Section 3.3.1 for additional information). Resource protection measures would be implemented to avoid effects to migratory birds and raptors, which include completing pre-construction surveys, implementing seasonal restrictions on construction activities to avoid nesting seasons, establishing buffer zones around nesting birds, and implementing best available noise control techniques (Appendix A).

Because the proposed action would redevelop structures at previously developed sites, BMPs would be implemented to minimize wildlife disturbance during construction, and migration routes would not be altered, wildlife and wildlife habitat impacts would be insignificant and are dismissed from further analysis.

CULTURAL RESOURCES

Archeological and Ethnographic Resources: No prehistoric or historic archeological sites or isolates within the Paramount Ranch, Rocky Oaks, or Peter Strauss Ranch APEs have been determined eligible for listing in the NRHP. If the proposed action is implemented, the NPS will (1) flag or fence sensitive archeological resources near project site boundaries for avoidance, and (2) ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites (Appendix A).

No known sites of traditional religious or cultural importance to tribes have been identified in the APEs for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch. NPS consulted with the 12 Native American Tribes and tribal organizations traditionally associated with SMMNRA lands to ensure a sense of respect for and protection of the ethnographic resources within and near the project sites (refer to Section 4.2 for a summary of Tribal consultation efforts).

If the proposed action is implemented, NPS and tribal archeological monitors will be onsite during ground disturbing activities (Appendix A). If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources are identified and documented. If the resources cannot be preserved in situ, an appropriate mitigation strategy will be developed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 will be followed. If non-Indian human remains are discovered, standard reporting procedures to the proper authorities, as well as applicable federal, state, and local laws will be followed (Appendix A). With implementation of resource protection measures, adverse effects to archeological and ethnographic resources would be avoided and minimized. Therefore, this issue is dismissed from further analysis.

Museum Collections: Approximately 95 percent of NPS archives at Rocky Oaks were burned in the Woolsey Fire. The extant museum collections would be unaffected by the proposed action. The archives would be reestablished as part of a separate action and relocated outside of the Rocky Oaks property.

If the proposed action is implemented, any inadvertent archeological resource discoveries made during construction activities will be accessioned, cataloged, preserved, and protected according to NPS standards and guidelines. If construction activities result in any discoveries associated with the 12 Native American Tribes and tribal organizations traditionally associated with the lands of the SMMNRA, NPS will consult with the respective tribes regarding the disposition of the artifacts. Therefore, this issue is dismissed from further analysis.

GEOLOGICAL

The project sites at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch were previously developed sites that burned in the Woolsey Fire. There are no geologic resources, such as geysers, hot springs, or geothermal systems; cave and karst systems; nor sand dunes, moraines, or terraces in depositional landscapes, within these three project sites. No geological processes would be affected by the proposed action. If the proposed action is implemented, construction will conform to the current IBC, which contains specifications to minimize adverse effects on structures caused by ground shaking from earthquakes and other geologic hazards. Through conformance with the IBC and implementation of site-specific engineering measures developed in compliance with the IBC, development of the proposed action would not result in exposure of people or structures to significant adverse effects related to seismic or geological hazards. Therefore, geological issues are dismissed from further analysis.

LIGHTSCAPES

The Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch properties are located in semirural settings. Existing light sources within the project sites include exterior and interior lighting from existing onsite buildings. In addition, the project sites receive spillover light from vehicles traveling on adjacent roadways, street lights, and adjacent residential and commercial properties. Construction activities would be limited to daylight hours and would not require lighting. The proposed action includes new buildings that would introduce lighting in a manner similar to pre-fire conditions.

If the proposed action is implemented, NPS will ensure that (1) the proposed light sources consist of appropriate emission spectrum lighting; (2) the use of outdoor lighting is limited to only what is necessary for basic safety requirement; and (3) all outdoor lighting is shielded to the maximum extent possible and directed downward to direct light away from the night sky and avoid disturbance to wildlife (Appendix A). The proposed action would result in insignificant effects on lightscapes, and this issue is dismissed from further analysis.

COMMUNITY

Environmental Justice: Executive Order 12898 directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. No minority or low-income populations were identified within the census block groups that overlap with the project site. In addition, as part of the planning process, NPS has actively solicited public participation and given equal consideration of input from all persons regardless of age, race, income status, or other socioeconomic or demographic factors. Benefits of the proposed action include reestablished and improved recreational opportunities for all within the SMMNRA boundary. Implementation of the proposed action would not result in adverse human health effects. Therefore, the proposed action would not adversely affect minority or low-income populations or communities. This issue is dismissed from further analysis.

Socioeconomics: Construction activities would generate a temporary increase in employment opportunities for the local workforce and has potential to increase revenue for local businesses. Although construction has potential to result in a beneficial impact to the local economy, this impact would cease following construction.

Implementation of the proposed action would not measurably affect population, housing, or employment in existing nearby communities. The proposed action includes construction of employee housing, containing four residential units (two two-bedroom units and two one-bedroom units) and four RV parking sites within NPS jurisdiction at Rocky Oaks to replace residences that were burned in the fire. As with the housing units that were lost in the fire, these housing units would only be available to NPS employees. The proposed action would not change staff levels at SMMNRA. Therefore, the proposed action would not contribute to population growth in the region, nor would it generate new long-term employment opportunities within SMMNRA.

Because the Rocky Oaks project site does not serve the public, except for the portion of the Rocky Oaks Loop Trail that would be reopened following construction activities, the proposed action would not restrict or increase long-term public access, and there would be no changes in revenue with implementation of the proposed action.

Compared to existing, post-fire conditions, the proposed action would result in increases in visitation, public events, and special uses (e.g., filming) at Paramount Ranch and Peter Strauss Ranch. However, the uses and types of activities would not change from those that occurred pre-fire, nor would they be expanded beyond the areas previously used for filming, public events, and private functions. Existing limitations on event size, hours of operation, and lighting would not change. Visitation at Paramount Ranch and Peter Strauss Ranch is anticipated to rise concurrently with overall SMMNRA visitation over time. Revenue associated with rentable venues decreased significantly due to loss of structures at Paramount Ranch and Peter Strauss Ranch in the Woolsey Fire. NPS anticipates a return to pre-fire revenue levels with implementation of the proposed action. The proposed action would result in a beneficial effect on revenue for SMMNRA, and increased visitation at the project sites has potential to benefit nearby local businesses. The effects of the proposed action on socioeconomics are anticipated to range from insignificant to beneficial, and this issue is dismissed from further analysis.

SOUNDSCAPES

Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch are developed sites located along developed semirural corridors. Existing ambient noise sources include vehicle traffic on adjacent roadways and activities at the project sites and on neighboring agricultural, residential, and commercial properties. Administrative and housing functions at Rocky Oaks, filming activities and visitation at the Paramount Ranch structures, and events at Peter Strauss Ranch generate nominal amounts of noise. The protection of natural ambient soundscapes and the opportunity for visitors

to experience natural sound environments are not objectives for these recreation areas, and guests do not typically visit the three sites to seek the quieter, intermittent sounds of nature. However, visitors utilizing trails from or adjacent to these sites would experience intermittent noise. Project construction activities, such as the hauling of material or the operation of construction equipment, would also result in intermittent noise. However, the noise would be temporary and consistent with existing ambient sounds. The anticipated noise from reestablishment of facilities and increased activities and visitation at the project sites would not adversely affect soundscapes. Furthermore, the anticipated operational noise levels would be consistent with historical trends because they would be similar to noise levels associated with pre-fire conditions. This issue is dismissed from further analysis.

VIEWSHEDS

The viewsheds of the project sites were adversely affected due to the loss of structures and landscapes burned in the Woolsey Fire. The sites were subsequently cleared, leaving disturbed vacant sites within the three developed project sites. During redevelopment of structures, the presence of construction equipment, vehicles, and crews within the project sites would result in temporary, short-term changes in the aesthetics of the properties. Construction activities would be limited to designated construction zones. Following construction, views within the project sites would be similar views that existed prior to the Woolsey Fire because the new buildings are proposed in the same approximate locations and footprints. The proposed structures would be similar in design, height, and massing to the pre-fire structures. Although new clustered housing is proposed at Rocky Oaks to consolidate housing that burned throughout the SMMNRA, the new housing would be sited in a flat area below the grade of surrounding rock outcroppings and slopes. Therefore, the proposed action would not result in adverse aesthetic or obstructive visual effects. Scenic views or vistas either from or to the project sites would not be affected by the proposed structures. Furthermore, the proposed action was designed to maintain the historic character and feeling of the existing settings and would not detract from the historic significance of existing cultural landscapes at Paramount Ranch and Peter Strauss Ranch (see Section 3.1, Cultural Resources, for additional information). The proposed action would not eliminate scenic views or introduce visual elements that are incompatible, out of scale, in great contrast, or out of character with the surrounding area. This issue is dismissed from further analysis.

VISITOR HEALTH AND SAFETY

Construction activities would be limited to established construction zones that would be fenced and closed to the public. If the proposed action is implemented, construction activities would comply with (1) applicable federal, state, and NPS worker safety requirements, including Occupational Safety and Health Administration standards and (2) applicable local jurisdiction orders, federal orders, and guidance and recommendations from the Centers for Disease Control and Prevention related to best safety practices during the COVID-19 pandemic. In addition, if the proposed action is implemented, NPS will implement a traffic control plan with standard measures, such as strategies to maintain safe and efficient traffic flow during the construction period (Appendix A). Therefore, construction would have no adverse effects on human health and safety.

WATER RESOURCES

Floodplains: The proposed action would comply with E.O. 11988, Floodplain Management (42 Fed. Reg. 26951), and NPS Director's Order #77-2: Floodplain Management. The majority of project construction disturbance and the footprint of redeveloped structures would be outside of the 100-year floodplain. However, the proposed action would involve limited actions within the defined floodplain, as follows:

- ▶ At Paramount Ranch, stabilization of paths, replacement of utilities, modifications to a fire hydrant, and construction of accessible parking spaces, which would be pervious surfaces, would occur within the defined 100-year floodplain of Medea Creek.
- ▶ At Peter Strauss Ranch, installation of a landscape swale, several parking stalls, and a pedestrian crossing, all of which would be pervious surfaces, would occur within the defined 100-year floodplain of Triunfo Creek.

These actions would constitute exceptions under Section 5.B of Procedural Manual #77-2 (NPS 2002), which applies to park functions near water that require little physical development and do not involve overnight occupation. The proposed action would not introduce accommodations for overnight occupation into existing floodplains. In addition, the proposed improvements would not increase impervious surfaces in the floodplain and would not affect the capacity or function of existing floodplains. Therefore, the proposed action would not result in adverse effects on floodplains. This issue is dismissed from further analysis.

Water Quality: Project construction has potential to contribute to short-term effects on water quality from ground disturbance, sedimentation, and erosion or pollutants from construction materials and equipment. If the proposed action is implemented, NPS and its contractors will comply with standard BMPs (Appendix A), which include implementing soil stabilization and erosion control measures, installing fencing around surface water features, spill prevention and pollution control measures, establishing equipment staging areas away from water bodies or wetlands, and scheduling construction activities outside of anticipated heavy rain events. If the proposed action is implemented, disturbed areas will be scarified, mulched, seeded, or planted with native species to reduce the potential for erosion of bare soils after construction. Furthermore, the proposed action is designed to redevelop the most essential buildings and utilities necessary to replace lost functions. Because the proposed structures would be similar in size and function to the previously existing structures, the proposed action would result in an insignificant change to impervious surface area at the project sites compared to pre-fire conditions. In addition, project designs include landscape swales to collect, infiltrate, and direct drainage of stormwater runoff. The proposed action would result in insignificant effects to water quality, and this issue is dismissed from further analysis.

Water Supplies and Wastewater: No dewatering of groundwater or the use of groundwater supplies would be required as part of the proposed action. The proposed action includes replacement of aged leach fields for the septic systems at Rocky Oaks and Peter Strauss Ranch, improving reliability of wastewater treatment and protection of water quality. In addition, the proposed action would replace structures lost in the Woolsey Fire, re-establishing visitation to the project sites to pre-fire conditions, increasing water use over post-fire conditions. However, the number of structures reestablished would be less than pre-fire conditions, water efficiency measures consistent with the current building code would be implemented. The reestablished facilities due to the proposed action would not measurably increase the demand for domestic water needs or wastewater treatment services over pre-fire conditions. The proposed action would result in insignificant effects to water supplies and beneficial effects to wastewater. Therefore, this issue is dismissed from further analysis.

WILDERNESS

There are no federal wilderness areas within the SMMNRA boundary, including the three project sites. The nearest wilderness areas are Sespe Wilderness, over 25 miles north of the SMMNRA, and the Magic Mountain Wilderness Area, over 25 miles northeast of the SMMNRA (Wilderness Connect 2021). The proposed action would not affect wilderness areas; therefore, this issue is dismissed from further analysis.

2 ALTERNATIVES

2.1 INTRODUCTION

This Environmental Assessment (EA) objectively evaluates a reasonable and feasible action alternative and a no action alternative, as follows:

- ▶ Alternative 1: No Action Alternative
- ▶ Alternative 2: Proposed Action – Woolsey Fire Disaster Recovery (Preferred Alternative)

A detailed description of the No Action Alternative and Proposed Action Alternative and is provided in Section 2.3. This chapter also includes a discussion of avoidance and minimization measures to be implemented as part of the Preferred Alternative, which are listed in Appendix A, and alternatives considered but dismissed from further consideration.

2.2 EXISTING CONDITIONS

The existing (2021) post-Woolsey Fire conditions serve as the baseline from which the effects of the alternatives are analyzed. The existing conditions within the SMMNRA Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch project sites are described in the sections below. The following sections are based in part on the information in the Predesign Reports prepared for Paramount Ranch (NPS 2020a), Rocky Oaks (NPS 2021b), and Peter Strauss Ranch (NPS 2020c). The locations of the three sites in relation to the SMMNRA boundaries are shown in Figure 1-1, provided in Section 1, Purpose and Need.

2.2.1 Overall Site Conditions

The SMMNRA is identified by CAL FIRE as a Federal Responsibility Area and not under local jurisdiction; however, the entire park is surrounded by areas identified as a VHFHSZ (CAL FIRE 2007). Although recent fires, including the Woolsey Fire, have resulted in the temporary reduction of fuels within the SMMNRA, the accumulation of fuels is anticipated over time with vegetation regrowth. Within the project area, the NPS follows Los Angeles County guidance for fuels treatments. In the event of a fire, the NPS follows the wildland fire management, public safety, and fire prevention strategies outlined in the SMMNRA Fire Management Plan (NPS 2012) and the Santa Monica Mountains Community Wildfire Protection Plan (Santa Monica Mountains CWPP Collaborator Organizations 2012).

Contaminated soils are present within the three project sites due to ash and debris from the Woolsey Fire. These areas are currently fenced and closed to the public. Soil remediation is being completed as part of a separate action and is scheduled to be completed by 2022.

2.2.2 Paramount Ranch

Paramount Ranch is an NPS property that comprises 765 acres within SMMNRA. The property is located in the northern central portion of the Santa Monica Mountains at 2903 Cornell Road in Agoura Hills, California (Figure 1-1). The property is bounded on the east and southeast by Malibu Creek State Park; the south by Triunfo Canyon, which includes Malibu Lake; and the southwest by a range of hills. The property is sited in the valley of the Medea Creek drainage, which flows in a north-south direction through the ranch. The area that encompasses the proposed action (project site) includes the developed portions of the Paramount Ranch property and includes approximately 19.3 acres (see Figure 2-1).

As shown in Figure 2-1, the project site is bisected by Medea Creek. The area west of Medea Creek features recreational uses including picnic areas and trails for hikers, equestrians, and bicyclists. There are two non-historic

film-set structures (Train Station/Building 214 and Chapel set) west of Medea Creek that survived the Woolsey Fire. Portions of the site are fenced and closed to the public due to ash and debris from structures that were destroyed in the fire. Destroyed structures include four permanent historic structures, six non-permanent film set buildings, one restroom building, one park ranger residence, and the western area movie set that incorporated these structures. All existing utilities serving the western portion of the site were damaged in the fire, including electric, water, and wastewater systems attached to the side of the Medea Creek Bridge.

Cooper Ditch, an ephemeral man-made ditch, is located at the south end of the Paramount Ranch area west of Medea Creek; the ditch flows in a west-southeast direction before joining Medea Creek. The ditch diverts flood flows from encroaching upon the western area of Paramount Ranch. The western area of Paramount Ranch is bordered to the north by a eucalyptus grove, which is a contributing feature to the Paramount Ranch cultural landscape, as well as oak woodlands and savanna, and chaparral habitats to the north, west, and south.

The area east of Medea Creek features three buildings dedicated to NPS administrative functions, which are also contributing features to the Paramount Ranch cultural landscape: the historic Mess Hall Building (today used as administrative offices and storage), Mill/Carpenter Shop (today houses wildland fire operations), and a Fire Patrol Station (today used as park employee housing). A non-contributing public restroom building is also located on this side of the creek. In addition, the eastern portion of the site includes an unpaved surface lot with unmarked parking stalls that provides ample parking for visitors. The western and eastern portions of the Paramount Ranch project site are connected by the Medea Creek bridge. The bridge allows visitors to access the western area by foot from the parking lot. Vehicle access on Medea Creek bridge is only available for administrative purposes. Riparian vegetation is present along Medea Creek, including willow and oak.

Two entrances along Cornell Road provide access to the property. The north access road, approximately 0.4 mile north of Mulholland Highway, serves as the primary vehicular entrance and exit road for the public. The south road located at Paramount Ranch Drive currently serves as a vehicular exit road for the public, due to the limited visibility and sight distance. This road also provides access for emergency vehicles.



Source: Adapted by Ascent in 2021

Figure 2-1 Paramount Ranch Existing Conditions

Paramount Ranch is open to the public from 8:00 a.m. to sunset, daily. Recreational activities at Paramount Ranch include hiking, picnicking, mountain biking, horseback riding, dog walking, and wildlife viewing. Special events and filming activities have ceased due to the loss of structures, assembly areas, and utilities. Site visitation levels at Paramount Ranch were approximately 191,567 visitors in 2020 (NPS 2021d). Revenue in 2020 fiscal year was approximately \$17,400 (Szymanski, pers. comm., 2021).

2.2.3 Rocky Oaks

Rocky Oaks is an NPS property that encompasses approximately 200 acres within SMMNRA and is sited northwest of the intersection of Kanan Road and Mulholland Highway. The property is at the crest of the Santa Monica Mountains. Mitten Rock (also known as Turtle Rock) is a prominent butte located on private property to the west of Rocky Oaks. The Rocky Oaks property is seven miles north of the Pacific Ocean and Point Dume within the Zuma Canyon watershed.

The Rocky Oaks property includes two use areas. The eastern portion of the property, which would not be altered by the proposed action, is open to the public and includes a constructed seasonal ranch pond, picnic areas, and recreational trails. The western portion of the property is the location of NPS administrative functions and includes a section of the Rocky Oaks Loop Trail, which begins in the eastern portion of the property. The western portion of Rocky Oaks, which includes 1.6 acres, encompasses the proposed action (project site) (see Figure 2-2).

The developed area within the project site includes the burned footprint of the Brandenberger-Brown House that was destroyed in the Woolsey Fire and the extant La Kretz Center. The La Kretz Center contains a necropsy laboratory and a small dormitory for visiting researchers and is used infrequently. This portion of the property also includes building footprints and foundations of auxiliary buildings once associated with the ranch; however, most of the auxiliary buildings associated with the ranch were destroyed in the 1978 Kanan Fire.

The project site is served by a septic system with an existing aged leach field. No natural gas services are available to the site. There is an existing 0.75-inch domestic water service line branching off the water main along Mulholland Highway at the main entrance. Power to the site is provided via a pole-mounted transformer located across Mulholland Highway. The power line crosses Mulholland Highway to a utility pole east of the extant (i.e., still existing; not destroyed) La Kretz Center. Vegetation and the electrical, sanitary sewer, and water utilities throughout the project site remain damaged from the Woolsey Fire. However, utilities serving the La Kretz Center are functioning.

An abandoned agricultural field is located north of where the Brandenberger-Brown House once stood. This non-native grassland is surrounded by rock outcroppings and steep slopes vegetated with chaparral. One of two branches of the Rocky Oaks Loop Trail passes through this portion of the project site along the southern border of the grassland. Coast Live Oak (*Quercus agrifolia*) woodlands border the non-extant Brandenberger-Brown House to the west, south, and east. Intermittent tributaries of Zuma Creek, which form seasonal wetlands, are located on either side of the access road to the non-extant Brandenberger-Brown House and extant La Kretz Center. The tributaries drain toward Mulholland Highway to the south.

The project site is accessed from a gated entry road from Mulholland Highway, approximately 0.2 mile west of Kanan Road. This entry is restricted to NPS staff and visitors by appointment only. The existing entry road spans a culvert that connects the seasonal wetlands described above. Within the property, there is an unpaved service road located east of the small rock outcrop that connects the northern and southern portions of the property. West of the rock outcrop, there is an existing 10-foot, unpaved service road that connects the administrative parking area to the Rocky Oaks Loop Trail. The western service road is gated and used for emergency egress. There are approximately 12 informal parking spaces in the paved areas around the Brandenberger-Brown House (non-extant) and La Kretz Center (extant). A separate park entrance to the east (approximately 400 feet west of Kanan Road), which is outside of the project site boundaries, serves the public day users.



Source: Adapted by Ascent in 2021

Figure 2-2 Rocky Oaks Existing Conditions

2.2.4 Peter Strauss Ranch

Peter Strauss Ranch is an NPS property that occupies approximately 78 acres within SMMNRA. The property is located at 30000 Mulholland Highway in Agoura Hills, California. The property is sited on a level terrace within Triunfo Canyon with a steep hillside or ridges and gullies at its south end. The area that encompasses the proposed action (project site) includes the developed portions of the Peter Strauss Ranch property and includes approximately 5.9 acres (see Figure 2-3).

The project site is divided by Triunfo Creek, a seasonal creek that enters the property from the north and gently bends east before exiting. The area west of Triunfo Creek features the remaining concrete foundation, surrounding concrete porches and walkways, the fireplace/chimney, and some portions of the stone wall veneer of the Ranch House, which was burned in the Woolsey Fire and is no longer extant. This area also includes several features that were identified as contributing to the Peter Strauss Ranch cultural landscape and spared by the fire, including the radio house/guest house, aviary, storage shed, swimming pool, amphitheater, terrazzo dance floor, and the relic of a large outdoor swimming pool with a small central platform. The aviary was not damaged by the fire but was damaged by a falling tree limb in spring 2020, which caused many of the framing members to bend. Other non-historic features in this area include a garden, restrooms, and lawn area. The area east of Triunfo Creek includes a parking lot that connects to two access driveways from Mulholland Highway.

Native vegetation communities within the property consist of coast live oak woodland, chaparral, and riparian vegetation. Developed areas are vegetated with large sycamore trees and an extensive turf lawn adjacent to the western entry driveway, a eucalyptus grove located southeast the non-extant Ranch House, mature native and ornamental trees along Mulholland Highway, and a cactus garden near the entrance driveway. Some of the vegetation, including several mature trees, remain damaged from the fire.

The project site is served by a septic system and leach field. No natural gas services are available to the project site. A 2-inch domestic water line connecting to the water main along Mulholland Highway is located at the northwestern corner of the site, east of the pool. A power pole near this location undergrounds an overhead line. An existing 50-inch culvert crosses under the entrance to the Ranch House and outfalls into Triunfo Creek.

There are three vehicular entries to the area east of Triunfo Creek from Mulholland Highway that provide access to Peter Strauss Ranch. The developed area to the west of Triunfo Creek has the historic entry to the non-extant Ranch House, which is generally not used by the public. The area east of Triunfo Creek has an entrance near Waring Drive that serves as the main public entrance to the property and leads visitors to a gravel road and two parking areas. This historically was the entrance to Lake Enchanto. Another entrance further east near Careful Avenue leads to the south end of the visitor parking area. These parking areas east of Triunfo Creek require visitors to walk across a bridge at Mulholland Highway to access the gathering spaces west of Triunfo Creek.

The property is currently closed to the public because it is still being used as a staging area while the old Mulholland Highway bridge is removed as part of a separate non-NPS action. Special events are not currently being held at the site. The property also features hiking trails, picnic areas, and oak woodlands, which are not currently open to the public.



Source: Adapted by Ascent in 2021

Figure 2-3 Peter Strauss Ranch Existing Conditions

2.3 DESCRIPTION OF ALTERNATIVES

2.3.1 Alternative 1: No Action Alternative

Under the No Action Alternative, the Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch sites would remain in their current, post-burn conditions as described in Section 2.2, “Existing Conditions.” No reestablishment of the structures burned at the three sites would occur. Routine maintenance of the remaining existing facilities and grounds would continue. Areas that are currently closed to the public within these sites would reopen to the public following the removal of contaminated soils resulting from the Woolsey Fire. The remediation is being conducted as part of a separate action and is scheduled to be completed by 2022. This alternative would not meet the objective of reestablishing structures essential to maintaining pre-fire visitor services and park operations at the three sites.

2.3.2 Alternative 2: Proposed Action - Woolsey Fire Disaster Recovery (Preferred Alternative)

The proposed action would include redevelopment of the most essential buildings and utilities necessary to replace lost functions. Recovery actions would include the redevelopment of nine structures to consolidate NPS administrative functions and housing at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch.

Overall, upgrades to the buildings, utilities, and associated infrastructure would be necessary to meet current design codes and standards for accessibility and fire safety. These codes and standards include the IBC, ABAAS/ADA standards, and IWUIC and NFPA codes. Exterior building materials of the new structures would be fire resistant (such as cement fiber siding) to meet the IWUIC. In addition, the proposed action would include other fire protection actions, which include establishing clear zones around foundations, installing external sprinkler spigots, reducing fine fuels in the non-native grassland, and spacing native plants and shrubs according to fuel reduction standards. Furthermore, NPS will continue to implement fire management actions as guided by the SMMNRA Fire Management Plan (NPS 2012), the Santa Monica Mountains Community Wildfire Protection Plan (Santa Monica Mountains CWPP Collaborator Organizations 2012), and the policies of the National Cohesive Wildland Fire Management Strategy. SMMNRA works together with Ventura County Fire Department, Los Angeles County Fire Department and Los Angeles City Fire Department through local agreements, the CA Fire Protection Agreement, and the CA Fire Assistance Agreement to suppress fires in the SMMNRA under the Incident Command System. While fire hazards would remain, construction consistent current building codes, multi-agency fire response agreements, and implementation of SMMNRA’s fire management actions would reduce the potential for structure loss and soil contamination in the event of future fires.

The proposed actions at the three redevelopment sites are described below and shown in Figures 2-4 through 2-6.

PARAMOUNT RANCH

NPS proposes to redevelop damaged or destroyed structures so that Paramount Ranch once again functions as a filming venue and events space. The four historic buildings and all utilities that were destroyed in the fire would be replaced. Site improvements would be implemented to enhance accessibility, visitor experience, site safety, and operational efficiency throughout the project site (see Figure 2-4).



Source: Figure by Architectural Resources Group 2021; adapted by Ascent in 2021

Figure 2-4 Paramount Ranch Site Plan

The area west of Medea Creek would be redeveloped so that it continues to function as a destination and programming area for events and interpretation. Actions on the western portion of the Paramount Ranch site would include replacing buildings destroyed by the fire, improving the roads and pedestrian paths, , , providing small outdoor program spaces, and other associated site improvements. Four new buildings would be constructed, west of Medea Creek and north of Cooper Ditch. These include the following:

- ▶ Covered open-air pavilion: approximately 6,600 square feet in size, 20 feet in height, and rectangular massing with capacity for approximately 264 seats, platform stage, storage, and restrooms
- ▶ Standalone restroom building: approximately 2,000 square feet in size, 18 feet in height, and rectangular massing with storage closets and room for electrical/telecommunications infrastructure
- ▶ Small event building: approximately 2,000 square feet in size, 20 feet in height, and rectangular massing with a platform stage and capacity for approximately 96 seats
- ▶ Barn: approximately 5,800 square feet in size, 19 feet in height, and rectangular massing with capacity for approximately 208 seats, platform stage, storage, and restrooms

The proposed pavilion, restroom building, and barn would be constructed in the same general location and with the approximate footprint of three historic structures that burned in the fire, Prop Storage Shed West (Freight Building 208), Prop Storage Shed East (Pavilion Building 207), and the Livestock Barn (Building 209). The small event building would be constructed in the approximate location of a non-historic, non-extant set structure (Saloon Building 210), which occupied the site of where another Prop Shed that stood during the Paramount era. One burned historic structure—the Equipment Storage Garage—would not be replaced with a new building due to its location within the 100-year flood zone. All the proposed new buildings would be designed in a similar vernacular aesthetic and with similar materials and features (rectangular plans; gable roofs; horizontal cement fiber siding, board and batten cement fiber siding, or corrugated metal siding; and corrugated metal roofing) as the historic buildings that burned. However, cement fiber siding would be installed rather than wood to meet the IWUIC to retard building ignition in the event of another wildfire.

No changes are proposed to the three existing historic buildings east of Medea Creek (Mess Hall Building, Mill/Carpenter Shop, Fire Patrol Station). The non-historic Train Station/Building 214 set structure would also remain in its current location in the western area on the west side of the creek. The non-historic Chapel set structure is impermanent and deteriorating. It would be removed once it is no longer being used for television production. The park residence destroyed in the Woolsey Fire would not be replaced at the Paramount Ranch site. Replacement housing would be constructed at Rocky Oaks, as described in the following section. All work within the cultural landscape would conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes.

There would be limited improvements on the eastern portion of the site for parking, orientation, visitor information, and administrative functions. Several site accessibility improvements would be made, including adding two concrete-paved ADA-accessible parking stalls east of the Medea Creek bridge. An ADA-accessible path of travel, consisting of stabilized decomposed granite, would be constructed from the existing bridge to each proposed building in the western area. The open lawn area on the western side of the site, to the south of Cooper Ditch, would be repaired and regraded for special events, such as concerts or festivals. Exterior lighting would be minimized and limited to full cutoff luminaires and low-angle spotlights for dark sky preservation in accordance with 2006 NPS Management Policies for lightscape management.

The existing water lateral and backflow preventer would remain in place. Utilities would be upgraded throughout the site to meet current codes and standards. A proposed pad-mounted transformer would service power demands for areas west of Medea Creek. The existing electrical service for areas east of Medea Creek would remain in place. All existing utilities attached to the bridge over Medea Creek would be replaced with new code-compliant power, communications, sewer, fire water, and domestic water services. Underground utility services would extend to all permanent buildings, and underground power lines would extend to the open lawn area to the south of Cooper Ditch to support special events.

Minor grading would be completed to correct stormwater runoff deficiencies. The proposed action includes modifications to Cooper Ditch to address existing flooding issues, including installation of a new sedimentation basin, a reinforced berm west of the proposed barn and train station film set structure, and a larger concrete culvert, as well as bank stabilization along the ditch near Medea Creek. All improvements to this ditch would occur in previously disturbed areas. The proposed action does not include any new stormwater outfalls to Medea Creek. Drainage of the area would be managed by level spreaders that distribute water outside of Medea Creek's top of bank.

Other site improvements include removing existing fencing and installing new wood fencing and hitching post bollards (matching the appearance of these features from the historic period), which would be added along paths and used to delineate developed areas. All extant resources associated with the Caretaker's Residence site would be preserved. New signage and wayfinding would be strategically placed throughout the project site.

The southern driveway at the intersection of Cornell Road and Paramount Ranch Drive would be closed to the public for egress (currently closed to the public for ingress only). The driveway would only be used for emergency access or when traffic control is available (e.g., during special events) due to the limited visibility and sight distance. Site visitors would be directed to the northern vehicular access road from Cornell Road, which would continue to be the primary entrance for all site visitors, including those traveling by motor vehicle, bicycle, by foot, or by horse.

Construction activities at Paramount Ranch would occur for approximately 12 months, currently scheduled from spring 2022 to spring 2023. Construction staging would be limited to disturbed areas within the project site. Clearing and grubbing would occur on approximately 2.27 acres. Grading and excavation would be required at various depths to help balance the site and trenching would be needed for installation of utilities. Cut and fill would be balanced onsite to the extent feasible. The import and export of soil offsite is not planned. However, the proposed action may use dredged spoils from the southern portion of the Paramount Ranch property. The proposed action would result in a net reduction in impervious surface area of 0.14 acre, including removal of 0.52 acre and replacement of 0.38 acre of impervious surfaces. Existing trees would be protected in place and disturbed areas would be revegetated with a native hydroseed mix.

Construction activities would comply with the avoidance and minimization measures identified in Appendix A, which would protect hydrologic/water resources, biological resources, cultural resources, night skies/lightscapes, soundscapes, and visitor use and experience, as well as minimize effects related to the spread of invasive species and the release of hazardous materials.

Compared to existing, post-fire conditions, the proposed action would result in increases in visitation, public events, and special uses (e.g., filming) at the Paramount Ranch project site. However, the uses and types of activities would not change from those that occurred pre-fire, nor would they be expanded beyond the area previously used for filming, public events, and private functions. SMMNRA limitations on event size, hours of operation, and lighting would not change. Visitation at Paramount Ranch is anticipated to rise concurrently with overall SMMNRA visitation over time.

ROCKY OAKS

The Rocky Oaks project site is envisioned as an administrative hub for NPS because of its location at a prominent intersection within SMMNRA, existing access to public utilities, and relatively level topography. The NPS proposes to centralize the replacement of employee housing and administrative offices lost in the fire from other NPS properties within SMMNRA to this site, which would improve the efficiency of NPS operations. The proposed action would include construction of an administrative office building, employee housing structures, recreational vehicle (RV) parking and hookups for seasonal employees, and associated site improvements at this site (see Figure 2-5). Only one housing building would be constructed in the first phase of the project, but the proposed action contains a design for a second housing building. The Rocky Oaks project site would not be open to the public.



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Source: Figure by Architectural Resources Group in 2021; adapted by Ascent in 2021

Figure 2-5 Rocky Oaks Site Plan

The proposed administrative office building would be constructed to replace the non-extant Brandenberger-Brown House that burned during the Woolsey Fire. The one-story rectangular administrative office building would be sited in the same location and would have the same approximate footprint (2,700 square feet) as the former Brandenberger-Brown House. The building would include a conference room, workout room, restrooms and showers, a kitchen, bunk room, offices, and storage rooms. The building would be used by Visitor Resource Protection (law enforcement) staff that were previously based at Paramount Ranch. The building would be capped with a gable roof covered in composition shingles and exterior walls would be clad in stucco, cement fiber siding, and stone veneer. Exterior materials would be fire resistant to meet the IWUIC. The building would be designed to reflect the vernacular, ranch aesthetic of its surroundings through its low-pitched roof, horizontal orientation, rectangular massing, and a full width covered porch.

Housing would be clustered within the Rocky Oaks project site to replace housing that was burned at various locations within SMMNRA, including Rocky Oaks, Paramount Ranch, and Arroyo Sequit. Housing would be occupied by permanent and temporary (e.g., seasonal) park employees. The proposed action would include two employee housing structures, each containing four residential units (two two-bedroom units and two one-bedroom units). The residential structures would be constructed on a flat area north of the existing La Kretz Center and proposed administrative office building. The housing structures would be sited in the approximate location of the non-extant tractor barn. A portion of the non-extant tractor barn's concrete foundation would be removed to accommodate the new structures. The residential buildings would be two stories tall with compact, rectangular footprints that occupy approximately 1,985 square feet (per floor). The buildings would have gable-on-hip roofs with asphalt shingle roofing and would be clad with stucco and cement fiber siding. Exterior materials would be fire resistant to meet the IWUIC. The buildings are intended to reflect the vernacular, ranch character of their surroundings with their low-pitched roofs, simple rectangular massing, and full-width porches.

The proposed action would provide a total of approximately 25-30 parking spaces throughout the Rocky Oaks site. A new parking lot with 12 standard vehicle stalls and four RV sites with utility hookups for seasonal employees would be sited north of the proposed housing structures, in an area that currently consists of disturbed grassland. The site for the parking lot would be graded and overlaid with gravel; no new impervious surfaces are proposed for the parking area. The existing parking area west of the La Kretz Center with approximately 4 parking stalls would serve as an overflow parking lot. One concrete ADA-accessible parking stall and 11 regular stalls would be added between the administrative building and the La Kretz Center.

The facilities at Rocky Oaks would be designed to meet current ADA and ABAAS codes. The proposed action would include universal access to all new building facilities on designated accessible pathways. A concrete path would connect the accessible parking stalls to the entries at both the administrative building and housing structures. An accessible concrete path would connect the administrative building to the La Kretz Center entrance.

The existing entry road would be repaved and widened to 20 feet within the existing roadbed to meet fire and emergency access regulations. Disturbance along the roadside drainage would be limited to less than 0.1 acre and no modifications would be made to the existing wetland. The abandoned ranch road east of the La Kretz Center and proposed administrative building would be regraded and improved to provide access to the housing structures. The existing unpaved service road north of the La Kretz Center would remain in place for emergency access and pedestrian circulation only.

Outdoor light fixtures would be shielded and limited to the minimum necessary. Utilities serving the Rocky Oaks project site would be reused where feasible, replaced where damaged in the fire, or upgraded to meet current standards, codes, and needs. The existing septic leach field is aged and undersized for the proposed building additions. A larger leach field and leach field reserve is proposed in the depressed area west of the La Kretz Center and service road to replace the existing leach field. New pipelines would be installed from the leach field, through the parking area, and along the eastern access drive to reach the proposed residences. The existing overhead power line that crosses through trees and over a sensitive habitat would be removed and replaced with an underground powerline along the access road entrance.

Existing trees would be protected in place to the extent feasible; NPS would adhere to the Los Angeles County Oak Tree Ordinance (Section 22.56.2050 of the Los Angeles County Code of Ordinances) for oak tree protection. However, the proposed action may require the removal of two 6-inch coast live oak trees. In addition, the proposed action would include fuel management practices, including annual removal of non-native grasses and maintenance of the spacing pattern of native plants within the protection zone to prevent establishment of a continuous fuel bed. Native plantings would be added to the constructed bioretention areas.

Construction activities would occur concurrently with the improvements proposed at Paramount Ranch, which would span approximately 12 months, currently scheduled from spring 2022 to spring 2023. However, as noted on Figure 2-5, construction of the second housing unit and the four RV sites with utility hookups for seasonal employees may occur in a later phase. Construction staging would be limited to disturbed areas within the project site. Clearing and grubbing would occur on approximately 1.95 acres. Grading and excavation would be required at various depths to help balance the site and trenching would be needed for installation of utilities. Cut and fill would be balanced onsite; the import or export of soil offsite is not planned. The proposed action would result in the replacement of 0.13 acre of impervious surfaces and the addition of 0.14 acre of new impervious surfaces for the proposed building pads and the ADA-accessible parking stalls and path of travel.

Project construction would require the temporary closure of a 0.14-mile segment of the Rocky Oaks Loop Trail. All other trails within the Rocky Oaks property would remain open during construction activities, which would serve as detour routes. The 0.14-mile trail segment would reopen following construction and would travel along the proposed residential buildings.

Construction activities would comply with the avoidance and minimization measures identified in Appendix A, which would protect hydrologic/water resources, biological resources, cultural resources, night skies/lightscapes, soundscapes, and visitor use and experience, as well as minimize effects related to the spread of invasive species and the release of hazardous materials.

Because this portion of the Rocky Oaks property does not serve the public, except for the portion of the Rocky Oaks Loop Trail that would be reopened following construction activities, the proposed action would not restrict or increase long-term public access. In addition, no changes in revenue would occur with implementation of the proposed action.

PETER STRAUSS RANCH

As shown in Figure 2-6, the proposed action would include replacement of the Ranch House and outdoor assembly areas, so that the property would once again function as an event space. Site improvements would be implemented to address deficiencies in accessibility, circulation, parking, and utilities. Access to the site would be improved to provide a welcoming visitor arrival experience by including a drop-off area and accessible and increased parking (east of Triunfo Creek), and service parking at the ranch complex (west of Triunfo Creek). In addition, the project design would improve functional and aesthetic qualities of the site and strengthen the site as a unique destination for recreation and events. All site work would conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

To address damage from the Woolsey Fire, two new buildings would be constructed on the west side of the project site. The main structure would be sited in the same approximate location and with the same approximate footprint as the non-extant Ranch House. The building would have rectangular massing and would be 1,584 square feet in size and approximately 17 feet in height. This new building would function as a venue for events and meetings (up to about 100 people inside and on surrounding porches), with one large room and support spaces that include a breakout room, catering kitchen, and two unisex restrooms. The new building would be designed in a similar vernacular aesthetic and with similar materials and features (i.e., hipped roof, wraparound porch, and stone accent cladding) as the historic Ranch House that previously existed on the site. Cement fiber siding would be installed rather than wood to meet the IWUIC. Although the building exterior would be constructed in a manner that is similar to the pre-fire exterior, the proposed action would include improvements related to circulation and accessibility.



Source: Figure by Architectural Resources Group in 2021; adapted by Ascent in 2021

Figure 2-6 Peter Strauss Ranch Site Plan

A second structure approximately 1,100 square feet in size and 13 feet in height would be constructed, which would provide restrooms to either replace or supplement the existing restroom building near the pool. As with the replacement of the Ranch House, the new restroom building would be designed with a similar vernacular aesthetic and similar materials and features to the accessory structures that previously existed at this portion of the project site. The restroom building would also incorporate fire-resistive construction approaches and materials.

The existing historic pool would be preserved; however, the historic swimming pool promenade would be lowered to improve accessibility. Direct access from the promenade to the pool would be created. The existing lawn would be repaired and the retaining walls east of the pool would be redefined and rehabilitated. The area encompassing the pool and lawn would be used as a large size outdoor event area with capacity to accommodate 500 to 1,200 visitors.

The historic terrazzo dance floor would be repaired, and a pergola similar to one from the Lake Enchanto era would be built of fire resistant materials on the east and north sides of the terrazzo dance floor (approximately 720 square feet). The area encompassing the existing terrazzo dance floor and the amphitheater would be used as a medium size outdoor event area with capacity to accommodate up to 300 visitors.

No changes are proposed to the radio house and storage shed, which were not damaged in the fire.

The proposed action would include new ADA-compliant pathways to improve access throughout the Peter Strauss Ranch project site. The paths would primarily consist of dirt or decomposed granite. An ADA-accessible parking and drop-off area would also be constructed adjacent to the new Ranch House building. A path of travel would be created between the accessible parking area and the terrazzo dance floor. Ramps would be integrated into the landscape to provide access between the reconstructed Ranch House and outdoor assembly areas. The sloped path at the south side of the terrazzo dance floor to the Ranch House would be widened to provide another accessible path of travel. Paths crossing Triunfo Creek would remain unpaved and would not introduce permanent structures in the floodplain.

The main visitor entrance to the visitor parking lot east of Triunfo Creek (near Mulholland Highway and Waring Drive) would be closed to the public. This entrance would only be used for emergency access or when traffic control is available (e.g., during special events). To increase safety and improve access to the project site, visitors would be directed to a gated entrance near Mulholland Highway and Careful Avenue, approximately 0.2 mile southwest. The entrance drive to the Ranch House west of Triunfo Creek would be regraded to provide a large flat area for vehicles to exit the highway quickly and safely. The historic main entrance and stone pillars would remain in place.

The primary parking lot east of Triunfo Creek would be reorganized and enlarged slightly (less than 0.1 acre) by clearing non-native vegetation adjacent disturbed areas to accommodate a larger number of vehicles, including approximately 184 parking stalls. The west side of Triunfo Creek would include ADA-accessible drop-off areas and parking (4 ADA-accessible stalls and 15 parking stalls), as well as roadway improvements to enhance circulation for NPS, service, and emergency vehicles. The parking areas would consist of gravel; no new impervious surfaces are proposed for the parking area. The proposed action would also include improvements to existing wayfinding signage within NPS boundaries.

The proposed action would include construction of code-compliant water, sewer, and electrical utilities, as well as new telecommunications connections. All utilities would run underground to not detract from the historic character and appearance of the ranch property. The existing septic system's leach field would be replaced with a force main connection to the municipal sewer system in conjunction with construction of the new restroom building. In addition, the proposed action would include improvements to existing stormwater and drainage facilities.

Construction would occur after the improvements at Paramount Ranch and Rocky Oaks are completed. The timing of construction is currently unknown but is estimated to take 12 months. Construction staging would be limited to disturbed areas within the project site. Clearing and grubbing would occur on approximately 2.77 acres. Existing grades would be maintained to the extent feasible; however, minor excavation may be needed to accommodate building foundations and utility trenching. Cut and fill would be balanced onsite; the import or export of soil offsite is not planned. The proposed action would include the removal and replacement of 0.34 acre of impervious surfaces,

resulting in no net change in impervious surface area. No tree removal would be required. Existing trees would be protected in place and disturbed areas would be revegetated with a native hydroseed mix.

Construction activities would comply with the avoidance and minimization measures identified in Appendix A, which would protect hydrologic/water resources, biological resources, cultural resources, night skies/lightscapes, soundscapes, and visitor use and experience, as well as minimize effects related to the spread of invasive species and the release of hazardous materials.

Compared to existing, post-fire conditions, the proposed action would result in increases in visitation, public events, and private functions at the Peter Strauss Ranch project site. However, the uses and types of activities would not change from those that occurred pre-fire, nor would they be expanded beyond the area previously used for public events and private functions. Existing limitations on event size, hours of operation, and lighting would not change.

2.4 ALTERNATIVES CONSIDERED BUT DISMISSED

Additional alternatives were considered but dismissed from further consideration as part of the Value Analysis Studies completed for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch (NPS 2020b; NPS 2021c; and 2021a). Rationale is provided as follows:

- ▶ **Paramount Ranch:** The Value Analysis Study (NPS 2020b) considered alternatives that would reestablish fewer structures (i.e., two to three buildings) to determine if a smaller project would meet the purpose and need of the proposed action. The study determined that a smaller project would not achieve the purpose and need of the proposed action. From the period of significance (1927-43) until the Woolsey Fire, the historic landscape at Paramount Ranch was far more developed than the four buildings proposed. The study determined that four buildings are the minimum needed to create a massing and spatial arrangement sufficiently characteristic of the historic period. In addition, the other alternatives did not meet SMMNRA's needs for restrooms and public services, nor did they meet NPS' General Management Plan (NPS 2002) goals, which include generating revenue and continuing filming operations.
- ▶ **Rocky Oaks:** The Value Analysis Study (NPS 2021c) considered alternatives that differ with respect to the layout of the proposed administration and residential buildings, the alignment of access roads throughout the site, and the routing of utilities. The study determined that these alternatives would result in greater impacts on natural and geological resources due to increased earthwork and excavation and larger paved areas. In addition, these alternatives would not meet the purpose and need of the proposed action because the placement of buildings and parking areas would not be as efficient for NPS operations and functionality.
- ▶ **Peter Strauss Ranch:** The Value Analysis Study (NPS 2021a) considered alternatives that would differ with respect to site pedestrian circulation, accessibility, and building footprint. The study determined that these alternatives would result in greater impacts on natural and historical resources. In addition, these alternatives would not meet the purpose and need of the proposed action because they would be limited in their ability to enhance visitor accessibility, maintain the pre-fire historic footprint and cultural landscape, and reestablish pre-fire event spaces used to generate revenue to fund NPS operations.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The National Environmental Policy Act (NEPA) requires that environmental documents discuss the environmental impacts of a proposed federal action, feasible alternatives to that action, and any adverse environmental impacts that cannot be avoided if an action is implemented. This chapter describes the affected environment and study area for the key resource topics; the methods and assumptions used for the analysis of impacts; and the potential environmental consequences (impacts or effects) that would occur as a result of implementing the alternatives. This chapter assesses the potential effects of the alternatives on historic structures and cultural landscapes; visitor experience, health, and safety; and threatened and endangered species and critical habitat.

3.1 HISTORIC STRUCTURES AND CULTURAL LANDSCAPES

3.1.1 Study Area/Affected Environment

The study area for historic structures and cultural landscapes is the area of potential effects (APE) that was established by the NPS in consultation with the California State Historic Preservation Officer (SHPO) to comply with the Advisory Council on Historic Preservation's (ACHP) regulations implementing Section 106 of the National Historic Preservation Act (NHPA). The APE encompasses the area of physical effects to historic properties and visual and auditory effects associated with the project. The APE also encompasses the temporary staging and stockpiling areas for construction activities at each project site. The APEs for the respective project sites at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch are shown in Figure 3-1 through Figure 3-3 and described below.

Overall, historic structures and cultural landscapes in the SMMNRA are maintained in a stable condition because actions that occur on NPS property within the SMMNRA are completed in accordance with the SMMNRA General Management Plan (NPS 2002). The General Management Plan is intended to protect natural and cultural resources while providing compatible recreation and educational programs to the public. No other actions are proposed within the APEs that have potential to affect historic structures and cultural landscapes that are listed or eligible for listing on the NRHP.

PARAMOUNT RANCH

Paramount Ranch is located within a valley surrounded by hills, which limit widespread views of the project site. The boundaries of the APE were determined using natural topographic features and vegetation, which take into account any important viewsheds of the project site. There are no historic properties with historically significant viewsheds adjacent to or surrounding the APE.

The Paramount Ranch Cultural Landscape Historic District (Cultural Landscapes Inventory [CLI]-725076) is a historic vernacular landscape encompassing 680 acres, the surviving portion of the original 2,400-acre Paramount Studio Movie Ranch. The cultural landscape was determined eligible for listing in the NRHP under Criterion A as one of the last remaining Southern California movie ranches used by the large Hollywood movie studios in the 1920s, 1930s, and 1940s. The period of significance of Paramount Ranch extends from 1927 to 1943, which represents the period of Paramount Studio's ownership, use, and development of the ranch as a motion picture production and on-location filming facility. This determination of eligibility finding was described in the CLI for Paramount Ranch (NPS 2005). The Keeper of the National Register of Historic Places concurred with the CLI findings on March 25, 2005.

Only 59.4 acres of the 680-acre Paramount Ranch cultural landscape are within the APE. The following extant buildings, structures, sites, and landscape features were identified as contributing to the cultural landscape and are located within the APE (see Figure 3-1):

- ▶ Mess Hall Building (LCS: 59681)
- ▶ Mill/Carpenter Shop (LCS: 59682)
- ▶ Fire Patrol Station (LCS: 59685)
- ▶ North-South Ranch Road
- ▶ Original Ranch Entry Road (LCS: 59691)
- ▶ Medea Creek Bridge (LCS: 59689, PARA-19-7H)
- ▶ Site of the Paramount Movie Ranch Caretaker's Residence (PARA-19-2H)
- ▶ A historic walnut tree, located just north of the Mess Hall Building
- ▶ Two historic valley oaks, located south and east of the Mill/Carpenter Shop

Four historic buildings that contributed to the Paramount Ranch cultural landscape (NPS 2005) were lost in the fire. The debris from these buildings has been removed from the site, with archeological and Native American monitors present onsite during removal (Polanco, pers. comm., 2019). These non-extant buildings were vernacular in appearance and historically featured simple rectangular plans, gable roofs, and either horizontal wood siding, wood board and batten siding, or corrugated metal siding. They are as follows:

- ▶ Prop Storage Shed West (aka Freight Building; LCS: 59686)
- ▶ Prop Storage Shed East (aka Pavilion; LCS: 59684)
- ▶ Livestock/Horse Barn (aka Sound Stage; LCS: 59683)
- ▶ Equipment Storage Garage (aka Saloon; LCS: 59687)

ROCKY OAKS

The Rocky Oaks APE is surrounded by rugged terrain, which limits widespread views of the site. The boundaries of the APE were determined using natural topographic features and vegetation, which take into account any important viewsheds of the project site. There are no historic structures with historically significant viewsheds, and no identified cultural landscape, adjacent to or surrounding the Rocky Oaks APE.

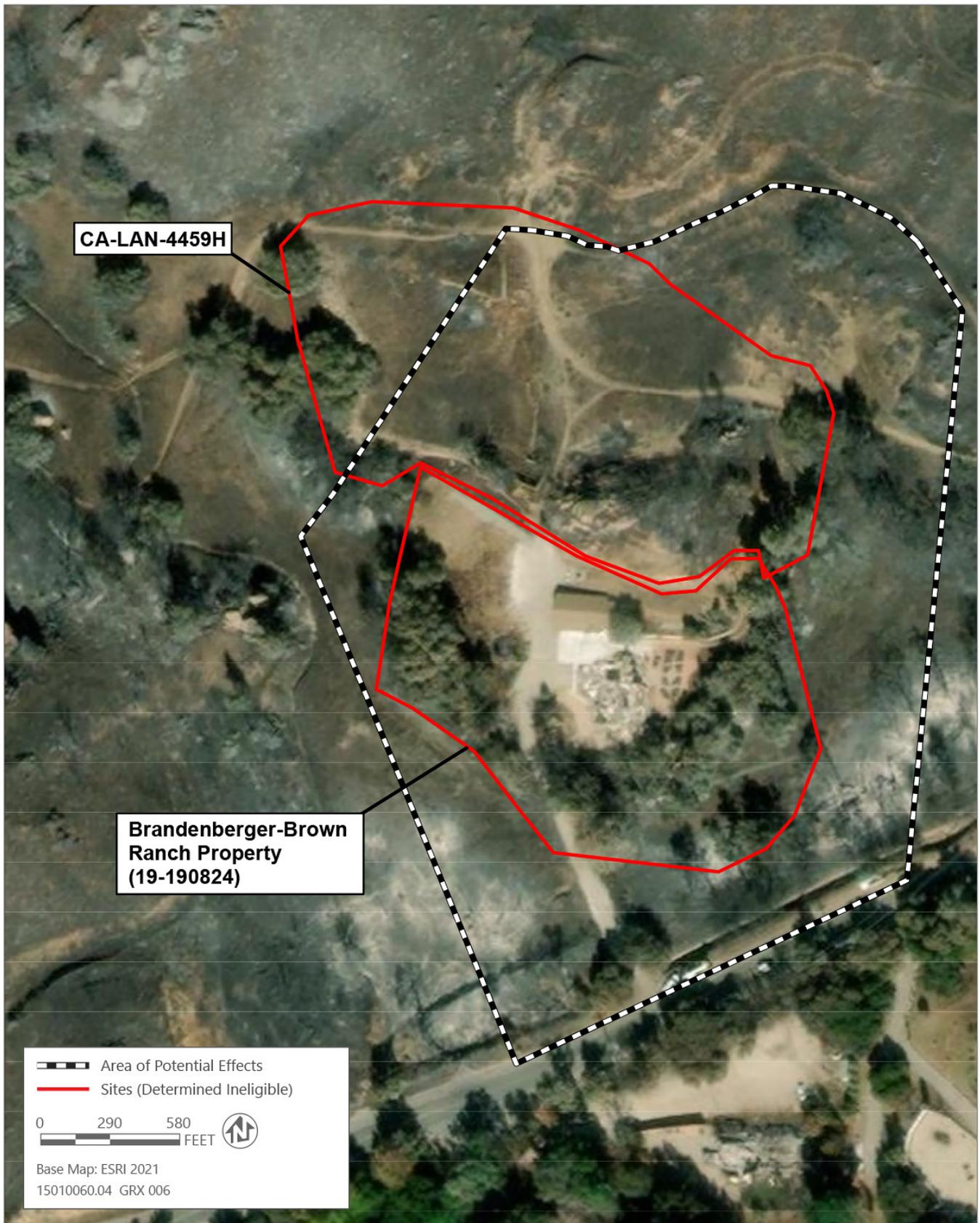
The following resources were identified within the Rocky Oaks APE through survey, but were determined ineligible for listing in the NRHP (see Figure 3-2) (Roland-Nawi 2015):

- ▶ Brandenberger-Brown Complex (19-190824), a historic built environment resources, that was determined through consultation with SHPO to be ineligible for listing in the NRHP in 2012 due to lack of historic integrity.
- ▶ CA-LAN-4459H, a historic archeological site associated with the Brandenberger-Brown Complex property that was determined ineligible for listing in the NRHP in 2015 with SHPO concurrence.
- ▶ Two prehistoric artifacts consisting of marine shell fragments, which were identified during a 2014 survey of CA-LAN-4459H and determined ineligible for listing in the NRHP in 2015 with SHPO concurrence.
- ▶ 19-101207 and 19-101208, which are prehistoric isolates (shell fragments) that were identified through survey and determined ineligible for listing in the NRHP in 2015 with SHPO concurrence.



Source: Image prepared and provided by Architectural Resources Group, Inc. in 2021

Figure 3-1 Paramount Ranch Historic Properties



Source: Image prepared and provided by Architectural Resources Group, Inc. in 2021

Figure 3-2 Rocky Oaks Historic Properties

PETER STRAUSS RANCH

Peter Strauss Ranch is located within a canyon surrounded by hills, which limit widespread views of the project site. The boundaries of the APE were determined using natural topographic features and vegetation, which take into account any important viewsheds of the project site. There are no historic properties with historically significant viewsheds adjacent to or surrounding the APE.

Peter Strauss Ranch (P-19-180775, CLI-725075) is a 78-acre historic vernacular landscape consisting of several buildings, structures, and landscape features. The ranch property was determined eligible for listing in the NRHP under Criterion A for its association with Lake Enchanto, a regional amusement and recreation park that operated from the 1930s through the 1960s at the site. The ranch property was also determined eligible under Criterion B for its association with Harry Miller, a pioneering automotive engineer whose numerous inventions contributed to the early development of automotive technology. The period of significance associated with Harry Miller extends from 1923 to 1933, while the period of significance associated with Lake Enchanto extends between 1939 and 1955. This determination of eligibility finding was described in the CLI for Peter Strauss Ranch (NPS 2006a). The CLI received concurrence from SHPO in 2007.

Only 21.9 acres of the 78-acre Peter Strauss Ranch cultural landscape are within the APE. The following extant buildings, structures, and landscape features were identified as contributing to the cultural landscape and are located within the APE (see Figure 3-3):

- ▶ Radio House (LCS: 59936)
- ▶ Storage Shed (LCS: 59937)
- ▶ Swimming Pool (LCS: 59933)
- ▶ Amphitheater (LCS: 59940)
- ▶ Terrazzo Dance Floor (LCS: 59938)
- ▶ Aviary (LCS: 59939)
- ▶ Entrance Arch Supports (LCS: 59932)
- ▶ Gate Tower (LCS: 59928)
- ▶ Water Tank (LCS: 59935)
- ▶ Terraced Hillside (LCS: 59927)
- ▶ Fairytale Land Wall (LCS: 59941)
- ▶ Spillway Bulkheads/Abutments (LCS: 59942)
- ▶ Retaining Walls (LCS: 57908)
- ▶ Stone and Concrete Foundations (LCS: 330049)
- ▶ Radio House Steps (LCS: 444202)
- ▶ Entrance walk from the dam (LCS: 444183)
- ▶ Entrance Drive
- ▶ Parking lots
- ▶ Eucalyptus grove
- ▶ Boundary oak
- ▶ Large oak trees around and behind the main house
- ▶ Large sycamore trees on the creek bank and next to the house
- ▶ Large ash tree on the north corner of the house

One built environment historic structure, the historic Ranch House, that contributed to the Peter Strauss Ranch cultural landscape was lost in the fire.



Source: Image prepared and provided by Architectural Resources Group, Inc. in 2021

Figure 3-3 Peter Strauss Ranch Historic Properties

3.1.2 Methodology and Assumptions

The information in this section is based on correspondence between NPS and the SHPO to fulfill the requirements of Section 106 of the NHPA. NPS consultation with the SHPO is summarized in Chapter 4.

In accordance with the ACHP's regulations implementing Section 106 of the NHPA, effects to historic properties (e.g., historic resources [built environment], archeological resources, or historic properties with religious and cultural significance) are evaluated by: (1) identifying historic properties present in the APE; (2) applying the criteria of adverse effects; and (3) considering ways to avoid, minimize, or mitigate adverse effects. The alternatives presented in this EA are evaluated to determine if actions would result in either no adverse effect or an adverse effect on the cultural landscape as a whole and/or on individually eligible properties or contributing elements.

Under ACHP regulations, a determination of no historic properties affected, no adverse effect, or adverse effect must be made for affected NRHP eligible historic resources. A determination of no historic properties affected occurs when there are no historic properties present, or the action will have no effect on historic properties. A determination of no adverse effect means that there is an effect, but the effect would not diminish, in any way, characteristics of a historic resource that would qualify it for inclusion in the NRHP. An adverse effect occurs whenever an action alters, directly or indirectly, any characteristic of a historic resource that qualifies it for inclusion in the NRHP, by diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur at a later time or that would be cumulative over the course of time.

Impacts on historic structures and cultural resources were evaluated on a spatial and temporal scale. The spatial scale is consistent with the APE for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch, as described in Section 3.1.1. The temporal scale includes both (1) short-term impacts, which are impacts that would last only during project construction activities (estimated to take 12 months, starting in Spring 2022 for Paramount Ranch and Rocky Oaks, and approximately 12 months for Peter Strauss Ranch, no start date determined at this time), and (2) long-term impacts, which are impacts that would extend throughout operation of the proposed facilities at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch (over decades).

3.1.3 Alternative 1: No Action

The No Action Alternative would result in no construction or alteration of the three project sites and would therefore have no impacts on cultural landscapes, including the extant buildings, structures, sites, and landscape features that were identified as contributing to the cultural landscapes at Paramount Ranch and Peter Strauss Ranch. Because there would be no ground disturbance, vegetation removal, or other construction activities under the No Action Alternative, there would be no construction-related adverse effects to historic structures. Routine maintenance of the extant facilities and grounds would continue under the No Action Alternative. On an as-needed basis, the NPS would continue to work with the appropriate parties (e.g., SHPO, qualified archeologists, and Native American tribes) to avoid effects on historic resources during routine maintenance activities. Therefore, the No Action Alternative would not result in short-term or long-term adverse effects on historic structures or cultural resources within the APE.

Although the No Action Alternative would result in no adverse effects to cultural landscapes or historic structures, this alternative would not meet NPS' objective of replacing lost functions to better serve the public interest and park operations. The No Action Alternative does not propose any actions to address damage to the cultural landscapes and destruction of features that contributed to the integrity of the properties. Specifically, the No Action Alternative would not rehabilitate cultural features at Paramount Ranch that are essential for NPS interpretation of film history and storytelling, as well as cultural features at Peter Strauss Ranch that are essential for NPS interpretation of the site's history as an amusement park and ranch.

3.1.4 Alternative 2: Proposed Action - Woolsey Fire Disaster Recovery

PARAMOUNT RANCH

The proposed action is designed to comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* for the rehabilitation of the cultural landscape features (Appendix A). At Paramount Ranch, the project is intended to rehabilitate and maintain the historic character and feeling of a working movie ranch. The proposed action would include replacing the four historic Paramount Ranch-era buildings that were lost in the Woolsey Fire on the west side of the site (west of Medea Creek) with new buildings in the same approximate locations and footprint. The scale, massing, design, and materials of the new buildings would be compatible with the historic buildings that were destroyed in the Woolsey Fire. The new buildings would be one story in height, vernacular in appearance, and would be made of the same or similar materials as the buildings that historically comprised Paramount Ranch. No buildings or structures would be added where they did not exist historically.

The proposed circulation and new parking improvements to enhance accessibility throughout the project site would be located in areas where paths and paving exist currently and would make use of historic circulation patterns. New utilities would be run through conduit connected to Medea Creek Bridge or installed under Medea Creek using directional drilling. No changes would be made to the bridge as part of the proposed action. Within the redevelopment area on the west side of the site, utilities would be undergrounded to not detract from the character and appearance of the cultural landscape. Existing trees would be protected in place, including those that contribute to the cultural landscape (e.g., eucalyptus, pine, walnut, and valley oak trees).

Although the proposed action involves new construction and site improvements within the cultural landscape at Paramount Ranch, the proposed action would not alter any characteristics of the Paramount Ranch cultural landscape and its contributing resources in a manner that would diminish the integrity of the property's design, setting, materials, workmanship, feeling, or association because the new buildings would be similar in scale, massing, and design as the historic buildings, utilities would be undergrounded, and the project would comply with Secretary of the Interior's Standards. The Paramount Ranch Cultural Landscape Historic District would remain eligible for listing in the NRHP upon completion of the proposed action. Furthermore, the proposed action would not affect the previously recorded prehistoric isolated occurrences or the newly recorded historic isolated occurrence. Therefore, the proposed action would have no adverse effect on historic structures or the cultural landscape at Paramount Ranch.

ROCKY OAKS

Based on consultation with the SHPO in 2012 and 2015 regarding historic structures, landscapes, and other resources, as well as previous archeological surveys and archival records searches, there are no eligible cultural landscapes or historic structures at Rocky Oaks (Roland-Nawi, pers. comm., 2015; Szymanski, pers. comm., 2017). Previous documentation indicates that historic ranching and residential uses have a lengthy span within the project site, but tangible archeological resources, historic structure remains, and landscape features lack sufficient integrity to be eligible for listing in the NRHP. Building foundations and stone walls associated with the Brandenberger-Brown historic complex (CA-LAN-4459H) at Rocky Oaks would be partially removed during construction; however, the site was determined by the NPS and SHPO in 2015 to be ineligible for listing in the NRHP. Therefore, the proposed action would have no effect on historic structures or cultural landscapes at Rocky Oaks.

PETER STRAUSS RANCH

As discussed above, the proposed action is designed to comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* for the rehabilitation of the cultural landscape features (Appendix A). At Peter Strauss Ranch, the proposed action is intended to rehabilitate and maintain the historic character and feeling of a 1920s-1930s rural retreat and 1930s-1960s recreation and amusement park. The proposed action would replace the burned Peter Strauss Ranch House on the west side of the site with a new building in the same approximate location and footprint. The scale, massing, design, and materials of the new building

would be compatible with the historic Ranch House. A second structure would provide restrooms to replace the 1980s-era non-contributing restroom building near the pool. The building would have a similar vernacular aesthetic and would be made of similar materials and features as the accessory structures that once existed at this end of the site. While the proposed action would result in alterations to the historic swimming pool promenade to improve accessibility, the overall design of the promenade would be the same as existing conditions, and the pool itself would be preserved.

The proposed circulation and new parking improvements to enhance accessibility throughout the project site would be located in areas where paths and paving exist currently and would make use of historic circulation patterns. Utilities would be run underground to not detract from the character and appearance of the historic cultural landscape. Existing trees would be protected in place, including those that contribute to the historic cultural landscape (e.g., oaks, sycamores, and eucalyptus grove).

Although the proposed action involves new construction and site improvements within the cultural landscape at Peter Strauss Ranch, the proposed action would not alter any characteristics of the Peter Strauss Ranch Historic District and its contributing resources in a manner that would diminish the integrity of the property's design, setting, materials, workmanship, feeling, or association because the new Ranch House and associated site improvements would be similar in scale, massing, and design as the historic structures, utilities would be undergrounded, and the project would comply with Secretary of the Interior's standards. The cultural landscape would remain eligible for listing in the NRHP upon completion of the proposed action. Therefore, the proposed action would have no adverse effect on historic structures or the cultural landscape at Peter Strauss Ranch.

CONCLUSION

The proposed action would result in no effects to historic structures or cultural landscapes at Rocky Oaks. At Paramount Ranch and Peter Strauss Ranch, the NPS proposes actions that would adhere to the *Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes* for the rehabilitation of the cultural landscape features (Appendix A). Although the proposed action involves reestablishing facilities and implementing site improvements within the cultural landscapes at Paramount Ranch and Peter Strauss Ranch, the proposed action would not alter any characteristics of either the Paramount Ranch Cultural Landscape Historic District or the Peter Strauss Ranch Historic District and their contributing resources in a manner that would diminish their historic integrity. The cultural landscapes would remain eligible for listing in the NRHP upon completion of the proposed action. Therefore, the proposed action would have no adverse effect on historic structures or cultural landscapes.

The proposed action would address damage resulting from the Woolsey Fire to the cultural landscapes and loss of features that contributed to the integrity of the properties. Therefore, it would contribute to long-term beneficial effects to historic structures and cultural landscapes at the SMMNRA.

3.2 VISITOR EXPERIENCE

3.2.1 Study Area/Affected Environment

SMMNRA encompasses 153,075 acres and consists of a patchwork of park units, operated by agencies that include NPS, California State Parks, Mountains Recreation and Conservation Authority, and the City of Los Angeles. NPS operates twelve developed areas within SMMNRA. The Woolsey Fire of November 2018 burned seven of NPS' developed areas and approximately 21,000 of the 23,595 acres (88 percent) of NPS land within the SMMNRA. Thirty structures within these areas were a total loss.

The study area related to visitor experience encompasses the Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch project sites, as shown on Figures 2-1 through 2-3, which burned in the Woolsey Fire and where NPS proposes to reestablish facilities that were destroyed in the fire. Existing visitor opportunities, visitation trends, and visitor access and circulation within the study area are summarized in the following sections.

Overall visitor experience within the SMMNRA has remained stable prior to the Woolsey Fire; however, the Woolsey Fire resulted in the loss of film set structures, assembly areas, and natural and cultural features that previously attracted visitors to the park. While public use areas within the SMMNRA have reopened, some areas remained closed due to safety hazards and to allow revegetation of sensitive areas. Since the Woolsey Fire, there has been an overall decline in visitor opportunities and visitation levels, despite some increases in visitation due to the COVID-19 pandemic and disaster tourism. These factors have contributed to overall adverse trends in visitor experience within the SMMNRA.

Visitor Opportunities: Popular activities within the SMMNRA include hiking, mountain biking, horseback riding, climbing, camping, and wildflower viewing. In addition, the NPS hosts various special programs and events, including education and volunteer programs. Visitor opportunities at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch include the following:

- ▶ **Paramount Ranch:** Paramount Ranch is open to the public from 8:00 a.m. to sunset, daily. Recreational activities, such as hiking, picnicking, mountain biking, horseback riding, dog walking, and wildlife viewing, have resumed since the fire. However, special events and filming activities, which previously ranged from 200 to 5,000 people, have largely ceased due to the loss of the Western Town structures, assembly areas, and utilities.
- ▶ **Rocky Oaks:** The Rocky Oaks project site is currently open by appointment only to visiting researchers. In addition, a section of the Rocky Oaks Loop Trail passes through the project site. The trail is approximately 1.3 miles long and is used primarily for hiking and viewing nature.
- ▶ **Peter Strauss Ranch:** Peter Strauss Ranch is currently closed to the public. Public and private events at Peter Strauss Ranch, such as Sunday concerts, art installations, private weddings and parties, park outreach programs, and other special events have ceased due to the loss of the Ranch House, assembly areas, and utilities in the fire.

Visitation Trends: As shown in Table 3-1, overall post-fire (e.g., 2019 and 2020) visitation levels were lower than pre-fire levels (e.g., 2016 and 2017) in SMMNRA. Specifically, post-fire visitation levels decreased approximately 32 percent from pre-fire peak 2016 levels at Paramount Ranch and dropped to zero for Rocky Oaks and Peter Strauss Ranch in 2019.

Table 3-1 Public Visitation within the Santa Monica Mountains National Recreation Area from 2016 to 2020

Year	Santa Monica Mountains National Recreation Area Number of Visitors	Paramount Ranch Number of Visitors	Rocky Oaks Number of Visitors	Peter Strauss Ranch Number of Visitors
2016	906,606	384,320	11,134	26,932
2017	897,593	340,339	9,713	23,192
2018	867,154	352,955	8,868	21,837
2019	707,566	260,163	0	0
2020	733,576	191,567	548	0

Source: NPS 2021

- ▶ **Paramount Ranch:** Paramount Ranch was closed to the public immediately following the Woolsey Fire and subsequently reopened to visitors in late November 2018 with fencing around areas of ash and debris. Recreational activities, such as the use of trails and picnic areas, have resumed since the fire. However, special events and filming activities, which previously ranged from 200 to 5,000 people, have ceased due to the loss of the Western Town structures, assembly areas, and utilities. Post-fire revenue associated with rentable venues decreased from \$112,000 in the 2017 fiscal year to \$17,400 in the 2020 fiscal year (Szymanski, pers. comm., 2021); however, revenue in 2020 was affected by lack of public gatherings due to restrictions from the COVID-19 pandemic.
- ▶ **Rocky Oaks:** Although overall site visitation at Rocky Oaks decreased from pre-fire levels, the majority of the project site is used for NPS administrative functions and is not open to the public. Following post-fire debris removal, the site was reopened to NPS staff and visitors by appointment only and continues to be used infrequently. A portion of the Rocky Oaks Loop Trail crosses through the project site, which is accessed by the

public at a trailhead east of the project site. The public trailhead for the Rocky Oaks Loop Trail was closed to the public following the Woolsey Fire due to safety hazards but was reopened in mid-2020. The Woolsey Fire did not contribute to any loss in revenue associated with the Rocky Oaks project site.

- ▶ **Peter Strauss Ranch:** Peter Strauss Ranch is currently closed to the public. It is being used as a staging area for the reconstruction of the Mulholland Highway bridge. The new bridge reconstruction is complete and the removal of the old bridge is currently scheduled for completion in fall 2021. Special events are not currently being held at the site. Prior to the Woolsey Fire, Peter Strauss Ranch was considered the primary site for medium-sized events (200 to 400 attendees), with an upper limit of approximately 1,000 to 1,200 attendees. Had the Woolsey Fire not occurred, NPS projected a revenue of \$91,000 in 2019, rising to \$190,000 by 2024.

Based on census data, Los Angeles County experienced a 2.2 percent increase in population from 2010 (9,818,605 people) to 2019 (9,819,968 people) (U.S. Census Bureau 2019). In Los Angeles County, the Southern California Association of Governments forecasts a population growth of 4.7 percent from 2020 (10,407,000 people) to 2030 (10,900,000 people) (SCAG 2020). It is anticipated that overall SMMNRA visitation, including visitation of individual park units, will rise over time concurrently with projected population growth.

Visitor Access and Circulation: Visitors primarily access SMMNRA by personal vehicle. Major highways that provide access to SMMNRA include U.S. Highway 101, State Route 27 (Topanga Canyon Boulevard), State Route 23, and State Route 1 (Pacific Coast Highway). Visitor access and circulation at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch are summarized in the following sections.

- ▶ **Paramount Ranch:** Two entrances along Cornell Road provide access to Paramount Ranch. The north access road, approximately 0.4 mile north of Mulholland Highway, serves as the primary vehicular entrance and exit road for the public. The south road located at Paramount Ranch Drive currently serves as a vehicular exit for the public, due to the limited visibility and sight distance. This road also provides access for emergency vehicles. Within the project site, the north access road leads to an unpaved visitor parking area. From the parking area, there is a network of unpaved paths that provide access to the various facilities and amenities throughout the property, including public restrooms, film set structures, an event lawn, and trailheads. The western and eastern portions of the project site are bisected by Medea Creek and connected by a bridge that is open to pedestrians and NPS vehicles.
- ▶ **Rocky Oaks:** Rocky Oaks is accessed from a gated entry road from Mulholland Highway, approximately 0.2 mile west of Kanan Road. This entry is restricted to NPS staff and visitors by appointment only. A separate park entrance to the east (approximately 400 feet west of Kanan Road), which is outside of the project site boundaries, serves the public day users. Within the project site, the entry road leads to a paved parking area. There is also an unpaved service road located east of the small rock outcrop that connects the northern and southern portions of the property. West of the rock outcrop, there is an existing 10-foot, unpaved service road that connects the administrative parking area to the Rocky Oaks Loop Trail. The western service road is gated and used for emergency egress. Although the trailhead for the Rocky Oaks Loop Trail is outside the project site, a section of the trail passes through the project site along the southern border of the grassland.
- ▶ **Peter Strauss Ranch:** There are three vehicular entries intersecting Mulholland Highway that provide access to Peter Strauss Ranch. The developed area to the west of Triunfo Creek includes the historic entry to the non-extant Ranch House, which is generally not used by the public. The area east of Triunfo Creek includes an entrance near Waring Drive that serves as the main public entrance to the property and leads visitors to a gravel road and two parking areas. This entrance was historically used as the entrance to Lake Enchanto. Another entrance further east near Careful Avenue leads to the south end of the visitor parking area. The parking areas east of Triunfo Creek require visitors to walk across a bridge at Mulholland Highway to access the gathering spaces west of Triunfo Creek. A network of unpaved trails connects the various facilities and amenities throughout the property, including event spaces, trailheads, and picnic areas.

3.2.2 Methodology and Assumptions

The NPS Management Policies state that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks and that the NPS is committed to providing appropriate high-quality opportunities for visitors to enjoy the parks (NPS 2006b). Consequently, one of the NPS' goals is to ensure that visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of park facilities, services, and appropriate recreational opportunities.

This analysis considers:

- ▶ the ability of visitors to experience the Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch sites and learn about the natural and cultural resources present at these sites;
- ▶ the ability of visitors to safely access these sites for public day use and special events; and
- ▶ the availability and quality of visitor facilities and park interpretation services at these sites.

Impacts on visitor experience, health, and safety were evaluated on a spatial and temporal scale. The spatial scale is consistent with the project sites for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch, as described in Section 3.2.1. The temporal scale includes both (1) short-term impacts, which are impacts that would last only during project construction activities (estimated to take 12 months, starting in Spring 2022 for Paramount Ranch and Rocky Oaks, and approximately 12 months for Peter Strauss Ranch, no start date determined at this time), and (2) long-term impacts, which are impacts that would extend throughout operation of the proposed facilities at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch (over decades).

3.2.3 Alternative 1: No Action

The No Action Alternative would maintain existing post-fire conditions within the Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch project sites. No construction activities would occur; therefore, no temporary impacts related to aesthetics, congestion, noise, and fugitive dust and other emissions would occur. As such, there would be no construction-related impacts on visitor experience, health, and safety.

However, the No Action Alternative would not redevelop the facilities and associated infrastructure that were destroyed in the Woolsey Fire, including culturally important resources, interpretive displays, and special event venues. Under the No Action Alternative, areas that are currently closed to the public within these sites would reopen to the public following the remediation of contaminated soils resulting from the Woolsey Fire (scheduled to be completed by 2022) and the sites would be maintained. However, the remaining extant structures at Paramount Ranch and the Ranch House at Peter Strauss would be less desirable and less utilized for filming and events when compared with pre-fire conditions. In addition, no new employee housing would be provided at Rocky Oaks. Furthermore, associated site improvements related to accessibility, signage, interpretation, and cultural values would not be implemented. Visitation trends associated with public day use and special events would continue to be reduced compared to pre-fire conditions. Therefore, the No Action Alternative would perpetuate adverse impacts to visitor experience because of the lack of recreational opportunities at the sites caused by the Woolsey Fire.

3.2.4 Alternative 2: Proposed Action - Woolsey Fire Disaster Recovery

Construction activities would temporarily diminish visitor experience in public use areas near construction zones. During the construction period, construction zones would be inaccessible to the public, including portions of Paramount Ranch and a segment of the Rocky Oaks Loop Trail within Rocky Oaks. Peter Strauss Ranch, which is currently closed to the public, would remain closed during construction activities. Construction equipment would be visible in existing viewsheds and has potential to temporarily detract from views of existing landscapes. The use of construction equipment and generators would also result in elevated noise levels and emissions, as well as dust from ground-disturbance. Furthermore, trucks and equipment traveling to and from the project sites would result in increased congestion on nearby roadways.

Construction-related effects would be short-term and temporary and would cease following the construction period. Construction activities at Paramount Ranch and Rocky Oaks would occur for approximately 12 months, currently scheduled from spring 2022 to spring 2023. Construction activities at Peter Strauss Ranch are also anticipated to take approximately 12 months, but the start date is not known at this time. It is assumed that construction at Peter Strauss would occur after the construction at Paramount Ranch and Rocky Oaks is completed. Resource protection measures during construction include performing work between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, implementation of a traffic control plan, notifying the public of any temporary park closures, ensuring construction equipment is fitted with adequate mufflers and pollution emission controls, implementing dust abatement measures, and implementing noise abatement measures (Appendix A). Therefore, the construction impacts to visitor experience would be temporary but adverse and would be minimized through implementation of resource protection measures.

The goal of the proposed action is to redevelop and reconfigure key NPS structures to improve visitor experience and the efficiency of park operations from pre- and post-fire conditions. Compared to existing, post-fire conditions, the proposed action would result in increases in visitation, public events, and special uses (e.g., filming and private functions). The uses and types of activities would be consistent with pre-fire conditions, and they would not be expanded beyond the area previously used for public events and special uses. Although the project would redevelop the sites similarly to pre-fire conditions, it is anticipated that visitation at the project sites would increase over time in tandem with regional population growth.

Improvements that would reestablish or enhance pre-fire visitor experience include the following:

- ▶ Structures, facilities, parking areas, and walkways would be required to meet current IBC, ABAAS, and ADA design codes and standards, which would enhance visitor accessibility at the project sites.
- ▶ Special event venues and outdoor assembly areas at Paramount Ranch and Peter Strauss Ranch would be repaired or redeveloped so that these sites once again function as a filming venue and events space.
- ▶ Cultural features at Paramount Ranch that were essential for NPS interpretation of film history and storytelling would be redeveloped. In addition, cultural features at Peter Strauss Ranch that were essential for NPS interpretation of the site's history as an amusement park and ranch would be redeveloped.
- ▶ The project design would reduce the environmental footprint of NPS facilities within the SMMNRA to allow for greater public use of spaces that were previously restricted to employee housing.

Based on the improvements described above, the proposed action would result in long-term beneficial impacts on visitor experience.

CONCLUSION

Construction activities associated with the proposed action would result in temporary short-term effects related to aesthetics, congestion, noise, and fugitive dust and other emissions. These effects would result in a short-term adverse impact on visitor experience. However, NPS would implement general construction management measures and best management practices as identified in Appendix A to minimize temporary adverse effects. Once operational, the proposed action would replace functions that were lost as a result of the Woolsey Fire, which would allow NPS to reinstate visitation, public events, and special uses to pre-fire levels and enhance visitor experience. Visitation would increase over existing post-fire conditions and the proposed action would result in long-term, beneficial impacts to visitor experience at the SMMNRA.

3.3 THREATENED AND ENDANGERED SPECIES AND CRITICAL HABITAT

3.3.1 Study Area/Affected Environment

The study area for biological resources consists of (1) the project area defined for the three project sites, which include the footprint of all construction activities, as well as proposed facilities and associated infrastructure, and (2) a 200-meter (approximately 650 foot) buffer. A description of the biological study area for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch is summarized in the following sections. In addition, the following sections describe the habitat types within the biological study area, as well as the threatened and endangered species and critical habitat with potential to occur within the biological study area.

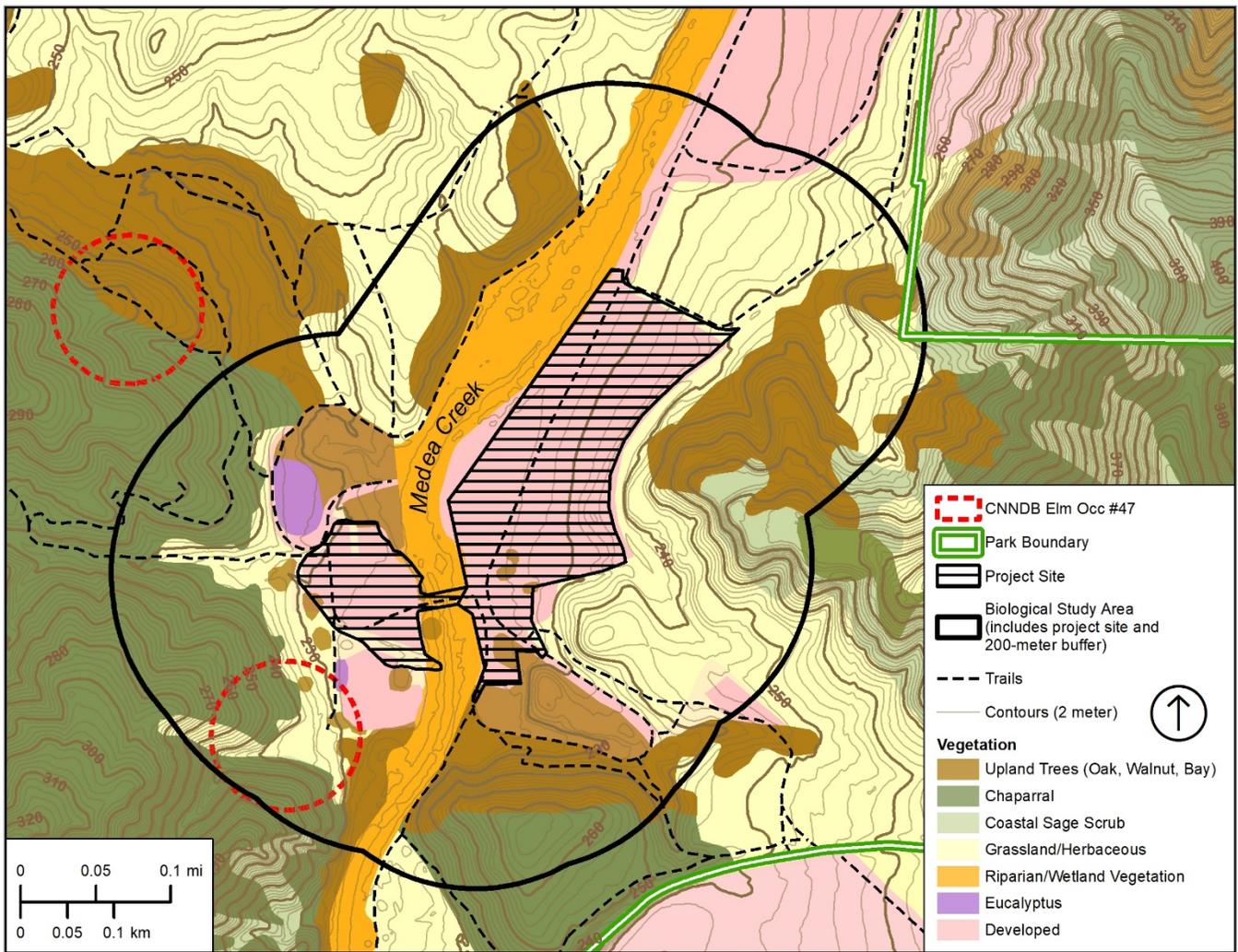
The Santa Monica Mountains and surrounding region have experienced an overall decline in the populations of threatened and endangered species and the size of their critical habitat due to effects from wildfires, invasive species, and human disturbance and development. Within the SMMNRA, NPS adheres to various management plans, which include the SMMNRA General Management Plan (NPS 2002), Invasive Plant Management Plan (NPS 2017), and Fire Management Plan (NPS 2012). These plans are intended to protect natural and cultural resources while providing compatible recreation and educational programs to the public. Implementation of these plans have contributed to long-term beneficial effects on habitats within the park, although the overall trend is adverse for threatened and endangered species and critical habitat in the region.

HABITAT

Paramount Ranch

The biological study area for Paramount Ranch is shown in Figure 3-4. The biological study area encompasses 17.2 acres of land that was developed prior to the Woolsey Fire and a 200-meter buffer, which encompasses 105 acres and includes developed land (7 percent), grassland (36 percent), upland trees/oak woodland (25 percent), chaparral (17 percent), riparian woodland (12 percent), and coastal sage scrub (3 percent).

The project site is bisected by Medea Creek, which is perennial and provides standing water year-round, and the associated riparian corridor. The project site also includes Cooper Ditch, a small ditch that flows into Medea Creek and was constructed to divert flood flows from the developed areas. The USFWS NWI identifies riverine habitat associated with Cooper Ditch and riverine and freshwater forested/shrub wetland associated with Medea Creek (USFWS 2021a).



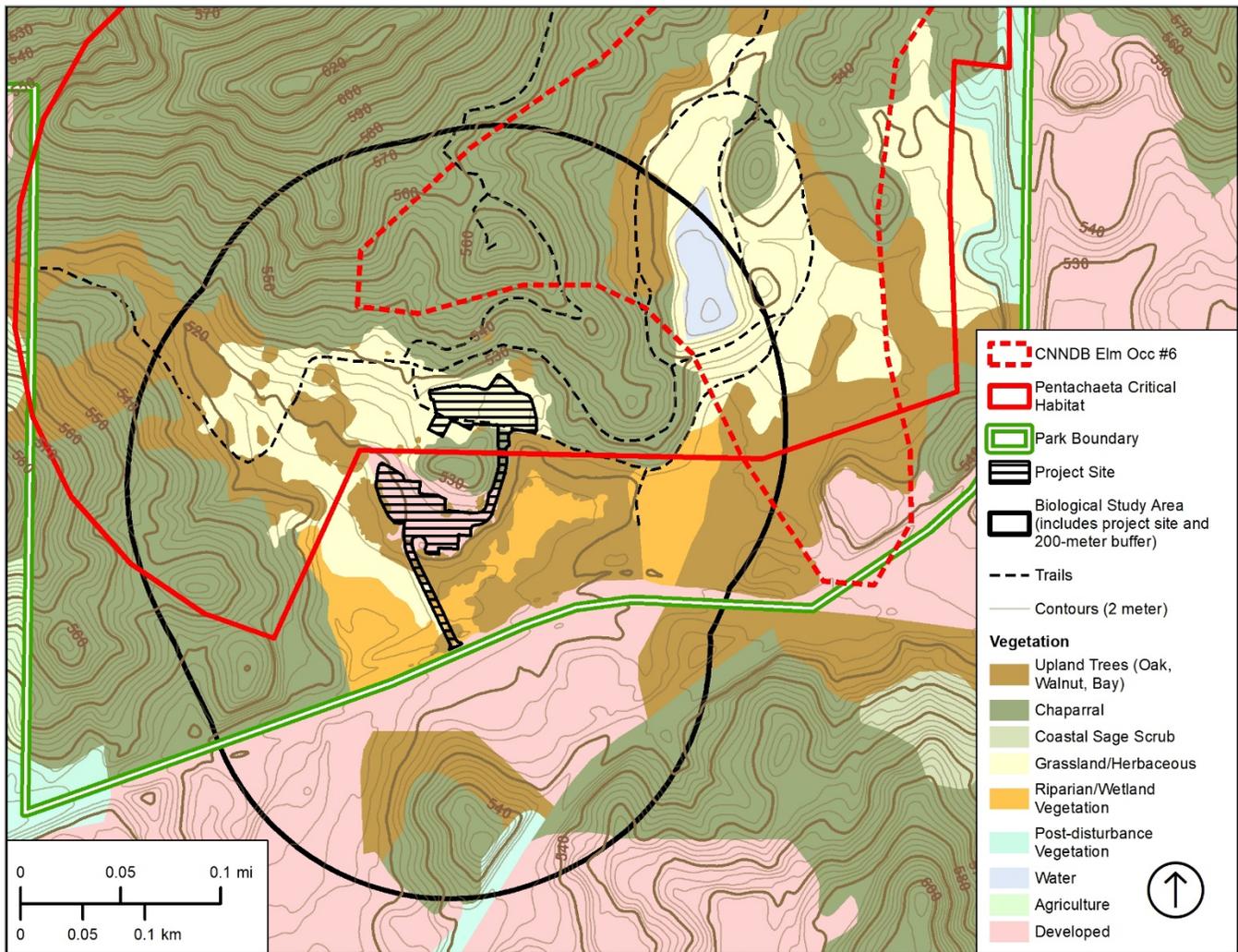
Source: NPS 2021 (September)

Figure 3-4 Biological Study Area for Paramount Ranch

Rocky Oaks

The biological study area for Rocky Oaks is shown in Figure 3-5. The biological study area encompasses 1.63 acres of land that was developed prior to the Woolsey Fire, as well as grassland, chapparral, and riparian/wetland, and a 200-meter buffer that includes 60 acres composed of developed land (17 percent), chaparral (43 percent), upland trees/oak woodland (21 percent), annual grassland (11 percent), and riparian woodland/wetland (7 percent).

The southern portion of the project site is entirely developed. The northern portion of the project site consists primarily of annual grassland that was formerly developed for agriculture, surrounded by areas of chaparral and upland trees/oak woodland. The USFWS NWI identifies freshwater forested/shrub wetland habitat west of the project site and freshwater emergent wetland habitat southeast of the project site (USFWS 2021a).



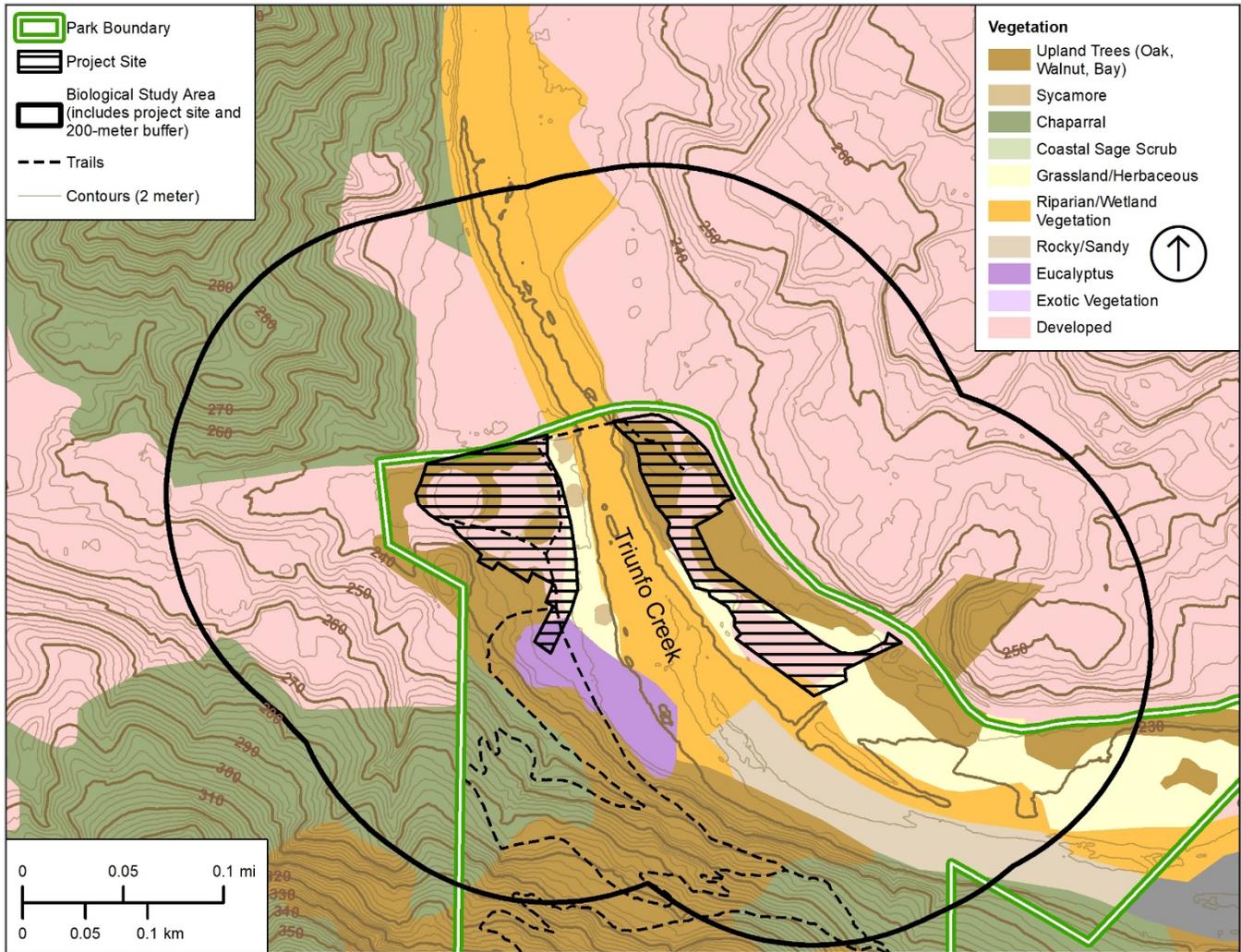
Source: NPS 2021 (September)

Figure 3-5 Biological Study Area for Rocky Oaks

Peter Strauss Ranch

The biological study area for Peter Strauss Ranch is shown on Figure 3-6. The biological study area encompasses 5.3 acres of land that were developed prior to the Woolsey Fire and surrounding trees (oak, walnut, bay laurel, and eucalyptus). The biological study area also includes a 200-meter buffer that encompasses 84 acres and includes developed land (46 percent), chaparral (18 percent), riparian woodland/wetland/alluvium (15 percent), oak woodland (14 percent), and annual grassland (5 percent).

The biological study area is bisected by Triunfo Creek. The creek is seasonal, with the period of standing water dependent on seasonal rainfall. The USFWS NWI identifies riverine, freshwater forested/shrub wetland, and freshwater emergent wetland habitat associated with Triunfo Creek (USFWS 2021a).



Source: NPS 2021 (June)

Figure 3-6 Biological Study Area for Peter Strauss Ranch

THREATENED AND ENDANGERED SPECIES AND CRITICAL HABITAT

The NPS obtained an official species list from the USFWS Information for Planning and Consultation (IPaC) website on May 4, 2021. The official species list identifies 20 threatened and endangered species with potential to occur within the boundary of the biological study area and/or that would be affected by the proposed action. This includes six birds, one amphibian, one fish, two invertebrate, and 10 plant species. The six bird species are also included on the USFWS Birds of Conservation Concern 2021 List, which is a list of migratory and non-migratory bird species that represent the agency's highest conservation priorities (USFWS 2021b). The NPS evaluated the potential for habitats present within the biological study area to support the 20 species known to occur in the region, which is discussed in the following sections.

Wildlife

None of the federally listed threatened or endangered wildlife species or their critical habitat have been documented within the project site at Paramount Ranch, Rocky Oaks, or Peter Strauss Ranch; however, the three bird species and one amphibian species described in the following sections could occur within or downstream of the project site due to the presence of potentially suitable habitat.

Birds

The Southwestern willow flycatcher (*Empidonax traillii extimus*) is an endangered species under the Federal Endangered Species Act (FESA). Southwestern willow flycatchers have not been observed within the biological study area. However, potentially suitable nesting and foraging habit (e.g., riparian woodland and wetland vegetation) occurs within the 200-meter buffer of each project site. No designated critical habitat for the southwestern willow flycatcher occurs within the biological study area. The nearest designated critical habitat is approximately 20 miles north of the biological study area along the Santa Clara Rivera and 20 miles northeast of the biological study area along Big Tujunga Wash.

The coastal California gnatcatcher (*Polioptila californica californica*) is a threatened species under FESA. Coastal California gnatcatchers have not been observed within the biological study area, but the species has been documented in other areas within the Santa Monica Mountains. Potentially suitable nesting and foraging habitat (e.g., coastal sage scrub) occurs within the 200-meter buffer of the Paramount Ranch project site. No designated critical habitat for the coastal California gnatcatcher occurs within the biological study area. The nearest designated critical habitat is approximately 25 miles east of the biological study area in the foothills of the San Gabriel Range.

The least Bell's vireo (*Vireo bellii pusillus*) is an endangered species under FESA. Least Bell's vireo has not been observed within the biological study area; however, the species has been documented at two locations near the coast in the Santa Monica Mountains. Potentially suitable nesting and foraging habitat (e.g., riparian woodland and scrub) occurs within the 200-meter buffer of each project site. No designated critical habitat for the least Bell's vireo occurs within the biological study area. The nearest designated critical habitat is approximately 20 miles north of the biological study area along the Santa Clara River.

Amphibians

The California red-legged frog (*Rana draytonii*) is a threatened species under FESA. The California red-legged frog has not been observed within the biological study area. However, the species has been documented in upper Las Virgenes Canyon and reintroduced at several locations within the Santa Monica Mountains. Potentially suitable habitat occurs immediately adjacent or in the immediate vicinity of the biological study area, including aquatic habitat (e.g., perennial creeks and ephemeral pools and ponds) and upland and riparian habitat. However, the presence of invasive predators, including bullfrogs, bass, carp, and crayfish, have likely prevented the occurrence of the red-legged frog within the biological study area. No designated critical habitat for the red-legged frog occurs within the biological study area. The nearest designated critical habitat is approximately 4.4 miles northeast of the biological study area in upper Las Virgenes Canyon in the Simi Hills.

Flowering Plants

None of the federally listed threatened or endangered plant species have been identified within the project site at Paramount Ranch, Rocky Oaks, or Peter Strauss Ranch. However, occurrences of Lyon’s pentachaeta (*Pentachaeta lyonii*), an endangered species under FESA, have been documented within the Paramount Ranch and Rocky Oaks park units. Two stands of Lyon’s pentachaeta were recorded approximately 1,000 feet to the northwest and 375 feet to the southwest of the project site at Paramount Ranch. In addition, five stands of Lyon’s pentachaeta were recorded between 500 to 1,050 feet from the project site at Rocky Oaks. These stands are all separated topographically from the Paramount Ranch and Rocky Oaks project sites by ridges.

Although there are no identified occurrences of Lyon’s pentachaeta within the project site, there is designated critical habitat for this species within the Rocky Oaks biological study area. Critical habitat is designated based on primary constituent elements (PCEs), which are the physical and biological features of a landscape that a species needs to survive and reproduce. PCEs for Lyon’s pentachaeta include: (1) clay soils of volcanic origin; (2) exposed soils that exhibit a microbiotic crust, which may inhibit invasion by other plant competitors; and (3) a mosaic of bare ground (at least 10 percent) patches, in an area with less than 60 percent overall vegetation cover. Approximately 0.7 acre of the project site at Rocky Oaks is designated critical habitat for Lyon’s pentachaeta. In addition, approximately 31 acres of Lyon’s pentachaeta designated critical habitat are within the 200-meter buffer of the Rocky Oaks project site. The critical habitat at Rocky Oaks has the first PCE, comes close to meeting the cover requirements of the second PCE, and does not have the third PCE (NPS 2021). No critical habitat for Lyon’s pentachaeta occurs within the Paramount Ranch or Peter Strauss Ranch biological study areas. No critical habitat for other threatened and endangered species occurs within the Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch biological study areas.

Threatened and Endangered Species Dismissed from Further Analysis

Fifteen federally listed species were determined to have no potential to be affected by the project because either (1) the biological study area is outside the species’ known range, or (2) the biological study area lacks suitable habitat conditions for these species. Table 3-2 includes a discussion of the threatened and endangered species that were dismissed from further analysis based on geographic range or habitat requirements.

Table 3-2 Threatened and Endangered Species Dismissed from Further Analysis

Species (Common Name, Species Name)	Federal Status ¹	Determination of Effect ²	Rationale ³
Birds			
Marbled Murrelet, <i>Brachyramphus marmoratus</i>	T	No effect (species and critical habitat)	Marbled murrelets have not been observed within the biological study area. The biological study area is approximately 5 miles inland from suitable breeding or foraging habitat for this species, which occurs along the coast. This species has been occasionally sighted wintering in waters off the coast of the Santa Monica Mountains, outside of the biological study area. If populations of marbled murrelet were to occur downstream of biological study area, effects on this species are unlikely due to the relatively small scale of construction work, the distance of the construction activities from the coast, and BMPs implemented to prevent pollutants from entering waterways. No designated critical habitat for marbled murrelet occurs within the biological study area. The nearest designated critical habitat for this species is approximately 270 miles northwest of the biological study area in Santa Cruz County.
Western Snowy Plover, <i>Charadrius nivosus</i>	T	No effect (species and critical habitat)	Western snowy plovers have not been observed within the biological study area and no suitable breeding or foraging habitat for this species exists in the biological study area. However, this species occurs downstream of the biological study area at Malibu and Zuma lagoons. Effects on this species are unlikely due to the relatively small scale of construction work, the distance of the construction activities from the coast, and BMPs implemented to prevent pollutants from entering waterways.

Species (Common Name, Species Name)	Federal Status ¹	Determination of Effect ²	Rationale ³
			The biological study area is approximately 5 miles inland from designated critical habitat for western snowy plover, which occurs at the outlets of Malibu and Zuma Creeks downstream from the biological study area. Because the proposed action would not adversely affect the hydrology of Malibu and Zuma Creeks and BMPs would be implemented to prevent substantial pollutants from entering downstream waters, there would be no effect on designated critical habitat for the western snowy plover.
California Least Tern, <i>Sterna antillarum browni</i>	E	No effect	California least terns have not been observed within the biological study area and no suitable breeding or foraging habitat for this species exists within the biological study area. However, this species occurs downstream of the biological study area at Malibu and Zuma lagoons. Effects on this species are unlikely due to the relatively small scale of construction work, the distance of the construction activities from the coast, and BMPs implemented to prevent pollutants from entering waterways. Critical habitat has not been designated for this species.
Fish			
Tidewater Goby, <i>Eucyclogobius newberryi</i>	E	No effect	<p>The tidewater goby occupies several locations along the coast of the Santa Monica Mountains. The biological study area is approximately 5 miles inland from suitable habitat (e.g., coastal lagoons, freshwater tributaries, and marshes in the upper brackish zone of larger estuaries). However, suitable habitat is present at the outlets of Malibu and Zuma Creeks downstream from the biological study area.</p> <p>No designated critical habitat for the tidewater goby occurs within the biological study area. The nearest designated critical habitat is located in Big Sycamore Canyon, Arroyo Sequit, Zuma Canyon, Malibu Lagoon, and Topanga Creek. Critical habitat is located downstream of Paramount Ranch and Peter Strauss Ranch and therefore could receive runoff from these sites.</p> <p>Effects on this species and critical habitat are unlikely due to the relatively small scale of construction work, the distance of the construction activities from the critical habitat, and BMPs implemented to prevent pollutants from entering waterways.</p>
Invertebrates			
Vernal Pool Fairy Shrimp, <i>Branchinecta lynchi</i>	T	No effect	The vernal pool fairy shrimp is not known to occur in the Santa Monica Mountains. In addition, no designated critical habitat for the vernal pool fairy shrimp occurs within the biological study area. The nearest known occurrence and designated critical habitat is in the Los Padres National Forest in Ventura County, approximately 30 miles north of the biological study area. Therefore, no effects on the species would occur from the proposed action.
Riverside Fairy Shrimp, <i>Streptocephalus woottoni</i>	E	No effect	The Riverside fairy shrimp is not known to occur in the Santa Monica Mountains. In addition, no designated critical habitat for the Riverside fairy shrimp occurs within the biological study area. The nearest known occurrence and designated critical habitat is at Tierra Rejada in Ventura County, approximately 10 miles north of the biological study area. Therefore, no effects on the species would occur from the proposed action.
Flowering Plants			
Marsh Sandwort, <i>Arenaria paludicola</i>	E	No effect	Marsh sandwort is not known to occur in the Santa Monica Mountains. In addition, the habitat types required by the species (e.g., freshwater marshes, swamps, and other mesic wetland or boggy habitats) do not occur within or adjacent to the biological study area. No critical habitat for this species has been proposed or designated. Therefore, no effects on the species would occur from the proposed action.
Braunton's Milk-vetch, <i>Astragalus brauntonii</i>	E	No effect (species and critical habitat)	Braunton's milk-vetch has not been documented within or adjacent to the biological study area. The closest known occurrences are approximately four miles north of Paramount Ranch and two miles south of Rocky Oaks. The biological study area does not provide suitable habitat (e.g., calcium carbonate soils) for this species. Therefore, no effects on the species would occur from the proposed action.

Species (Common Name, Species Name)	Federal Status ¹	Determination of Effect ²	Rationale ³
			There is no designated critical habitat for Braunton's milk-vetch within the biological study area. The closest designated critical habitat units are approximately 3.5 miles north of Paramount Ranch, in the southern Simi Hills, and 3.5 miles south of Rocky Oaks, in Zuma Canyon.
Salt Marsh Bird's-beak, <i>Cordylanthus maritimus ssp. maritimus</i>	E	No effect	Salt marsh bird's-beak does not occur within or in the vicinity of the biological study area. The nearest occurrences of this species are in Mugu Lagoon and Ormond Beach Wetlands west of the Santa Monica Mountains. Therefore, no effects on the species would occur from the proposed action. No critical habitat for this species has been proposed or designated.
Marcrescent Dudleya, <i>Dudleya cymosa ssp. marcescens</i>	T	No effect	Marcrescent dudleya has not been documented within or adjacent to the biological study area. The closest known occurrences are approximately 0.9 miles south of Paramount Ranch, 1.4 miles southwest of Peter Strauss Ranch and 1.6 miles east of Rocky Oaks. Therefore, no effects on the species would occur from the proposed action. No critical habitat for marcescent dudleya has been proposed or designated.
Santa Monica Mountains Dudleya, <i>Dudleya cymosa ssp. ovatifolia</i>	T	No effect	Santa Monica Mountains dudleya does not occur within the biological study area. The closest occurrence is in Malibu Canyon, approximately 4.3 miles south of Paramount Ranch. In addition, the habitat type (e.g., sandstone conglomerate rock outcroppings on northerly facing vertical canyon walls above perennially flowing streams) for this species does not occur within the biological study area. Therefore, no effects on the species would occur from the proposed action. No critical habitat for Santa Monica Mountains dudleya has been proposed or designated.
Verity's Dudleya, <i>Dudleya verityi</i>	T	No effect	Verity's dudleya does not occur within the biological study area. The closest occurrence is approximately 11 miles from Rocky Oaks. Therefore, no effects on the species would occur from the proposed action. No critical habitat for Verity's dudleya has been proposed or designated.
Spreading Navarretia, <i>Navarretia fossalis</i>	T	No effect	Spreading navarretia does not occur within the Santa Monica Mountains. In addition, suitable vernal pool or depressional wetland habitat for this species is not present within the project site or vicinity. Therefore, no effects on the species would occur from the proposed action. No designated critical habitat occurs in the Santa Monica Mountains. The closest designated critical habitat unit is in the Liebre Mountains, approximately 70 miles northeast of the Santa Monica Mountains.
California Orcutt Grass, <i>Orcuttia californica</i>	E	No effect	California Orcutt grass does not occur within the Santa Monica Mountains. The nearest documented occurrence is at Tierra Rejada in Ventura County, approximately 10 miles north of the biological study area. In addition, suitable vernal pool or depressional wetland habitat for this species is not present within the biological study area or vicinity. Therefore, no effects on the species would occur from the proposed action. No critical habitat for California Orcutt grass has been proposed or designated.
Gambel's Watercress, <i>Rorippa gambellii</i>	E	No effect	Gambel's watercress is not known to occur in the Santa Monica Mountains. Suitable habitat (e.g., perennial freshwater marsh) does not occur within or adjacent to the biological study area. Therefore, no effects on the species would occur from the proposed action. No critical habitat for Gambel's watercress has been proposed or designated.

Notes:

¹ E = Endangered species under the Federal Endangered Species Act; T = Threatened species under the Federal Endangered Species Act

² The Determination of Effect provided in this column is based on the definition provided under the Federal Endangered Species Act, which differs from the definition of "effect" under the implementing regulations of the National Environmental Policy Act, as defined in 40 CFR 1508.1.

³ Detailed rationale provided in *Biological Assessment for Rebuilding Structures and other Facilities lost in the 2018 Woolsey Fire* (NPS 2021)

3.3.2 Methodology and Assumptions

The information in this section is based on the Biological Assessment prepared for the project in accordance with legal requirements set forth under Section 7 of the Endangered Species Act (ESA; 19 U.S. Code, Subsection 1536[c], and 50 Code of Federal Regulations, Part 402). (NPS 2021). NPS consultation with USFWS is summarized in Chapter 4.

The determination of effect in this EA is based on the species' likelihood of occurring in the biological study area, the removal or modification of the species' habitat, and the loss of habitat because of short-term construction disturbances that cause wildlife to relocate, avoid the area, or abandon occupied habitat.

Impacts on threatened and endangered species and critical habitat were evaluated on a spatial and temporal scale. The spatial scale is consistent with the biological study area for Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch, as described in Section 3.3.1. The temporal scale includes both (1) short-term impacts, which are impacts that would last only during project construction activities (estimated to take 12 months, starting in Spring 2022 for Paramount Ranch and Rocky Oaks, and approximately 12 months for Peter Strauss Ranch, no start date determined at this time), and (2) long-term impacts, which are impacts that would extend throughout operation of the proposed facilities at Paramount Ranch, Rocky Oaks, and Peter Strauss Ranch (over decades).

3.3.3 Alternative 1: No Action

The No Action Alternative would maintain existing post-fire conditions within the biological study area. The facilities and associated infrastructure that were destroyed in the Woolsey Fire would not be redeveloped. No construction activities, such as temporary ground disturbance or vegetation removal would occur. In addition, existing post-fire visitation, public events, and private functions, as well as NPS routine maintenance activities would be maintained. As such, the No Action Alternative would have no short-term construction-related impacts or new long-term impacts on federally listed threatened or endangered species or their critical habitat.

3.3.4 Alternative 2: Proposed Action - Woolsey Fire Disaster Recovery

The proposed action is intended to redevelop the burned areas in a manner that better aligns with the NPS mission of conserving natural resources. The proposed action would not change operations from pre-fire conditions and operation of the proposed reconstructed facilities would not affect biological resources. Construction of the proposed action would result in disturbance within the biological study area. As summarized above in Table 3-2, the proposed action would have no effect on 15 of the 20 special-status species with potential to occur in the biological study area and their critical habitat. However, the proposed action has the potential to impact three bird species, one amphibian species, and one flowering plant species. Potential impacts on these species are described in the sections below.

WILDLIFE

Birds

Southwestern Willow Flycatcher, Coastal California Gnatcatcher, and Least Bell's Vireo

As described in Section 3.3.1, southwestern willow flycatcher, coastal California gnatcatcher, and least Bell's vireo have potential to occur within the biological study area due to the presence of suitable habitat. The proposed action would occur within the footprint of previously developed areas, except for 0.70 acres at Rocky Oaks, where construction would occur in an old orchard that has reverted to a mix of native and non-native forbs and low shrubs. The proposed action would not require the removal of vegetation that would provide potential habitat for these species. Although trimming or removal of trees and vegetation would be required to accommodate construction work, the impact on habitat for the southwestern willow flycatcher, coastal California gnatcatcher, and least Bell's vireo would be insignificant.

Temporary excessive noise and human presence during construction activities has potential to disrupt normal behavior, cause nest or territory abandonment, or mask the presence of predators. Breeding bird surveys would be conducted prior to construction activities in vegetated areas adjacent to the construction areas, including in riparian habitat. Surveys would be conducted according to applicable protocols by qualified personnel, and appropriate avoidance measures would be implemented if surveys were positive.

Long-term impacts to habitat for these species have potential to occur through the introduction of invasive plant and animal species and pathogens by construction vehicles and equipment or by importation of materials. BMPs to prevent importation of harmful biota would be implemented. In addition, the NPS would monitor the sites after work is completed to provide early detection and manage any introductions that occur.

A full list of measures to avoid and minimize impacts on bird species is included in Appendix A. With implementation of these measures, these potential impacts would be minimized such that they would not adversely affect the southwestern willow flycatcher, coastal California gnatcatcher, and least Bell's vireo. The proposed action would have no effect on the critical habitat for these bird species based on the distance from the nearest critical habitat to the biological study area.

Amphibians

California Red-Legged Frog

As described in Section 3.3.1, the California red-legged frog is not expected to occur in the biological study area. Temporary, construction-related sediment and pollutants have potential to affect the California red-legged frog if undetected populations of the species occur within or downstream of the biological study area. However, effects on the species would be insignificant based on the scale of construction work and the implementation of avoidance and minimization measures to prevent impacts on waterways (Appendix A). With implementation of these measures, these potential impacts would be minimized such that they would not adversely affect the California red-legged frog. The proposed action would have no effect on critical habitat for the California red-legged frog based on the distance from the nearest critical habitat to the biological study area.

FLOWERING PLANTS

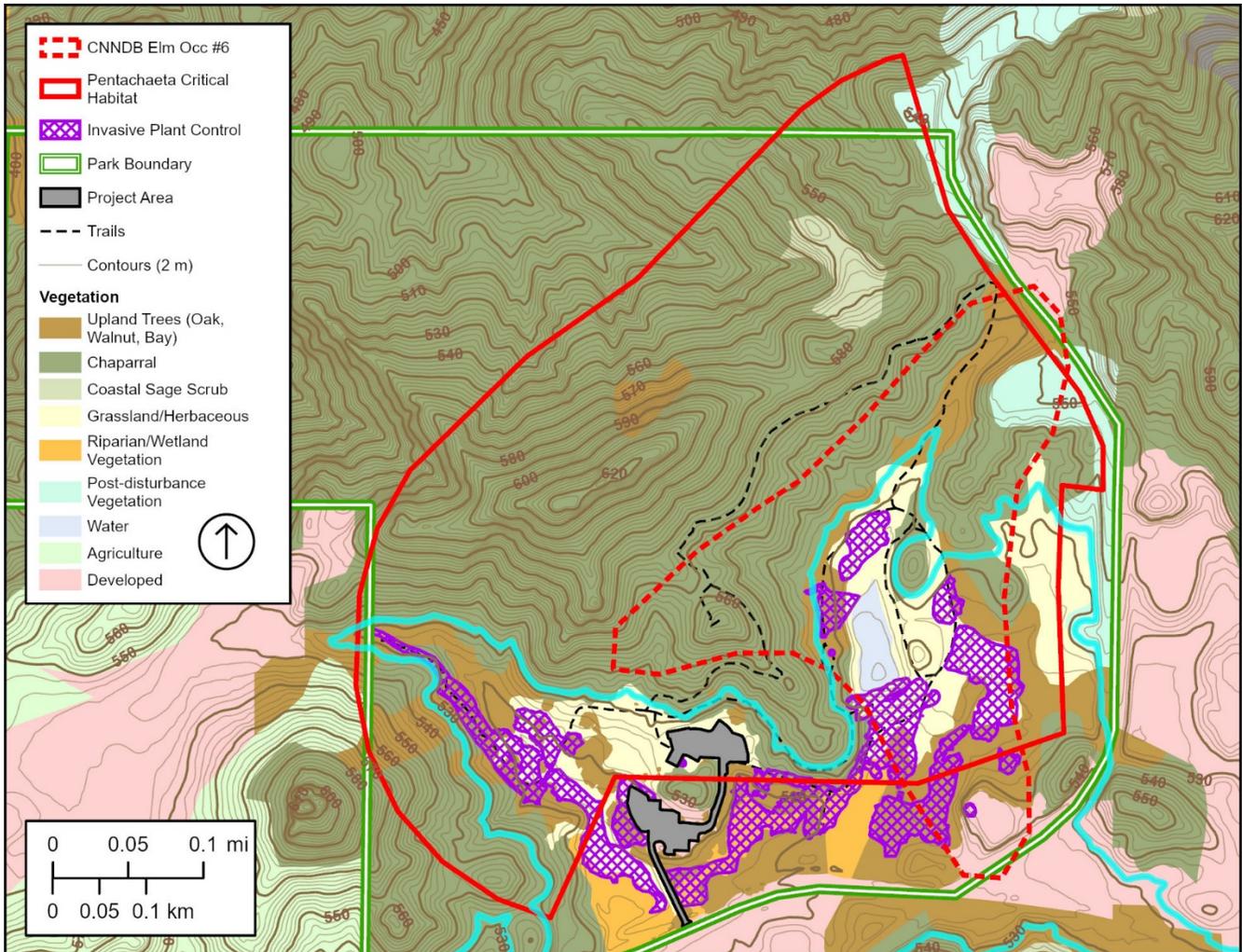
Lyon's Pentachaeta

Lyon's pentachaeta was not observed within the project sites at Paramount Ranch, Rocky Oaks, or Peter Strauss Ranch. However, Lyon's pentachaeta occurs within the 200-meter buffer of the Paramount Ranch and Rocky Oaks project sites. Because there are no stands of Lyon's pentachaeta within the project sites and the nearest existing stands are separated topographically from the project sites by ridges, construction and operation of the proposed action would not result in adverse impacts on this species.

However, the proposed action would remove 0.7 acre of designated critical habitat for Lyon's pentachaeta at the Rocky Oaks project site by constructing two buildings and associated driveways and parking areas. The permanent loss constitutes less than 0.7 percent of Mulholland Drive Subunit 5b, which is 107 acres. Therefore, the proposed action would adversely affect Lyon's pentachaeta critical habitat at Rocky Oaks.

Impacts on Lyon's pentachaeta are anticipated to be limited based on the size and peripheral location of the designated critical habitat that would be lost. In addition, as noted above, known stands of Lyon's pentachaeta are topographically separated from the project site by a ridgeline. Furthermore, after construction, operational activities associated with residences and park administration would be limited to the developed area, except for fire fuels reduction (up to 100 feet from buildings), which may include up to 1.83 acres of designated critical habitat immediately surrounding the project site. However, vegetation would be managed in a way to preserve, and possibly enhance, Lyon's pentachaeta habitat. Within the fuels zone grasses would be cut early, before the pentachaeta is up and as a precaution, grasses would be cut at six inches, above the height of the pentachaeta. The effect would be to reduce crowding by grasses and the buildup of thatch. Where shrubs occur within the fuels reduction zone, they would be selectively thinned or removed to create an open, non-contiguous canopy within a mosaic of bare ground.

If the proposed action is implemented, NPS will improve habitat quality for Lyon’s pentachaeta within the remaining designated critical habitat and expand primary constituent elements in areas adjacent to existing Lyon’s pentachaeta stands to mitigate for the conversion of 0.7 acre of critical habitat for Lyon’s pentachaeta at the Rocky Oaks project site (Figure 3-7). Mitigation would include implementation of a program to control invasive plants that outcompete and eliminate suitable habitat for Lyon’s pentachaeta (Appendix A). The invasive plant control program would treat 6.5 acres within and 4.5 acres immediately adjacent to the designated critical habitat at Rocky Oaks. In addition, if the project is implemented, NPS will implement a program to thin annual grasses and forbs and remove thatch on approximately 0.3 acre and 0.1 acre at two existing stands of Lyon’s pentachaeta at Rocky Oaks, which will more than double the amount of suitable habitat in these areas. Although the project would adversely affect (i.e., remove) Lyon’s pentachaeta critical habitat at the project site, mitigation to enhance critical habitat elsewhere would replace the habitat values diminished by the proposed action, such that overall critical habitat conditions in the region would not be adversely affected.



Source: NPS 2021 (September)

Figure 3-7 Mitigation for the Loss of Lyon’s pentachaeta Critical Habitat at Rocky Oaks

CONCLUSION

The proposed action would have no effect on 15 of the 20 special-status species with potential to occur in the biological study area and their critical habitat. Alternative 2, the proposed action, has potential to result in short- and long-term effects to the following special-status species: southwestern willow flycatcher, coastal California gnatcatcher, least Bell's vireo, and California red-legged frog. However, with implementation of the resource protection measures included in Appendix A, the proposed action would not adversely affect these species.

Lyon's pentachaeta was not observed within the project site at Paramount Ranch, Rocky Oaks, or Peter Strauss Ranch, and the proposed action would not adversely affect occurrences of this species. However, the proposed action would remove 0.7 acre of designated critical habitat for Lyon's pentachaeta at Rocky Oaks. Although the project would adversely affect (i.e., remove) Lyon's pentachaeta critical habitat at the Rocky Oaks project site, mitigation to enhance critical habitat for this species (Appendix A) would be sufficient to replace and add to the habitat values diminished by the proposed action, such that overall critical habitat conditions in the region would not be adversely affected.

4 CONSULTATION AND COORDINATION

4.1 PROJECT SCOPING HISTORY

The NPS completed public scoping for the Woolsey Fire Disaster Recovery Project in accordance with 43 CFR Section 46.305. The scoping period was initiated on June 15, 2021, and the NPS accepted scoping comments through July 16, 2021. NPS used the scoping process to confirm and define the project purpose and need and to identify issues and impact topics associated with the proposed action. The public was invited to submit comments electronically through the Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov>) or by mail.

NPS received 28 correspondences from individuals related to the following environmental issue areas: visitor experience, health, and safety; cultural resources; water resources; traffic volume and circulation; and non-native or exotic plant species. Overall, the commenters expressed support for improving accessibility, reinstating event spaces and programming, and reconstructing the film sets and cultural resources at Paramount Ranch; and reconstructing the event space at Peter Strauss Ranch. Other commenters expressed concerns about locating NPS facilities and housing at Rocky Oaks and about placing structures in areas prone to fire or flood. Commenters expressed concerns regarding the spread of invasive species, as well as the protection of wildlife habitat and water resources. In addition, commenters expressed concerns regarding traffic from special events.

Based on internal and public scoping comments and applicable federal law, regulations, and executive orders, the NPS determined that an EA would be the appropriate level of NEPA compliance for the proposed action. Public scoping comments were used to assist the NPS in developing a reasonable and feasible action alternative that meets the purpose and need, as well as a no action alternative. In addition, the public scoping comments were used to determine the range of topics evaluated in the EA and analyze the potential environmental effects of both alternatives in the EA.

4.2 CONSULTATION WITH TRADITIONALLY ASSOCIATED AMERICAN INDIAN TRIBES AND GROUPS

NPS has initiated consultation with the federally recognized Santa Ynez Band of Chumash Indians as well as 11 other tribal organizations on the Native American Heritage Commission Tribal Consultation List for this proposed action. In addition to the Santa Ynez Band of Chumash Indians, the Tribal organizations include the following: (1) the Barbareno/Ventureno Band of Mission Indians; (2) the Chumash Council of Bakersfield; (3) the Coastal Band of the Chumash Nation; (4) the Fernandeno Tataviam Band of Mission Indians; (5) the Gabrielino Band of Mission Indians – Kizh Nation; (6) the Gabrielino/Tongva San Gabriel Band of Mission Indians; (7) Gabrielino/Tongva Nation; (8) Gabrielino Tongva Indians of California Tribal Council; (9) Gabrielino-Tongva Tribe; (10) Northern Chumash Tribal Council; and (11) San Luis Obispo County Chumash Council.

NPS initiated Section 106 consultation with traditionally associated American Indian tribes and groups via a written letter sent on June 11, 2021. NPS subsequently followed up by phone on July 19, 2021. In response, four different tribal organizations expressed interest in entering into formal consultation with regard to the project, as follows: the Santa Ynez Band of Chumash Indians; the Fernandeno Tataviam Band of Mission Indians; the Gabrielino/Tongva San Gabriel Band of Mission Indians; and the Barbareno/Ventureno Band of Mission Indians. The outcome of this consultation process is as follows:

- ▶ NPS formally consulted with the Santa Ynez Band of Chumash Indians in a meeting held by videoconference on July 30, 2021; the result of that meeting was that the tribe requested to remain informed regarding the future development of the project over time as well as tribal monitoring when the project was undertaken.
- ▶ NPS formally consulted with the designated representative of the Gabrielino/Tongva San Gabriel Band of Mission Indians on August 20, 2021; the result of that meeting is that the designated representative requested

that the tribe be kept informed of the proposed action as plans continue to develop for its implementation and that a tribal monitor from the Gabrieleno/Tongva San Gabriel Band of Mission Indians be present for all ground-disturbing activities.

- ▶ NPS communicated by phone with the designated representative of the Fernando Tataviam Band of Mission Indians on multiple occasions and provided requested materials to him; on September 9, 2021, this designated representative provided a letter to the NPS stating that the Cultural Resource Division of the Fernando Tataviam Band of Mission Indians has reviewed the proposed undertaking presented in the initial letter dated June 11, 2021, and the tentative plans provided on July 29, 2021, and takes no issue with efforts by NPS to rehabilitate the Paramount Ranch and Rocky Oaks sites. The letter also requested that the tribe be a consulting party to provide comments and recommendations pertaining to sensitive tribal cultural resources during project planning and implementation. In particular, the tribe requested participation in monitoring efforts during ground disturbing activities and archeological testing in areas containing tribal cultural resources. The letter specified that if multiple tribes were to be engaged in monitoring efforts that the tribe be apprised of any work in tribal cultural resources on days when monitors from their own tribe were not in the field and that any archeological document created be shared with the tribe. Finally, the tribe also expressed the desire to be consulted on the treatment and disposition of any tribal cultural resources encountered in the field.
- ▶ NPS communicated by phone with the designated representative of the Barbareno/Ventureno Band of Mission Indians on September 22, 2021. This representative of the tribe had reviewed the proposed undertaking presented in the initial letter dated June 11, 2021, and the tentative plans provided on July 29, 2021, in advance of the phone meeting. The representative had no significant issues with the plans, but requested that the tribe be kept informed as plans develop. The representative expressed a preference for less development in the park, when possible, and for monitoring and limiting development impacts on wildlife. The representative requested that Shovel Test Pits be conducted should the proposed footprints of the buildings change in the future and that a tribal monitor representing her tribe be present during all construction activities. NPS concurs with the preference for less development and will provide further information to the Barbareno/Ventureno Band of Mission Indians regarding the reduction in development proposed through this fire recovery effort, which provides for consolidation of facilities that are smaller in scale and in fewer locations. In addition, NPS will coordinate with the tribe on test pits and construction monitoring.

The NPS will respond to these requests by continuing to keep the tribes apprised of the proposed action as the planning effort further develops and by engaging tribal monitors to conduct monitoring during implementation of the project. Tribal consultation for Peter Strauss Ranch will be initiated if/when funding is identified.

4.3 CONSULTATION WITH FEDERAL AGENCIES

U.S. Fish and Wildlife Service. The NPS obtained a list of federally listed, endangered, and threatened species with potential to be present in the project site from the USFWS IPaC website on May 4, 2021. The list was used as the basis for the threatened and endangered species and critical habitat analysis in this EA. NPS is initiating formal consultation concurrently with release of the EA in October 2021. Currently, the NPS anticipates a “no effect” determination for the following species: marbled murrelet, western snowy plover, California least tern, tidewater goby, vernal pool fairy shrimp, Riverside fairy shrimp, marsh sandwort, Braunton's milk-vetch, salt marsh bird's-beak, marcescent dudleya, Santa Monica Mountains dudleya, Verity's Dudleya, spreading navarretia, California Orcutt Grass, and Gambel's watercress. In addition, the NPS anticipates a “not likely to adversely affect” determination for the southwestern willow flycatcher, coastal California gnatcatcher, least Bell's vireo, and California red-legged frog. The NPS has initiated formal consultation with a finding of “may affect, likely to adversely affect” Lyon's pentachaeta critical habitat. The NPS has proposed mitigation and is awaiting a biological opinion from the USFWS. The NPS will seek concurrence from USFWS on the assessment of effects on federally listed species and critical habitat and a signed biological opinion prior to finalizing the NPS decision document for this EA.

4.4 CONSULTATION WITH STATE AGENCIES

California Office of Historic Preservation. The NPS initiated consultation with the State Historic Preservation Officer (SHPO) at the California Office of Historic Preservation for the Woolsey Fire Disaster Recovery Project on June 10, 2021. The NPS will continue to consult with the SHPO throughout the planning and implementation of the proposed action. The NPS is seeking SHPO concurrence with a no adverse effect finding for Paramount Ranch and a no historic properties affected finding for Rocky Oaks, and anticipates completion of the Section 106 process in late 2021/early 2022. Consultation for the Peter Strauss Ranch, with a proposed finding of no adverse effect, would be completed when funding for that portion of the proposed action is available.

Los Angeles Regional Water Quality Control Board. Prior to construction, NPS would obtain coverage under the National Pollution Discharge Elimination System (NPDES) Construction General Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). In compliance with the General Permit, a stormwater pollution prevention plan (SWPPP) would be prepared detailing best management practices (BMPs) to control soil erosion and waste discharges from project construction areas. All contractors conducting construction-related work would be required to implement the SWPPP to control soil erosion and waste discharges. The general contractor(s) and subcontractor(s) conducting the work would be responsible for implementing all BMPs detailed in the SWPPP.

4.5 PUBLIC REVIEW OF THE ENVIRONMENTAL ASSESSMENT

Updated information about various aspects of the Woolsey Fire Disaster Recovery Project will be available via the NPS website (<https://parkplanning.nps.gov/>) and regional and local news media.

There will be a 30-day public comment period on this EA, from October 25 to November 24, 2021. Readers are encouraged to review the document online (<https://parkplanning.nps.gov/>). Printed copies of this document will be available for review at the following location:

Anthony C. Bielenso Interagency Visitor Center at King Gillette Ranch
26876 Mulholland Highway, Calabasas, CA, 91302
Wednesdays through Sundays from 12:00 p.m. to 4:00 p.m.

Readers are encouraged to submit comments electronically through the NPS PEPC system. The PEPC can be accessed from the NPS website linked above. Select "Santa Monica Mountains National Recreation Area" from the drop down box, then "SAMO Woolsey Fire Recovery EA," and "Open for Public Comment" box.

Written comments regarding this document should be directed to:

Santa Monica Mountains National Recreation Area
ATTN: Superintendent David Szymanski
401 West Hillcrest Drive
Thousand Oaks, CA 91360
Fax: 805-370-1850

To request a printed copy or thumb drive of this EA (available in limited quantity), please email:

SAMO_Planning@nps.gov.

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Chapter 4, Consultation and Coordination

There are no references used in this chapter.

Appendix A

Resource Protection Measures

The National Park Service (NPS) places a strong emphasis on avoidance, minimization, and mitigation of impacts. To help ensure that the construction and operational activities protect natural, cultural, and social resources and the quality of the visitor experience within the Santa Monica Mountains National Recreation Area (SMMNRA), resource protection measures have been developed. The following table includes measures that NPS/SMMNRA staff will implement prior to, during, and after construction of the proposed action.

Topic	Resource Protection Measure	Responsible Party
Air Quality		
Dust Abatement Measures	<p>The contractor shall comply with standard dust abatement measures, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ Stabilize soils with water or other dust palliatives ▶ Cover loads on haul trucks ▶ Employ speed limits on unpaved roads ▶ Minimize areas of vegetation clearing ▶ Revegetate disturbed areas after construction ▶ Suspend dust-generating activities during high winds to prevent dust clouds 	Contractor
Hydrological/Water Resources		
Construction Activity Monitoring	SMMNRA staff shall monitor and/or direct water bar and drainage placement, brushing and clearing, and revegetation activities.	SMMNRA
Fill Material	SMMNRA staff shall direct contractors on where to obtain fill and other materials for trails, as well as how to apply fill materials such as soil, gravel, and rocks.	SMMNRA
Erosion and Sedimentation Controls	<p>Where appropriate, SMMNRA shall direct the contractor to implement permanent erosion control features, such as rock walls and rolling dips to stabilize soils.</p> <p>The contractor shall avoid placing soils and other materials within drainages to prevent potential sedimentation during rain events.</p> <p>The contractor shall schedule substantial ground-disturbing work outside of anticipated heavy rain events.</p> <p>During construction, the contractor shall implement standard erosion-control measures, such as erosion matting and silt fencing, where earthwork is needed to reduce erosion, surface scouring, and discharge to drainages.</p> <p>The contractor shall minimize the time that soil is left exposed.</p> <p>The contractor shall re-spread topsoil in as near to the original location as possible. Spreading topsoil shall be supplemented with scarifying, mulching, seeding, and/or planting with species native to the immediate area. Conserving native topsoil would minimize vegetation impacts and potential compaction and erosion of bare soils. The use of conserved topsoil would help preserve microorganisms and seeds of native plants.</p>	SMMNRA; Contractor
Wetland Fencing	Where wetlands occur in the vicinity of construction activities, SMMNRA shall direct the contractor to clearly demarcate construction limits with fencing to minimize the potential for wetland fill outside of the intended project site.	SMMNRA; Contractor
Impervious Surfaces	SMMNRA shall incorporate porous pavement into the site design, where possible, to reduce impervious surface area.	SMMNRA

Topic	Resource Protection Measure	Responsible Party
Biological Resources (Trees and Vegetation)		
Protected Zones for Trees	<p>SMMNRA shall establish a Protected Zone extending to at least five feet outside the drip line (canopy edge), or 15 feet from the trunk of a tree, whichever distance is greater, around native oaks, sycamores, walnuts, ashes, and other trees of historic or cultural value within and adjacent to the project site.</p> <p>SMMNRA shall direct the contractor to enclose Protected Zones as follows. For trees within 30 feet of construction areas, the contractor shall use 6-foot or higher chain link fencing with posts sunk into the ground (not movable) and a lockable access gate for tree maintenance. For trees beyond 30 feet from construction areas, the contractor shall use 4-foot or higher orange safety fencing. No-access signs shall be posted on the protective fencing to prohibit entry.</p> <p>The contractor shall not be allowed to operate equipment or machinery, store materials, remove vegetation, or conduct earth-moving activities (e.g., grading, trenching, or excavating) within a Protected Zone without review and approval by an arborist.</p> <p>If construction activities must be performed within a Protected Zone, the contractor shall utilize hand tools or small hand-held power tools. The contractor shall conserve any major roots encountered to the extent possible. All work within a Protected Zone shall be monitored and supervised by an arborist.</p> <p>SMMNRA shall direct the contractor to complete any trenching immediately adjacent to (outside) the Protected Zone by hand or with small tools. For any trenching within and immediately outside the Protected Zone, an arborist shall be allowed to properly trim the roots (i.e., make clean minimum diameter cuts) and implement protective measures (e.g., cover roots with wet burlap) as necessary until trenching work is completed and the trench is filled.</p> <p>No planting or irrigation systems shall be installed within the drip line of any oak tree.</p>	SMMNRA; Contractor
Tree Replacement Requirements	<p>SMMNRA shall replace any removed trees with the same or other appropriate species at a minimum ratio of 3:1. SMMNRA shall plant replacement trees within the same park unit as the removed trees. The replacement trees shall be of indigenous origin and similar in canopy cover at maturity to existing native trees on site.</p> <p>SMMNRA shall monitor replacement trees for a minimum of seven years to evaluate the growth, health, and condition of replacement trees. SMMNRA shall implement necessary actions to promote the health and growth of the replacement trees and shall replace any replacement tree that fails to survive.</p>	SMMNRA
Oak Tree Removal	If oak tree removal is deemed necessary, SMMNRA shall adhere to the Los Angeles County Oak Tree Ordinance (Section 22.56.2050 of the Los Angeles County Code of Ordinances).	SMMNRA
Revegetation of Disturbed Areas	<p>The contractor shall revegetate disturbed areas with a native hydroseed mix.</p> <p>The contractor shall plant native and/or other SMMNRA-approved species where any non-tree vegetation lost during construction.</p>	SMMNRA; Contractor
Biological Resources (Invasive Plants and Plant Species)		
Pre-Construction Invasive Plant Removal	<p>SMMNRA shall survey the project sites for the presence of invasive species prior to construction.</p> <p>The contractor shall remove invasive plants from construction areas prior to commencing construction, in accordance with the approaches prescribed by the SMMNRA <i>Invasive Plant Management Plan</i> (2017) and NPS Integrated Pest Management Program.</p>	SMMNRA; Contractor

Topic	Resource Protection Measure	Responsible Party
Prevention of the Spread of Invasive Species	<p>The contractor shall implement BMPs to prevent the spread or introduction of invasive plants, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ The contractor shall steam clean all vehicles, trucks, equipment, tools, and machinery prior to arriving and being used at the project site to control the importation of mud, seedbearing materials, plant propagules and other unwanted substances. A SMMNRA representative shall inspect equipment and vehicles for proper cleaning prior to their entry onto the job site. ▶ The contractor shall use fill material from within park site to the extent feasible. If fill must be imported, the contractor shall only use clean fill. Prior to any importing of fill, an NPS representative shall inspect the source site for invasive plants and other unwanted organisms and materials. An NPS representative shall also inspect and monitor any materials stockpiled at the project site. ▶ The contractor shall certify that any seeds or straw material used for the project are weed free. 	SMMNRA; Contractor
Post-Construction Invasive Plant Monitoring	<p>SMMNRA shall monitor project sites and surrounding areas for invasive plants for five years after project construction is complete for the presence of new invasive species and signs of pathogens. Following the five-year monitoring period, SMMNRA shall continue monitoring the sites in accordance with their invasive plant monitoring program.</p> <p>Any invasive plants found during the monitoring period shall be treated according to the SMMNRA <i>Invasive Plant Management Plan (2017)</i> and NPS Integrated Pest Management Program.</p>	SMMNRA
Landscaping	SMMNRA shall utilize native or site appropriate non-invasive species for landscaping within the project site. SMMNRA shall inspect all plant stock and soil brought to the project site for undesirable plants and pathogens.	SMMNRA
Imported Plant Materials	An NPS representative shall inspect and approve any plant materials that are imported for temporary use under permitted activities such as filming.	SMMNRA
Biological Resources (Bird Species)		
Nesting Bird Surveys	<p>During the breeding season (February through August), a qualified biologist shall conduct nesting bird surveys no more than three days before construction work begins and prior to restarting work after breaks longer than three days.</p> <p>If nesting bird species are discovered within the project site, the contractor shall modify activities on a case-by-case basis in consultation with the qualified biologist. The qualified biologist may require the contractor to modify work or set buffers appropriate to the species present and work to be performed. If appropriate work modification and distancing cannot be obtained, work shall be halted until nesting has completed. If work can continue after establishing appropriate buffers, the qualified biologist shall monitor nests to determine the effectiveness of the protections employed.</p>	SMMNRA; Contractor
Pollution Emission Controls	The contractor shall ensure that construction equipment is fitted with adequate mufflers and pollution emission controls.	
Hours of Construction	The contractor shall limit construction activities to between 7:00 a.m. and 6:00 p.m.	Contractor
Biological Resources (Amphibian, Fish, and Aquatic Invertebrate Species)		
Storm Water Pollution Prevention Plan	SMMNRA shall develop a SWPPP in compliance with the California State Water Resources Control Board General Permit for Discharges of Stormwater Associated with Construction Activity.	SMMNRA
Construction Limit Fencing	SMMNRA shall direct the contractor to clearly demarcate construction limits with fencing or by other means to avoid the potential of the introduction of fill into streams/wetlands.	SMMNRA; Contractor

Topic	Resource Protection Measure	Responsible Party
Stormwater Best Management Practices	<p>The contractor shall employ appropriate stormwater BMPs at each site (such as use of wattles, silt fencing, and/or gravel bags) to prevent off-site migration of waste into nearby waters in accordance with the General Permit and SWPPP.</p> <p>The contractor shall utilize a dike or other suitable barrier around work areas to ensure that sediment, petroleum products, chemicals, and other liquid or solid materials do not enter waters.</p> <p>The contractor shall use care in constructing and removing barriers to avoid discharge of material into, or siltation of, water. The contractor shall remove and properly dispose of sediment and other material collected by the barrier.</p>	Contractor
Dust Control Measures	The contractor shall use engineering controls to manage dust, such as watering down prior to start of work.	Contractor
Spill Prevention Best Management Practices	<p>The contractor shall employ spill prevention BMPs at each site to prevent introduction of petroleum and deleterious chemicals into the soil and nearby waters, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ The contractor shall limit operation and parking of equipment to the construction site. ▶ The contractor shall prohibit the operation or storage of vehicles and equipment leaking oil, gas, or antifreeze within park boundaries. Prior to commencement of work each day, the contractor shall inspect equipment for leaks. If leaks are identified, the contractor shall repair the equipment immediately or remove it from park boundaries. ▶ The contractor shall prohibit draining oil, hydraulic fluids, antifreeze, or other chemicals onto ground within park boundaries. ▶ The contractor shall completely contain diesel fuel at the work site. 	Contractor
Spill Response	<p>The contractor shall develop a spill response plan prior to construction activities and implement the plan immediately on detecting a spill.</p> <p>The contractor shall keep a supply of absorbent materials manufactured specifically for containment and cleanup of hazardous materials at the job site in event of spills.</p> <p>The contractor shall contain and dispose of contaminated materials according to state and federal regulations.</p>	Contractor
Biological Resources (Wildlife)		
Dangerous Wildlife Encounters	Construction crews shall not engage in any activity that causes harm or destroys any wildlife, including intentional killing of rattlesnakes (<i>Crotalus</i>). The contractor shall implement appropriate safety protocols to manage rattlesnakes and other dangerous wildlife without lethal means, such as implementing avoidance measures or waiting for the animal to leave the work area.	Contractor
Preventing Accidental Harm to Wildlife	<p>The contractor shall implement BMPs to prevent accidental harm to wildlife, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ The contractor shall cover any excavations left overnight or provide escape ramps with a 1:2 rise (vertical) to run (horizontal) ratio to prevent wildlife from becoming entrapped. ▶ Field crews shall search open trenches or steep-walled holes prior to initiating daily activities to ensure wildlife are not trapped. ▶ If any wildlife is found, the contractor shall notify a qualified biologist or designee to either relocate the species to adjacent habitat or to allow the species to naturally disperse. ▶ A biologist or designee shall complete visual checks prior to moving vehicles and equipment to avoid crushing wildlife. 	Contractor

Topic	Resource Protection Measure	Responsible Party
Wildlife Scavenging	<p>The contractor shall implement BMPs to reduce the potential for wildlife to scavenge food from humans, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ Wildlife-proof garbage containers shall be required on all construction sites. ▶ Feeding or approaching wildlife shall be prohibited. ▶ Work areas shall be inspected for food remains and micro-trash (e.g., plastic caps, bolts, screws, wiring, tape, and zip ties). 	Contractor
Biological Resources (Threatened and Endangered Species and Critical Habitat)		
Mitigation for the Loss of Critical Habitat for Lyon's pentachaeta	<p>SMMNRA shall mitigate the loss of critical habitat for Lyon's pentachaeta (<i>Pentachaeta lyoni</i>) by improving the quality of existing critical habitat at Rocky Oaks through control of invasive plants and the expansion of primary constituent elements (PCE). The NPS shall continue to implement a program to eradicate invasive species such as Harding grass (<i>Phalaris aquatica</i>) and Italian thistle (<i>Carduus pycnocephalus pycnocephalus</i>), which form dense stands that overtop Lyon's pentachaeta and eliminate bare ground. This invasive plant control program shall treat 6.5 acres within and 4.5 acres immediately adjacent to the designated critical habitat at Rocky Oaks. Target invasive plants shall be monitored, and treatment areas expanded as necessary.</p> <p>SMMNRA shall also implement a program of thinning annual grasses and forbs and removing thatch adjacent to the two largest stands of Lyon's pentachaeta at Rocky Oaks. The NPS would treat approximately 0.3 acres at the stand immediately east of the stock pond and slightly more than 0.1 acre at the stand east of the Rocky Oaks Loop Trail. This program would more than double the amount of habitat with suitable bare ground at these two locations, a PCE for Lyon's pentachaeta, at these two sites.</p>	SMMNRA
Archeological and Ethnographic Resources		
Avoidance of Archeological Resources	<p>The contractor shall avoid archeological resources either eligible for listing in or listed in the NRHP during construction. The limits of the area(s) surveyed for archeological resources shall be identified at the construction contract start-up meeting and clearly flagged and/or fenced in the field.</p> <p>Construction activities shall avoid the Saddle Rock Ranch Pictograph Site (Cave of the Four Horsemen; CA-LAN-717).</p>	SMMNRA; Contractor
Penalties for Collecting or Damaging Cultural Resources	SMMNRA shall ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archeological sites, historic buildings and structures, or elements of the cultural landscape.	SMMNRA; Contractor
Archeological and Native American Monitoring	<p>SMMNRA or the contractor shall retain an archeological monitor for all earth-moving activities that have not been previously subject to excavation. In addition, SMMNRA or the contractor shall retain a Native American monitor for any activities with potential to affect tribal resources, as determined in consultation with traditionally associated Native American tribes.</p> <p>If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity of the discovery shall be halted until the resources can be identified and documented. If the resources cannot be preserved in situ, an appropriate mitigation strategy shall be developed in consultation with the SHPO and traditionally associated Native American tribes, as applicable.</p>	SMMNRA; Contractor
Unanticipated Discovery of Human Remains	In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, the contractor shall follow the provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990. If non-Indian human remains are discovered, the contractor shall follow standard reporting procedures to the proper authorities, as will all applicable federal, state and local laws.	SMMNRA; Contractor

Topic	Resource Protection Measure	Responsible Party
Native American Consultation	SMMNRA shall consult with associated Native American tribes to develop and execute park programs in a manner that respects the beliefs, traditions, and other cultural values of the tribes that have ancestral ties to park lands. The NPS recognizes the past and present connections of associated tribes with park lands. In addition, the NPS recognizes that potential resources, places, and traces of tribal use are important parts of the cultural environment and shall be preserved, protected, and interpreted as appropriate.	SMMNRA
Historic Resources and Cultural Landscapes		
Rehabilitation of Cultural Landscape Features	SMMNRA shall adhere to the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes</i> for the rehabilitation of the cultural landscape features.	SMMNRA
Buildings Eligible for Listing or Listed in the National Register of Historic Places	<p>No building determined eligible for listing or listed in the NRHP shall be removed or allowed to naturally deteriorate (a process commonly known as "demolition by neglect") without prior review by park and region cultural resource specialists, including approval by the regional director and consultation with the SHPO.</p> <p>Before a structure that is listed or eligible for listing in the NRHP is removed or allowed to naturally deteriorate, appropriate documentation to record the structure would be prepared in accordance with the <i>Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation</i> as mandated by Section 110(b) of the National Historic Preservation Act. This documentation would be submitted to the HABS/ HAER/HALS program, as well as any local repositories deemed appropriate, as identified through consultation with the SHPO.</p>	SMMNRA
Night Sky (Lightscape Management)		
Lightscape Management	The NPS endeavors to preserve natural ambient lightscares and protect night sky viewing, which are natural resources. SMMNRA shall limit the use of artificial outdoor lighting to the minimum necessary. SMMNRA shall ensure that all artificial outdoor lighting consists of emission spectrum lighting, is limited to the minimum necessary for basic safety requirements, and is shielded to the maximum extent possible to direct light on the intended subject and out of the night sky.	SMMNRA
Soundscape Management		
Soundscape Management	<p>The contractor shall implement standard noise abatement measures during construction, which may include the following measures:</p> <ul style="list-style-type: none"> ▶ Scheduling noise-generating activities that are in proximity to noise-sensitive uses during daytime hours. ▶ Utilizing best available noise control techniques wherever feasible. ▶ Using hydraulically or electrically powered impact tools when feasible. ▶ Locating temporary noise sources as far from sensitive uses as possible. 	Contractor
Visitor Use and Experience		
Education Program	SMMNRA shall implement an education program to ensure that visitors understand the need and benefits of the proposed action.	SMMNRA
Traffic Control Plan	SMMNRA shall implement a traffic control plan with standard measures, such as strategies to maintain safe and efficient traffic flow during the construction period.	SMMNRA
Temporary Closure Notifications	SMMNRA shall notify the public of any temporary park closures, including closure dates and alternate access points. Notifications would be posted on the park website, distributed at visitor centers within the park, and posted at the project sites. When closures are necessary, SMMNRA shall publicize information on alternative opportunities for visitor use on the park website and install signage at the access points.	SMMNRA

Topic	Resource Protection Measure	Responsible Party
Temporary Road Closures	<p>Construction activities may require temporary road closures in which traffic may be periodically subjected to alternating, one-way flow.</p> <p>The NPS shall inform visitors of construction activities and associated delays.</p> <p>The contractor shall make all efforts to reduce delays as much as possible and to alert park staff as soon as possible if delays longer than normal are expected. Flaggers shall be used during work hours to control traffic.</p>	SMMNRA; Contractor
Construction Equipment Storage	The contractor shall not store construction equipment along roadways overnight without prior approval of SMMNRA staff.	SMMNRA; Contractor
General Measures		
Contractor Working Conditions	The contractor shall provide safe on-site working conditions for employees working on and visiting NPS property. All work shall be performed in accordance with applicable local jurisdiction orders, federal orders, and the Centers for Disease Control and Prevention guidance and recommendations related to best safety practices during the COVID-19 pandemic. https://www.cdc.gov/coronavirus/2019-ncov/community/index.html .	Contractor
Contractor Emergency Protocols	The contractor shall hold a kickoff meeting to ensure that all workers are apprised of proper protocol to follow in the event of an emergency, including contact information for first responders.	Contractor
Contractor Coordination	The contractor shall follow all park rules and regulations and shall coordinate all on-site activities with the NPS construction management representative.	SMMNRA; Contractor
Hours of Construction	The contractor shall perform all work between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, federal holidays excluded.	Contractor
Construction Equipment Staging	Construction equipment shall be restricted to paved surfaces where practicable to avoid natural and cultural resources, including wetland areas. If construction equipment must be used or staged on unpaved surfaces, BMPs would be implemented in accordance with the General Permit and SWPPP to minimize potential for adverse impacts.	Contractor
Construction Contract Standards	The contractor shall follow NPS construction contract standards during construction, including implementation of an accident prevention program, installation of warning signs at the construction site and along the nearby parking lots, and installation and maintenance of construction fences around the construction sites to prevent non-contractors and the public from entering the construction areas.	SMMNRA; Contractor
Spill Prevention and Pollution Control	<p>The contractor shall implement a spill prevention and pollution control program for hazardous materials. Standard measures could include procedures for hazardous materials storage and handling; spill containment, cleanup, and reporting; and limiting hazardous activities (e.g., refueling) to non-sensitive sites.</p> <p>The contractor shall only conduct fueling of machinery in approved equipment staging areas away from water bodies. The contractor shall immediately clean any spills of hazardous materials or fuel to prevent contamination or discharge into ground or surface waters. The contractor shall regularly inspect construction equipment for leaks of fuel, lubricants, and other chemicals.</p>	Contractor
Construction Specifications	All mitigation and protection measures shall be clearly stated in the construction specifications.	SMMNRA; Contractor
Construction Zone	Before construction activities, the contractor shall delineate construction zones with stakes or by other means in order to confine activity to the minimum area required for construction, as defined by NPS. The contractor shall instruct workers to avoid conducting activities beyond the construction zone.	Contractor
Materials Recycling	The contractor shall recycle as much steel, glass, and concrete as possible.	Contractor

Topic	Resource Protection Measure	Responsible Party
Lead Abatement	If lead paint is found, SMMNRA shall implement a lead abatement plan to protect employees, contractors, and visitors from lead-contaminated materials.	SMMNRA
Asbestos Abatement	If asbestos is found, SMMNRA shall implement an asbestos abatement plan to protect employees, contractors, and visitors from asbestos-contaminated materials.	SMMNRA

SMMNRA = Santa Monica Mountains National Recreation Area; BMP = Best Management Practice; SWPPP = Storm Water Pollution Prevention Plan; NRHP = National Register of Historic Places; SHPO = State Historic Preservation Officer; HABS = Historic American Buildings Survey; HAER = Historic American Engineering Record; HALS = Historic American Landscapes Survey