

PUBLIC REQUEST TO ADDRESS THE BOARD OF SUPERVISORS COUNTY OF LOS ANGELES, CALIFORNIA

Correspondence Received

MEMBERS OF THE BOARD

HILDA L. SOLIS HOLLY J. MITCHELL LINDSEY P. HORVATH JANICE HAHN KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
8.		Favor	Stu Harris	Favor the denial of the appeal but am surprised that the staff report misses the bigger point. Namely, if the purpose of an RV park is "recreation" then it makes sense to have a limit on time that one vehicle can occupy a space. In that way, more people can enjoy the sights and scene offered by the location. It also recognizes that there could be a season of no or little usage (e.g. rainy season or fire season, especially in light of health and safety concerns noted in staff report) If the purpose instead is to create some permanent housing then the site should not be called an RV park and the whole environmental review should be through that lense instead.
		Other	Chad Christensen	See attached comment letter from Santa Monica Mountains Conservancy and related attachments.
		Item Total	2	
Grand Total			2	

SANTA MONICA MOUNTAINS CONSERVANCY LOS ANGELES RIVER CENTER & GARDENS 570 WEST AVENUE TWENTY-SIX, SUITE 100 LOS ANGELES, CALIFORNIA 90065 PHONE (323) 221-8900 FAX (323) 221-9001 WWW.SMMC.CA.GOV



October 21, 2024

Board of Supervisors County of Los Angeles 320 West Temple Street Los Angeles, California 90012

Comments Supporting Denial of Appeal of Condition No. 23 for the Conditional Use Permit No. RPPL2019001251 and Continued Operation of Cali Lake RV Resort (Project No. 2019-000706-(5))

Dear Supervisors:

The Santa Monica Mountains Conservancy (Conservancy) expresses its support for the denial of appeal of Condition No. 23 associated with the Conditional Use Permit (CUP) No. RPPL2019001251 and continued operation of the Cali Lake RV Resort (Project No. 2019-000706-(5)) as a low-cost, visitor-serving RV park adjacent to the Angeles National Forest (ANF), in Soledad Canyon, unincorporated Los Angeles County (County).

As described in the Project No. 2019-000706-(5) materials, the Cali Lake RV Resort attempted to expand from the previously approved CUP 98-003 authorizing a 47-unit, visitor-serving RV park into an approximate 103-unit, permanent-resident RV park with unauthorized encroachments into U.S. Forest Service (USFS) property.

The Conservancy supports County staff's determination that the unauthorized expanded use is not compatible at this Project Site within the Santa Clara River floodplain and Significant Ecological Area (SEA), adjacent to both the ANF and Scenic Drive (Antelope Valley Area Plan) of Soledad Canyon Road. The USFS letter dated September 28, 2022, attached to County materials as "Exhibit M – USFS Letter" and included as an attachment to this letter, states in part:

The property line was surveyed and posted by Forest Service surveyors in April 2022, so the owners and operators of Cali Lake RV Park are aware of its exact location and have taken several steps to ensure that their activities and improvements are located well away from it.

The Conservancy has prepared the attached Overlay Map showing the subject Project's site plan overlayed on a 2023 Google Earth aerial. Unfortunately, this Overlay Map shows continued use of USFS property for Cali Lake RV Resort vehicle storage near both the northwestern and northeastern extents of the subject property identified as APN 3210-011-019. The Overlay Map also shows areas within the subject property where vehicles and equipment are parked in areas that the Project's Exhibit A – Site Plan indicates should be free of parking, storage, or RV occupancy.

Separately, the County's GIS-Net 2023 aerial imagery of the subject property and surrounding land appears to indicate more RV occupancy than the maximum allowable 47 units with similar, ongoing use of USFS property despite the USFS's September 2022 letter indicating Cali Lake RV Resort owners'/operators' commitments otherwise.

The Conservancy has also prepared the attached 2005-2023 Aerial Exhibit (Aerial Exhibit) that compares aerials of the subject property from 2005, 2011, 2017, and 2023. Review of Aerial Exhibit imagery indicates Cali Lake RV Resort's expanded, unpermitted use of USFS property north of the subject property began no later than July 2011, indicated by yellow arrows on respective aerials, with habitat removal and storage on USFS property both northwest and northeast of the subject property. The included 2017 Google Earth aerial shows further expansion of the Cali Lake RV Resort into USFS property with grading spoils dumped onto riparian and riparian buffer habitat northwest of the subject property, expanded habitat clearance in the central area north of the former White Rock Lake (aka Cali Lake) and into USFS property, and expanded habitat clearance into USFS property northeast of the subject property. The included 2023 Google Earth aerial shows these areas were maintained as functional Cali Lake RV Resort areas after USFS's September 2022 letter.

Further, the Aerial Exhibit's May 2023 imagery also shows the man-made impoundment of the Santa Clara River that used to form the White Rock Lake was breached, and a new vehicle bridge was constructed across the Santa Clara River. There is no indication in the County staff material published for the August 13, 2024, Board of Supervisors hearing that the County has reviewed this recently constructed vehicle bridge over the active river channel for impacts to habitat or species within the Santa Clara River SEA. The attached Annotated Aerial Exhibit uses the 2023 Google Earth aerial and includes labels and pointers to the Northwest Dump / Storage Area (approx. 1.48 acres), Central North Bank clearance zone (approx. 0.8 acres), Northeast Expanded Use / Storage Area (approx. 0.93 acres), New Vehicle Bridge location, and shows the location of the former Man Made Impoundment (aka "Cali Lake," "White Rock Lake"). Absent additional review and

related mitigation measures for this new development in a floodplain and SEA, the Project cannot be approved as is.

The Conservancy supports the County's determination that due to the Cali Lake RV Resort's location in a Very High Fire Hazard Severity Zone (VHFHSZ), Federal Emergency Management Agency 100-year flood zone, Santa Clara River SEA, and high visibility from Soledad Canyon Road (a County-designated Priority Scenic Drive), that expanding the Project's use from a visitor-serving RV park to permanent residential housing is incompatible with the subject property's characteristics and would require additional California Environmental Quality Act analysis.

The importance of the Santa Clara River as a multi-agency recognized wildlife corridor cannot be overstated. The subject property is approximately one-half mile from the confluence of Agua Dulce Creek with the Santa Clara River. Agua Dulce Creek is the primary north-south habitat corridor between the Saugus (northern) and Tujunga (southern) Units of the ANF. The South Coast Missing Linkages Project, a collaboration of public agencies and private organizations, designed the *San Gabriel-Castaic Connection* based on the least cost corridor of suitable habitat for 12 focal species between the San Gabriel Mountains and Castaic Range. This habitat linkage is essential to maintain the genetic diversity of coastal, transverse range mountains with inland ranges and subsequent inter-regional connectivity to the Sierra Nevada.

Thus, the Conservancy recommends the following as additional Conditions of Approval (COAs) to ensure the habitat of the Santa Clara River continues to support the federaland state-listed endangered unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*) and southwestern willow flycatcher (*Empidonax traillii extimus*), the federallisted threatened Santa Ana sucker (*Catostomus santaanae*) and coastal California gnatcatcher (*Polioptila californica californica*), and other species of concern including, but not limited to, arroyo chub (*Gila orcuttii*), two-striped garter snake (*Thamnophis hammondii*), coast horned lizard (*Phrynosoma blainvillii*), and the southern California Evolutionary Significant Unit of mountain lion (*Puma concolor*) that is protected by the California Endangered Species Act.

1. Require the applicant record a metes-and-bounds defined deed restriction over the whole of the Santa Clara River on the subject property and a minimum 50-foot setback area from top of bank in favor of the County or another public agency.

- 2. Install a wildlife permeable fence along the Santa Clara River's southern bank delineating the minimum setback area.
- 3. Removal of the recently constructed vehicle bridge over the Santa Clara River and prohibit the replacement of a similar structure without approval from relevant jurisdictional agencies including the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, California Regional Water Quality Control Board, and the County.
- 4. Prohibit any grading, armoring, or other bank stabilization efforts to channelize, divert, retain, impound, or otherwise impede the Santa Clara River.
- 5. Prepare and submit annual monitoring reports to the County for the lifetime operation of the Project to document compliance with Project Site-Specific Conditions including, but not limited to, COAs 24, 25, 26, 27, and 28.

These additional COAs are feasible and do not require the applicant to change the Project footprint or substantially change any Project elements. Further, additional COAs will help limit the Project's visual impacts to the Santa Clara River SEA from Soledad Canyon Road—a Priority Scenic Drive identified by the County's Antelope Valley Area Plan.

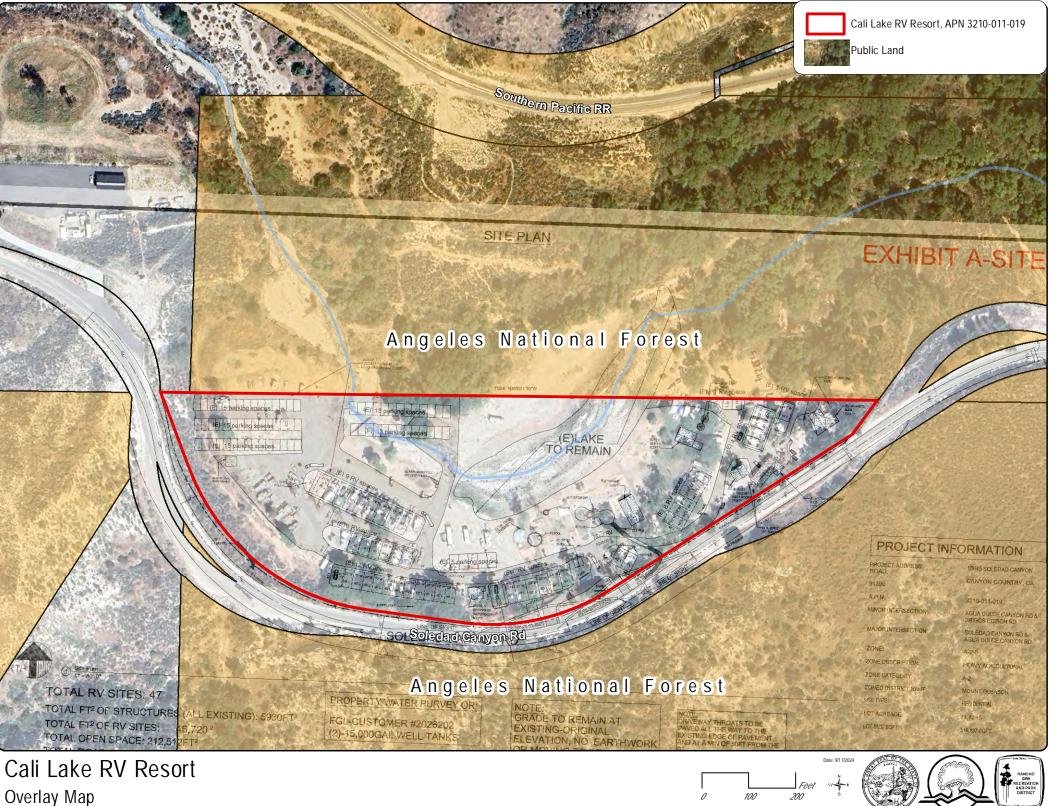
Please address any correspondence to Paul Edelman, Director of Natural Resources and Planning, at (310) 589-3200, extension 128, <u>edelman@smmc.ca.gov</u>, or at the above letterhead address.

Sincerely,

orar

STEVE VERES Chairperson

Cali Lake RV Resort – Overlay Map			
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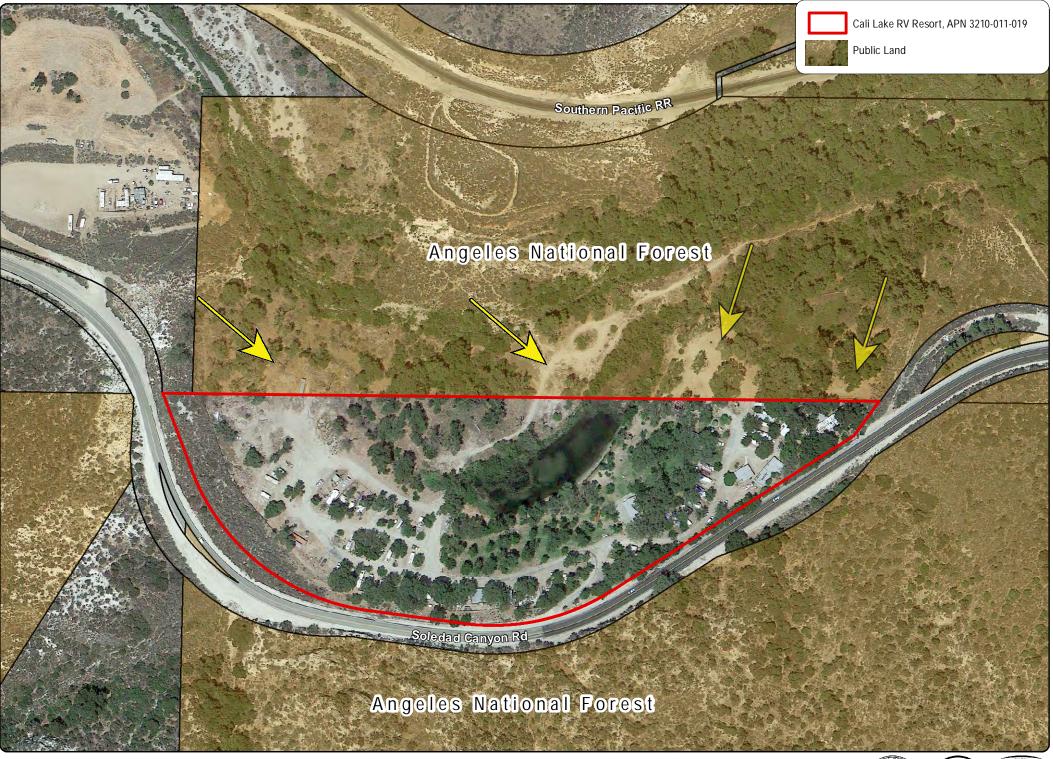




Cali Lake RV Resort 2005 Google Earth Aerial



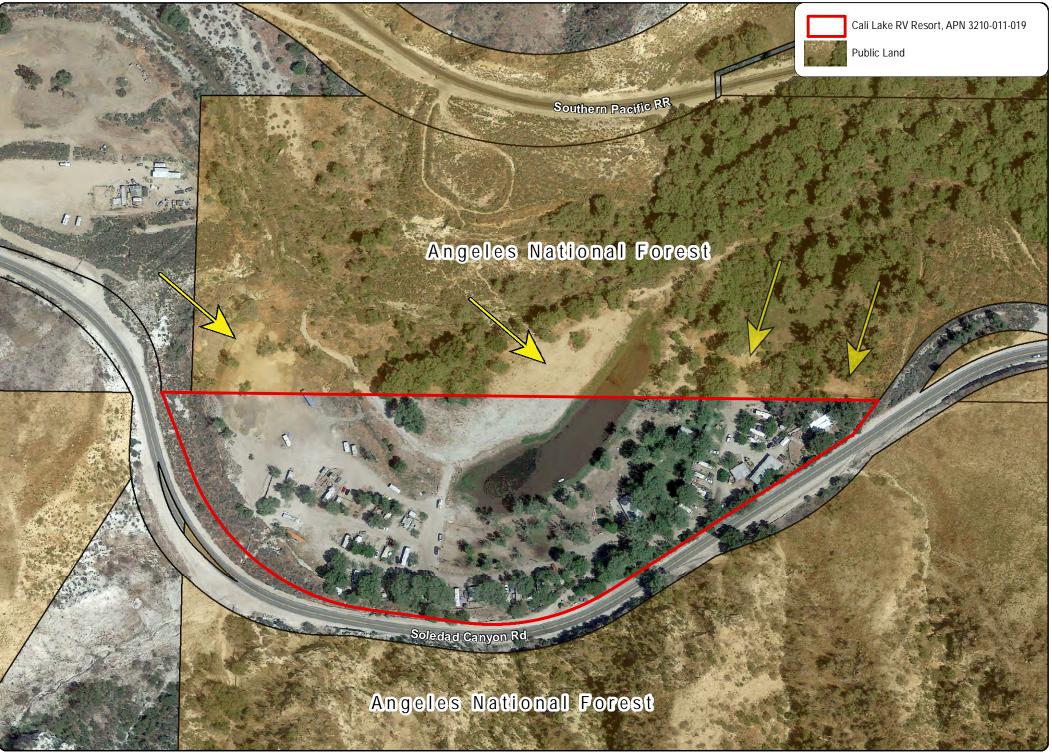




Cali Lake RV Resort 2011 Google Earth Aerial



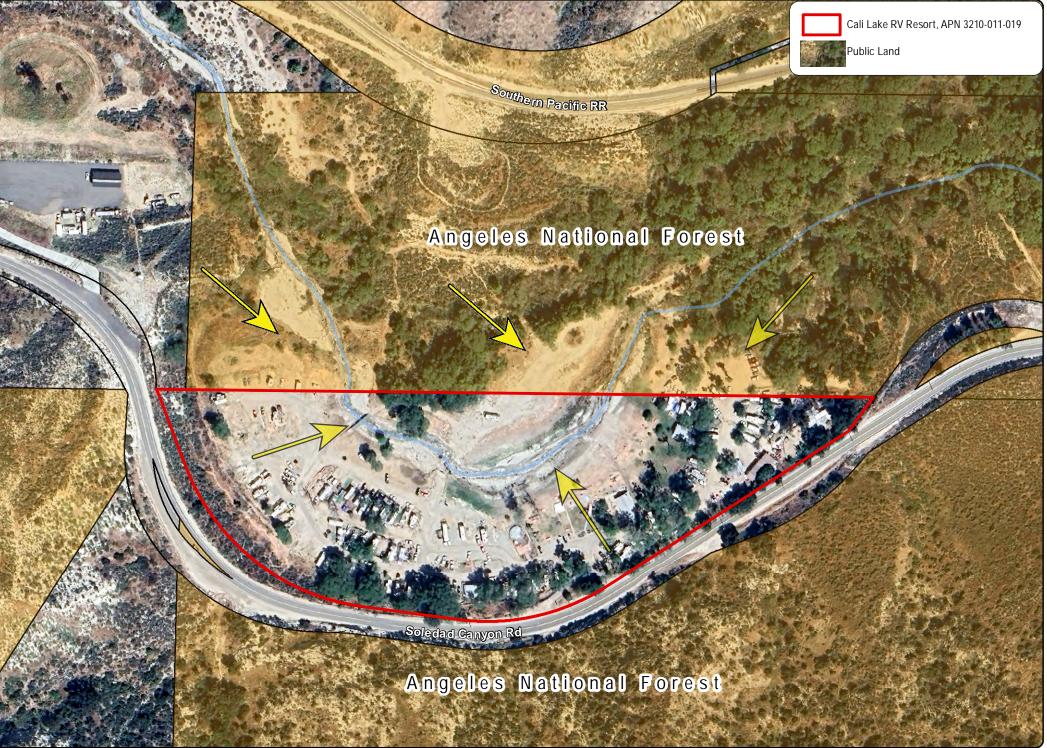




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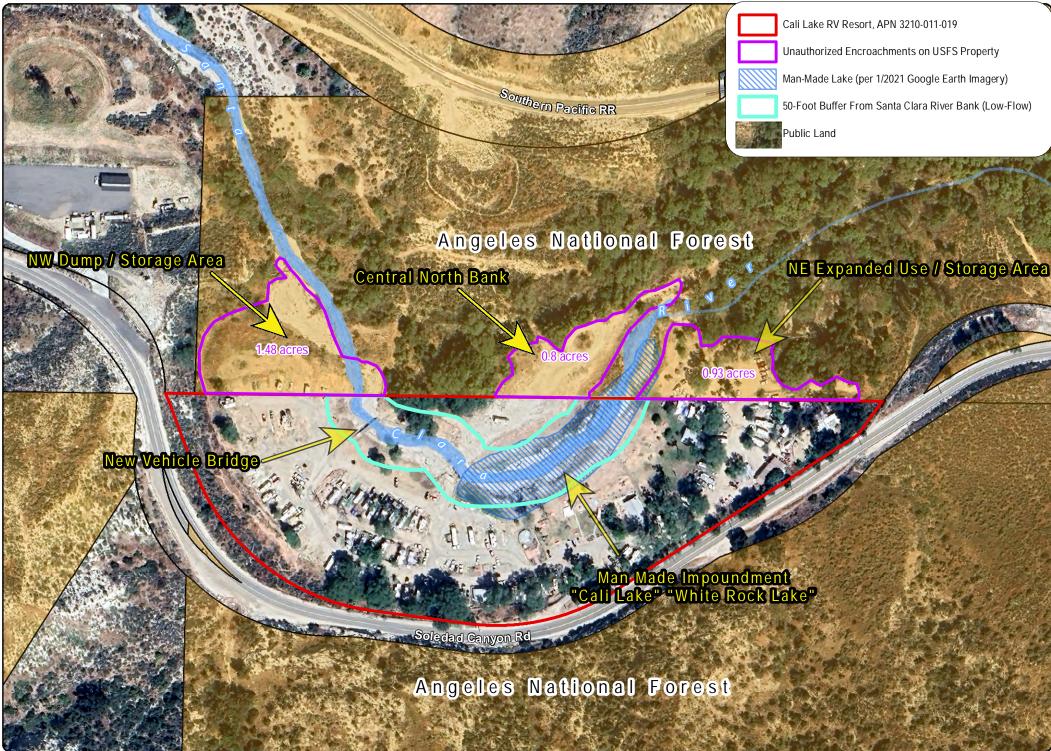




Cali Lake RV Resort 2023 Google Earth Aerial







Cali Lake RV Resort Annotated Aerial Exhibit





EXHIBIT M-USFS LETTER



United States Forest Department of Service Agriculture

Angeles National Forest San Gabriel Mountains National Monument 701 North Santa Anita Avenue Arcadia, CA 91006-2725 626-574-1613

 File Code:
 2700

 Date:
 September 28, 2022

Richard Claghorn LA County Department of Regional Planning 320 West Temple St. Room 1348 Los Angeles, CA 90012

RE: Conditional Use Permit (RPPL2019001251), 10645 Soledad Canyon Rd.

Dear Mr. Claghorn:

I am writing regarding the application for a conditional use permit from Cali Lake RV Park, a private property adjacent to the Angeles National Forest on Soledad Canyon Rd. In correspondence with the property owners your department indicated that a condition of granting this permit would be to "Obtain approval from the United States Forest Service... for all activities within the purview of [the] agenc[y]." You also requested a letter of non-jurisdiction regarding the need for a Special Use Permit from us for any private improvements or property on Federal land.

I have visited the property and spoken with the owner and his agents. Please accept this letter as confirmation that I see no use of Federal land that would require them to receive a Forest Service Special Use Permit. The property line was surveyed and posted by Forest Service surveyors in April 2022, so the owner and operators of Cali Lake RV Park are aware of its exact location and have taken several steps to ensure that their activities and improvements are located well away from it.

I appreciate the County's diligence in coordinating with partner agencies regarding land use decisions and would like to remain apprised of any future developments or permits issued to Cali Lake RV Park. Please direct any future correspondence or questions regarding this matter to Monument Manager, Matthew Bokach at <u>matthew.bokach@usda.gov</u> or via mobile phone at 626-260-3622.

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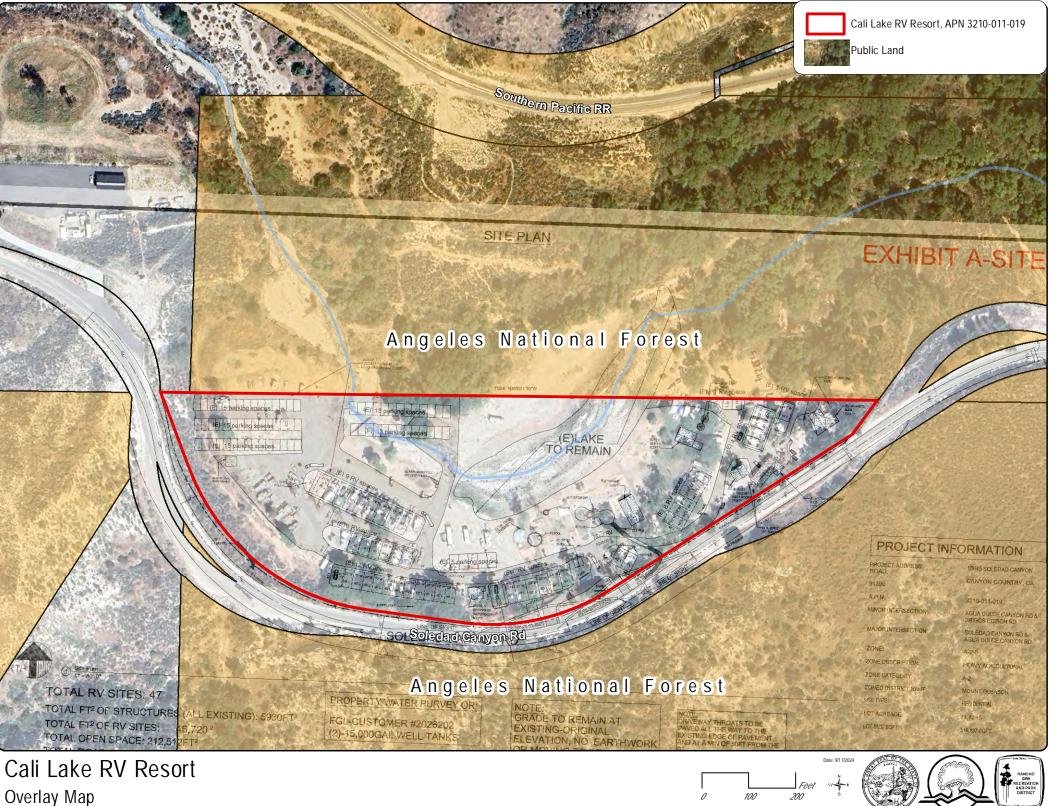
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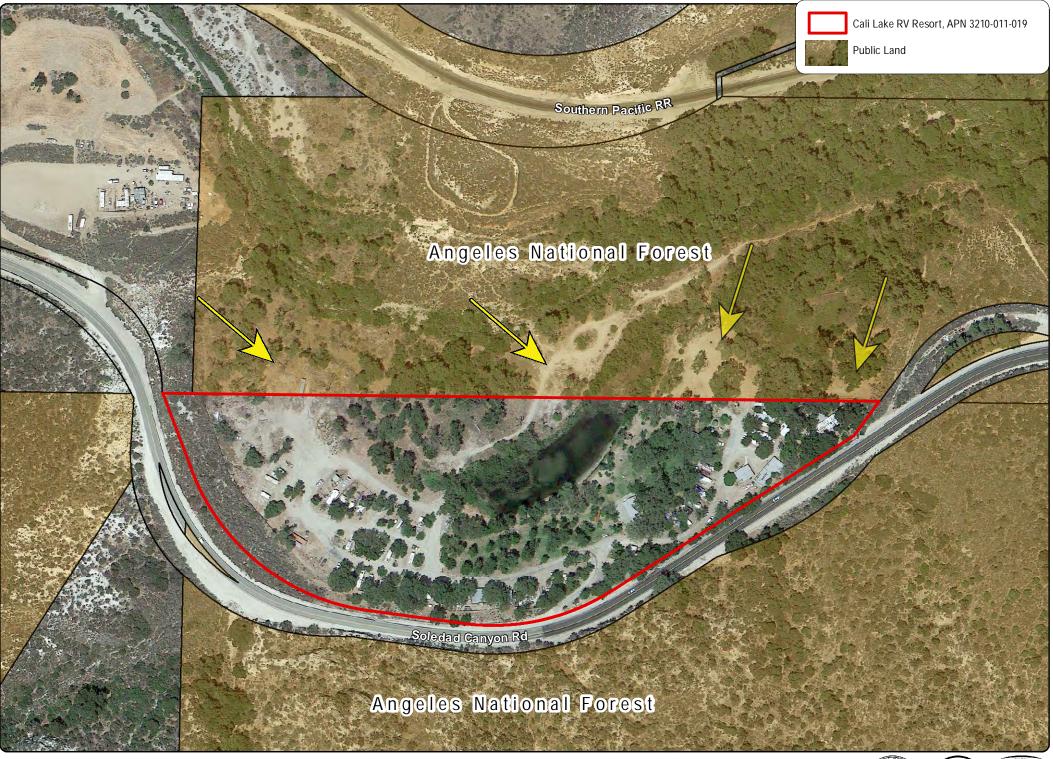




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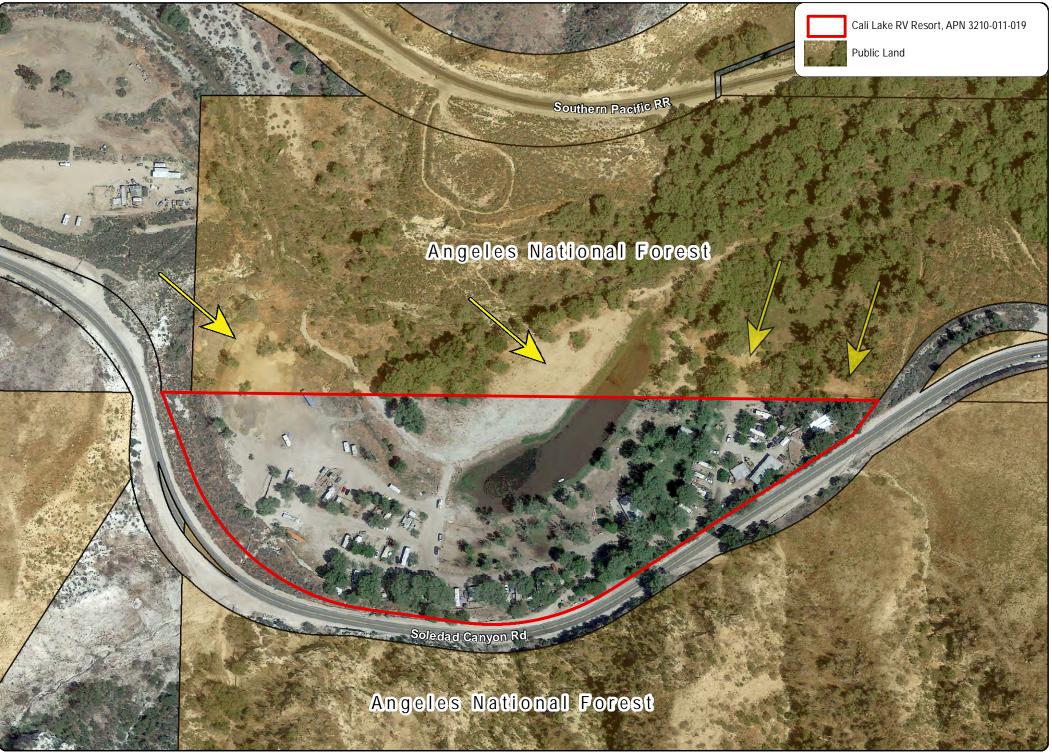




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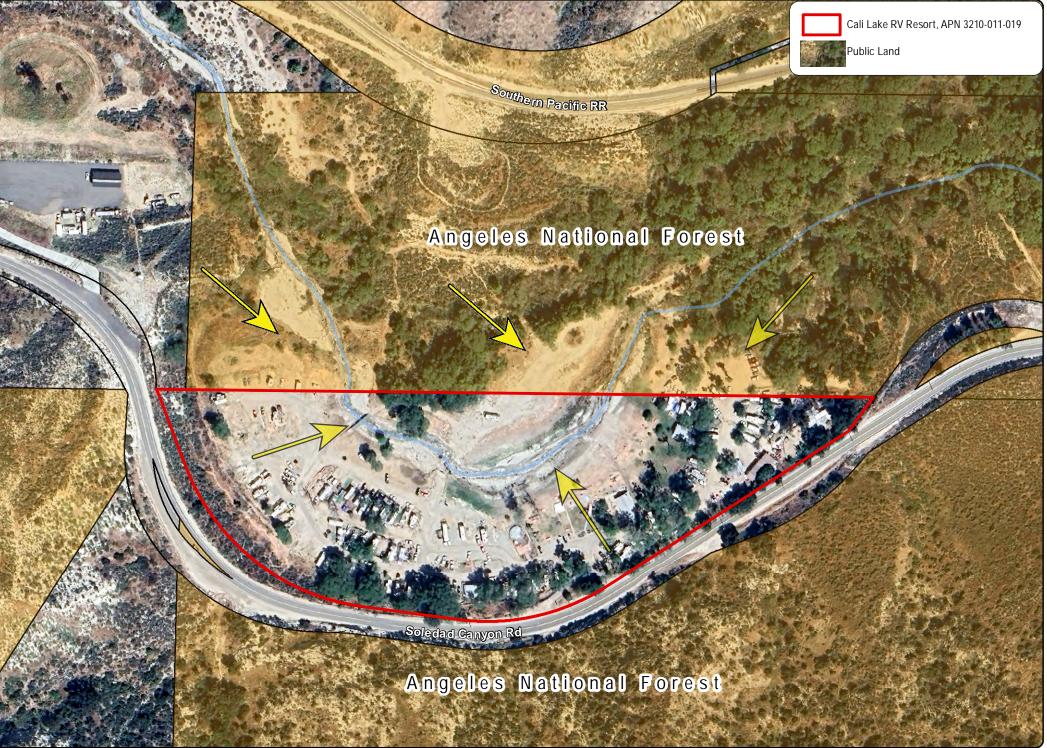




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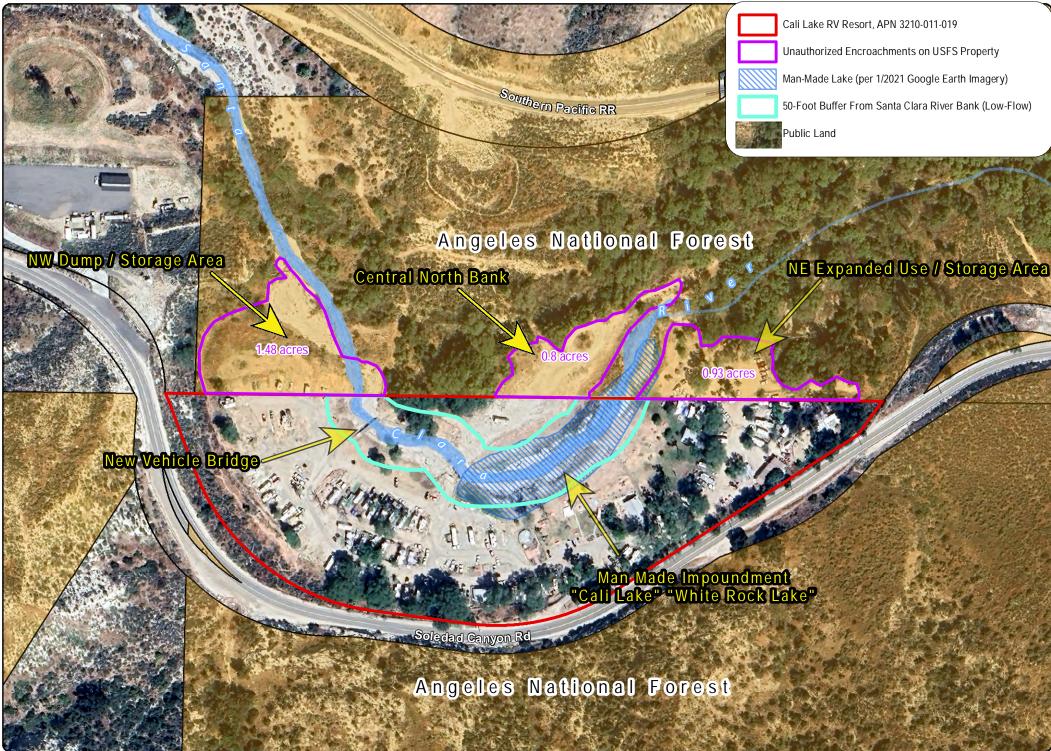




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