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STAFF REPORT: REGULAR CALENDAR

Application No.: **4-12-088**

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

Agent: **Mark Peterson, STV Inc.**

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

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

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

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

SUMMARY OF STAFF RECOMMENDATION

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

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

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

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

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

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

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

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

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LOCAL APPROVALS RECEIVED:
none

I. MOTION AND RESOLUTION

The staff recommends that the Commission adopt the following resolution:

Motion:

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

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

Resolution:

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

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Interim Erosion Control Plans and Construction Responsibilities

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

1. Erosion Control Plan

(a) The plan shall delineate the areas to be disturbed by demolition or grading activities and shall include any temporary access roads, staging areas and stockpile areas. The natural areas on the site shall be clearly delineated on the plan and on-site with fencing or survey flags.

(b) Include a narrative report describing all temporary run-off and erosion control measures to be used during construction.

(c) The plan shall identify and delineate on a site or grading plan the locations of all temporary erosion control measures.

(d) The plan shall specify that should demolition or grading take place during the rainy season (November 1 – March 31) the applicant shall install or construct temporary sediment basins (including debris basins, desilting basins or silt traps); temporary drains and swales; sand bag barriers; silt fencing; stabilize any stockpiled fill with geofabric covers or other appropriate cover; install geotextiles or mats on all cut or fill slopes; and

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

(e) The erosion control measures shall be required on the project site prior to or concurrent with the initial demolition or grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during demolition and grading. All sediment should be retained on-site, unless removed to an appropriate, approved dumping location either outside of the coastal zone or within the coastal zone to a site permitted to receive fill.

(f) The plan shall also include temporary erosion control measures should demolition, grading or site preparation cease for a period of more than 30 days, including but not limited to: stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag barriers, silt fencing; temporary drains and swales and sediment basins. The plans shall also specify that all disturbed areas shall be seeded with native grass species and include the technical specifications for seeding the disturbed areas. These temporary erosion control measures shall be monitored and maintained until grading or construction operations resume.

(g) All temporary, construction related erosion control materials shall be comprised of bio-degradable materials (natural fiber, not photo-degradable plastics) and must be removed when permanent erosion control measures are in place. Bio-degradable erosion control materials may be left in place if they have been incorporated into the permanent landscaping design.

(h) The plan shall also include temporary erosion control measures that will be implemented and maintained on site in the interim period after demolition of all development and before the commencement of the construction of new facilities. The plan shall include measures to minimize erosion and sedimentation. All disturbed areas shall be seeded with native grasses or annuals within 30-days of the completion of demolition and grading, unless construction of new facilities has commenced. The plan shall specify the species to be used for the seeding. The plan shall include additional measures designed to minimize erosion from the disturbed areas, and designed to convey runoff off-site in a non-erosive manner. These temporary erosion control measures and plantings shall be monitored and maintained until such time as new camp facilities and/or permanent drainage and erosion control are constructed pursuant to a new coastal development permit.

2. Construction Best Management Practices

(a) No demolition or construction materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wave, wind, rain, or tidal erosion and dispersion.

(b) No demolition or construction equipment, materials, or activity shall be placed in or occur in any location that would result in impacts to environmentally sensitive habitat areas, streams, wetlands or their buffers.

(c) Any and all debris resulting from demolition or construction activities shall be removed from the project site within 24-hours of completion of the project.

(d) Demolition or construction debris and sediment shall be removed from work areas each day that demolition or construction occurs to prevent the accumulation of sediment and other debris that may be discharged into coastal waters.

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

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

2. Oak Tree Monitoring

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

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

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

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND SITE VICINITY

1. Detailed Project Description

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

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

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

2. Location, Vicinity, & Surrounding Development

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

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

3. Physical Site Characteristics

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

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

4. Trails on Property or in Vicinity

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

5. Visibility from Public Viewing Location

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

6. Environmentally Sensitive Habitat

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

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

Past Commission Action

The subject site has no prior Coastal Commission permitting activity.

B. WATER QUALITY

Section 30231 of the Coastal Act states that:

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

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

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

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

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

Special Condition 1: Interim Erosion Control Plans and Construction Responsibilities

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

C. OAK TREE PROTECTION

Section 30240 states:

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

Section 30250(a) of the Coastal Act states:

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

Section 30251 of the Coastal Act states:

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

1. Protection of Oaks

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

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

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

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

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

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

2. Project Consistency

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

a. Oak Tree Encroachment

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

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

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

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

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

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

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

b. Oak Tree Protection Measures and Monitoring

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

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

Special Condition 2: Oak Tree Monitoring

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

D. LOCAL COASTAL PROGRAM (LCP) PREPARATION

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

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

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

Special Conditions 1 and 2

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

E. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

Special Conditions 1 and 2

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

APPENDIX 1: SUBSTANTIVE FILE DOCUMENTS

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

TABLE
EXISTING CAMP KILPATRICK LAND USES

Existing Land Use	Size (sf)	Comments
Buildings		
Dormitories (3[a])	16,219 (total)	Accommodates up to 125 minor detainees
Administration	5,115	
Gymnasium	3,321	Building is yellow-tagged (unfit for occupation)
School	7,782	Classrooms and office space
Modular Classrooms (2)	1,950 (total)	
Laundry and Warehouse	2,160	
Maintenance	1,740	
Sheds (2)	220 (total)	
Kitchen and Dining Hall	6,371	Shared use by Camp Kilpatrick and Camp Miller
Subtotal Existing Buildings	**44,878**	
Outdoor Facilities[b]		
Multi-purpose Field	47,000	Irregularly shaped grass area
Sports Court	12,720	Asphalt paved
Swimming Pool and Deck	5,225	Existing facility to remain
Ball Field	21,380	
Subtotal Outdoor Facilities	**~86,325**	
Other Land Uses		
Surface Parking	18,200 (39 spaces)	Asphalt paved
Hardscape and Landscape	138,050	
Undeveloped Open Space[c]	220,128	
Subtotal Other Land Use	**~376,378**	
Project Site Total	***~507,581 (11.7 acres)***	

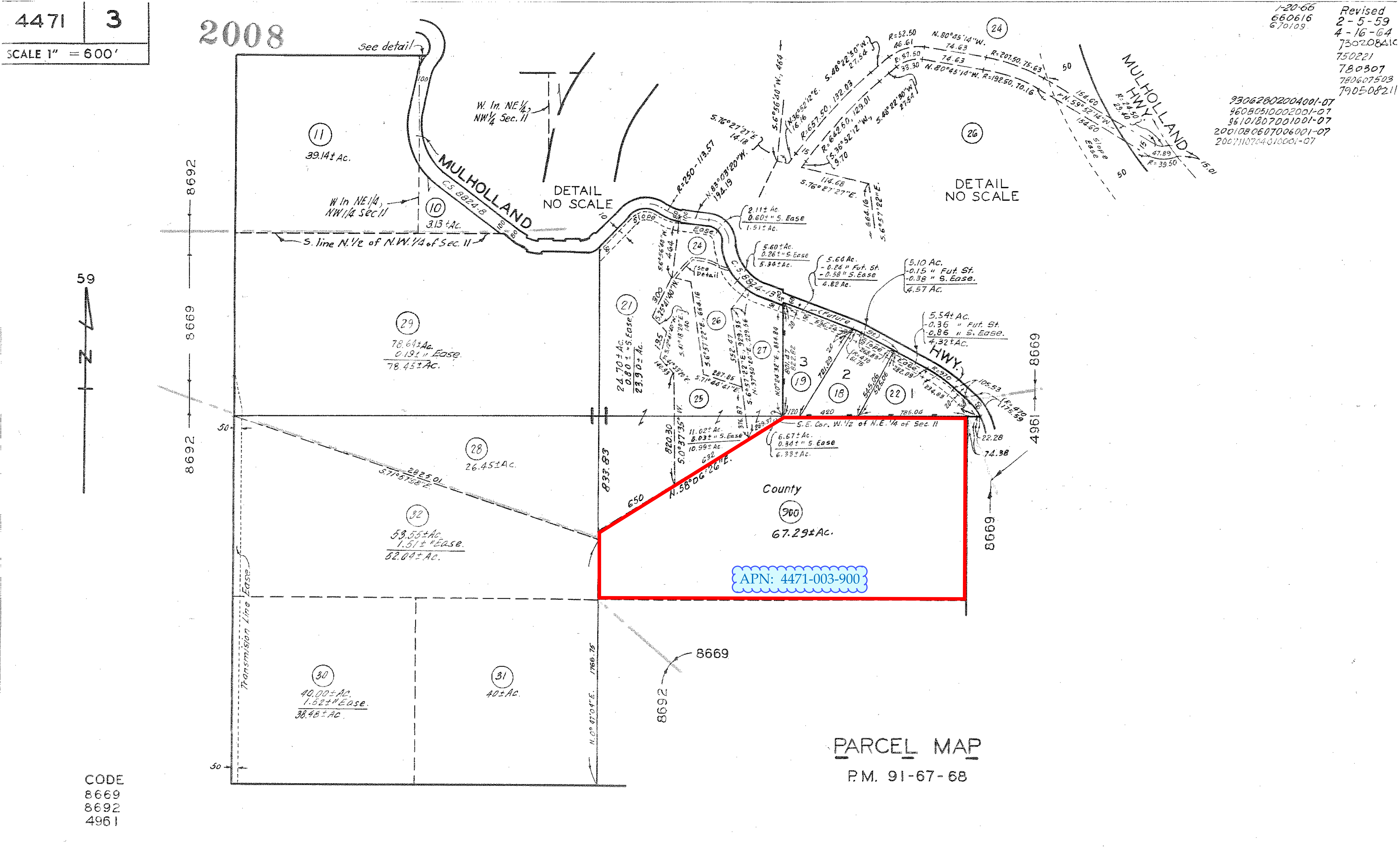
sf: square feet

[a] Includes two main dormitories located along the western side of the Project site and one dormitory for residents with medical and other special needs located along the eastern side of the site.

[a] Size of existing outdoor facilities measured on current aerial photographs with ArcGIS, a geographic information system.

[c] Undeveloped open space within 11.7-acre Project site boundary defined for purposes of this IS/MND.

Sources: Ninyo & Moore 2012a; Anderson Environmental 2012a



FOR PREV. ASSM'T. SEE:
4471 - 3

Parcel Map - *north of Encinal Canyon Road* Exhibit 2
Camp Kilpatrick (-900)

CALIFORNIA COASTAL COMMISSION

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

4471 | 4

SCALE 1" = 200'

Revised
2-5-59
4-16-64
780307
780320?0
780510

POR. S. 1/2, S.E. 1/4, SEC. 11

APN: 4471-004-902

COUNTY
902
29.58 ± Ac.
- 0.60 ± " S. Ease.
- 0.03 ± " Br Ease.
28.95 ± Ac.

APN: 4471-004-904

COUNTY
904
7.93 ± Ac
0.10 ± " S. Ease
7.83 ± Ac.

RD. 60

8669
8666

Slope Esm't.
Drain Esm't.

COUNTY
905
30.16 ± Ac.
0.35 ± " S. Ease.
29.81 ± Ac

ENCINAL — CANYON — 60

COUNTY
903
8.82 ± Ac
- 0.61 ± " S. Ease.
- 0.03 ± " Br Ease.
8.18 ± Ac

APN: 4471-004-903

APN: 4471-004-905

S.1/4 Cor Sec 11

S.E. Cor Sec 11

8669 — 8666

59

T. 1S., R. 19W.

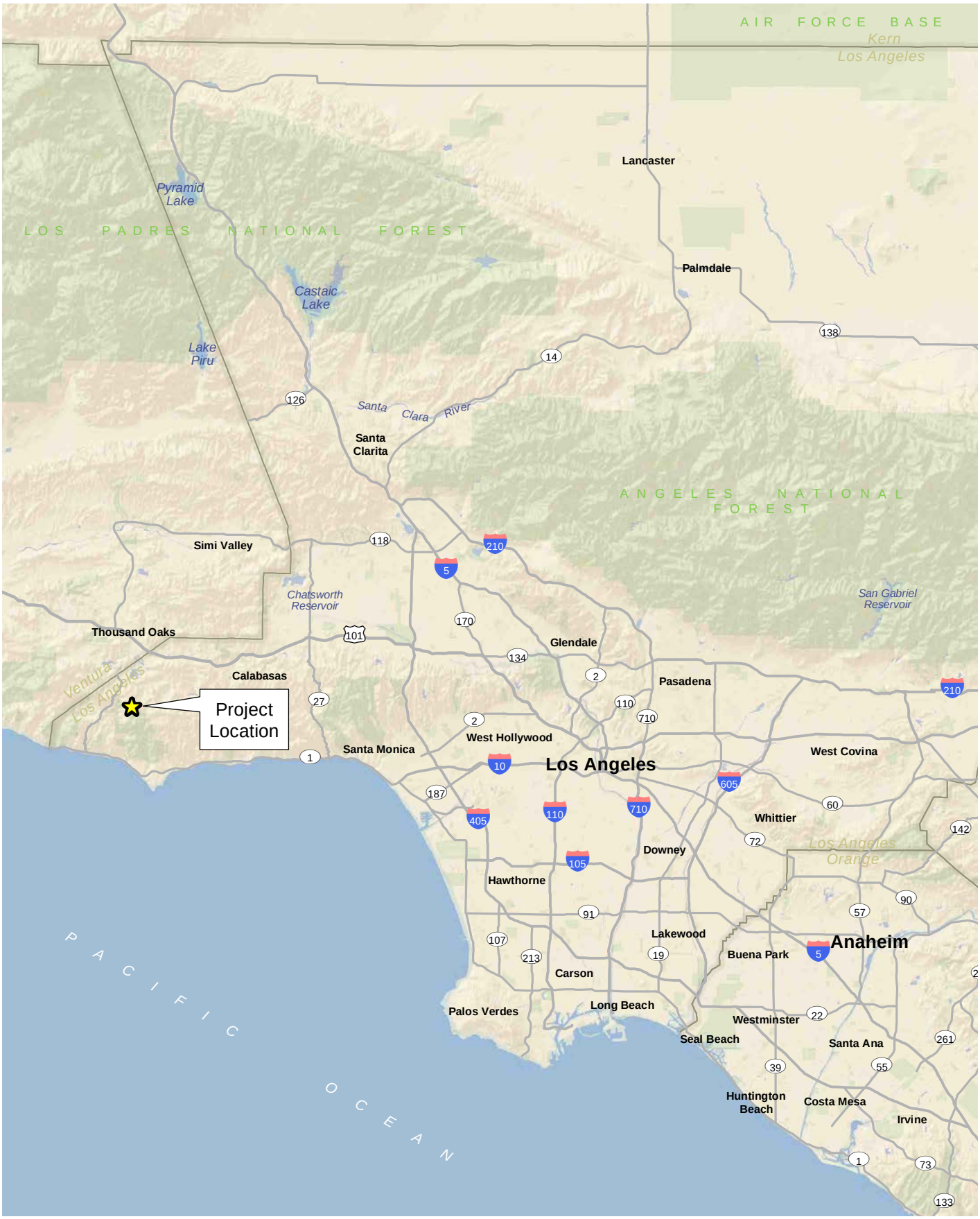
CODE
8666
8669

FOR PREV. ASSM'T. SEE:
4471 - 4

Parcel Map - *north and south of Encinal Canyon Road* Exhibit 3
Camp Miller (-902), WWTP (-903)

CALIFORNIA COASTAL COMMISSION

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.



Regional Location

Exhibit 4

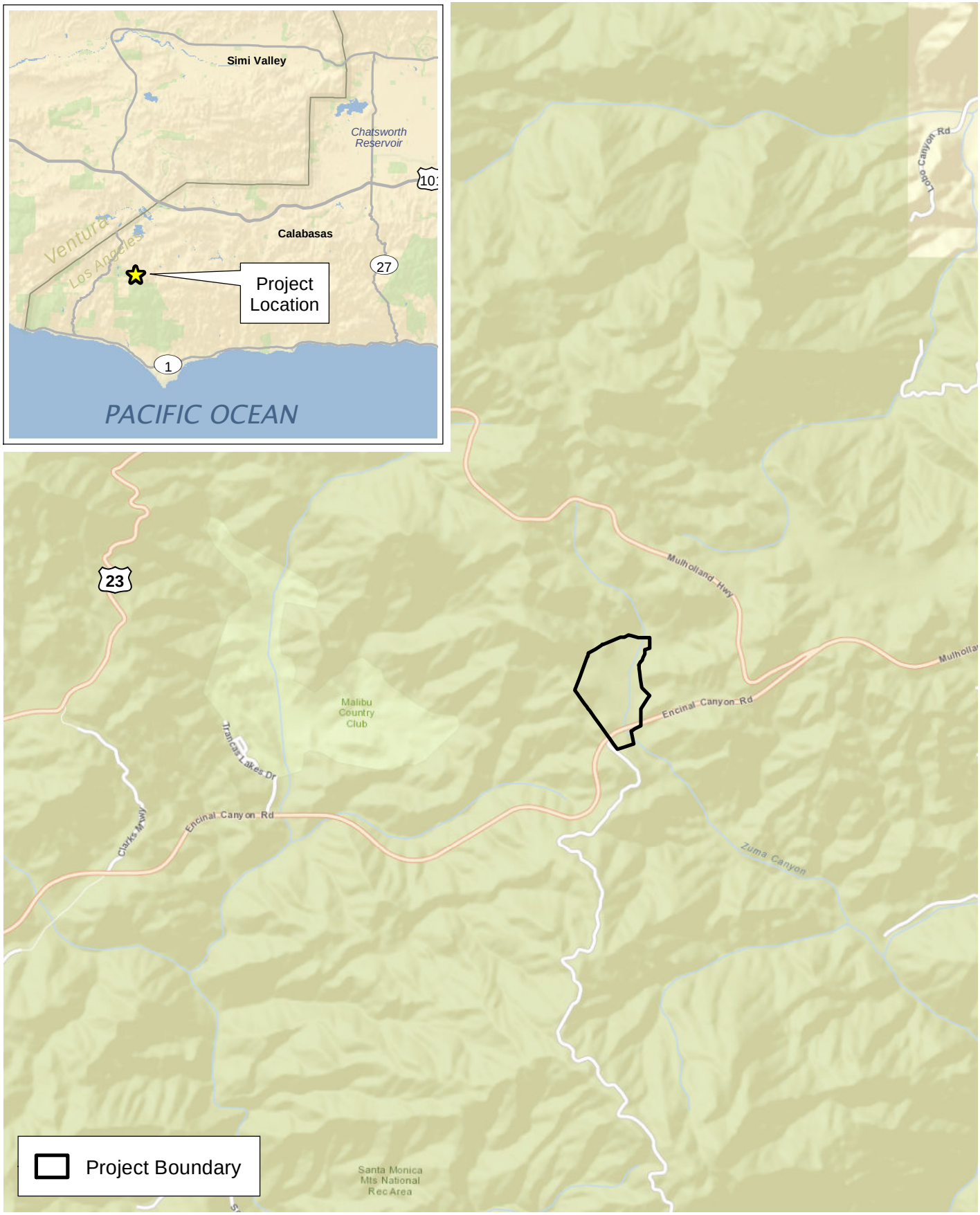
Camp Kilpatrick Demolition Project

N
W E
S

10 5 0 10

Miles

CALIFORNIA COASTAL COMMISSION



Local Vicinity

Exhibit 5

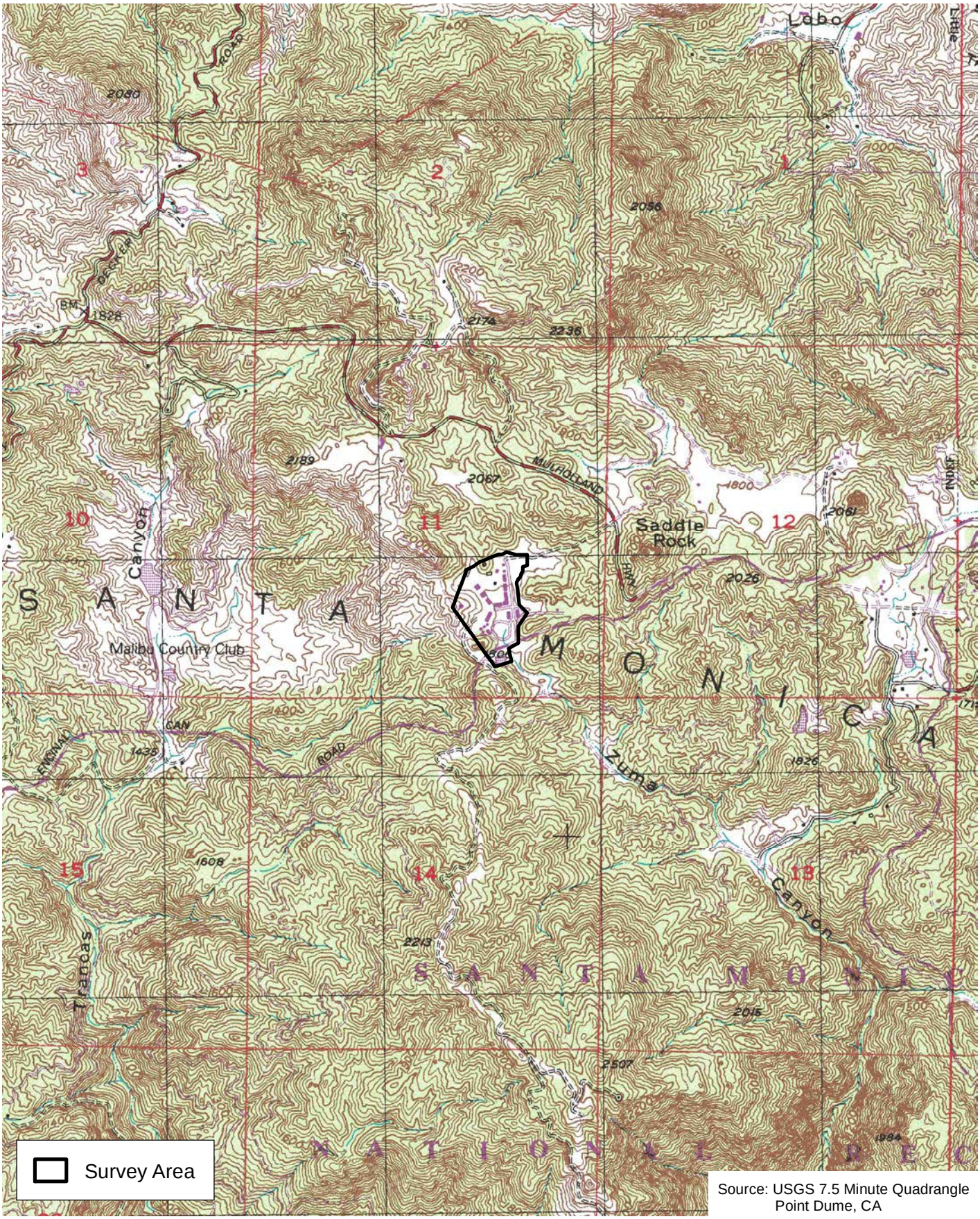
Camp Kilpatrick

N
W E
S

2,000 1,000 0 2,000

Feet

CALIFORNIA COASTAL COMMISSION



Local Area USGS Topographic Map

Exhibit 6

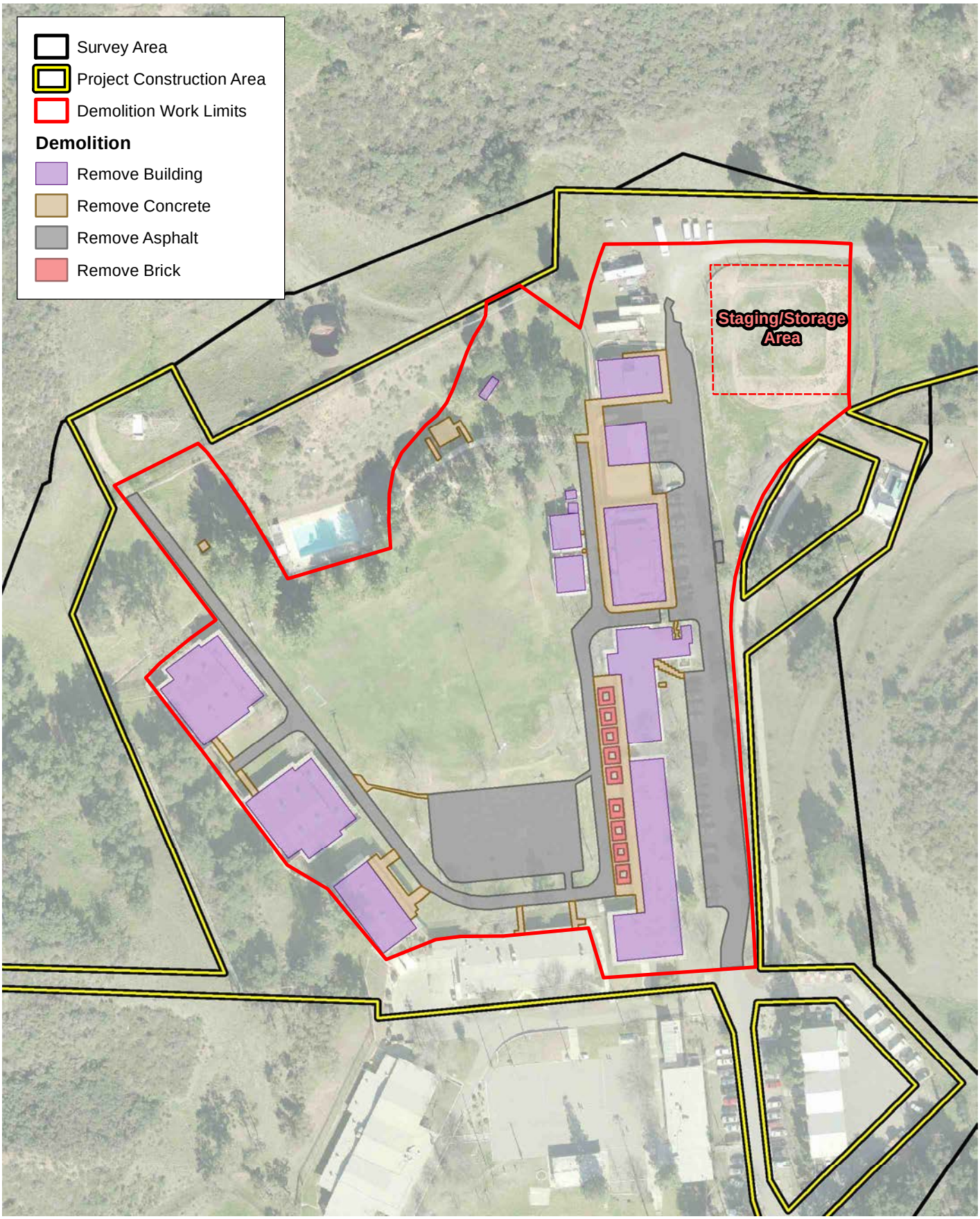
Camp Kilpatrick

N
W E
S

2,000 1,000 0 2,000

Feet

CALIFORNIA COASTAL COMMISSION



Proposed Demolition Plan

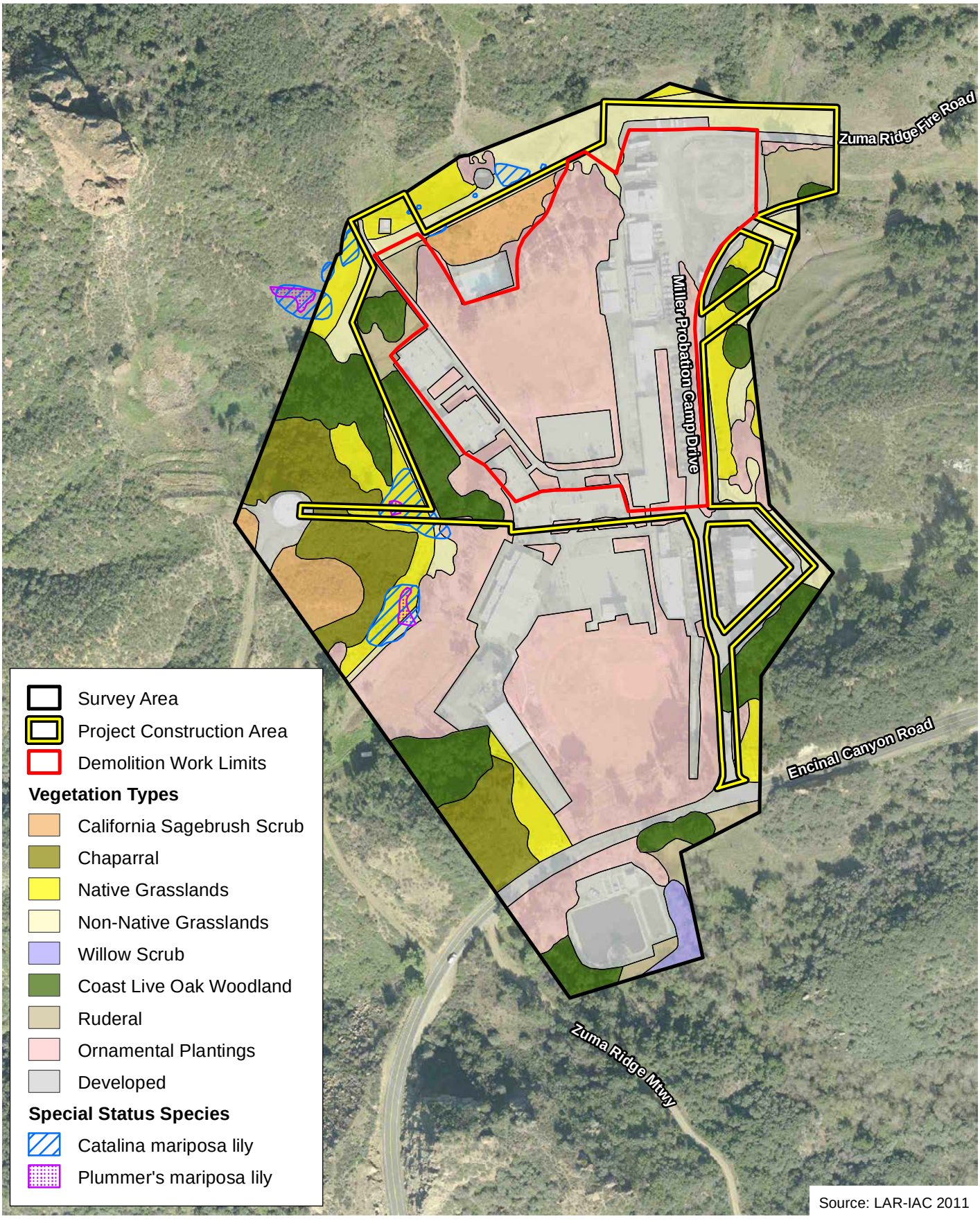
Exhibit 7

Camp Kilpatrick

N
W
E
S

130 65 0 130 Feet

CALIFORNIA COASTAL COMMISSION



Biological Resources

Exhibit 8

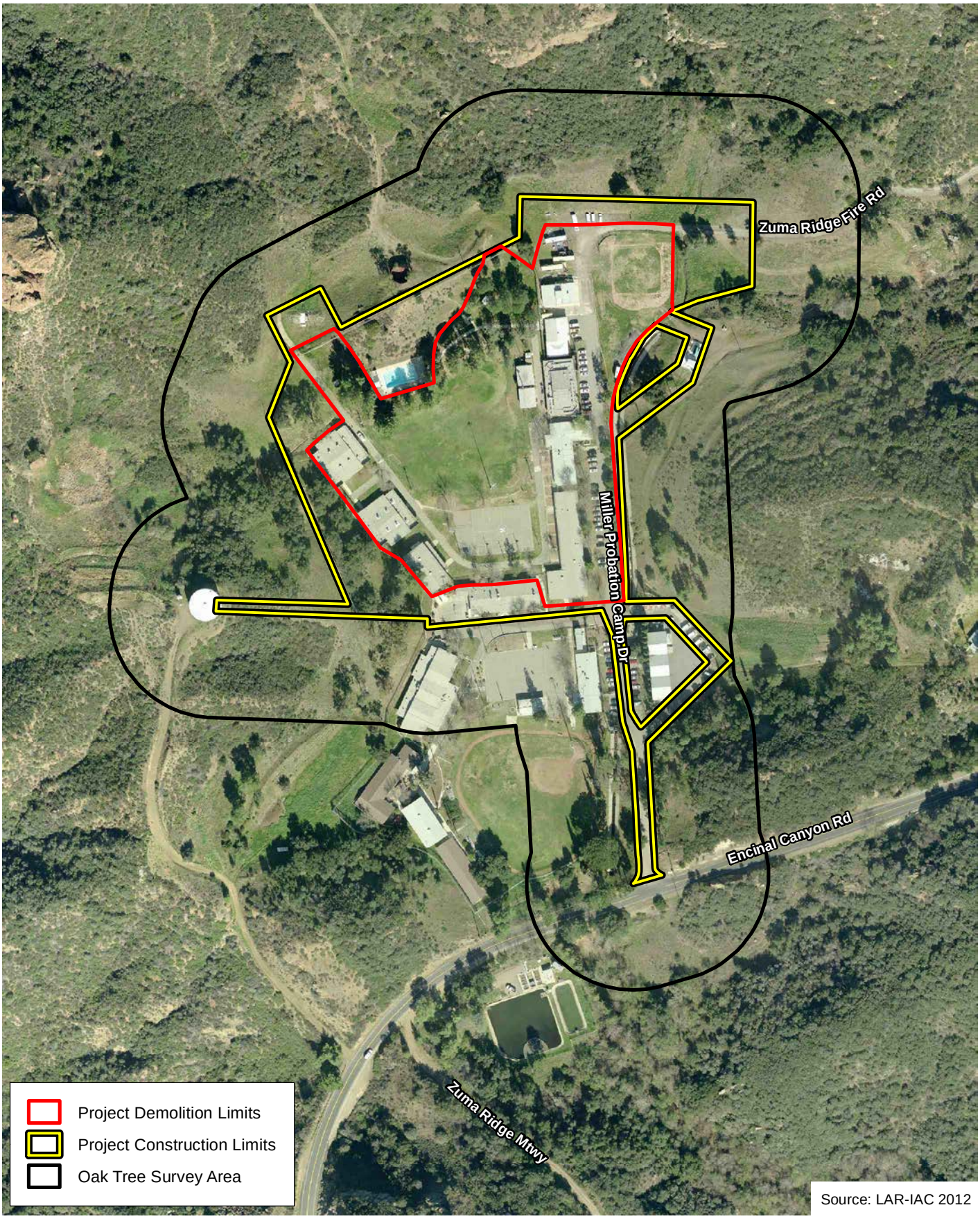
Camp Kilpatrick Demolition Project

N W E S

250 125 0 250

Feet

CALIFORNIA COASTAL COMMISSION



Project Location

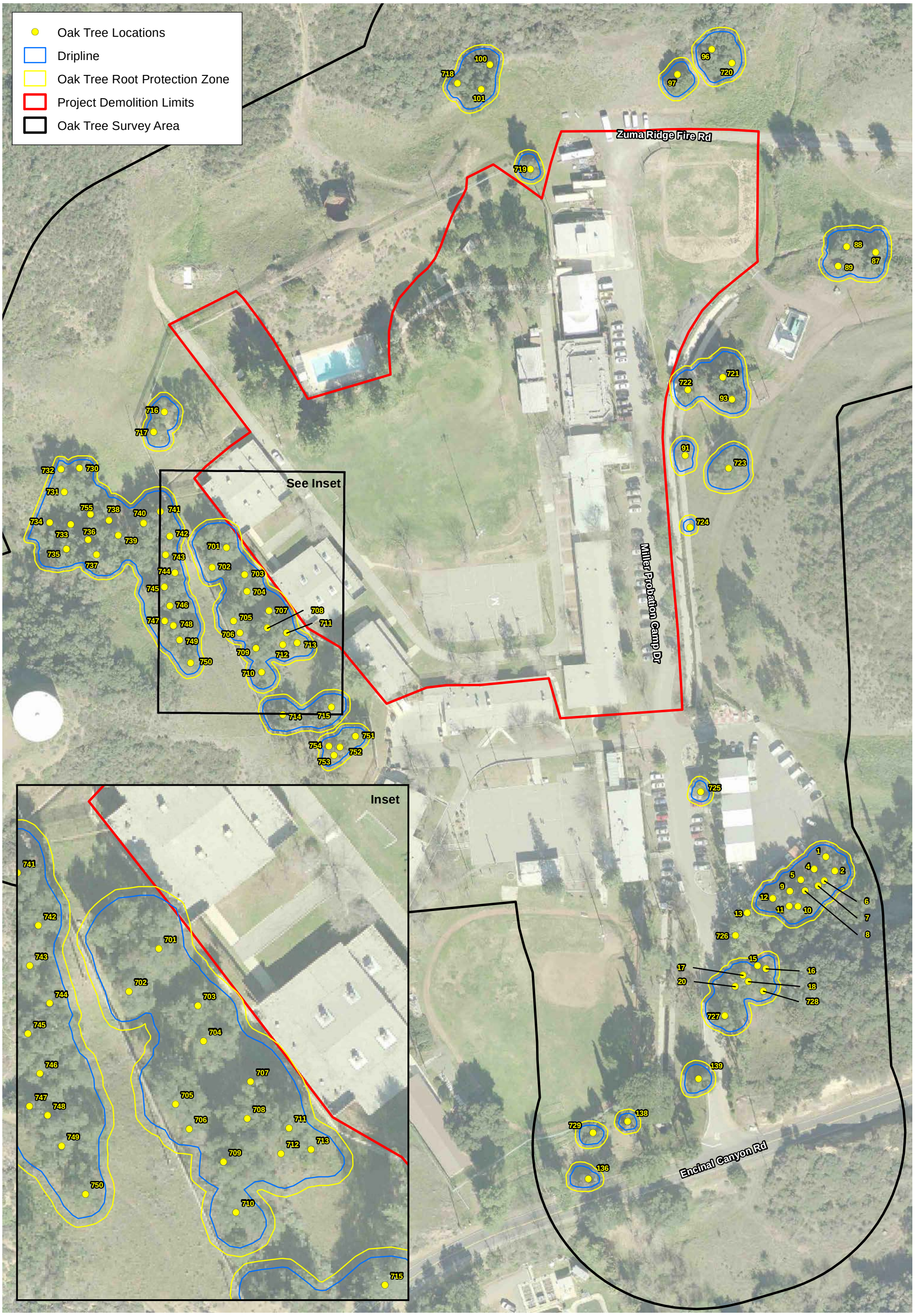
Exhibit 9

Camp Kilpatrick

N W E S

250 125 0 250 Feet

CALIFORNIA COASTAL COMMISSION



Oak Tree Impacts - Demolition

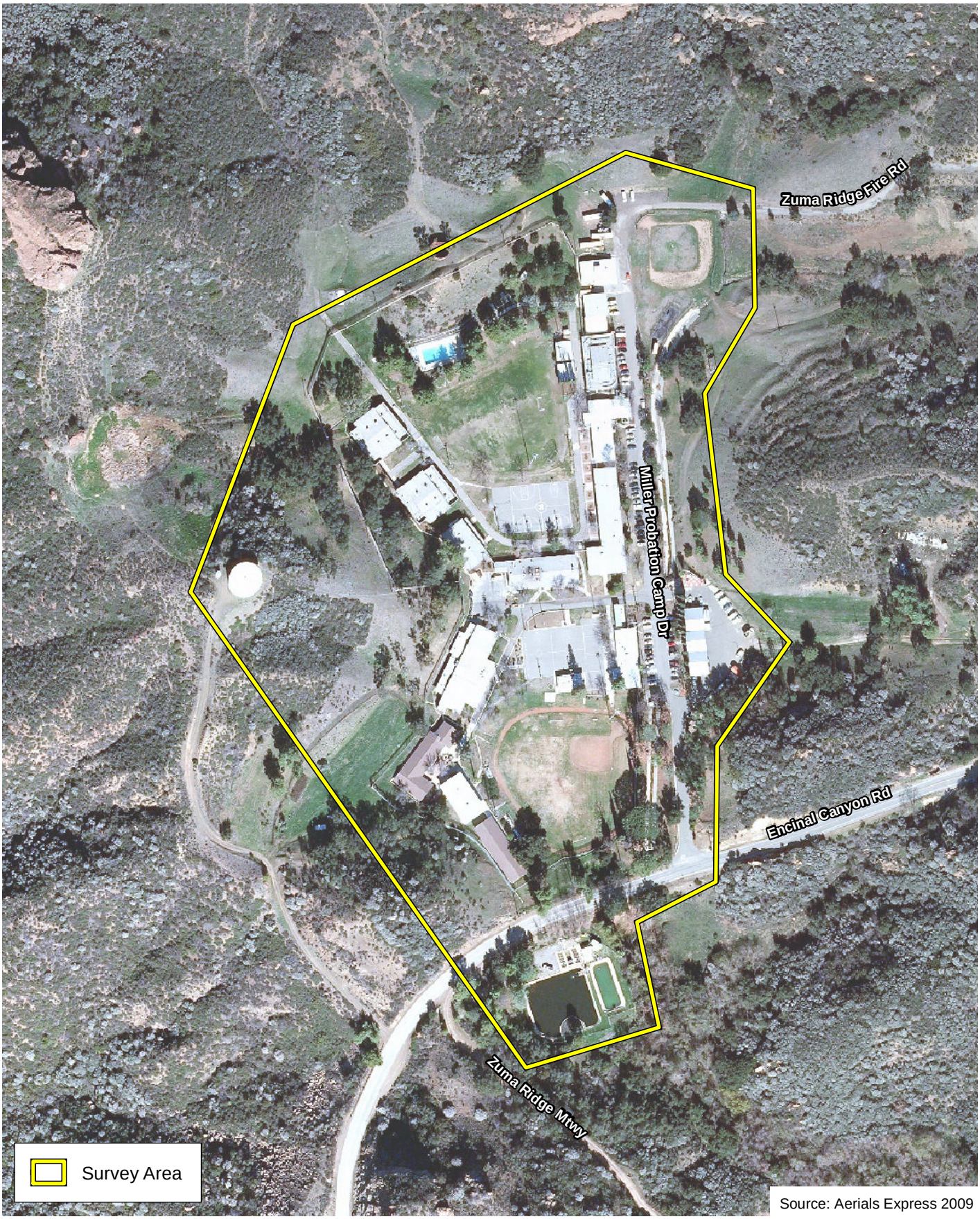
Exhibit10

Camp Kilpatrick

N W E S

80 40 0 80 Feet

CALIFORNIA COASTAL COMMISSION



Source: Aerials Express 2009

Aerial View

Exhibit 11

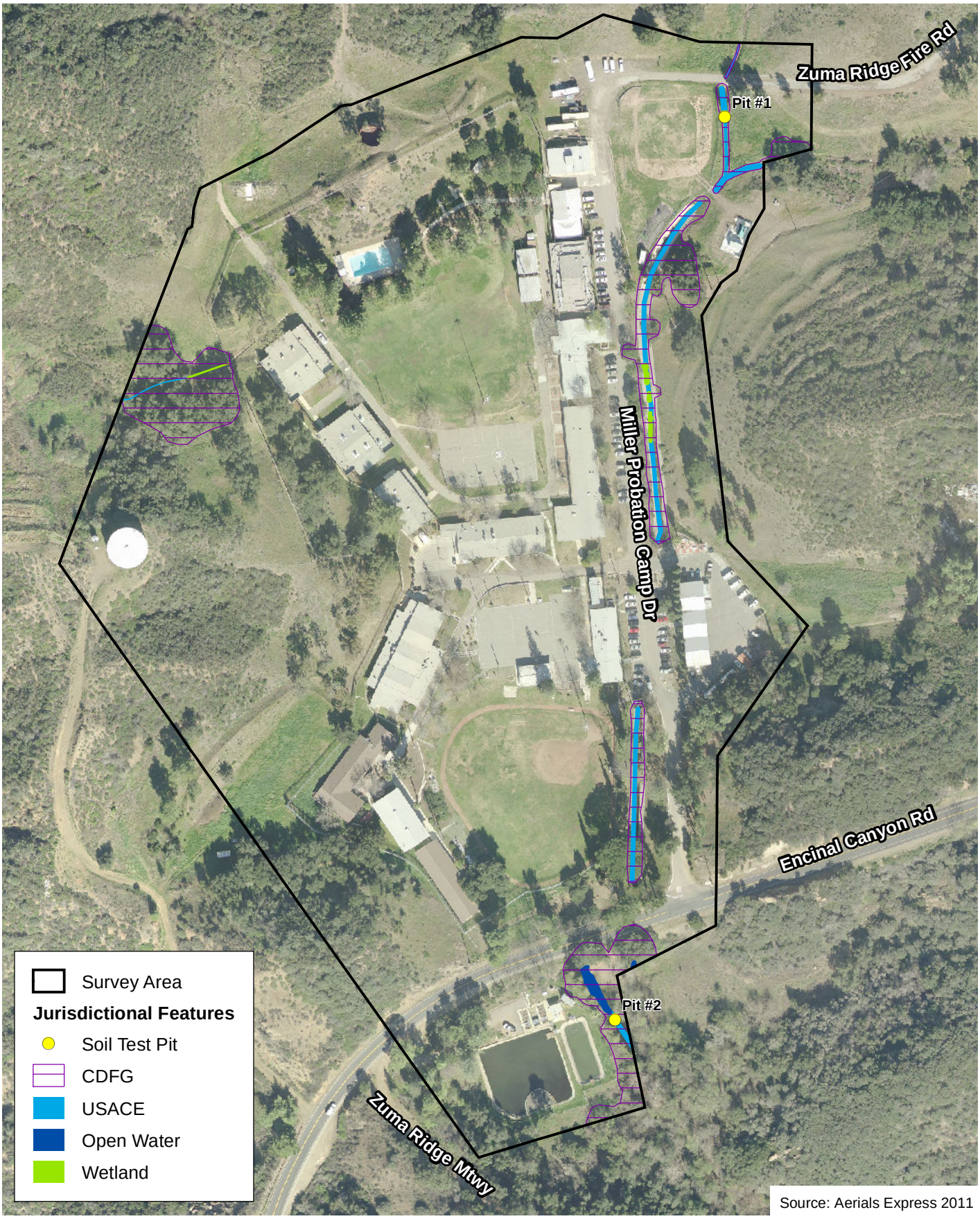
Camp Kilpatrick

N W E S

250 125 0 250

Feet

CALIFORNIA COASTAL COMMISSION



USACE and CDFG Jurisdictional Resources

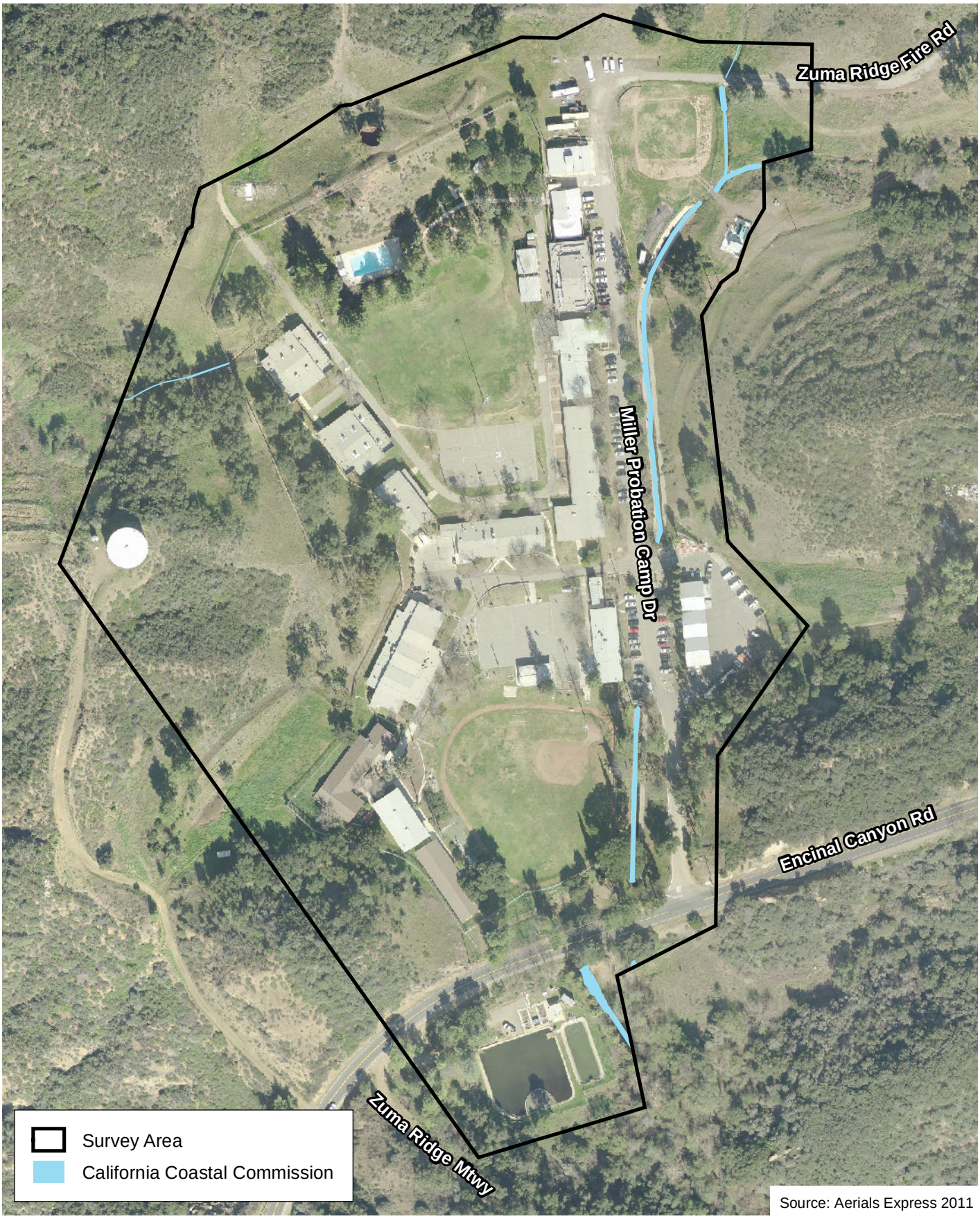
Exhibit 12

Camp Kilpatrick

N W E S

200 100 0 200 Feet

CALIFORNIA COASTAL COMMISSION



California Coastal Commission Jurisdictional Resources

Exhibit 13

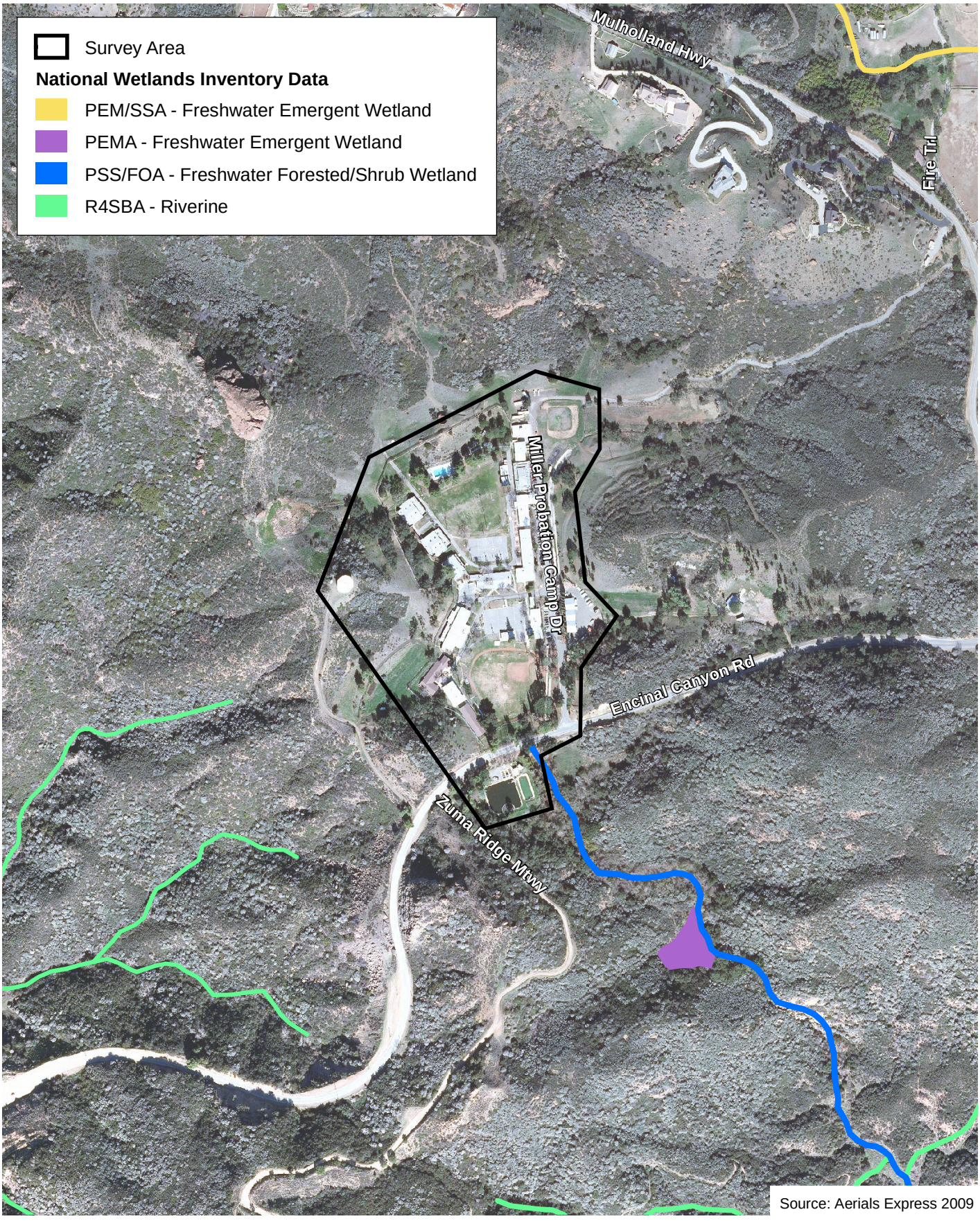
Camp Kilpatrick

N W E S

200 100 0 200

Feet

CALIFORNIA COASTAL COMMISSION



National Wetlands Inventory

Exhibit 14

Camp Kilpatrick

N W E S

200 100 0 200 Feet

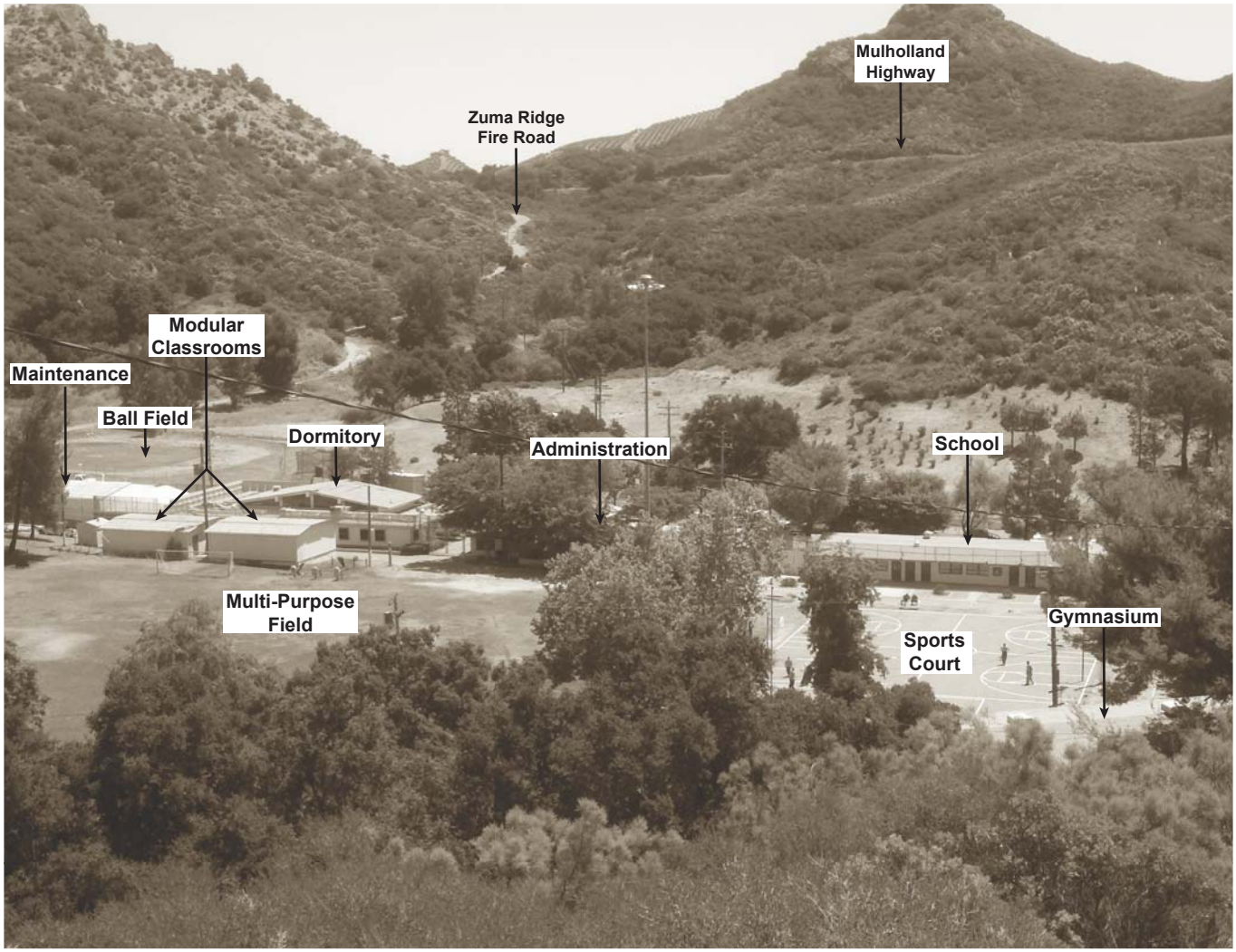
CALIFORNIA COASTAL COMMISSION

Site Plan of Camp Kilpatrick Juvenile Detention Center

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

Annotated Aerial Image Exhibit 15
Camp Kilpatrick

CALIFORNIA COASTAL COMMISSION



View looking east from watertank hill.

Project Site Views

Exhibit 16

Camp Kilpatrick

CALIFORNIA COASTAL COMMISSION

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

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

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

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

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

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

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

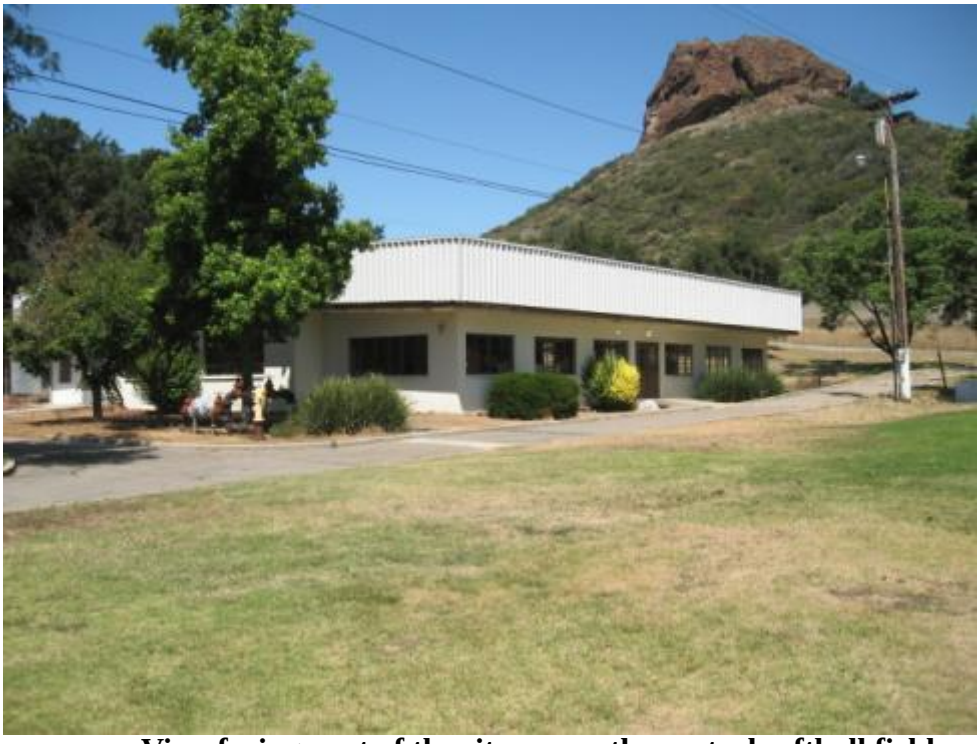
Photograph 8: **View of the interior hallway of the administration building.**

Photograph 9: **View facing west at the swimming pool.**

Photograph 10: **View of pole mounted transformer on site.**

Photograph MM: Gymnasium. View looking southwest.

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



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

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

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

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

Photgraph 17: Camp driveway east side: looking north.

Photgraph 18: Slope east of camp: looking east.

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

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

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

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

Off-Site Photographs #5

Exhibit 18

Camp Kilpatrick

CALIFORNIA COASTAL COMMISSION

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

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

Off-Site Photographs #6

Exhibit 18

Camp Kilpatrick

CALIFORNIA COASTAL COMMISSION