TOPANGA LAGOON RESTORATION PROJECT

Final Environmental Impact Report

Prepared for
California Department of Parks and Recreation

August 2024

ESA

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CHAPTER 1
Introduction

In accordance with Section 15089 of the California Environmental Quality Act (CEQA) Guidelines, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft EIR; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

This Final EIR constitutes the second part of the EIR for the Topanga Lagoon Restoration Project (Project) and is intended to be a companion to the Draft EIR. The Draft EIR for the proposed Project, which was circulated for public and agency review and comment from February 12, 2024, to April 12, 2024, constitutes the first part of the EIR and is incorporated by reference and bound separately.

Accordingly, the Final EIR for the proposed Project comprises two parts as follows:

- Part 1: Draft EIR and Appendices
  - Draft Environmental Impact Report (Chapters 1 through 7)
  - Draft Environmental Impact Report – Appendices A through R
- Part 2: Final EIR and Appendices
  - Final Environmental Impact Report (Chapters 1 through 4)
  - Final Environmental Impact Report – Appendix N, Appendix P, Appendix S, and Appendix T

1.1 Organization of the Final EIR

This Final EIR is organized into four main chapters as follows:

- **Chapter 1 – Introduction:** This section provides an introduction to the Final EIR, presents the contents of this Final EIR, summarizes the EIR public review process, identifies the Preferred Hybrid Alternative 3A, provides a summary of the proposed Project and a summary of the environmental impacts.
- **Chapter 2 – Responses to Comments:** This section presents master responses to key topic areas among the comments received on the Draft EIR. A matrix of the parties that

commented on the Draft EIR is also included. This matrix is followed by the response to comments received on the Draft EIR. Numbered responses are provided for each of the written and verbal comments made regarding the Draft EIR. Copies of the comments received on the Draft EIR and the full public meeting transcripts are provided in Appendix T of this Final EIR.

- **Chapter 3 – Revisions, Clarifications, and Corrections to the Draft EIR:** This section provides a list of revisions, clarifications, and corrections that have been made to the Draft EIR for the proposed Project based on comments received from the public and agencies.
- **Section 4 – Mitigation Monitoring and Reporting Program (MMP):** This section provides the full MMRP for the proposed Project. The MMRP lists project design features and mitigation measures by environmental topic and identifies for each of the features and measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

This Final EIR also includes the following appendices:

- **Appendix N – Air Quality, Greenhouse Gas Emissions, and Energy Data, Modeling, and Noise Calculations (ESA 2023)** This Appendix was included in the Draft EIR but the subsections were mislabeled as Appendix P. The Final EIR contains the corrected subsection numbers.
- **Appendix P – Topanga Lagoon Restoration Project Water and Sediment Quality Study Technical Report (ESA 2023) and Water Quality Pre-Construction Baseline Report (RCDSMM and Bay Foundation 2022)** This Appendix was inadvertently omitted from the Draft EIR original publication. It was added to the State Parks website during the public review period. It is being included in the Final EIR for clarity.
- **Appendix S, Operations and Maintenance Plan:** This appendix to the Final EIR includes a manual completed by Moffat & Nichol (2022) to assist with post-construction maintenance and anticipate, plan, and conduct post-construction maintenance operations, as well as serve as a central reference document for the landowners.
- **Appendix T, Copies of Comment Letters, Emails, and Public Meeting Transcripts.** This Appendix includes the letters received during the Draft EIR public comment period.

1.2 Project Summary

Three Build Alternatives were considered in the Draft EIR to restore the Topanga Lagoon in addition to a No Project Alternative. Each of these alternatives are closely related, with differing approaches to lagoon size, coastal resilience functionality, visitor serving amenities, emergency access, historic resource management, and roadway alignment. The Draft EIR did not identify a preferred alternative in order to provide an opportunity for the public and regulatory agencies to provide comments on the benefits and challenges of each project alternative to help identify a preference. Based on this feedback, a preferred alternative would be selected and identified in the Final EIR.

1.2.1 Alternative 1, No Project Alternative

The No Project Alternative assumed that no improvements would be implemented at the location. The project site would continue to function under existing conditions, but onsite resources would continue to degrade over time.

1.2.2 Alternative 2, Maximum Lagoon Habitat

Alternative 2 provides the maximum increase in lagoon, wetland, and riparian bank habitats. The lagoon area would be graded and re-contoured to provide for a wider lagoon, refugia, and improved fish migration. Natural side channels would be created that would allow the lagoon system to better accommodate changing sea level and storm surge conditions. Based on initial designs, Alternative 2 would restore approximately 9.5 wetted acres, with 23 riparian/transitional/upland acres restored and beach expansion to 4.39 acres.

The Topanga Ranch Motel and all onsite business leases except one located at the site of the current Reel Inn would be removed from the project area and would be replaced with riparian and transitional habitats. There is sufficient space within the project area to replace the coastal access non-concession parking that currently exists. A loop trail would be developed to connect parklands to the beach, and a small picnic area and day-use parking would also be included. At the Gateway Corner, approximately 5,500 square feet of visitor serving one-story structures would be developed, which would include a park office, an employee house, a maintenance/storage facility, and a small outdoor interpretive pavilion/restroom. The existing mobile mini shed used by the California Department of Fish and Wildlife for fish research would be moved slightly to the north but would remain. Free shoulder parking along Topanga Canyon Boulevard (TCB) would remain, and the bus stops would be rebuilt to be more obvious and welcoming. Stairs down to the beach from the intersection of TCB and Pacific Coast Highway (PCH) would be added.

The existing 79-foot long Caltrans bridge would be replaced with a longer one along the same road alignment to span the widened lagoon. The span of the new bridge would total 460 feet (200-foot primary span, with secondary/side spans of 120-140 feet each). This alternative includes lifeguard staff and ADA disabled parking spaces on the beach level, with additional recreational parking at the PCH upper level on the south side of PCH only.

The lifeguard and public restroom building and non-standard helipad on the knoll would be demolished and rebuilt closer to the realigned access road and to each other on the same beach level. Approximately 256,000 cubic yards (CY) of soil would be removed from the existing fill areas to contour the new lagoon and, if placed nearshore for nourishment, would be distributed within a portion of the 35-acre area. Construction of this Alternative would be expected to last approximately 60 months.

1.2.3 Alternative 3, Limited Lagoon Habitat Expansion, Retention of Motel

Alternative 3 would expand the lagoon, wetland, riparian and transitional habitat to the west side of the existing creek channel, but not as extensively as Alternative 2 on the east side. Based on initial designs, Alternative 3 would restore approximately 7.7 wetted acres, with 23.7 riparian/transitional/upland acres restored and beach expansion to 4.42 acres.

Up to twenty Topanga Ranch Motel structures would be restored in their historic configuration, including potential relocation of some of the oldest structures from the west side that is currently experiencing flood and bank erosion. One existing concession building (restaurant lessee) would be remodeled and continue operation in place. However, no other business leases would remain. Parking on the north side of PCH and along the road shoulder will be retained. There is sufficient space along TCB at the Gateway Corner to replace the coastal access non-concession parking that currently exists. A loop trail would be developed to connect parklands to the beach, and a small picnic area and day-use parking would also be included.

At the Gateway Corner, approximately 5,500 square feet of visitor serving one-story structures would be developed, which would include a park office, an employee house, a maintenance/storage facility, and a small outdoor interpretive pavilion/restroom. The existing mobile mini shed used by the California Department of Fish and Wildlife for fish research would be moved slightly to the north but would remain. Free shoulder parking along TCB would remain, and the bus stops will be rebuilt to be more obvious and welcoming. Stairs down to the beach from the intersection of TCB and PCH will be added.

All of the changes to the new 460-foot Caltrans bridge (200-foot center span, with secondary/side spans of 120-140 feet each) would be the same as for Alternative 2. However, the beach access road alignment would be slightly to the east.

The lifeguard and public restroom building would be rebuilt closer to the realigned access road moving slightly east to enhance sight lines along the beach, and the new helipad would be located at the western edge of the parking lot on the PCH level with a gated separation. Approximately 166,000 CY of soil would be removed from the existing fill areas to contour the new lagoon and, if placed in the nearshore for nourishment, would be distributed within a portion of the 35-acre area. Construction of this Alternative would be expected to last approximately 60 months.

1.2.4 Alternative 4, Maximum Managed Retreat, Partial Motel Retention

Alternative 4 would alter the alignment of PCH northward, curving inland over the lagoon and expanding the maximum amount of beach area. Based on initial designs, Alternative 4 would restore approximately 7.6 wetted acres, with 23.7 riparian/transitional/upland acres restored and beach expansion to 4.56 acres.

The portion of the historic Topanga Ranch Motel east of the current motor court access lane, which includes 15 structures, would be retained. Adjacent parking would be adjusted and a

remodeled restaurant building would be retained. This alternative would provide an expanded lagoon, wetland, riparian and transitional habitats, primarily on the west side of the existing channel due to removal of all fill in that western area. A loop trail would be developed to connect parklands to the beach, and a small picnic area and day-use parking would also be included No other business leases would remain. Partial or full relocation or replacement of public parking from the current location on the north side of PCH to the west side of TCB in the Gateway Corner will be developed. There is sufficient space along TCB to replace the coastal access non-concession parking that currently exists.

At the Gateway Corner, approximately 5,500 square feet of visitor serving one-story structures would be developed, which would include a park office, an employee house, a maintenance/storage facility, and a small outdoor interpretive pavilion/restroom.. The existing mobile mini shed used by the California Department of Fish and Wildlife for fish research would be moved slightly to the north but would remain. Free shoulder parking along TCB would remain, and the bus stops will be rebuilt to be more obvious and welcoming. Stairs down to the beach from the intersection of TCB and PCH will be added.

Due to the curve of the alignment under Alternative 4, the Caltrans bridge roadway approach has the greatest length of all the Alternatives, though the actual span lengths are similar to the other alternatives with a total of 460 feet consisting of a 200-foot long center span and a 120-140 foot side span on each side. Shoulder parking would be retained along the road shoulder. The lifeguard and public restroom building and new helipad would be rearranged with staff, emergency vehicles, and ADA disabled parking with sight lines required for the expanded recreational beach area. This Alternative would maximize managed retreat, recreational beach area (and/or living shoreline features such as dunes) and provides the most sea level rise resilience. Approximately 210,000 CY of soil would be removed from the existing fill areas to contour the new lagoon and, if placed in the nearshore for nourishment, would be distributed within a portion of the 35-acre area.. Construction of this Alternative would be expected to last approximately 60 months.

1.2.5 Wastewater Management Options

Three wastewater options are considered for the proposed project: Option 1 Subsurface Drip Irrigation (SDI), Option 2 Seepage Pits and Option 3 Sewer. Option 1 (SDI) would support effluent levels for State Parks facilities under Alternative 2 only, while Options 2 (Seepage Pits) and 3 (Sewer) could support all project Alternatives. A preferred wastewater option is identified in the Final EIR (Section 1.3) after receiving public and agency comments on the Draft EIR.

Options 1 (SDI) and 2 (Seepage Pits) would be located on State Parks property along Topanga Canyon Boulevard north of the parking lot. Construction would require a pipe and pump system with treatment works to move effluent from the sources to the receiver sites. These wastewater options would require three- to six-months of construction that would occur during the 60-month project construction period.

Option 3 (Sewer) would involve constructing an approximately 1-mile extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of

the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Both DBH and State Parks could connect Project facilities to this sewer extension. The sewer extension is anticipated to use a force main (pump station and pressure pipe) system, although a gravitation system may be used if feasible. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years.

1.3 Preferred Alternative

As noted on page 1-1 of the Draft EIR, State Parks committed to identifying a Preferred Alternative prior to certifying the Final EIR and after receiving input from the public and regulatory agencies.

As noted in Section 2.6.8 of the Draft EIR (page 2-42), the Preferred Alternative may be a "Hybrid Alternative", combining elements from each of the Build Alternatives based on comments received. Following the close of the Draft EIR public review period, representatives of each of the three landowners (County of Los Angeles, Caltrans, and State Parks) met on two occasions (4/22/24 and 5/6/24) to review and discuss the comments received on the Draft EIR and to identify a Preferred Alternative. The result of these meetings produced Alternative 3A as the Preferred Alternative that combines elements from each of the Build Alternatives and avoids all significant impacts.

1.3.1 Alternative 3A Description

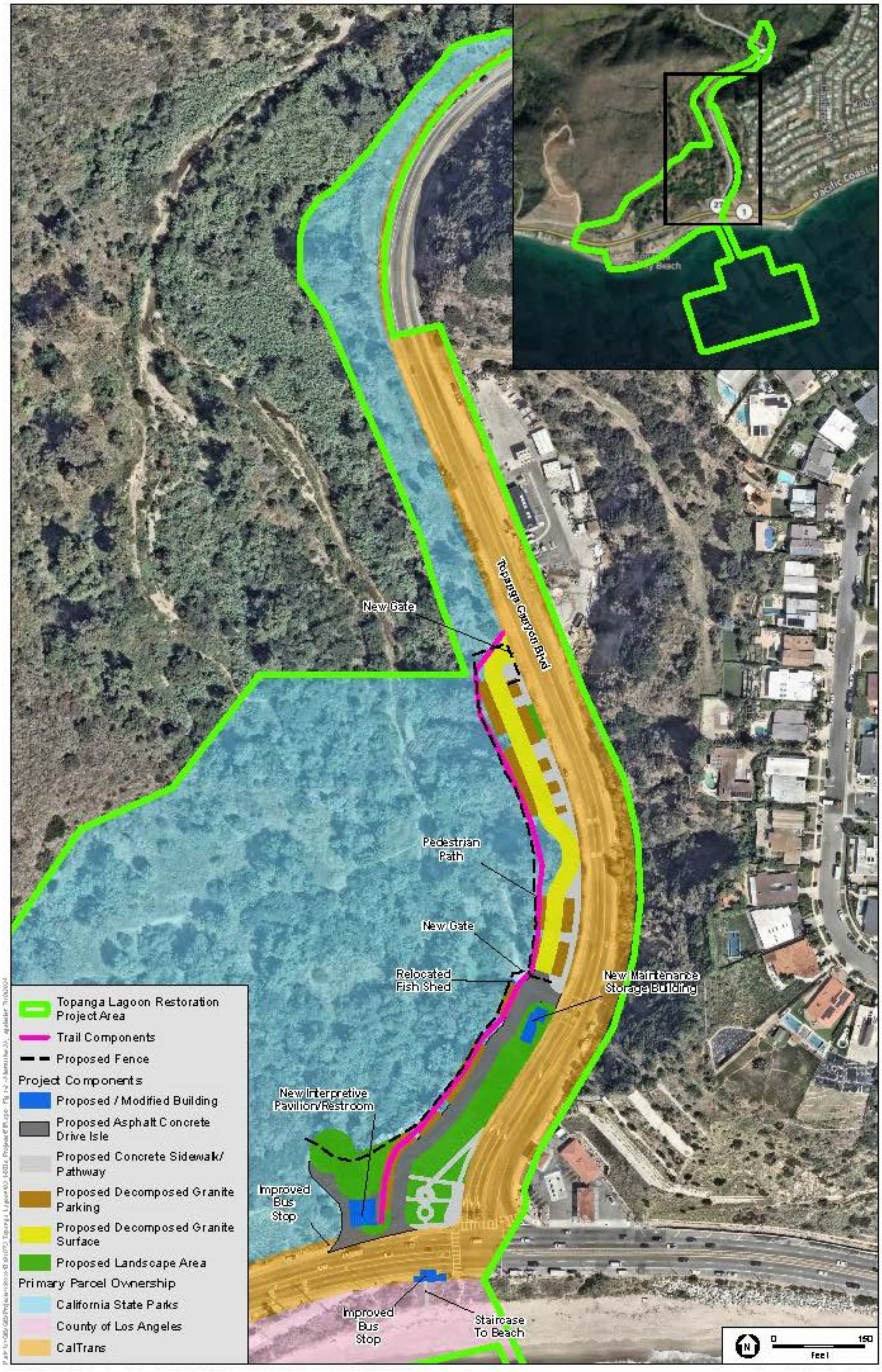
Alternative 3A is a Hybrid Alternative made up of components of the three Build Alternatives evaluated in the Draft EIR and meets all Project Objectives as outlined on page 2-10. Alternative 3A incorporates all components of Alternative 2 south of and including PCH and the new bridge. This includes all areas of Caltrans PCH ROW and Topanga Beach. A loop trail would be developed to connect parklands to the beach, and a small picnic area and day-use parking would also be included. For areas north of PCH within State Parks property, the new Alternative 3A would incorporate the footprint for the parking area and concession identified in Alternative 3-and would retain as many as 15 Topanga Ranch Motel structures consistent with Alternative 4 resulting in more parking available than identified in Alternative 2. The resulting lagoon footprint therefore would be slightly smaller than what was evaluated in Alternative 2, but larger than Alternatives 3 or 4. As a result, native sediment available for nearshore nourishment is also estimated to be slightly smaller than what was evaluated in Alternative 2, but larger than Alternatives 3 or 4. Alternative 3A would avoid significant and unavoidable historic and cultural impacts, similar to Alternative 3. The Gateway Corner will be consistent with the elements described in Alternative 3. As a component of the preferred Alternative 3A, the placement of sediment excavated from the lagoon area as part of the project would be placed in the nearshore as described on page 2-36 of the Draft EIR. Alternative 3A would also incorporate Wastewater Management Option 2 Seepage Pits as described on page 2-41 of the Draft EIR. The combination of these components that constitute Alternative 3A is depicted in **Figures 1-1** through **1-5**. Construction of this Alternative would be expected to last approximately 60 months.

SOURCE: Chris Nelson Associates, Inc; Moffatt & Nichol, 2024; NearMap, 2023-09-12 (Aerial); ESA, 2024

Topanga Lagoon Restoration Project

Figure 1-1

Preferred Hybrid Alternative 3A

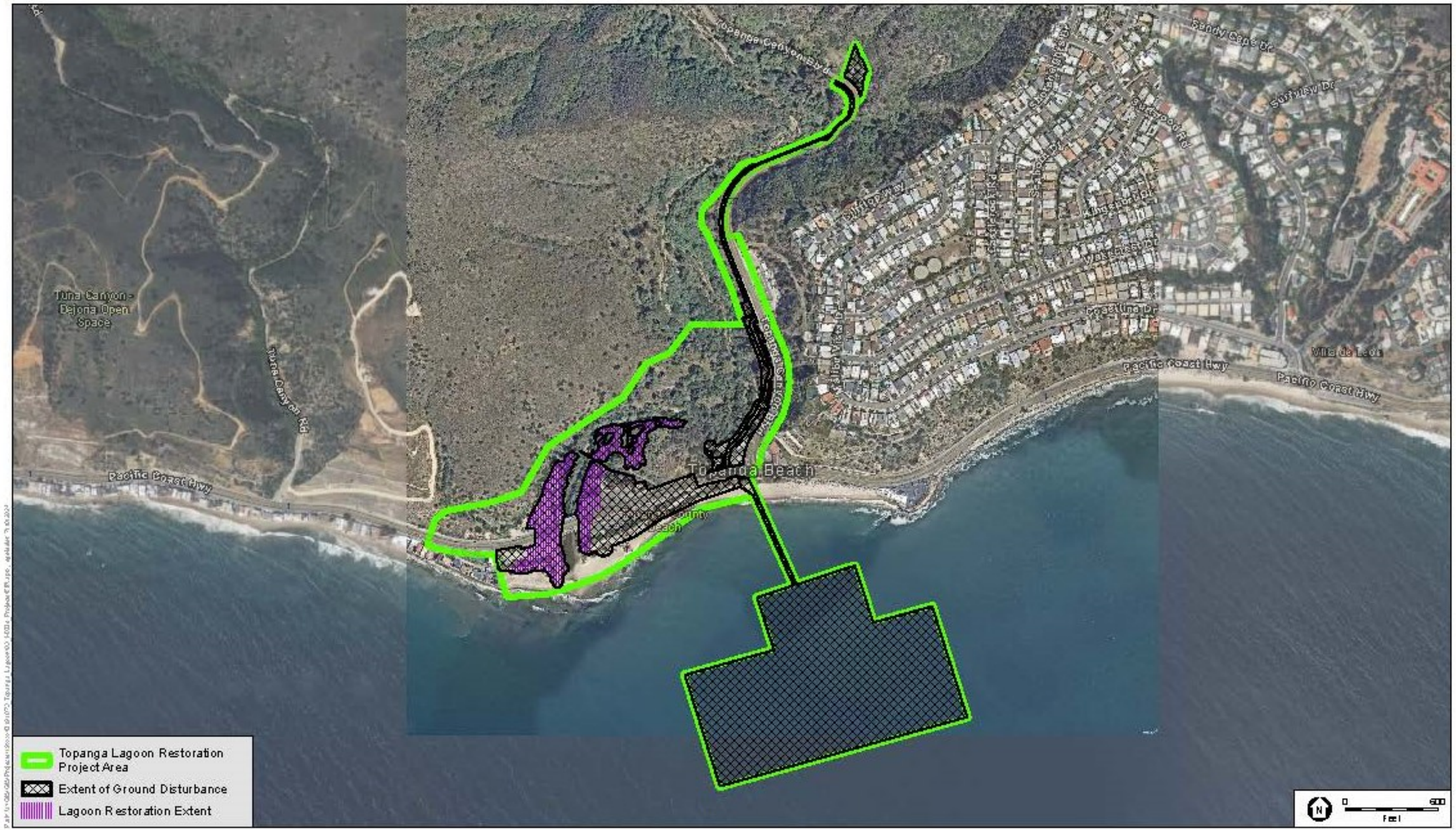


SOURCE: Chris Nelson Associates, Inc; Moffatt & Nichol, 2024; NearMap, 2023-09-12 (Aerial); ESA, 2024

Topanga Lagoon Restoration Project

Figure 1-2

Preferred Hybrid Alternative 3A



SOURCE: Chris Nelson Associates, Inc; Moffatt & Nichol, 2024; NearMap, 2023-09-12 (Aerial); ESA, 2024

Topanga Lagoon Restoration Project

Figure 1-3

Preferred Hybrid Alternative 3A

Topanga Lagoon Restoration Project Area

Wastewater Management Option 2: Seepage Pits

Proposed Private Wastewater Effluent Disposal Area (12 Seepage Pits) and Construction Staging Area

Proposed Private Wastewater Corridor

Proposed Highway Crossing for Wastewater Pipeline

Alternate PCH Pipeline Corridor

Topanga Canyon Blvd

Cliffcrest Rd

Kingsport Dr

Coastline Dr

Pacific Coast Hwy

Topanga Beach

Cliffcrest Rd

Cliffcrest Way

Castlerock Rd

Seahorn Dr

Kingsport Dr

Wakecrest Dr

Coastline Dr

Malibu Vista Dr

Topanga Canyon Blvd

Pacific Coast Hwy

Topanga Beach

Topanga County Beach

Tuna Canyon Rd

0 400 Feet

Path: U:\GIS\GIS\Projects\19xxxx\D191073 Topanga Lagoon\03 MXDs Projects\EIR.aprx, sgelssler 7/10/2024

SOURCE: Chris Nelson Associates, Inc; Moffatt & Nichol, 2024; NearMap, 2023-09-12 (Aerial); ESA, 2024

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Topanga Lagoon Restoration Project

Figure 1-4

Preferred Hybrid Alternative 3A
Wastewater Management Option 2, Seepage Pits

1.3.2 Value Analysis Modifications to the Bridge Design

Caltrans policy requires that all projects with construction cost over $25 million undergo a Value Analysis Study to ensure cost effective, best-value designs are incorporated into Caltrans projects. A Value Analysis Study was conducted for the proposed Topanga Lagoon Restoration project and three design recommendations that slightly modify the proposed bridge design were accepted by the Project Development Team. These recommendations are being added to the project description of the Alternative 3A Preferred Hybrid Alternative and are summarized below:

- Recommendation 1 would increase the number of columns to reduce the size of the columns at the bridge piers. The recommendation was made to enhance performance of the bridge supports.
- Recommendation 2 would reduce the western span of the bridge by 20 feet which would make the east and west wing spans of equal length. This would shorten the overall structure by 20 feet. The recommendation would enhance the performance of the bridge.
- Recommendation 3 would increase the width of the bridge over Topanga Creek by 38 feet on the northbound side. This would allow for the bridge to be constructed without the need for a temporary bridge, reducing the construction duration and saving time and money. It also would enhance performance of the bridge, ultimately allowing additional space for and parking on the bridge itself.

These minor design modifications would occur entirely within the estimated footprint evaluated in the Draft EIR for each Alternative. The modifications would not increase construction duration or modify construction method assumptions. The modifications would not therefore result in any new environmental impacts not already evaluated in the Draft EIR, nor would they substantially increase the severity of any impact identified in the Draft EIR.

1.3.3 Rationale for Development of Alternative 3A and Selection as Preferred Alternative

The process of selecting a Preferred Alternative by State Parks, DBH, and Caltrans was conducted in a manner that carefully considered public input and project landowner preferences in light of the stated Project Objectives. Over 121 comments from individuals and 20 comments from organizations, agencies and cities were received during the 60-day Draft EIR review period. Approximately 66 comments from individuals expressed a preference for an alternative as summarized in Table 1-1 below.

TABLE 1-1
SUMMARY OF ALTERNATIVE PREFERENCES

Alternative	Number of Comments Supported
Alternative 1, No Change	6 of 66 comments from individuals supported
Alternative 2, Maximum Lagoon	51 of 66 comments from individuals supported; Supported by the CA Coastal Commission, numerous agencies and NGO's, CDFW, NMFS, SMMC, Surfrider
Alternative 3, Maximum Historic	8 of 66 comments from individuals supported; LA Conservancy supports retention of Topanga Ranch Motel and concessions
Alternative 4, Maximum	0 of 66 comments from individuals supported; Least preferred by Caltrans due to potential to destabilize the slopes
Hybrid	At least 1 of 66 comments from individuals supported a hybrid alternative

Alternative 2 received the most support from commentors as shown in Table 1-1. Preferences for a wastewater option were limited with less than a handful supporting sewer, and only one noted a preference for an advanced onsite wastewater treatment option. The County identified a preference for the helipad configuration in Alternative 2, to avoid conflicts with PCH. Caltrans identified a preference for the roadway designs included in either Alternative 2 or 3, which would keep the new bridge span and roadway within the existing alignment of PCH. The Alternative 4 alignment poses greater design challenges associated with geotechnical considerations and as such was not preferred by Caltrans. This was also supported by State Parks as the existing alignment avoids potential significant and unavoidable impacts to Tribal cultural resources.

The Project Development Team accepted the three Value Analysis recommendations as a means to reduce project costs and avoid the need to construct a temporary bridge. The recommendations would reduce the overall project impact area and would not result in any new impacts not already addressed in the Draft EIR, other than increasing area of shade over the Topanga Creek. The additional shade over the creek is not anticipated to result in any new significant impact to habitat quality, since it will help to regulate water temperatures during the summer, provide fishes some additional protection from avian predation, and not impede vegetation growth.

State Parks identified a preference for retaining as many of the Topanga Ranch Motel structures as possible to maximize interpretive and visitor services opportunities onsite and to avoid significant and unavoidable impacts to cultural resources. The mission of State Parks is to balance protection of natural and cultural resources with maintaining quality recreational opportunities accessible to the general public. In addition, State Parks must also comply with state laws, including Public Resources Code 5024.5, which requires state agencies to minimize adverse effects to cultural resources that are listed or eligible for listing on the National Register and California Register, such as the Topanga Ranch Motel. By retaining the portion of the Motel that sits adjacent to the lagoon, State Parks is able to restore much of the historical lagoon configuration, while preserving underlying Native American resources and providing a restored feature of Topanga's early 1920-30's history that can become a recreational resource and gathering place for the community.

State Parks determined that the smaller motel footprint associated with Alternative 4 provides a greater natural buffer between the historic motel and adjacent open space areas compared to Alternative 3. This greater buffer reduces the potential for natural creek movement to affect the motel area thereby reducing facilities maintenance needs, and reducing conflicts between visitor services uses and natural resource protection.

State Parks considered that while lagoon and riparian habitat expansion for Alternative 3A are not as extensive as proposed in Alternative 2, significant restoration will occur on both the west and east sides of the creek to provide space for sea level rise adaptation and resilience. Nearshore nourishment benefits would be retained with Alternative 3A. The grading plans to be prepared during the 100 percent design phase will determine final grading contours and ultimate restored lagoon and riparian habitat acreages. Alternative 3A would avoid work in the wetted areas (other than removing the old bridge) and is not anticipated to require extensive retaining walls or other extensive slope stabilization structures for either the roadway or to protect the Topanga Ranch

Motel structures. If determined to be needed, any required slope stabilization methods will favor natural-looking alternatives over extensive retaining walls.Trails and coastal access parking would be further developed as well.

State Parks also determined that seepage pits were the most feasible wastewater option based on the assessment of the system's ability to support potential visitor use (eliminating SDI), technical feasibility concerns associated with sewer (eliminating sewer), and the most sustainable long term cost.

1.3.4 Alternative 3A Impact Analysis

Each element included in Alternative 3A has been derived from one of the Build Alternatives that was thoroughly evaluated in the Draft EIR. As a result, all potential environmental impacts of Alternative 3A have been examined in the DEIR. No additional analysis is required. Rather, Alternative 3A combines components of the three Build Alternatives in such a way to lessen impacts and to avoid significant impacts. As such, Alternative 3A has been chosen as the preferred alternative. Since this alternative avoids any significant and unavoidable impacts (as summarized in Section 1.6 below), a statement of overriding considerations for unmitigated significant environmental effects is not required in accordance with Section 15091 of the CEQA Guidelines.

As noted in Section 1.3.2, minor design modifications of the bridge resulting from the Value Analysis recommendations would occur entirely within the estimated footprint evaluated in the Draft EIR for each Alternative. The modifications would not increase construction duration or modify construction method assumptions. The modifications would not therefore result in any new environmental impacts not already evaluated in the Draft EIR, nor would they substantially increase the severity of any impact identified in the Draft EIR.

1.4 Public Review Process

Public engagement has been ongoing during the development of the project goals and objectives and resulting Build Alternatives since 2020. In addition to the public notification associated with the CEQA process, State Parks has completed periodic public meetings to solicit public input on February 29, 2020, February 27, 2021, and June 17, 2023. An additional meeting with adjacent homeowners along the beach was conducted on March 28, 2024. This outreach is part of a greater effort to engage the public via ongoing social media, email, website, press releases and onsite posting updates.

In accordance with CEQA, the environmental review process for the proposed Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties in the scope of the Draft EIR, through a Notice of Preparation (NOP) Process. State Parks prepared and circulated an NOP to members of the public, local and state agencies, organizations, and interested parties to solicit comments on the proposed Project between May 23, 2022, and June 22, 2022. The availability of the NOP and notice of the public meeting was advertised in the Los Angeles Times on May 26, 2022. A virtual public meeting was held during the scoping period on June 11, 2022, from 10:00 a.m. to 11:15 a.m. via Zoom for

reviewing agencies and the public. A recorded presentation was shown during the public meeting and was made available to the public on the Resource Conservation District's website during the 30-day scoping period (https://www.rcdsmm.org/topanga-lagoon-restoration//).

The NOP was available on the project website and at local public facilities. Hard copies of the NOP were also available at the following public facilities during the public review period:

- Malibu Library, 23519 Civic Center Way, Malibu CA, 90265
- Calabasas Library, 200 Civic Center Way, Calabasas CA, 91302
- Topanga Library, 122 N. Topanga Cyn. Blvd., Topanga, CA 90290

Following the comment period for the NOP, a Draft EIR was prepared for the proposed Project. The NOP, and NOP comment letters were included in Appendix A of the Draft EIR. Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the Los Angeles County Clerk and the State Clearinghouse, a division of the Governor's Office of Planning and Research and circulated for public review. A notice of the availability of the Draft EIR for public review was also published in the Los Angeles Times on February 16, 2024, and public notification additionally occurred via email, media press releases, onsite postings, and social media blasts. The public comment period for the Draft EIR was from February 12, 2024, to April 12, 2024, exceeding CEQA's 45-day public comment period requirement. During the comment period, the Draft EIR was made available for review on the proposed Project's website: https://www.topangalagoonrestoration.org

In addition, hard copies of the Draft EIR were made available at the following public facilities:

- Malibu Creek State Park Office, 1925 Las Virgenes Rd., Calabasas, CA 91302
- RCDSMM Office, 4505 Las Virgenes Rd., Suite 215, Calabasas, CA 91302
- Topanga Library, 122 N. Topanga Cyn. Blvd., Topanga, CA 90290
- Malibu Library, 23519 Civic Center Way, Malibu CA, 90265
- Calabasas Library, 200 Civic Center Way, Calabasas CA, 91302

In-person public meetings were held on February 24, 2024 at the Annenberg Community Beach House and on February 28, 2024 at the Topanga Community Center during the 60-day public comment period for the Draft EIR. Comments were accepted in-person, online, and by mail via the following:

Website https://www.topangalagoonrestoration.org/

Mail California State Parks
Attn: John Ota, Environmental Scientist
City of Los Angeles
1925 Las Virgenes Road, Calabasas, CA 91302

This Final EIR was prepared following the Draft EIR comment period. In accordance with CEQA Guidelines Section 15088, this Final EIR includes responses to comments on environmental issues that were received during the comment period for the Draft EIR.

1.5 Final EIR Review, Certification, and Project Approval

Section 15088(b) of the CEQA Guidelines requires that the lead agency provide written responses to all agency comments no less than 10 days in advance of the meeting at which the EIR is considered for certification. Since State Parks with the support of Caltrans and County of Los Angeles as Responsible Agencies has chosen a Preferred Alternative that is a hybrid of the three Build Alternatives described in the Draft EIR, the Final EIR will be made available to all commentors for a 30-day period. State Parks will hold a public meeting during that period to update the public on the Final EIR and preferred Alternative. R

Prior to considering the project for approval, State Parks will review and consider the information presented in the Final EIR and will certify that the Final EIR has been adequately prepared in accordance with CEQA. Once the Final EIR is certified, State Parks may proceed to consider approval of Alternative 3A as the Preferred Project (CEQA Guidelines Section 15090; Section 15096(f)). Prior to approving the project, State Parks must make written findings and adopt statements of overriding considerations for each unmitigated significant environmental effect, if any, identified in the Final EIR in accordance with Section 15091 of the CEQA Guidelines.

1.6 Summary of Environmental Impacts

Table 1-2 summarizes the conclusions of the environmental impact analysis fully described in Chapter 3 of the Draft EIR, including the need for mitigation measures to achieve less than significant impacts. All Build Alternatives (Alternatives 2, 3, 4) and Preferred Build Alternative 3A would have temporary impacts associated with constructing and operating the proposed project features. Impacts associated with the No Project Alternative 1 assume that future conditions will result in degraded conditions at the site. However, since these conditions are not project impacts, no level of significance has been assigned to these effects and no mitigation measures would be applicable. Rather, Table 1-2 briefly describes the areas where future degradation is assumed for Alternative 1.

TABLE 1-2
SUMMARY OF IMPACT ANALYSIS BY ALTERNATIVE

Environmental Resource	Alternative 1 – No Action/ Managed Decline or No Build	Alternative 2 – Maximum Lagoon Habitat	Alternative 3 – Limited Lagoon Habitat Expansion	Alternative 4 – Maximum Managed Retreat	Alternative 3A – Hybrid Preferred Alternative
Aesthetics	Continued deterioration	LTSM	LTSM	LTSM	LTSM
Air Quality	No Impact	LTS	LTS	LTS	LTS
Biological Resources	Continued deterioration of biological resources	LTSM	LTSM	LTSM	LTSM
Cultural Resources	Continued deterioration of historic resources	SU	LTSM	LTSM	LTSM
Energy	No Impact	LTS	LTS	LTS	LTS
Geology, Soils, Seismicity, Topography, and Paleontology	Unabated coastal erosion impacts and slope failures	LTSM	LTSM	LTSM	LTSM
Greenhouse Gas Emissions/Climate Change	No Impact	LTS	LTS	LTS	LTS
Hazards and Hazardous Materials	Increased risks from SLR	LTSM	LTSM	LTSM	LTSM
Hydrology/Floodplain and Water Quality/Stormwater Runoff	Continued deterioration of water quality and flood impacts	LTSM	LTSM	LTSM	LTSM
Land Use and Land Use Planning	Non-conforming land uses	LTSM	LTSM	LTSM	LTSM
Noise and Vibration	No Impact	LTSM	LTSM	LTSM	LTSM
Public Services	Continued deterioration of septic system	LTSM	LTSM	LTSM	LTSM
Parks and Recreation	Coastal erosion impacts, no trails	LTSM	LTSM	LTSM	LTSM
Transportation and Circulation	Continued deterioration of bridge	LTSM	LTSM	LTSM	LTSM
Tribal Cultural Resources	No Impact	LTSM	LTSM	SU	LTSM
Utilities and Service Systems	Continued deterioration and non-conforming uses	LTSM	LTSM	LTSM	LTSM
Wildfire	Increased risk	LTSM	LTSM	LTSM	LTSM

NOTES:
NI = No Impact, no mitigation proposed
LTS = Less than Significant, no mitigation proposed
LTSM = Less than Significant Impact with Mitigation Incorporated
SU = Significant and Unavoidable

CHAPTER 2
Response to Comments

2.1 Introduction

Section 21091(d) of the Public Resources Code states that: "With respect to the consideration of comments received on a draft environmental impact report, the lead agency shall evaluate comments on environmental issues that are received from persons who have reviewed the draft and shall prepare a written response." The lead agency is not required to provide a response to comments provided outside of the allotted comment period. Section 21092.5 of the Public Resources Code requires that "At least 10 days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division." The California Department of Parks and Recreation (State Parks) is the CEQA Lead Agency for the Topanga Lagoon Restoration Project (proposed Project). This section of the Final EIR provides State Parks' responses to the written comments received during the comment period for the Draft EIR.

Section 2.2, *Comments Received on the Draft EIR*, includes a table with an assigned comment number, individual and/or organization names, and date the comment was received. The table also includes those commenters who provided verbal or written comments during the Draft EIR public comment meetings held on February 24, 2024, and February 28, 2024.

Section 2.3, *Hydrologic Modeling Master Response*, includes responses to common issues raised during the Draft EIR comment period. Section 2.4, *Response to Comments*, provides State Parks' responses to the comment letters and verbal comments received on the Draft EIR. Copies of the original comment letters and the oral transcript from the public meeting are provided in **Appendix T** of this Final EIR. As required by CEQA Guidelines Section 15088(c), the focus of the response to comments is "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided to comments that do not relate to environmental issues. However, in some cases, additional information has been added for reference and clarity.

2.2 Comments Received on the Draft EIR

TABLE 2-1
COMMENTS RECEIVED IN RESPONSE TO THE DRAFT EIR

No.	Name	Date Received
Federal Agencies		
AG 1	NOAA National Marine Fisheries Service	4/23/2024
State Agencies		
AG 2	Caltrans	4/12/2024
AG 3	California Coastal Commission – Michelle Kubran	4/12/2024
AG 4	California State Lands Commission	4/12/2024
AG 5	California Department of Fish and Wildlife	4/12/2024
AG 6	Caltrans	4/24/2024
AG 7	California Coastal Commission – Michelle Kubran	4/30/2024
Local Agencies		
AG 8	Los Angeles County Department of Regional Planning	2/28/2024
AG 9	City of Malibu – Richard Mollica	4/9/2024
AG 10	City of Malibu – Patricia Salazar	4/11/2024
AG 11	Department of Beaches and Harbors – Warren Ontiveros	4/12/2024
AG 12	County of Los Angeles Department of Public Works	5/31/2024
Organizations		
ORG 1	Friends of Topanga Point	3/31/2024
ORG 2	Santa Susana Mountain Park Association	4/12/2024
ORG 3	Ocean Conservation Society	4/12/2024
ORG 4	Xerces Society	4/12/2024
ORG 5	Surfrider Foundation	4/12/2024
ORG 6	Santa Monica Mountains Conservancy	4/12/2024
ORG 7	Los Angeles Conservancy	4/12/2024
ORG 8	California Native Plant Society	4/12/2024
ORG 9	Heal the Bay, Friends of Ballona Wetlands, LA Waterkeeper, California Trout, Loyola Marymount University Center for Urban Resilience, and E Read & Associates, Inc.	4/12/2024
Individuals		
IND 1	David W. Kay	2/13/2024
IND 2	Elizabeth Tracy	2/13/2024
IND 3	Jim Robertson	2/14/2024
IND 4	Linda Hill	2/15/2024
IND 5	Claire Sanders	2/15/2024
IND 6	Margaret L. Stuber	2/15/2024
IND 7	Alan DeRossett	2/16/2024
IND 8	A Sakimoto	2/20/2024
IND 9	Samir Patel	2/23/2024

No.	Name	Date Received
IND 10	Anonymous Commenter	2/24/2024
IND 11	Madelyn Glickfeld	2/24/2024
IND 12	Madelyn Glickfeld	2/24/2024
IND 13	Madelyn Glickfeld	2/24/2024
IND 14	Madelyn Glickfeld	2/24/2024
IND 15	Judy Villablanca	2/24/2024
IND 16	Steve Levin	2/24/2024
IND 17	Anonymous Commenter	2/24/2024
IND 18	Dennis Washburn	2/24/2024
IND 19	Andrew McPhee	2/24/2024
IND 20	Anonymous Commenter	2/24/2024
IND 21	Anonymous Commenter	2/24/2024
IND 22	David Tokofsky	2/26/2024
IND 23	Chloe Kim	2/26/2024
IND 24	Beate Nilsen	2/28/2024
IND 25	Tom	2/28/2024
IND 26	R.C Brody	2/28/2024
IND 27	James Erickson	2/28/2024
IND 28	Anonymous Commenter	2/28/2024
IND 29	Michael Anapol	2/29/2024
IND 30	Chad White	2/29/2024
IND 31	Chester Griffiths, Michael Bedner, Ron Kurstin, Cami Colbert, Christine Lee Griffiths, Lloyd Ahern	3/4/2024
IND 32	Sally Reinman	3/6/2024
IND 33	Andy Cracchiolo	3/8/2024
IND 34	Keon Smith	3/9/2024
IND 35	Lucinda Mittleman	3/13/2024
IND 36	Angela de Mott	3/13/2024
IND 37	Karen Martin	3/15/2024
IND 38	Stacy Sledge-Baldino	3/27/2024
IND 39	Larissa Hadijo	3/27/2024
IND 40	Jessica Thompson	3/28/2024
IND 41	Brad Folb	3/28/2024
IND 42	Florence Nishida	3/31/2024
IND 43	Gilbert Dembo	3/31/2024
IND 44	Tam Taylor	4/1/2024
IND 45	Candace De Puy	4/2/2024
IND 46	William Alford	4/3/2024
IND 47	Scott Dittirich	4/7/2024
IND 48	Ken Torimaru	4/9/2024

No.	Name	Date Received
IND 49	Lloyd Ahern	4/10/2024
IND 50	Susan Duenas	4/11/2024
IND 51	Jaz Bennassar	4/11/2024
IND 52	Natasha Roit	4/11/2024
IND 53	Karin Bens	4/11/2024
IND 54	Catherine Tirr	4/11/2024
IND 55	Lisa Rand	4/11/2024
IND 56	Dorothy Steinicke	4/11/2024
IND 57	Patt Healy	4/11/2024
IND 58	Kraig Hill	4/11/2024
IND 59	Gerlinde Gautrey	4/12/2024
IND 60	Louise Ratliff	4/12/2024
IND 61	Charley Griffiths	4/12/2024
IND 62	Kenneth Widen	4/12/2024
IND 63	Elisabeth Bersin	4/12/2024
IND 64	Stephanie Faulkner	4/12/2024
IND 65	Lou Porter	4/12/2024
IND 66	Tamara Gould	4/12/2024
IND 67	Dr Chris Harz	4/12/2024
IND 68	Michael Hari	4/12/2024
IND 69	Becky Rickley	4/12/2024
IND 70	Susan Mahler	4/12/2024
IND 71	Karen Harper	4/12/2024
IND 72	Susan Nissman	4/12/2024
IND 73	Cohen	4/12/2024
IND 74	Christine Griffiths	4/12/2024
IND 75	Marti Whitter	4/12/2024
IND 76	Chester Griffiths	4/12/2024
IND 77	Brian Cinadr	4/12/2024
IND 78	Holly Beverly	4/12/2024
IND 79	Sunset Mesa Property Owners	4/12/2024
IND 80	RWG Law – Laurence Wiener	4/12/2024
IND 81	Kelli Frye	4/12/2024
Public Meeting Comments		
PUB 1	Jay Shields	2/24/2024
PUB 2	Aaron Clark	2/24/2024
PUB 3	Anonymous Speaker	2/24/2024
PUB 4	Anonymous Speaker	2/24/2024
PUB 5	Anonymous Speaker	2/24/2024

No.	Name	Date Received
PUB 6	Anonymous Speaker	2/24/2024
PUB 7	Anonymous Speaker	2/24/2024
PUB 8	Christine Lee Griffiths	2/24/2024
PUB 9	Will Alfred	2/24/2024
PUB 10	Anonymous Speaker	2/24/2024
PUB 11	Anonymous Speaker	2/24/2024
PUB 12	Anonymous Speaker	2/24/2024
PUB 13	Anonymous Speaker	2/24/2024
PUB 14	Michael Bedner	2/24/2024
PUB 15	Ron Kurstin	2/24/2024
PUB 16	Dennis Washburn	2/24/2024
PUB 17	Eugenia Ermacora	2/24/2024
PUB 18	Alisa Land	2/24/2024
PUB 19	Anonymous Speaker	2/24/2024
PUB 20	Anonymous Speaker	2/24/2024
PUB 21	Anonymous Speaker	2/24/2024
PUB 22	Anonymous Speaker	2/24/2024
PUB 23	Lloyd Ahern	2/28/2024
PUB 24	Chester Griffiths	2/28/2024
PUB 25	Anonymous Speaker	2/28/2024
PUB 26	John Luker	2/28/2024
PUB 27	Matt	2/28/2024
PUB 28	Anonymous Speaker	2/28/2024
PUB 29	Keon Smith	2/28/2024
PUB 30	Jay Shields	2/28/2024
PUB 31	Carolyn Day	2/28/2024
PUB 32	Anonymous Speaker	2/28/2024
PUB 33	Kris Wolfe	2/28/2024
PUB 34	Christine Lee Griffiths	2/28/2024
PUB 35	Dennis Robert Smith	2/28/2024
PUB 36	Anonymous Speaker	2/28/2024
PUB 37	Anonymous Speaker	2/28/2024
PUB 38	Randy Johnson	2/28/2024
PUB 39	Carrie B.	2/28/2024
PUB 40	Anonymous Speaker	2/28/2024
PUB 41	Michael	2/28/2024
PUB 42	Anonymous Speaker	2/28/2024

2.3 Hydrologic Modeling Master Response

A Master Response has been prepared in order to provide comprehensive responses to address multiple, similar comments that have been raised on key topics during the Draft EIR public review period. Where appropriate, references to the Master Response are provided within the individual responses to comments prepared in Section 2.4, *Responses to Comments*. The Master Response focuses on Hydrologic Modeling which was commonly raised among the comments received on the Draft EIR.

2.3.1 Master Response - Hydrology and Flooding

Several comments were received expressing concern that the Proposed Project could adversely affect properties on the beach adjacent to the State Park and County beach to the west. These neighboring properties are beach-front homes located in the City of Malibu and are accessed by Topanga Beach Drive connected to PCH approximately 250 feet west of the City of Malibu/unincorporated Los Angeles County boundary. The concerns focus on the potential for the widened channel to increase flood risks and beach erosion at these neighboring properties. This Master Response compiles information included in the Draft EIR that describes the forces that affect channel dynamics and beach morphology and summarizes results of the predictive hydrological modeling conducted to support the environmental impact analysis.

Hydrology, Sedimentation, and Breach Analyses

The Draft EIR includes a detailed hydrologic modeling effort summarized in **Appendix B** and **Appendix E** that estimates flood flow and morphologic dynamics at the Topanga Beach during a 10-year and 100-year flow event. These reports are based on the best available data of the lagoon's flooding and breaching dynamics and the studies were conducted by Moffatt & Nichol, an established coastal engineering firm with extensive experience along the Malibu coast.

Appendix B (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on pages 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll used as a helicopter landing area and the lifeguard and public restroom buildings would not cause more erosion on adjacent beaches. This statement is supported by the historic photographs showing the conditions of the rocky delta that anchors the position of the shoreline and beaches shown in Figures 5.1-5.7 (pgs. 46-51 **Appendix B**).

Appendix E (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment

Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The model was calibrated using data from the Topanga Stream Gage F54C-R from 1996-2019 along with annual peak flow data from 1930-2018 provided by Los Angeles County Department of Public Works (page 7, Technical Report for Hydraulics, Sediment Transport and Sea Level rise Analyses, **Appendix E**). Additionally, beach morphology and breach analyses utilized observed breach centerlines and inlet dimensions (Table 5-1, ESA 2020 **Appendix M**).

The sediment transport results are summarized on page 35 and 36 of that report (Moffatt & Nichol 2022). The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably and that each Alternative would increase fish passage opportunities.

The modeling predicts no impact to properties or the shoreline west of the lagoon based on the predicted thalweg position which is constrained by 1) topography of the surrounding areas, 2) the western-most bridge abutment (Abut4) and embankment, and 3) the underlying cobble delta. Due to these factors, the stream course will continue to be constrained and prevent a western shift of the creek thalweg toward the neighboring properties as further described below.

Topography, Bridge Abutment, and Ocean Currents

The modeling evaluates whether the grading of the side-slopes and removal of the locally sourced fill material that currently fills the area surrounding the lagoon would alter the channel morphology or location in a manner that could adversely affect neighboring properties. The modeling results indicate that the thalweg (lowest point of the channel) will remain close to the existing location within the 200-ft main span of the PCH bridge.

The shoreline morphology modeling analysis (**Appendix B**) uses the advanced Delft3D modeling suite. The modeling area shown in **Figure 2-1** stretches from Big Rock Beach to the west to Gladstones Beach to the east. This model domain is inclusive of the properties to the west of the project. The model is calibrated with the most recently available beach profile and Lidar data. The model simulated the shoreline morphology changes under the typical dry weather, 10-year fluvial storm and extreme 100-year fluvial storm conditions for 1-year and 5-year post construction. The Draft EIR (Hydrology, Flood and Water Quality Section 3.9) used model results and evaluated the potential project impacts to public beaches and adjacent properties in all those above-mentioned conditions.

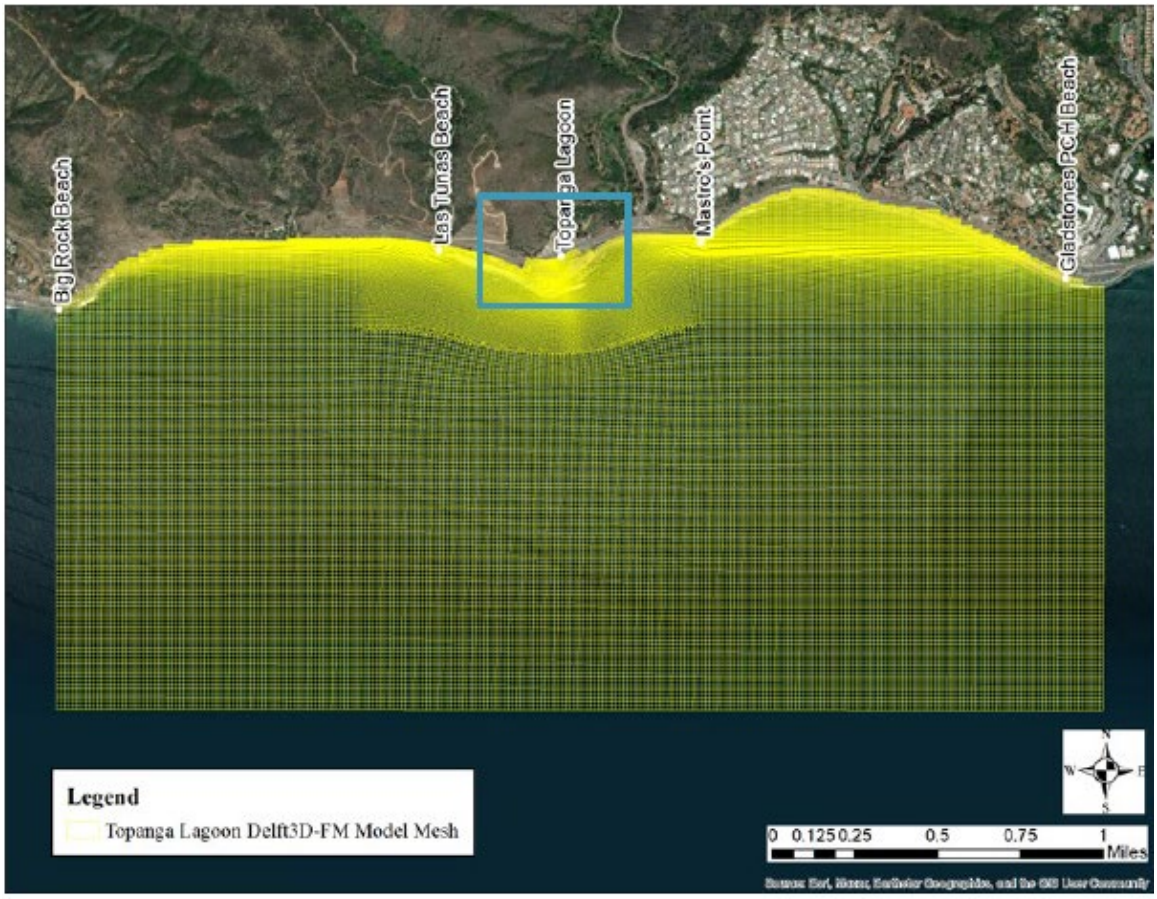

Figure 2-1 Delft3D Morphologic Modeling Mesh and Domain

As shown in **Figure 2-2** below, the model predicts that the primary creek channel (pilot channel) would remain within the 200-foot main span of the bridge between Bents 2 and 3, which is about 200 feet east of the western Bridge Abutment (Abut4). As shown in Figure 2, the western bridge abutment will be protected with rocks and bioengineered protection meeting Caltrans design requirements that will establish and control the western channel edge, and the westmost possible migration. The western channel invert is +10 feet NAVD88 which is 6 feet higher than the main creek thalweg of +4 feet NAVD88 and more than 150 feet west of the main creek thalweg; then, it is flanked on the west by a bank that will rise up to +16 feet and be protected by rocks as a physical barrier, preventing any further westward migration of the channel in the westward direction. Grading begins on the outer edge of the riparian trees in the bank which will initially retain much of the existing bank to retain shade and provide erosion protection to the slope.

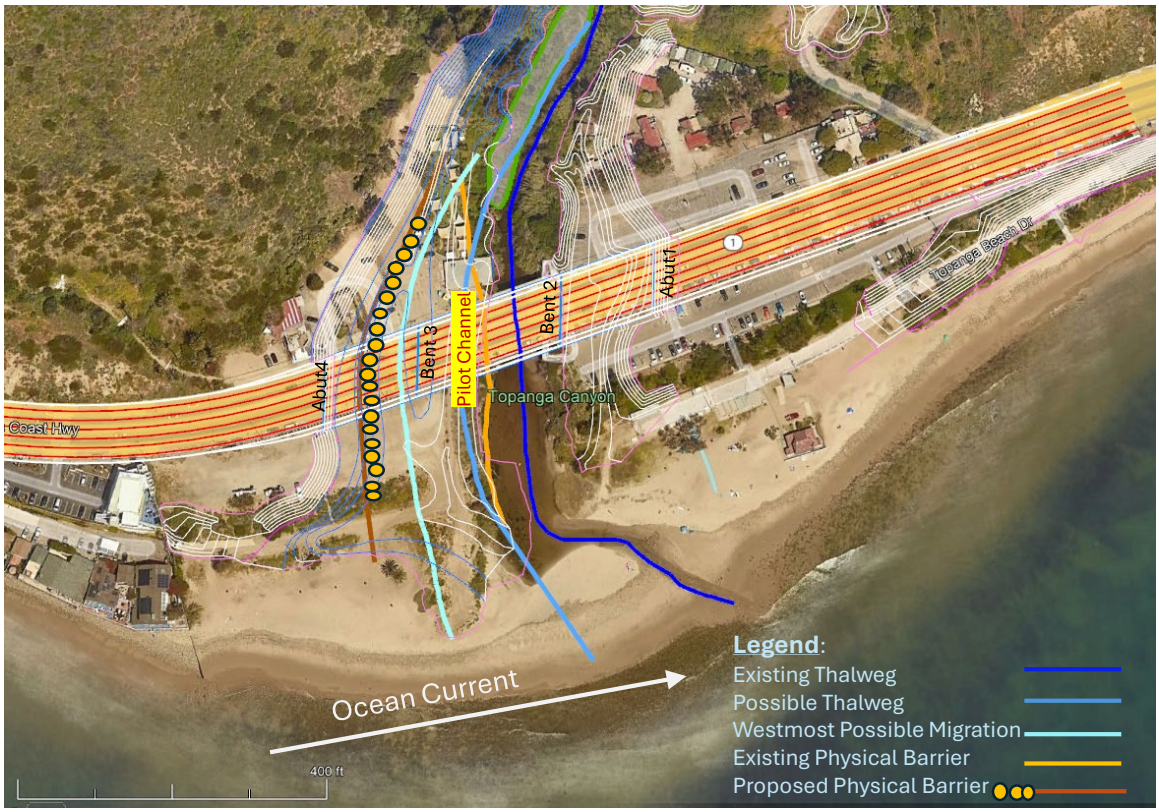

Figure 2-2 Pilot Channel Location, Thalweg and Physical Barrie

The modeling predicts that although the thalweg may shift west to some extent within the 200 feet main bridge span during the highest flood flow period, it will gradually migrate east as the flow discharge drops off due to predominant easterly longshore currents. The modeling and this documented historic pattern of the lagoon breach occurring on the existing western edge of the lagoon during high flow events is followed by gradual and steady migration towards the east under the forces of longshore drift by waves and tides. As shown in Figure 4.17 through Figure 4.19 (pages 42–44) in **Appendix B**, the eventual western breaching channel is predicted to remain near the historic breaching location in the main channel and is not predicted by the model to migrate far enough west to encroach onto neighboring properties. The longer-term position of the mouth predicted by modeling is farther to the east nearer to the lifeguard and public restroom building. The modeling results do not indicate that a channel would be created along the western bank of the lagoon edge. It is not possible for the channel to shift further westward from the western most abutment to the existing residences located over 200 feet further west since the bridge abutment will prevent further westward migration beyond it.

The creek flow exits the canyon at a very high speed and jets straight into the ocean as evidenced in the recent flood and as described by Dr. Tony Orme of UCLA. Dr. Orme performed a sediment yield study in 2002 for the area and he called the creek a “chute,” meaning flows move very fast (in a supercritical flow condition) and when the creek turns toward the south just upstream of Highway 101, it continues in a straight line out into the ocean. The creek has too much momentum to meander and spread to the west during a flood. Topanga Creek is not like a creek that exists in flat areas in the mid-west U.S., where there is room to meander, but is similar to

flows through an exaggerated steep canyon, where flows continue straight into the ocean when draining through the mouth during floods. Then after flood waters recede, the ocean takes control and turns creek outflows to the east.

Cobble Delta

As described in **Appendix B** of the Draft EIR, the position of the beach along Topanga Point and immediately up- and downcoast is the result of the large cobble delta feature. With the large cobble delta remaining in place, the shoreline position will remain relatively stable. As evidenced in historical imagery from **Figure 2-3** (1928) through **Figure 2-6** (2023), the Topanga Point had been stable before and after the existence of the current bridge, imported fill material, and the knoll used as a helicopter landing area. The cobble delta extends southward into the ocean and is bigger than what is being seen above water. The delta results in wave breaking farther away from the shore resulting in the surf break as shown in **Figure 2-3** and **Figure 2-6**.

The position of the shoreline at this location is well-anchored by the resistant and unmoving cobble delta. The delta serves two functions: 1) to anchor the position of the shoreline due to its armoring effect on the shore, and 2) to cause wave energy to focus on the delta (wave refraction and convergence) and dissipate adjacent to the delta (wave diffraction and divergence). The result of wave refraction over the delta is that wave energy is expended across the delta and less is available to erode the beach landward of the delta, resulting in beach formation. It also results in sand being deposited on either side of the delta in small pocket beaches in the areas of lower wave energy just up- and downcoast of the feature as shown in **Figure 2-7**.

Figure 2-3 Prior to Creation of Knoll Used as a Helicopter Landing Area; 1928 Aerial (FrameFinder, UCSB.edu)

Figure 2-4 Evidence of Knoll West of Lagoon at Beach; 1940 Aerial (FrameFinder, UCSB.edu)

Figure 2-5 Evidence of Knoll West of Lagoon at Beach; 1947 Aerial (FrameFinder, UCSB.edu)

Figure 2-6 Current Condition of Knoll Area West of Lagoon at Beach; 2023 Aerial (Nearmap.com)

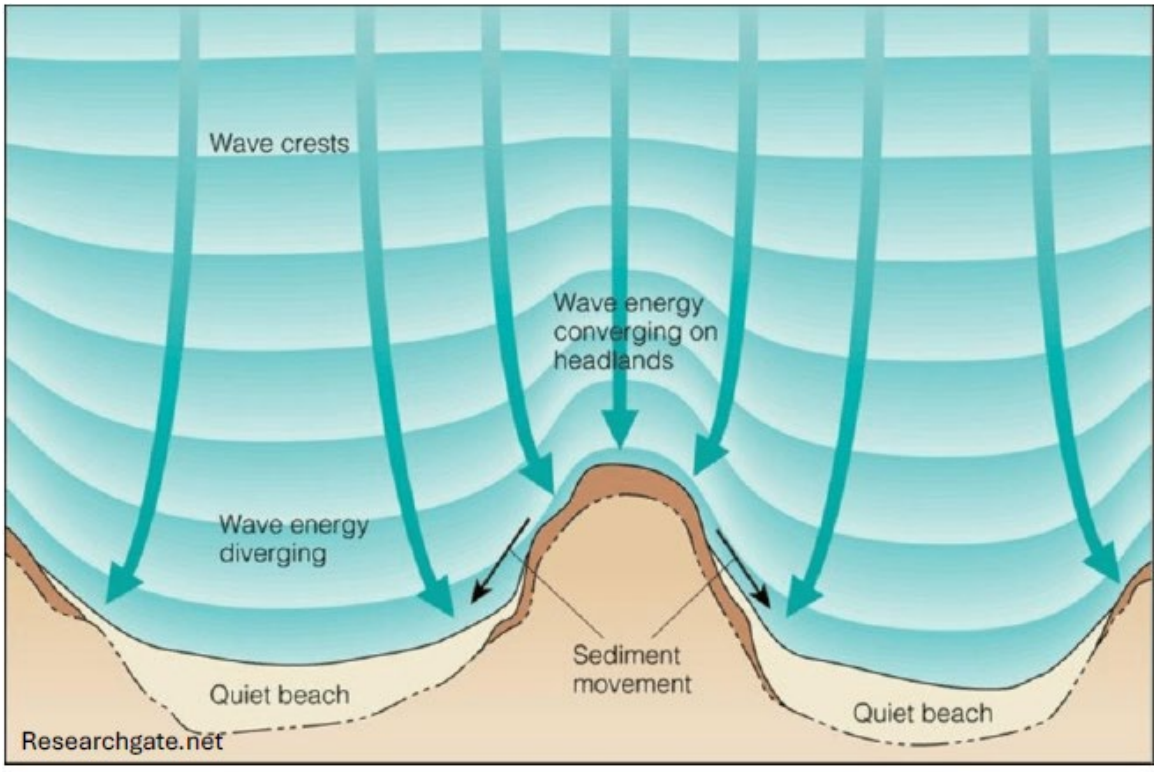

Figure 2-7 Schematic of Typical Wave Energy Around Headlands

Information Received from Commentors

Comments were received on the Draft EIR from the property owners contiguous with the project site toward the west within the City of Malibu, raising concerns on the potential for the project to increase the risk of flood inundation from creek runoff westward of the existing channel that could encroach into neighboring properties. The comments requested that flood impacts be modeled assuming that the creek channel migrates farther west than expected. The comments provided a map with a blue line drawn to depict a western channel. This channel location is not supported by any technical data including the modeling described above or in **Appendix E** due to elevation and channel control measures of the project including the bridge abutment. The blue line shown in the comment is an arbitrary line drawn on a topographic map and is not supported by data. Conducting a model using the proposed channel geometry would require altering elevation and channel morphology to conditions not reflecting the actual or proposed conditions. Additional modeling with inaccurate assumptions would not be instructive. Similarly, conducting additional modeling of debris flows using inaccurate assumptions would not provide useful information or add to the current understanding of the hydrology and sediment transport dynamics of the creek as described in **Appendix E**.

Knoll Landing Area

Comments received on the Draft EIR suggest that the "Helipad" knoll may be controlling beach erosion and channel morphology. The landing area used as a de-facto helipad does not meet FAA standards as a designated and mapped helipad. However, it is currently used as a landing area for emergency helicopters conducting rescue efforts. The hydrological modeling summarized in **Appendix B** concludes that the knoll landing area is not creating stability of the flow channel or the beach berm. The current knoll landing area is an emergency landing area and was not officially constructed for its current use. The project proposes moving it to the east of creek to be closer to the lifeguard and public restroom building and to be constructed to meet current FAA standards. It will also have a water hydrant providing opportunity for the site to support wildfire air operations when needed.

The knoll landing area is positioned landward of the mean high tide line and shows no bearing on the position of the shoreline, as demonstrated in all historical images and specifically shown in **Figure 2-8** with a yellow line. In addition, sand retention features are typically hard structures such as rock or sheet pile groins because they are in direct contact with the water and impacted by waves, rather than the soft earthen fill of the knoll landing area. The reasons the knoll landing area has not been eroded away are due to the protection and sheltering of the large cobble delta and its distance from the water. Hence, the knoll landing area is not functioning as sand-retaining groin. The bluff between the lagoon and the sheet-pile sand retention wall to the west is located far enough back from the water to provide space for a beach to exist. The modeling and historic photographs indicate that the knoll landing area does not provide sand retention functions. Removing the knoll landing area will not affect beach erosion requiring any nourishment or sand retention to the west. There is no work proposed that would change the existing and natural beach berm elevation. All proposed work is landward of the Mean Higher High Tide line. The existing groin along the private property line clearly shows that sand accumulates on the west side of the groin indicating sand movement from west to east. Any effects of the project on the shoreline

would occur east of the project area along the coast rather than to the west. The groin upcoast of the project area may be holding sand along a private beach that could benefit the public beach at Topanga.

The knoll landing area is a relatively small feature that does not influence the shoreline position. Rather, the cobble delta at the center of the historic creek discharge channel influences the shoreline position as a large feature that armors the shoreline and breaks up wave energy, resulting in beaches in its lee and on both sides of the delta. The shoreline position at Topanga Point and the sandy beaches to the north, west and the east are all a function of the existence of the large cobble delta rather than the knoll landing area. Those beaches existed prior to the existence of the knoll landing area as shown in historic photographs noted above. As described in **Appendix B**, the cobble delta at Topanga Point serves as a large wave refraction feature that causes incoming ocean waves to bend (refract) around the delta upon approaching the shoreline. This wave refraction results in a convergence of wave energy on the delta and a divergence of wave energy on both sides of the delta. The divergence of wave energy adjacent to the delta results in lower wave energy on either side and deposition of sand creating small beaches. The knoll is not a sand retention feature and does not hold the position of the beach west of the inlet.

The knoll landing area was constructed with locally sourced sandy fill materials, and it is relatively stable there due to the presence and protection of the large cobble delta. Without the large cobble delta protection, the knoll landing area would potentially have been eroded and removed by waves and currents. Also, there is an existing sand retention device installed by the homeowners visible in Figure 2-8. The lagoon is located “downcoast” of the homes as demonstrated in Figure 2-8; the sand is being retained on the west side of the sand retention devise. Hence, the lagoon restoration will not impact the shoreline near the homes.

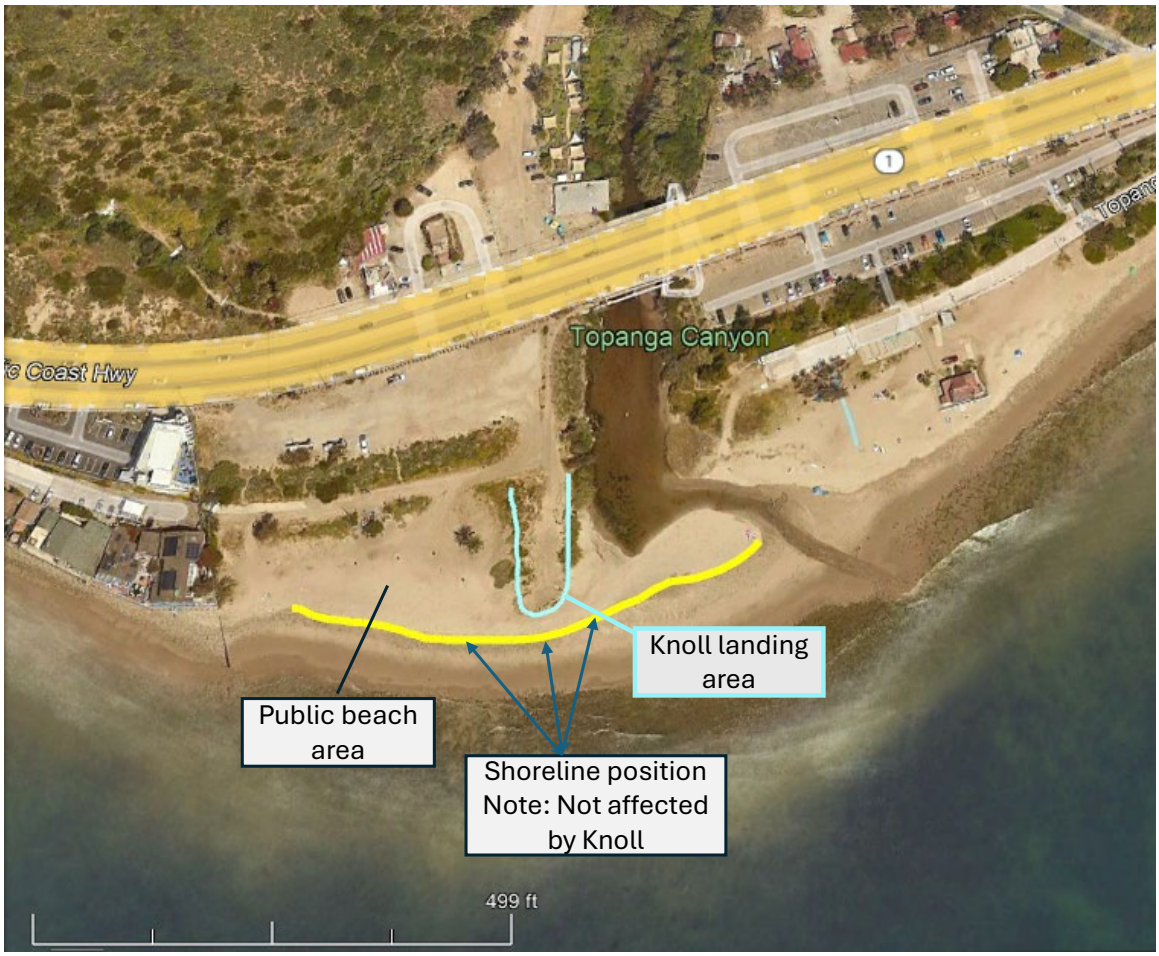

Figure 2-8 Knoll Landing Area and Shoreline (Google Earth)

2.4 Responses to Comments

TABLE 2-2
RESPONSES TO COMMENTS ON THE DRAFT EIR

Comment Number	Comment	Response
NOAA National Marine Fisheries Service		
AG 1-1	Attached is Mark Capelli's letter regarding the Topanga Lagoon Restoration Project. If you have any questions, or require more information, please contact Mark Capelli at mark.capelli@noaa.gov or (805) 963-64788. Thank you	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 1-2	Dear Mr. Ota: Enclosed with this letter are NOAA's National Marine Fisheries Service's (NMFS) comments on the Draft Environmental Impact Report (DEIR) for the proposed restoration of Topanga Creek Lagoon. We understand the proposed project involves the expansion of the Topanga Creek and lagoon ecosystem, chiefly through replacement of the existing Pacific Coast Highway Bridge (SR-1 #53-0035) with a longer bridge to accommodate natural fluvial processes and lagoon restoration, and deposition of project-related fill material in the nearshore marine environment to replenish nearby beaches. The project will also entail the relocation of State Park Recreational facilities on the beach that are threatened by projected sea-level rise, and the construction of new visitor service facilities at the northwest corner of the Pacific Coast Highway intersection.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 1-3	As explained more fully in the enclosure, we are generally supportive of this project, which implements one of the key recovery actions identified for Topanga Creek in NMFS' Southern California Steelhead Recovery Plan (2012), though there are outstanding issues regarding the deposition of fill material into the nearshore environment. Based on our current understanding of the alternatives identified in the DEIR, Alternative 2 appears to provide the maximum lagoon restoration and, therefore, the greatest potential to support recovery of federally listed endangered southern California steelhead (Oncorhynchus mykiss) that utilize Topanga Creek and lagoon. Our specific comments on the DEIR are presented in the enclosure.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks, DBH and Caltrans developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
AG 1-4	NMFS appreciates the additional time provided to submit comments on this important restoration project. If you have a question or would like additional information, please contact Mark H. Capelli at mark.capelli@noaa.gov or (805) 963-64788. Sincerely, Anthony P. Spina Supervisor, Southern California Branch California Coastal Office	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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AG 1-5	Introduction Southern California steelhead were listed under the U.S. Endangered Species Act as endangered in 1997. NMFS originally listed the Southern California Steelhead as endangered, from the Santa Maria River to the Santa Monica Mountains, under the Evolutionary Significant Unit (ESU) policy in 1997 (62 FR 43937), and extended the listing to cover the populations southward from the Santa Monica Mountains to the United States U.S. Mexico border in 2002 (67 FR 21586). The listing was reconfirmed using the Distinct Population Segment (DPS) policy in 2016, including reaffirming the endangered status for the Southern California Steelhead DPS (81 FR 33468). As explained more fully below, we support restoration of Topanga Creek Lagoon1 because of the anticipated benefits to the long-term survival and recovery of endangered southern California steelhead (Oncorhynchus mykiss).	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 1-6	Topanga Creek Topanga Creek is one of 4 core steelhead recovery populations comprising the Santa Monica Mountains Biogeographic Population Group (BPG) within the Southern California Steelhead Recovery Planning Domain. Currently, only the Topanga Creek watershed retains a remnant population of O. mykiss, and this population is threatened by a variety of natural and man-made activities, including reoccurring drought conditions in southern California (Dagit et al. 2015, 2017, 2019, Dagit and Krug 2016, Stillwater Sciences et al. 2020, NMFS 2023). Topanga Creek is identified as a Core 1 steelhead recovery population in NMFS' Southern California Steelhead Recovery Plan (NNMFS 2012), and is therefore a high priority recovery watershed where recovery of viable steelhead populations is necessary to meet the viability criteria and ultimate goal of delisting the Distinct Population Segment (DPS) of the federally endangered Southern California Steelhead DPS. The Core 1 populations have been identified as the highest priority for recovery actions based on a variety of factors, including: the intrinsic potential of the population in an unimpaired condition; the role of the population in meeting the spatial and/or redundancy viability criteria; the current condition of the populations; the severity of the threats facing the populations; the potential ecological or genetic diversity the watershed and population could provide to the species; and the capacity of the watershed and population to respond to the critical recovery actions needed to abate those threats. Core 1 populations form the nucleus of the recovery implementation strategy and must meet the population-level viability criteria set out in NMFS Southern California Steelhead Recovery Plan (See NMFS 2012, Chapter 6, Steelhead Recovery Goals, Objectives & Criteria, Table 6-1.) In 2005, NMFS designated critical habitat for the endangered Southern California Steelhead DPS within the areas occupied by the species at the time of its listing (70 FR 52488). Critical habitat is defined as: (1) specific areas within the geographical area occupied by the species at the time it is listed on which are found those physical or biological features essential to the conservation of the species, and which may require special management considerations or protection; and (2) specific areas outside the	The Draft EIR notes the presence of steelhead in Topanga Creek on page 2-6.

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	geographical area occupied by the species at the time it is listed upon a determination by the Secretary that such areas are essential for the conservation of the species. Approximately 4 miles of critical habitat are designated in Topanga Creek watershed, including the Topanga Creek Lagoon (See Figure 1, Topanga Watershed Steelhead Critical Habitat Map). Additionally, NMFS' Southwest Fisheries Science Center – Santa Cruz Laboratory mapped intrinsic potential steelhead over-summering habitat within the Southern California Steelhead Recovery Planning Area, including the Santa Monica Mountains BPG (Boughton and Goslin 2006). That habitat classification is based on observed associations between fish distributions and the values of environmental conditions such as stream gradient, summer mean discharge and air temperature, ratio of valley-width to mean-discharge, and the presence of alluvial deposits, which are essential to successful steelhead spawning and rearing (Boughton and Goslin 2006, Boughton et al. 2006). Approximately 12 miles of Topanga Creek are identified as having high intrinsic potential, including the Topanga Creek Lagoon. (See Figure 2, Topanga Intrinsic Potential Steelhead Spawning and Rearing Habitat Map).	
AG 1-7	Topanga Creek Recovery Actions The replacement of the Pacific Coast Highway culvert over Topanga Creek is identified as a Critical Recovery Action in NMFS Southern California Steelhead Recovery Plan. Table 11.3 Critical recovery actions for Core 1 populations within the Santa Monica Mountains BPG stipulates: "Develop and implement plan to replace the U.S. 101 [sic - Pacific Coast Highway] culvert over Topanga Creek with a full span bridge to remove fill from Topanga Creek Estuary, and allow natural migration to upstream spawning and rearing and passage of smolts and kelts downstream to the estuary and the ocean habitat. Develop and implement a restoration and management plan for the Topanga Creek Estuary." NMFS 2012, p. 11-11. The replacement of the existing culvert and the development of an estuary management plan is also called out in the following specific recovery actions of the recovery plan: TopC-SCS-3.1 (Culverts and Road Crossings) "Develop and implement plan to prioritize, remove and/or modify anthropogenic fish passage barriers within the watershed to allow natural rates of adult and juvenile O. mykiss migration between the estuary and upstream spawning and rearing habitats, passage of molts and kelts downstream to the estuary and the ocean, and to reduce intrusion into the riparian corridor and restore sediment transport." NMFS 2012, p. 11-29 TopC-SCS-11.3 (Approach Fill for Railroad Lines and Roads) "Develop and implement plan to remove or reduce approach-fill for railroad lines and roads and maximize the clear spanning of active channels, floodways, and estuaries to accommodate natural river and estuarine fluvial processes to protect all O. mykiss lifehistory stages, including adult and juvenile migration, spawning, incubation and	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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	rearing habitats." NMFS 2012, p. 121-31 TopC-SCS-12.1 (Upslope/Upstream activities). "Develop and implement restoration and management plan for the relevant estuary. To the maximum extent feasible, the plan should include restoring the physical configuration, size and diversity of the wetland habitats, eliminating exotic species, controlling artificial breaching of the sand bar, and establishing an effective buffer to restore estuarine functions and promote O. mykiss use (including rearing and acclimation) of the estuary." NMFS 2012, p. 11-31	
AG 1-8	NMFS' 2023 5-Year Status Review NMFS 2023 5-Year Review for Southern California Steelhead identified a number of "Population Specific Key Emergent or Ongoing Habitat Concerns" for Topanga Creek (NMFS 2023). These included: • Fish passage impediments created by numerous road crossings (e.g., culverts) throughout the coastal watersheds, including Highway 1 along a major portion of the ocean frontage of the Santa Monica Mountains BPG (e.g., Big Sycamore Canyon Creek, Arroyo Sequit, Topanga Creek). NMFS 2023, p, 71 • Degradation of estuarine habitat through impaired water quality runoff (from both urban and agricultural land uses (including fine sediments and pesticides), artificial breaching of the sandbar, and reduction in the size and complexity of estuarine habitats resulting from the intrusion of roads, as well as urban land-uses (e.g., Big Sycamore Canyon, Arroyo Sequit, Malibu Creek, Topanga Creek). See, for example, Dagit (2015), Capelli (2022, 2023). NMFS 2023, p. 71 Among the "Recommended Future Actions Over the Next 5 Years Toward Achieving Population Viability" that are identified in the recovery plan for Topanga Creel involve the following: • Topanga Creek: Initiation of studies to remove and replace the bridge/culvert over the lower reach of Topanga Creek/Estuary (NMFS 2012: Recovery Actions TopC-SCS-3.1). NMFS 2023, p. 76 • Completion of studies and implementation of the plan for the replacement and enlargement of CalTrans U.S. Highway 1 bridge over Topanga Creek/Estuary (NMFS 2012a: Recovery Actions TopC-SCS-11.1 – 11.3; TopC-SCS-12.1). NMFS 2023, p. 76	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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AG 1-9	Topanga Creek Lagoon Restoration Removal of the existing culvert and replacement with a full-span bridge over Topanga Creek Lagoon and restoration of the aerial extent and morphology of the Topanga Creek bar-built estuary/lagoon implements one of the critical recovery actions identified in NMFS' Southern California Steelhead Recovery Plan (NMFS 2012), and would set an important precedent for a number of other bridge replacement projects for core recovery populations in the Santa Monica Mountains BPG, including Big Sycamore Canyon, Arroyo Sequit (completed), Malibu Creek, Los Flores Canyon, as well as elsewhere in the Southern California Steelhead DPS (see, for example, Capelli 2022, 2023). Small bar-built coastal estuaries, such as Topanga Creek Lagoon, have the potential to play an important role in the fresh-water life-history phase of steelhead by providing a productive environment for rearing juvenile steelhead (Bond, et al. 2008, Hayes, et al. 2008, 2011, Jacobs, et al. 2011, Largier, et al. 2019, Largier 2023). Restoring the size and complexity of the Topanga Creek Lagoon would enhance its current degraded potential to support rearing juvenile steelhead, and in particular the "lagoon-anadromous" form of the species, which is one of the three basic life-history forms identified by NMFS' Technical Recovery Team as contributing importantly to the life-history diversity and therefore the viability of the species (Boughton et al. 2006).	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 1-10	Specific Comments The Topanga Lagoon is situated on a marine delta formed by the deposition of sediments derived from the Topanga Creek watershed (Bates 1953, Ferren et al. 1995, Bhattacharya and Giosan 2005, Zavala et al. 2021). In addition to the naturally derived, transported, and deposited sediments, the delta has been modified by the deposition of imported fill material to form the approaches for the Pacific Coast Highway crossing over Topanga Creek. The draft EIR indicates that up to 256,000 cubic yards (cy) of soil would be removed from the existing fill areas to contour the new lagoon, with excavations ranging from 8 to 30 feet deep. Placement of some of this excavated fill in the nearshore marine environment could temporarily cover up to 35 acres of nearshore habitat that could be utilized by steelhead smolts emigrating out of the Topanga Creek Lagoon. Juvenile steelhead (along with other Pacific anadromous salmonids) depend on feeding at high levels to achieve initial growth necessary for survival and maturation in the ocean (Mueter et al. 2005, Peterson et al. 2006, Grimes et al. 2007, Moore and Berejikian 2017; see also references in Hertz and Trudel 2014). Nearshore habitat in the vicinity of the project includes rocky habitat that harbors marine species that juvenile steelhead potentially prey upon. (See Figure 3, Topanga Bar-Built Estuary/Lagoon and Nearshore Habitats,aerial photo that documents the historic lagoon, and nearshore habitats within the vicinity of Topanga Lagoon). While no excavation is proposed within regulated waters and wetlands, limited disturbance to this area (approximately 0.33 acres) would occur temporarily during demolition of the existing crossing of Topanga Creek Lagoon. The majority of the proposed lagoon area would remain non-tidal as a naturally freshwater-dominated,	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. A Nearshore Mound Dispersal Study (Moffatt & Nichol 2023) included in **Appendix B** of Draft EIR was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized.

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	seasonally closed, bar-built estuary/lagoon, and thus foster juvenile steelhead rearing (as well as other estuarine species that juvenile steelhead may prey upon). Mechanical excavation of material from the marine delta and subsequent deposition of soil in the nearshore marine environmental has the potential to adversely impact (at least temporarily) emigrating smolt steelhead by disrupting early feeding opportunities (Daly et al. 2013, Kendall et al. 2017, Meyers 2018). Generally, the more sediment that can be transported to the nearshore environment through reliance on natural fluvial processes, rather than artificial mechanical methods, the less likely adverse impacts are to occur in nearshore benthic habitats, such as rocky habitats, which harbor species that juvenile steelhead may prey upon., as well as other marine species. To minimize the potential aversive impacts to nearshore habitats utilized by juvenile steelhead emigrating from the Topanga Lagoon, soils excavated from the project site should be sorted and evaluated to determine their suitability (and potential unsuitability) for mechanical deposition in the nearshore environment. Unsuitable material (e.g., those containing contaminants or miscellaneous debris) should not be placed in the nearshore environment but rather disposed of in an authorized disposal site, or otherwise used for appropriate purposes (e.g., construction fill, soil amendment, etc.). Materials suitable for nearshore deposition should be placed to avoid, to the maximum extent possible, sensitive nearshore benthic habits (particularly rocky habitats that support prey species important for rearing and maturing juvenile steelhead, and well as other marine species), and under conditions that would facilitate their natural dispersal in response to wave action and littoral processes. Finally, excavated soils that are mechanically deposited within the nearshore environments should be monitored to assess adverse effect on nearshore habitats, and mitigation measures should be identified and implemented to address residual adverse effects of such mechanical deposition.	The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand northeastward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. The nearshore mount dispersal study predicted materials that will be dispersed 1-year and 5-year post construction. The materials not dispersed over the 5-year modeling period are not lost and still within the littoral zone and will be mobilized under larger wave storms and lower tidal conditions. The materials to be placed nearshore are compatible with the current materials. No residual adverse effects are expected; hence, no mitigation measures are required. Once constructed, normal fluvial sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions.
Caltrans		
AG 2-1	Dear John Ota: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Proposed Project involves the expansion of the Topanga Creek and lagoon ecosystem, replacement of the existing PCH bridge (SR-1 #53-0035) with a longer bridge to accommodate the lagoon expansion, development of visitor services in lower Topanga State Park, and relocation of DBH facilities on Topanga Beach that are threatened by sea level rise. The Proposed Project includes the construction of new visitor services at the northwest corner of the intersection of PCH and TCB, referred to as the "Gateway Corner." The Proposed Project also evaluates beneficial reuse options for excavated sediment and options for on- and off-site wastewater disposal. The California Department of Parks and Recreation is the Lead Agency under the California Environmental Quality Act (CEQA). The closest state facilities are SR-1 and SR-27. After reviewing the project's documents, Caltrans has the following comments:	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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AG 2-2	• The Proposed Project will have potentially significant impacts on Caltrans R/W along SR-1 and SR-27. Please be advised that any permanent work, or temporary traffic control that encroaches onto the ROW requires a Caltrans-issued encroachment permit.	The Draft EIR concludes that impacts to traffic would be reduced to less than significant levels through conformance with Caltrans design standards including construction traffic control and the maintenance of four lanes of traffic at all times. Table 2-6 of the Draft EIR notes that the project would require an encroachment permit from Caltrans for work within Caltrans' right-of-way.
AG 2-3	• Implement a mitigation measure that focuses on bicyclists and pedestrians.	The Draft EIR identifies increased safety and coastal access for pedestrians and cyclists as a project objective. To accomplish this, the Draft EIR notes on page 2-16 that coastal access improvements would incorporate safety measures to improve safety compared with existing conditions. This includes incorporation of a pedestrian path under PCH and placing parking in areas more directly linked with recreational locations. The Draft EIR notes on page 2-18 "A pedestrian path would lead from the parking area south to the intersection of PCH and TCB, where a safe crossing of PCH to the beach would be available. Stairs providing beach access from PCH are proposed near the intersection as well. Additionally, the existing municipal bus stops on each side of PCH would be designed to be more visible and welcoming to visitors." No additional mitigation is required to ensure less than significant impacts.
AG 2-4	• Upgrade the existing Class III bike facility to a Class I or at minimum a Class IV bike facility. This would achieve connectivity with other proposed and existing separated bicycle and pedestrian facilities	As discussed on page 3.16-8 of the Draft EIR, PCH is designated as a Class III Bicycle Route according to the County of Los Angeles Bicycle Master Plan (Bicycle Master Plan). The Draft EIR notes that the project would maintain the Class III bikeway. The project would not change the designation to a Class IV or Class I bikeway as there is no available ROW along PCH to improve the bikeway to Class IV or Class I. The Draft EIR concludes that once the project is constructed, operational impacts would not result in significant impacts requiring mitigation. As a result, no modifications to the Bikeway Class are planned or required.
AG 2-5	• Please update the metro bus route numbers to the most current route numbers on pages 3.16-8 and 3.16-9.	In response to the comment, the following revision to pages 3.16-8 and 3.16-9 of the Draft EIR has been made (strikethrough/underline text is used to track changes made to the Draft EIR text): The Metro Express Line 134 ~~534~~ provides service along PCH. The first stop of the 134 ~~534~~-bus route is Trancas Canyon/PCH, and the last stop is Olympic/7th. Route 134 ~~534~~ is operational every day and has 39 stops with a total trip duration of approximately 62 minutes from end to end.
AG 2-6	As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.	Construction activities requiring the transportation of heavy equipment meeting the Caltrans threshold will obtain a permit from Caltrans. The contractor will be responsible for obtaining any permits required for construction as required.

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AG 2-7	Caltrans looks forward to reviewing the future environmental documents. If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04451. Sincerely, MIYA EDMONSON LDR/CEQA Branch Chief	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
California Coastal Commission – Michelle Kubran		
AG 3-1	Please find the attached comment letter for the Draft EIR from Coastal Commission staff.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 3-2	Mr. Ota, Thank you for the invitation to provide comments on the Draft Environmental Impact Report (DEIR) dated February 2024 for the proposed Topanga Lagoon Restoration Project. The DEIR analyzes three build alternatives for restoration of the Topanga Lagoon. Each build alternative includes removal and replacement of the existing 79 ft. Pacific Coast Highway (PCH) bridge that crosses the lagoon with a 460 ft. bridge to allow for expansion and restoration of the lagoon. Alternative 2 would result in the largest lagoon restoration (9.5 wetted acres) and would not maintain any of the Topanga Ranch Motel structures that exist on State Parks property. Alternative 3 would restore 7.7 acres of the lagoon and maintain 20 of the motel structures. Alternative 4 would restore 7.6 acres of the lagoon, maintain 15 of the motel structures, and relocate the new PCH bridge to a more inland location. Alternatives 2, 3, and 4 would also include approximately 23 acres of riparian habitat restoration and expand the beach area by at least 1 acre. Additional project components for each build alternative include new pedestrian access and trail system, relocation of the existing lifeguard and beach restroom facility to a more inland location, a new State Parks interpretive pavilion and restaurant at the corner of PCH and Topanga Canyon Boulevard, changes to the public parking in the project area, including an increase in the number of public parking spaces, and potential beneficial nearshore sediment disposal. Commission staff is very supportive of the Topanga Lagoon Restoration Project and its objectives. The following summarizes Commission staff's comments on the proposed project alternatives and analysis presented in the DEIR:	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 3-3	1. The DEIR discusses the removal of habitat that is designated as H1 and H2 in the L.A. County Santa Monica Mountains Local Coastal Program (LCP). The Final EIR should clarify whether in fact these habitats will be removed by structural development or are part of the restoration area and/or are converted from one habitat type or designation to another.	The project is a habitat restoration project that will restore acres of highly degraded habitat and should be considered self-mitigating. Table 3.3-1 of the Draft EIR provides a list of H1 and H2 LCP-designated areas within the project area and identifies the existing habitat types in those areas. Table 3.3-8 identifies acreages of impacts per vegetation type and Table 3.3-9 identifies overall restoration acreage. The Draft EIR concludes that the Proposed Project would result in more acreage of native vegetation than under existing conditions. The exact acreage of impact and the amount of LCP-designated H1 and H2 lands affected will depend on final grading plans

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AG 3-4	2. The DEIR describes the removal of up to 32 native trees, encroachment of up to 15 trees, and proposes mitigation measure BIO-14 to mitigate for these impacts. However, the replacement tree ratios contained in this mitigation measure are not consistent with the mitigation ratios required in the County's certified LCP for impacts to native trees. The DEIR should correct proposed mitigation measure BIO-14 to include the mitigation ratios required by the LCP or if replacement plantings at the LCP ratios are not feasible, justification should be provided for the lower ratios proposed (e.g., the appropriate habitat areas on site will not be sufficient in size to allow for the larger number of replacement trees, etc.).	The project is a habitat restoration project that will restore acres of highly degraded habitat with native plants; the project should be considered self-mitigating instead of being required to do additional habitat mitigation for a project whose purpose is habitat mitigation. There will be both a net increase in native trees and associated understory plants, not to mention a vast reduction in invasive species that currently plague the site. Rather than setting arbitrary replacement ratios for each native tree lost, we seek the flexibility to choose the exact number of replacement trees based on site conditions post-construction to maximize habitat quality and survival rates of installed plantings.
AG 3-5	3. Section 3.9 briefly discusses the modeling of sea level rise for each alternative and states that Alternative 2 would be the most resilient alternative with regards to sea level rise. However, the same paragraph goes on to state that Alternative 4 would maximize the resilience of the beach infrastructure. Please clarify. Further, the COAST Long-term Shoreline Change Analysis for the project appears to indicate that the proposed beach infrastructure would be safe under 6.6 ft. of sea level rise; however, none of the sea level rise studies for the project clearly state this. We recommend that the Final EIR clearly states how long the beach infrastructure is expected to be safe from coastal hazards under each sea level rise scenario and including a 100-year storm and, if not, what adaptation measures could be included to ensure new development will not rely on future shoreline armoring.	This comment does not address the adequacy of the Draft EIR. The Draft EIR describes on page 3.9-20 that Alternative 2 would provide the most fluvial resilience with the largest lagoon and lowest flood water elevations, but that Alternative 4 would provide for the more infrastructure resilience through adaptation to sea level rise by moving coastal infrastructure including PCH itself further inland compared to the other Alternatives. With respect to coastal erosion and wave runup estimates for each Alternative, the relocated helipad and lifeguard and public restroom building will be properly designed and constructed for sea level rise meeting State (CCC) and Federal (USACE) design requirements over their service life. The detailed design will be carried out in the next design phase of the project.
AG 3-6	4. Mitigation measure FIRE-1 requires preparation of a fuel modification plan for the project area. However, the DEIR does not specify whether fuel modification would impact native habitats. Particularly, if the Ranch Motel structures are maintained, would fuel modification be required and, if so, would the required fuel modification extend into the restoration area?	The Draft EIR concludes on page 3.18-19 that Mitigation Measure FIRE-1 would be required to ensure significant wildfire impacts were avoided. The mitigation measure requires that a fuel modification plan be prepared that allows for maintenance areas around structures. These fuel modification areas requiring routine clearing would not be included in the overall acreage of restored habitats.
AG 3-7	5. As the DEIR describes, several new structures are proposed, including a new lifeguard/restroom building, a new interpretive pavilion and restaurant, a new ranger building, and other new or refurbished structures. The DEIR also explains that the operational greenhouse gas emissions for the proposed project would be comparable to the current GHG emissions at the project site. Are solar panels for one or more of the proposed structures proposed in order to reduce operational GHG emissions at the project site?	The proposed project does not include solar panels to offset energy requirements. All electricity on site would be provided by existing overhead power lines with energy supplied by SCE.

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AG 3-8	6. The DEIR project description includes replacement of the existing Pacific Coast Highway (PCH) bridge with a longer bridge to accommodate lagoon expansion, development of visitor services in lower Topanga State Park, and relocation of L.A. County Dept. of Beaches and Harbors facilities threatened by sea level rise. A stated project objective of the new bridge design is to improve fish passage and sediment transport to the littoral cell. We are supportive of the longer span bridge design which appears to be the case in both Alternative 2 and Alternative 3. In order to understand the amount of new fill of coastal wetlands being proposed, how many piles would be required to support the longer span? What is the total amount of fill proposed compared to the current amount?	No material will be removed from the existing wetted area. All grading starts at the inland edge of the trees along the banks and works upland from that point. As noted on page 2-22 of the Draft EIR, Alternative 2 would result in the greatest volume of fill material (~256,000 cy) removed from the areas surrounding the wetted lagoon to promote creation of 9.5 acres of wetland habitat compared with existing conditions. The bridge abutments would be located outside of the existing wetted area and the estimates of seasonally wetted acres does not include their footprint. Alternatives 3 and 4 would create slightly fewer acres of seasonally wetted area, and similarly would accommodate bridge abutments, resulting in a net gain of wetted area and wetland habitats compared with existing conditions. No grading or fill is proposed in the current wet lagoon area. The proposed bridge consists of 3 spans with a middle span of 200 feet long. The middle span is much longer than the current span of 79 feet. The bridge will be constructed in dry with top-down construction without touching any water. The lagoon grading will occur after the bridge construction. The bridge bents and abutments will be constructed in the dry area (current fill area) and will not have any impact on the lagoon. The bridge will have two bents in the middle. The number of piles will be determined in the next design phase of the project.
AG 3-9	7. Section 2.7.2 describes how parking and pedestrian access will be maintained during construction. How will the public be informed about the parking changes? Is there temporary signage proposed directing the public toward open parking areas? Will a public outreach campaign be developed so that beachgoers understand which areas are open for public parking during construction?	Mitigation Measure TRA-2 requires the preparation of a public outreach and signage plan to highlight the temporary parking modifications as construction proceeds.
AG 3-10	8. Figures 3.1-6 through 3.1-8 provide visual simulations of the bridge design under all alternatives with a dedicated bike lane, sidewalk, and upgraded bridge rails. The DEIR states that the visual simulations, including these features, do not reflect a final design. Can you clarify whether or not a bike lane, sidewalk, and upgraded bridge rails will be included in the final design. Additionally, the renderings depict bridge barriers and railings that appear to be visually permeable and consistent with the Commission's Bridge Rails and Barriers Guide1(Guide) for Caltrans projects in the coastal zone; nevertheless, it is unclear which barrier and rail design has been selected. Therefore, our staff requests that State Parks work with Caltrans to select and provide the railing and barrier design that is consistent with the Guide.	The bridge will be designed to comport with Caltrans bridge design requirements within the coastal zone. Final designs will be provided to CCC and attached to the CDP application for CCC approval.
AG 3-11	9. Currently, the unmarked shoulder areas along Topanga Canyon Blvd (TCB) are used for free coastal access parking. Table 2-2 summarizes the amount of conforming and non-conforming parking within the project site. Section 2.6.9 of the DEIR describes how 79 nonconforming spaces would decrease to 54 (or 51) spaces on PCH depending on the project alternative selected. But overall public parking would increase, albeit with more fee parking than free parking. The section then goes on to describe how 20 free spaces are available on TCB but does not distinguish whether or not they are conforming or non-conforming spaces. How many free parking spaces will be maintained on TCB?	Table 2-2 of the Draft EIR summarizes the number of conforming parking spaces to be provided by the Proposed Project in each landowner area. Figure 1, 2, and 3 in **Appendix F** show that 40 free parking spaces would be provided on the shoulder of TCB. Currently as shown in Table 2-1, there are 40 conforming free-shoulder spaces on TCB.

Comment Number	Comment	Response
AG 3-12	10. The Environmental Justice Analysis section states, “Overall, the Topanga [census designated place], City of Malibu, and City of Los Angeles include a total minority population of approximately 40 percent, which is less than 50 percent and thus, as a reference population, does not represent a minority population (U.S. Census Bureau 2022a).” However, Table 4-1 shows the total minority population for the City of Los Angeles to be 71.5%. We recommend clarifying the discrepancy between the above statement and the minority population data as shown in Table 4-1. The DEIR goes on to state that even though the City of Los Angeles meets the “meaningfully greater” minority population criteria, “consideration of all areas within the City of Los Angeles would not be appropriate, as most impacts of the Proposed Project would be highly localized.” However, one of the objectives of the project is to improve and enhance coastal access and recreational facilities within the project area, and the proposed project will ultimately have an impact (whether adverse or beneficial) for all of those visiting the site. Additionally, due to historic discriminatory land use policies and practices, communities of color and low-income communities are more likely to live farther away from the beach. We recommend conducting meaningful engagement of environmental justice communities within inland areas of the City of Los Angeles and Los Angeles County and provide information for how targeted engagement of environmental justice communities will be conducted in future steps of the project.	The Draft EIR provides an assessment of the Proposed Project's effects on lower income and minority populations within a regional study area that includes the City of Los Angeles. The analysis concludes that the area experiencing the greatest effects of construction does not have minority populations greater than 30 percent. The analysis notes that minority populations in the City of Los Angeles comprise 71.5 percent of the City's total population. The Project site is located within unincorporated Los Angeles County in an area with minority populations less than 30 percent. The Draft EIR concludes on page 4-17 that the project would not disproportionately impact minority or low-income populations. The Proposed Project includes improvements to coastal access to benefit the public at large, including minority populations. The project conforms to the CDPR's 2012 Topanga State Park General Plan that outlines objectives for increasing diverse visitorship at the site.
AG 3-13	Thank you again for the opportunity to comment. These comments represent our preliminary comments. We will review the Final EIR for this project and depending on the particular details of the proposed project as submitted in a coastal development permit application, there may be additional comments or issues to be addressed. If you have any questions regarding these comments, please contact me at 805-585-1800. Sincerely, Michelle Kubran Coastal Resiliency Coordinator	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
California State Lands Commission		
AG 4-1	Dear John Ota: The California State Lands Commission (Commission) staff has reviewed the draft Environmental Impact Report (EIR) for the Topanga Lagoon Restoration Project (Project), which is being prepared by the California Department of Parks and Recreation (CDPR). CDPR, as the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 4-2	Commission Jurisdiction and Public Trust Lands The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine. As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line, except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 4-3	After review of the information contained in the draft EIR, there are several components of the Project that would require further review and Commission authorization. Under Alternatives 2, 3, and 4, CDPR proposes to increase the area of Topanga Beach from 50 to 90feet of additional depth. The proposed expansion would add 1 to 1.2 acres of beach area. While the draft EIR mentions that this expansion of beach area would be installed above the mean high tide line, staff requests CDPR conduct a mean high tide line survey when design of this element is further developed for the preferred alternative to confirm whether this project component will encroach upon State sovereign land and require Commission authorization.	The proposed alternatives will increase beach area by 0.2 to 0.4 acres, but no depth increase is proposed at the beach area. The fill in the lagoon area will be removed to provide riparian habitats. The Draft EIR acknowledges in Table 2-6 CSLC's authority over nearshore sediment placement on State lands, requiring a State lands lease. The mean high tide line survey has already been budgeted and included in the next design phase of the project. The State Lands Commissions will be consulted and a lease application will be filed in the next permitting phase of the project.
AG 4-4	Additionally, under Alternatives 2, 3, and 4 of the Project, CDPR proposes the removal of existing fill from the Project area (Topanga Lagoon) and reuse in the nearshore environment to renourish the littoral cell and benefit beaches downcoast. The proposed fill placement would consist of approximately 156,000– 256,000 cubic yards placed nearshore in the Pacific Ocean. The lands waterward of the mean high tide line remain ungranted sovereign lands under the management of the Commission. Therefore, the proposed Project and the placement of fill material from the Project area in the Pacific Ocean will require Commission authorization. Information on the Commission's lease application process can be found at www.slc.ca.gov/leases-permits/, the online application can be found at www.oscar.slc.ca.gov/, and any related questions can be directed to Public Land Management Specialist, Mr. Kelly Connor (contact information below).	The Draft EIR acknowledges in Table 2-6 CSLC's authority over soil placement on State lands, requiring a State lands lease. A nearshore placement analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized.

Comment Number	Comment	Response
AG 4-5	Project Description The CDPR proposes the project to meet the agency's objectives and needs as follows: Optimize beneficial reuse of excavated sediment by increasing sediment replenishment via nearshore placement and long-term conveyance increased by a wider bridge to the littoral cell while maintaining the integrity of the surf break as well as protecting the surf break and beach recreation. Replace the 1933 Pacific Coast Highway bridge to accommodate lagoon restoration and expansion that would improve estuarine hydrologic functions and protect endangered species. Replacing the bridge will also Increase safety and coastal access. Establish a visitor-serving "Gateway Corner" at the northwest corner of the intersection of Topanga Canyon Boulevard and State Route 27, consistent with the Topanga State Park General Plan goal of providing a coastal gateway to the park. Manage historic and archaeological resources in the Project area and the lagoon ecosystem consistent with the guidelines in the Topanga State Park General Plan.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 4-6	From the Project Description, Commission staff understands that the Project would include the following components that have potential to affect State sovereign land: Deposition Area. The nearshore Deposition Area located offshore in the Pacific Ocean for the relocation of sediment from Topanga Lagoon. Temporary Pipeline Construction and Operation. Temporary pipeline on risers running from the beach, below the mean high tide line, out to the Pacific Ocean for the transport of sediment into the nearshore deposition area. The draft EIR identifies Alternative 3 – Limited Lagoon Habitat Expansion as the Environmentally Superior Alternative. Environmental Review Commission staff requests that CDPR consider the following comments on the Project's draft EIR to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR when considering a lease application for the Project.	The Draft EIR acknowledges in Table 2-6 CSLC's authority over nearshore placement on State lands, requiring a State lands lease. The State Lands Commissions will be consulted, and a lease application will be filed in the next permitting phase of the project.

Comment Number	Comment	Response
AG 4-7	General Comments 1. Project Description: The Final EIR must contain a more robust description of the activities that are to occur in the Nearshore Deposition Area before the Commission could issue a lease for Project activities. This includes construction methods and materials proposed for the temporary pipeline, size of the pipeline, specific methods of powering any pumps (if necessary) that may be used to transport the sediment slurry, how the barge will be transported to the Nearshore Deposition Area, the barge's route to the Nearshore Deposition Area, and potential anchoring locations. Additionally, figures showing where the pipeline, barge, and slurry area will be located and incorporation of all the new Project Description information into the environmental analyses will ensure an accurate depiction of environmental impacts to sovereign lands. Based on the requested updates to the Project description, the Final EIR should therefore have associated updated analyses in, but not limited to, Section 3.2 Air Quality, Section 3.2 Biological Resources, Section 3.7 Greenhouse Gas Emissions/Climate Change, and Section 3.8 Hazards and Hazardous Materials. In particular, Section 3.2 Air Quality should include criteria pollutant calculations for vessels traveling between the Nearshore Deposition Area and Port Hueneme, and that data should be incorporated into all relevant tables. Lastly, Commission staff suggest creating a larger buffer area for the temporary pipeline to account for the possibility that the pipeline location may need to be altered to avoid sensitive and/or critical habitat.	The Draft EIR acknowledges in Table 2-6 CSLC's authority over nearshore sediment placement on State lands, requiring a California State Lands Commission lease. A nearshore material dispersal modeling analysis was conducted to determine the most suitable placement site to maximize the beach nourishment benefits and minimize the impact to marine habitats while constructable without too much risk. a. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. Impacts from sediment placement within the nearshore environment to air quality, GHG emissions, biological resources, and hazards have all been assessed in the Draft EIR. As part of the State Lands lease application, final designs including disposal plans and specifications will be provided.
AG 4-8	2. Public Agency Approvals: On page 2-1, the Commission and State sovereign land in the Pacific Ocean offshore were excluded from the list of publicly managed areas. Please include the Pacific Ocean and the Commission in the list.	Page 2-1 of the Draft EIR lists Caltrans, CDPR, and Los Angeles County as the three landowners participating in the project. The list was not meant as a comprehensive list of permit jurisdictional authorities. Table 2-6 provides such a list and identifies CSLC as a permitting authority for any project activities on State lands including submerged lands in the nearshore.
AG 4-9	Marine Biological Resources 3. Mitigation Measure MAR-1: On page 3.11-29, the draft EIR states that the mitigation measure will use preconstruction surveys to "ensure that sediment is not [emphasis added] placed on hard-bottom habitats or other sensitive marine resources." However, the language of the mitigation measure on page ES-46 states that the placement of the pipeline will avoid hard-bottom habitats to "the maximum extent feasible." Please clarify if the mitigation measure will ensure that the Project will fully avoid hard-bottom habitats. If the mitigation is not able to fully avoid hard-bottom habitats, please indicate what parameters would define "the maximum extent feasible" and how impacts would remain less than significant if sediment is ultimately placed on hard-bottom habitat or other sensitive marine resources.	Mitigation Measure MAR-1 requires the avoidance of hardbottom habitats to the maximum extent feasible. Pre-placement surveys required by the mitigation measure will identify the location of any such habitats. **Appendix K** includes a report on the surveys already conducted of the nearshore sediment placement area that indicate avoidance of hard bottom habitats is feasible. The placement of the pipeline would avoid hard bottom to the maximum extent feasible, but Mitigation Measure MAR-1 ensures the sediment would not be placed on hard bottom substrate. However, since the pipeline would extend from the beach all the way out to the sediment deposition location in the ocean, it would not be feasible to guarantee that no hard bottom would be touched by the pipeline. Monitoring during the pipeline activities will ensure that any impacts would be temporary and minimal considering the temporary placement of the pipe and overall width of the pipeline.
AG 4-10	Thank you for the opportunity to comment on the draft EIR for the Project. As a responsible and trustee agency, the Commission will rely on the Final EIR in issuing a new lease as specified above (see Section "Commission Jurisdiction and Public Trust Lands"). Staff requests that you consider these comments before certifying the Final EIR.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 4-11	Please send electronic copies of the Final EIR, Mitigation Monitoring Program, and Notice of Determination, approving resolution, CEQA Findings, and, if applicable, Statement of Overriding Considerations, when they become available. Please note that federal and state laws require all government entities to improve accessibility of information technology and content by complying with established accessibility requirements. (29 U.S.C. § 794d; 36 C.F.R. § 1194.1 et seq.; Gov. Code, § 7405.) California State law prohibits State agencies from publishing on their websites content that does not comply with accessibility requirements. (Gov. Code, § 115467.) Therefore, any documents submitted to Commission staff during the processing of a lease or permit, including all CEQA documentation, must meet accessibility requirements for Commission staff to place the application on the Commission agenda. Refer questions concerning environmental review to Christine Day, Environmental Scientist, at Chrisitne.Day@slc.ca.gov or (916) 562-0027. For questions concerning Commission leasing jurisdiction, please contact Mr. Kelly Connor, Public Land Management Specialist III, at Kelly.Connor@slc.ca.gov or (916) 574-0343. Sincerely, Nicole Dobroski, Chief Division of Environmental Science, Planning, and Management	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
California Department of Fish and Wildlife		
AG 5-1	Dear John Ota: The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) from the California Department of Parks and Recreation (CDPR; Lead Agency) for the Topanga Lagoon Restoration Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 5-2	CDFW's Role CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 5-3	PROJECT DESCRIPTION SUMMARY Proponent: CDPR Objective: The proposed Project is a multi-agency effort to expand the Topanga Creek and Topanga Lagoon ecosystem, replace the existing Pacific Coast Highway (PCH) bridge, and relocate several beach facilities on Topanga Beach. A recreational trail system through the Project would also be developed. The proposed Project would involve development of the Gateway Corner, which includes the construction of new visitor services at the northwest corner of the intersection of PCH and Topanga Canyon Boulevard (TCB). Development at the Gateway Corner is anticipated to consist of five one-story structures to support a park office, an employee house, a maintenance and storage facility, restrooms, and interpretive pavilion. Additionally, a new pedestrian undercrossing under the PCH bridge, beach access stairs, improved bus stop areas, and would be constructed in all build alternatives. Three build alternatives and a no project alternative are proposed in the DEIR.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 5-4	Alternative 1: No Project/No Build – Managed Decline– Alternative 1 would result in no changes to the current conditions within the Project area. The Project area would remain the same and consist of 3.6 acres of wetted area, 21.4 acres of riparian/transitional upland habitat, and 4.18 acres of Topanga beach. Alternative 2: Maximum Lagoon Habitat – Alternative 2 would result in the maximum increase in lagoon, wetland, and associated vegetative habitats. Following buildout,	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
	the Project area would consist of 9.5 wetted acres, 23 acres of restored riparian/transitional upland habitat, and beach expansion to 4.39 acres with an additional acre outside the immediate lagoon area. On the outer edge of the lagoon, approximately 13.6 acres would be graded to recontour the creek and widen the lagoon. Restoration would entail recontouring the western side of the lagoon with more natural side channels to accommodate sea level rise and storm surge conditions. Additionally, the existing PCH bridge would be replaced with a new bridge that spans approximately 460 feet and would retain the current bridge alignment. Roughly 0.33 acres of the lagoon would be temporarily disturbed during bridge activities. The total area graded would be 17.22 acres with no excavation proposed in the regulated waters and wetlands. A total of approximately 335,000 cubic yards (CY) of soil would be removed from the Project area. Contaminated soil and construction debris would be hauled off-site for disposal at appropriate landfills. Non-contaminated soil material is also proposed to be reused for nourishment of the nearshore and would be hauled to a designated nearshore deposition location in the ocean. The nearshore deposition location would cover up to 35 acres. Approximately 8,400 gallons of wastewater would be generated per day under this alternative. The Project proposes three options available for Alternative 2, however, the Project would move forward with one wastewater management option. Option 1 consists of an on-site subsurface drip irrigation (SDI) system. The SDI system would be installed on State Parks property along TCB. Construction of the SDI system would require a pipe and pump system with treatment works to move effluent from the sources to the receiver site. Option 2 consists of on-site seepage pits. Construction of seepage pits would require a pipe and pump system with treatment works to move effluent to the dispersal site. The pipe alignment between the treatment works and the dispersal site would be located outside of Caltrans right of way, on the west shoulder of TCB. The dispersal site would be located on the east side of TCB on State Parks property. Option 3 consists of constructing an off-site sewer connection. This option would involve construction of an extension of the Los Angeles County Sanitation Districts public sewer from existing facilities to facilities associated with Topanga Beach, motel structures, and gateway corner.	

Comment Number	Comment	Response
AG 5-5	Alternative 3: Limited Lagoon Habitat Expansion – In Alternative 3, expansion of Topanga lagoon and riparian/transitional upland habitat on the west side of Topanga Creek would not be as extensive as Alternative 2. Following buildout, the Project area would consist of 7.7 wetted acres, 23.7 acres of restored riparian/transitional upland habitat, and expansion of the beach to 4.42 acres with an additional acre outside of the lagoon area. Due to retention of structures, only the western side of Topanga creek and Topanga lagoon would be expanded for habitat creation. Grading of 12.8 acres of the outer edge of the lagoon would occur. The PCH bridge would also be deconstructed and expanded as detailed in Alternative 2. Approximately 0.33 acres of the lagoon would be temporarily disturbed during bridge activities. The total area graded would be 15.3 acres with no excavation proposed in the regulated waters and wetlands. A total of approximately 245,000 CY of soil would be removed from the Project area. Construction debris would be hauled off-site, and soil would be hauled-off site or reused for nearshore nourishment as described in Alterative 2. Approximately 12,400 gallons per day of wastewater would be generated from State Parks facilities. Waste management available for this alternative would be option 2 and option 3. Alternative 4: Maximum Managed Retreat – Alternative 4 would result in 7.6 wetted acres of lagoon restoration, 23.7 acres of riparian/transitional upland habitat restored, and beach expansion of 4.56 acres with an additional acre outside of the lagoon area. Grading activities would occur on 14.4 acres of the outer edge of the lagoon. The PCH would be realigned to move northward, curving the freeway inland over the lagoon and expanding the beach area to its maximum amount. In addition to realignment of PCH, the existing PCH bridge would be demolished and replaced with the same bridge length proposed in Alternative 2 and 3. A total of approximately 249,000 CY of soil would be removed from the Project area. Construction debris would be hauled off-site, and soil would be hauled-off site or reused for nearshore nourishment as described in Alterative 3. Approximately 11,500 gallons per day of wastewater would be generated from State Parks facilities. Waste management options 2 and 3 are available for this alternative.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 5-6	Location: The Project area, located within the Santa Monica Mountains National Recreation Area and west of the intersection of TCB and State Route 1 PCH, covers 91 acres, of which 35 acres are in the ocean. It encompasses Topanga State Park, Topanga Lagoon, and Topanga Beach, located on the coastal slope of the Santa Monica Mountains in unincorporated Los Angeles County. Timeframe: Construction and demolition activities within the Project area is anticipated to commence in 2027 and continue for approximately 60 months.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 5-7	Biological Setting: The Project area encompasses five core areas: Topanga State Park, Topanga Creek, Topanga Lagoon, Topanga Beach, and the marine zone. Topanga Creek drains an 18-square-mile watershed and conveys flow into Topanga Lagoon. Topanga Lagoon is a naturally bar-built lagoon, disconnected from the ocean by a sand berm. During heavy storms the sand berm becomes breached, which allows seawater to flow into the lagoon and facilitates fish passage. The PCH bridge will be expanded to accommodate restoration and expansion of the Topanga Lagoon. Topanga Beach supports a large run of California grunion (Leuresthes	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
	tenuis). The nearshore deposit site (e.g., marine zone) is located in the ocean and encompasses approximately 35 acres. A suite of biological field surveys were completed between June 2019 through November 2023, and findings were compiled in a Biological Resources Assessment (BRA) report. Baseline conditions of the Project area are outlined in the BRA. Roughly 18.51 acres were delineated as subject to Fish and Game Code Section 1600. Approximately 21.79 acres of coastal wetlands and waters within the Project area is subject to the California Coastal Act. If soil is placed in the nearshore deposition site, it would impact approximately 35 acres subject to the Rivers and Harbors Act. In regard to the vegetation composition within the Project area, a total of 25 vegetation communities were identified. Sensitive vegetation communities observed within the Project area include California Sycamore Woodland (Platanus racemosa woodland; 8.98 acres) with red willow (Salix laevigata), arroyo willow (Salix lasiolepis), and mulefat (Baccharis salicifolia) understory, California black walnut woodland (Juglans californica woodland; 0.03 acre), California black walnut and laurel sumac woodland (Juglans california – Malosma laurina woodland; 0.15 acre), California Brittlebush-California sagebrush shrubland association (Encelia californica-Artemisia californica; 0.51 acre), Ashyleaf buckwheat association (Eriogonum cinereum; 0.96 acre), Lemonade berry shrubland association (Rhus integrifolia; 3.96 acres), Purple sage-ashyleaf buckwheat association (Salvia leucophylla- Eriogonum cinereum; 0.53 acre), and giant wildrye grassland (Elymus condensatus; 0.18 acre). In regard to plant species, a total of 253 plant species were recorded during terrestrial and freshwater field surveys. For special status plant species, southern California black walnut trees were identified. Over 100 wildlife species were observed during terrestrial and freshwater Project surveys, of which 24 species were identified as special status. A total of 13 special status species were confirmed to be present on-site and the remaining eight special status species have a moderate to high potential to be present during Project activities. Special-status wildlife species observed within the Project area or have a moderate to high potential to be present during Project activities include, but are not limited to, tidewater goby (Eucyclogobius newberryi; Endangered Species Act (ESA)-listed endangered), arroyo chub (Gila orcuttii; California Species of Special Concern (SSC)), southern steelhead (Onchorynchus mykiss irideus, population 10; ESA-listed endangered, and CESA candidate), Monarch butterfly overwintering population, two striped gartersnake (Thamnophis hammondii; SSC), yellow warbler (Setophaga petechia; SSC), western red bat (Lasiurus blossevillii; SSC), San Diego desert woodrat (Neotoma lepida intermedia; SSC), Crotch's bumble bee (Bombus crotchii; CESA candidate), and mountain lion (Puma concolor; CESA candidate). CDPR has incorporated 15 biological mitigation measures and three marine mitigation measures to avoid, minimize, and/or mitigate adverse Project impacts.	
AG 5-8	Project History: CDFW has coordinated with CDPR as part of the Technically Advisory Committee for the Project. A Notice of Preparation (NOP) comment letter was submitted to CDPR on June 22, 2022.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 5-9	COMMENTS AND RECOMMENDATIONS CDFW offers the comments and recommendations below to assist CDPR in adequately avoiding and/or mitigating the Project's impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 5-10	Comment #1: Human-Wildlife Interface Issue: The Project may increase human and wildlife interactions through the incorporation of a recreational trail system through the Project area. Specific impacts: Development of a trail system throughout the Project area is proposed under all build alternatives and would impact wildlife. Impacts to wildlife could result in mortality or injury, increased human disturbance in areas supporting habitat, reproductive suppression during breeding season, or population decline of a special status species. Why impact would occur: The DEIR states that, "[a]n interpretive trail would be developed to allow visitors to meander through the restored transitional upland areas…" (page 2-18). Increased human foot traffic in the Project area would result in increased noise levels in sensitive areas, increased trash or pet waste, and introduction of unnatural food sources via trash and trash receptacles. Outdoor recreation may also cause distress on individual wildlife, resulting in energetic costs to the animal and decline in the animals' behavior and fitness. Because components of the recreational trails are not clearly defined in the DEIR, sensitive habitats such as terrestrial and aquatic breeding grounds may be encroached upon and disturbed. Wildlife species of all sizes, including monarch butterflies, San Diego desert woodrat, and mountain lion have been recorded within and adjacent to the Project area. Although mountain lions were not observed denning in the Project area, they, "[a]re known and anticipated to use the site occasionally" (page 3.3-47). If not designed appropriately, the creation of recreational trails would lead to an increase in human-wildlife interactions that may result in harm to wildlife and/or humans. Evidence impact would be significant: The Project area supports a variety of special status species. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to special status plant or wildlife species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service(USFWS). Recommended Potentially Feasible Mitigation Measure(s): Recommendation #1: Trails Plan – CDPR should develop a Trails Management Plan and submit it for review and approval by CDFW and the USFWS (hereafter referred	The proposed hiking trails will be installed and maintained by CDPR largely within State Parks property. Operation and maintenance of the trails will comply with CDPR standards including standards for managing habitat/human interface. While Trail Management Plans are typically developed on a park unit level, CDPR will consider the creation of a Trails Management Plan for the restored area. CDPR will maintain trails consistent with other State Parks in coordination with CDFW. The Draft EIR concludes that habitat used by special status species in the area will be improved as a result of project implementation. CDPR anticipates consulting with both CDFW and USFWS as appropriate on future design elements, including a potential Trail Management Plan.

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	to as the Wildlife Agencies) prior to Project implementation. The Plan should include, at a minimum: a. refined location of the trails system, including maps and figures; b. a discussion of the location of the Topanga Creek crossing associated with the trails system, and how the crossing will be achieved; c. analysis of any impacts to sensitive upland habitats and/or CESA-listed species which could occur as a result of cutting new trails; d. description of trail materials (i.e., paved asphalt, gravel, etc.) and/or level of access; e. allowable and prohibited trail uses; and f. best management practices (BMP), including but not limited to: a. public information signage which focuses on educating and informing the public about wildlife, and advise on proper avoidance measures to reduce human-wildlife conflicts; b. trash receptacles to be placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas; c. prohibition of electric bicycles; and d. pets should always be kept on leash and on the trails at all times. Trail users should also be encouraged to clean up after their dogs.	
AG 5-11	Comment #2: Nearshore Sediment Placement Impacts Issue: Nearshore sediment placement could cause potential burial of sensitive marine species and their rocky bottom habitats via direct sediment placement or subsequent littoral drift causing substantial adverse effects. Specific Impact: Several types of Habitat Areas of Particular Concern (HAPC) occur at the Project site, including rocky reefs, seagrass (e.g., surfgrass), and potential canopy kelp. Los Angeles waters support commercially and recreationally important fish and invertebrate species such as California halibut (Paralichthys californicus), California spiny lobster (Panulirus interruptus), and the important forage fish Northern anchovy (Engraulis mordax). Nearshore sediment placement activities could impact HAPC and the species that inhabit them via direct burial/smothering, increased turbidity, and/or decreased light availability. Additionally, the installation and operation of a nearshore nourishment pipeline, an increase in vessel traffic, and anchoring would directly impact HAPC if these habitats exist within the work area footprint. Why impact would occur: After the Project's proposed nearshore sediment placement, the primary effect pathway of potential burial/smothering, increased turbidity, and or decreased light availability to rocky reef, seagrass, and algal communities is indirect. The Draft EIR does not address how the potential indirect effects, as a result of the nearshore sediment placement, would be monitored and/or mitigated for postconstruction to avoid and minimize impacts to HAPC. Evidence impact would be significant: HAPC, a subset of Essential Fish Habitat, are habitats of special importance to fish populations due to their rarity, vulnerability to	Potential direct and indirect impacts to marine habitats and water quality are addressed in Section 3.11 of the Draft EIR. Mitigation Measure MAR-1 requires the avoidance of hardbottom habitats to the maximum extent feasible. Pre-placement surveys required by the mitigation measure will identify the location of any such habitats. **Appendix K** includes a report on the surveys already conducted of the nearshore sediment placement area that indicate avoidance of hard bottom habitats is feasible. The placement of the pipeline would avoid hard bottom to the maximum extent feasible, but Mitigation Measure MAR-1 ensures the sediment wouldn't be placed on hard bottom substrate. However, since the pipeline would extend from the beach all the way out to the sediment deposition location in the ocean, it would not be feasible to guarantee that no hard bottom would be touched by the pipeline. Monitoring during the pipeline and placement activities will ensure that any impacts would be temporary and minimal. The use of the nearshore placement area is intended to benefit the coastline with sediment nourishment. No additional mitigation would be required to avoid significant impacts to the marine environment.

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	development and anthropogenic degradation, and/or ability to provide key ecological functions. Rocky reefs, seagrass, and canopy kelp (e.g., giant kelp have been designated as groundfish HAPC by the Pacific Fisheries Management Council under the Magnuson-Stevens Fishery Conservation and Management Act. Recommended Potentially Feasible Mitigation Measure(s) Recommendation #2: HAPC - CDFW appreciates the Project's inclusion of Mitigation Measure MAR-1 (Marine Resources Protection Measures), which ensures that pipeline installation, vessel traffic, anchoring, and nearshore sediment placement avoid HAPC to the greatest extent feasible. CDFW recommends that the Final EIR should quantify the amount of rocky reef, seagrass, and canopy kelp that could be lost due to the Project and potential alternatives. If impacts cannot be avoided, compensatory mitigation may be required. Additionally, CDFW recommends that post-construction monitoring of the nearshore sediment placement should occur to ensure HAPC's are not impacted. CDFW recommends consulting with CDFW and NOAA Fisheries on the Final EIR's impact analysis and all proposed mitigation measures for HAPC prior to release of the Final EIR.	
AG 5-12	Comment #3: Impacts on Southern Steelhead Issue: The Project may impact southern steelhead during steelhead migration season. Specific impacts: Project activities (e.g., expansion, recontouring, demolition, etc.) associated with the lagoon, creek, and other wetted areas would have an impact on aquatic species, especially southern steelhead. Why impact would occur: Biological Mitigation Measure 4 through Mitigation 6 in the DEIR are intended to minimize impacts to aquatic fish species known to inhabit the Project area. While CDFW appreciates the effort to reduce significant impacts to this species, we believe that the measures as written could be refined to further reduce impacts to steelhead. Mitigation Measure 4 states that work would preferentially occur outside of the steelhead migration season of December through March. Although December to March is the primary window for returning adult steelhead, the time frame should be expanded to account for weather variability and migrating smolts. Stream connectivity and beach berm conditions in the Topanga watershed is highly influenced by seasonal rainfall and dictates when migration occurs. In any given year during Project activities, a heavy rain event may occur in the proposed time frame, or the area may experience rainfall as early as October or as late as April. Additionally, the Project should consider downstream-migrating smolts, who generally migrate to the ocean between March through May (Booth 2020). Furthermore, CDFW 2023 (unpublished; available upon request) data from work on Topanga Creek demonstrates that smolts migrating downstream were observed and recorded in January through June. Project activities conducted in months outside of the proposed time frame may result in incidental take and/or disruption of migration. Evidence impact would be significant: Southern steelhead are designated as a candidate species under CESA and afforded full protection. Southern steelhead also meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on southern steelhead may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of southern	Impacts to Southern California steelhead are addressed on page 3.3-68 of the Draft EIR. Expansion and improvement of the lagoon to accommodate Southern California steelhead is a key objective of the project. The Draft EIR acknowledges in Table 2-6 that a Streambed Alteration Agreement would be necessary for work within CDFW jurisdictional drainages and compliance with the California Endangered Species Act through either Section 2081 or Section 2080.1 would be needed. As a result, CDPR will consult with CDFW as necessary to ensure compliance with the state requirements within CDFW's jurisdiction.

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	steelhead, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by Wildlife Agencies. Recommended Potentially Feasible Mitigation Measure(s): Recommendation #3: Project Scoping - Given that a Lake and Streambed Alteration Agreement is required for the Project, CDFW would like to the opportunity to be included during formal consultation with USFWS and National Marine Fisheries Service (NMFS) as it pertains to work in wetted areas and impacts on fish species. CDPR should revise Mitigation Measures 4 through 6 in the DEIR to include scoping with CDFW during formal federal consultation process, so that all Project requirements are in alignment with each other.	
AG 5-13	Mitigation Measure #1: BIO-4: Fish Protection Measures During Work in Wetted Areas - Mitigation Measure BIO-4 Fish Protection Measures During Work in Wetted Areas shall be revised to incorporate the underlined language and omit language in strikethrough: Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project shall comply with all permit requirements. The following measures shall be implemented to protect and minimize impacts on tidewater goby and steelhead trout, their critical habitat, and other special-status aquatic species during construction: 1. Cofferdam, sediment curtain, and/or another method approved by CDFW/NMFS/USFWS shall be used to cordon off the area (approximately 0.33 acre) around the existing bridge abutment to both exclude fish and wildlife and to contain construction debris and runoff within the work area. Final construction design shall meet all permit conditions and be developed by the contractor in coordination with State Parks. a. The cofferdam shall not be fully dewatered until the supervising biologist determines that no fish remain within the area. The supervising biologist shall have appropriate handling permits and experience with dewater and fish relocation activities. This includes experience with aquatic species associated with the lagoon, creek, and wetted areas. i. Dewatering shall be done slowly with supervision to ensure that any fish trapped in the area can be captured and relocated, reducing the risk of injury or stress. ii. Pumps shall be properly screened to prevent fish from entering the intake. iii. Dewatering and flow diversion shall comply with permit requirements from CDFW, USFWS, and NMFS. iv. Once the supervising biologist has confirmed that the work area is isolated, all fish are excluded, and there is no risk of entraining fish, then the pump screen may be removed. v. Water removed from the work area shall be directed to an adjacent holding area according to permit requirements before being infiltrated into the existing fill or release into the lagoon or ocean downstream of the work area.	Impacts to Southern California steelhead are addressed on page 3.3-68 of the Draft EIR. Expansion and improvement of the lagoon to accommodate Southern California steelhead is a key objective of the project. The Draft EIR acknowledges in Table 2-6 that a Streambed Alteration Agreement would be necessary for work within CDFW jurisdictional drainages and compliance with the California Endangered Species Act through either Section 2081 or Section 2080.1 would be needed. As a result, CDPR will consult with CDFW as necessary to ensure compliance with the state requirements within CDFW's jurisdiction. In response to this comment, the following modifications have been made to Mitigation Measure BIO-4 (strikethrough/underline text is used to track changes made to the Draft EIR text): Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project shall comply with all permit requirements. The following measures shall be implemented to protect and minimize impacts on tidewater goby and steelhead trout, their critical habitat, and other special-status aquatic species during construction: 1. Cofferdam, sediment curtain, and/or another method approved by CDFW/NMFS/USFWS shall be used to cordon off the area (approximately 0.33 acre) around the existing bridge abutment to both exclude fish and wildlife and to contain construction debris and runoff within the work area. Final construction design shall meet all permit conditions and be developed by the contractor in coordination with State Parks. a. The cofferdam shall not be fully dewatered until the supervising biologist determines that no fish remain within the area. The supervising biologist shall have appropriate handling permits and experience with dewatering and fish relocation activities. This includes experience with aquatic species associated with the lagoon, creek, and wetted areas. i. Dewatering shall be done slowly with supervision to ensure that any fish trapped in the area can be captured and relocated, reducing the risk of injury or stress.

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	vi. Water quality testing including turbidity, temperature, salinity, dissolved oxygen, pH, and conductivity, nutrients (and potentially metals if required) shall be monitored and documented at the start, middle and end of each day. b. Blocking nets providing a buffer area outside the work zone shall remain in place until all work is completed, and the coffer dam removed. i. Blocking nets shall be inspected at least three times a day (start, middle, end) or more if requested by the supervising biologist. If fish are impinged on the net, or weather/flow conditions change significantly, the supervising biologist can increase inspection efforts. c. Silt curtains may also be installed inside the blocking nets to further reduce potential for water quality impacts. 2. All construction activities within or directly adjacent to the lagoon, creek, and wetted areas will occur preferentially outside of the steelhead migration season (November– June) ~~December through March~~). In the event, this time frame cannot be avoided, measures shall be implemented with the approval of NMFS and CDFW to avoid impacts such as allowing passage through a protected portion of the work area and implementation of additional BMPs to buffer fish from adjacent work, such as use of silt curtains within the wetted edge and silt fence along the dry edge, etc.). 3. If fish upstream are observed in distress, a fish kill occurs, or spills occur, the supervising biologist shall immediately contact the contractor to stop work, contact the relevant agencies, and work with the contractor to correct the problem. 4. Upon completion of the removal of the old bridge within the coffer dam area, water quality shall be tested within the work area before removal of the walls. Flow shall be restored slowly, and fish shall remain excluded upstream of the work area pending confirmation that water parameters are suitable for direct release into the lower lagoon.	ii. Pumps shall be properly screened to prevent fish from entering the intake. iii. Dewatering and flow diversion shall comply with permit requirements from CDFW, USFWS, and NMFS. iv. Once the supervising biologist has confirmed that the work area is isolated, all fish are excluded, and there is no risk of entraining fish, then the pump screen may be removed. v. Water removed from the work area shall be directed to an adjacent holding area according to permit requirements before being infiltrated into the existing fill or release into the lagoon or ocean downstream of the work area. vi. Water quality testing including turbidity, temperature, salinity, dissolved oxygen, pH, and conductivity, nutrients (and potentially metals if required) shall be monitored and documented at the start, middle and end of each day. b. Blocking nets providing a buffer area outside the work zone shall remain in place until all work is completed, and the coffer dam removed. i. Blocking nets shall be inspected at least three times a day (start, middle, end) or more if requested by the supervising biologist. If fish are impinged on the net, or weather/flow conditions change significantly, the supervising biologist can increase inspection efforts. c. Silt curtains may also be installed inside the blocking nets to further reduce potential for water quality impacts. 2. All construction activities within or directly adjacent to the lagoon, creek, and wetted areas will occur preferentially outside of the steelhead migration season (November–June) ~~December through March~~). In the event, this time frame cannot be avoided, measures shall be implemented with the approval of NMFS and CDFW to avoid impacts such as allowing passage through a protected portion of the work area and implementation of additional BMPs to buffer fish from adjacent work, such as use of silt curtains within the wetted edge and silt fence along the dry edge, etc.). 3. If fish upstream are observed in distress, a fish kill occurs, or spills occur, the supervising biologist shall immediately contact the contractor to stop work, contact the relevant agencies, and work with the contractor to correct the problem. 4. Upon completion of the removal of the old bridge within the coffer dam area, water quality shall be tested within the work area before removal of the walls. Flow shall be restored slowly, and fish shall remain excluded upstream of the work area pending confirmation that water parameters are suitable for direct release into the lower lagoon.

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AG 5-14	Comment #4: Impacts on Crotch's Bumble Bee Issue: The Project may impact Crotch's bumble bee. Specific impacts: Project activities may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Ground-disturbing activities may result in death/injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success. Why impacts would occur: There is a high potential for Crotch's bumble bee to be utilize the Project area for nesting and foraging opportunities. The DEIR has included Mitigation Measure BIO-3 to avoid and minimize impacts to Crotch's bumble bee. The measure describes that a 15-meter no disturbance buffer should be placed around any identified nests. If a buffer zone is not appropriately sized, any active nests may be encroached upon or destroyed. Moreover, Project activities in close proximity to an active nest may result in incidental take of individual larva or eggs within the nest. In addition to a small buffer zone, surveys conducted for Crotch's bumble bee should follow CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Following the most recent survey protocol allows a qualified biologist to avoid incidental take of the species during surveying efforts. Evidence impact would be significant: Crotch's bumble bee is designated as a candidate species under CESA and afforded full protection. Crotch's bumble bee also meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on Crotch's bumble bee may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065).	Impacts to Crotch's Bumble Bee will be revised as per CDFW recommendations as noted in following comment.
AG 5-15	Recommended Potentially Feasible Mitigation Measure(s): Mitigation Measure #2: BIO-3: Crotch's Bumble Bee Measures - Mitigation Measure BIO-3 Crotch's Bumble Bee Measures shall be revised to incorporate the underlined language and omit language in strikethrough: The following measures shall be implemented to protect and minimize impacts on Crotch's bumble bees: 1. Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist with the appropriate permits and familiarity ~~familiar~~ with the identification, behavior, and life history of the species. The qualified entomologist shall conduct surveys adhering to CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. ~~A minimum of three surveys during peak flying season shall be conducted when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983), non-lethal survey methodology shall be used and photo vouchers for species confirmation will be obtained (CBBA 2023).~~ At minimum, a survey report shall provide the following:	In response to this comment the following changes have been made to Mitigation Measure BIO-3 (strikethrough/underline text is used to track changes made to the Draft EIR text): Crotch's bumble bees: 1. Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist with the appropriate permits and familiarity ~~familiar~~ with the identification, behavior, and life history of the species. The qualified entomologist shall conduct surveys adhering to CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. ~~A minimum of three surveys during peak flying season shall be conducted when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983), non-lethal survey methodology shall be used and photo vouchers for species confirmation will be obtained (CBBA 2023).~~ At minimum, a survey report shall provide the following: a. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee.

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	a. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. b. Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c. Map(s) showing the location of nests/colonies. 2. If Crotch's bumble bee is detected, the following shall be implemented: a. The qualified entomologist shall: i. Identify the location of all nests within and adjacent to the Project site. ii. Provide a survey report to CDFW ~~summary~~ of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). iii. An Avoidance Plan shall be developed with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate ~~Establish a 15-meter~~ no disturbance buffer zone around all any identified nest(s) to reduce the risk of disturbance or accidental take. The buffer zone will be expanded as necessary to prevent disturbance or take to the extent feasible. b. If complete avoidance ~~of the buffer zone~~ is not feasible, consultation with CDFW shall occur to ~~identify any additional measures needed to avoid impact on the species, confirm allowable activities within the buffer zone,~~ and determine if take authorization from CDFW is required. c. Floral resources associated with Crotch's bumble bee that require removal during restoration activities shall be replaced at a 1:1 ratio and with guidance from CDFW. Floral resources will be planted within 200 meters of the original plant location or in the most centrally available location relative to identified Crotch's bumble bee nests and be located no more than 1.5 kilometers from the nest sites. d. The Habitat Restoration and Adaptive Management Plan will include native and local plant species preferred by Crotch's bumblebee within the plant palette to further support the existence and expansion of the species on-site.	b. Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c. Map(s) showing the location of nests/colonies. 2. If Crotch's bumble bee is detected, the following shall be implemented: a. The qualified entomologist shall: i. Identify the location of all nests within and adjacent to the Project site. ii. Provide a survey report to CDFW ~~summary~~ of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). iii. An Avoidance Plan shall be developed with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate ~~Establish a 15-meter~~ no disturbance buffer zone around all any identified nest(s) to reduce the risk of disturbance or accidental take. The buffer zone will be expanded as necessary to prevent disturbance or take to the extent feasible. b. If complete avoidance ~~of the buffer zone~~ is not feasible, consultation with CDFW shall occur to ~~identify any additional measures needed to avoid impact on the species, confirm allowable activities within the buffer zone,~~ and determine if take authorization from CDFW is required. c. Floral resources associated with Crotch's bumble bee that require removal during restoration activities shall be replaced at a 1:1 ratio and with guidance from CDFW. Floral resources will be planted within 200 meters of the original plant location or in the most centrally available location relative to identified Crotch's bumble bee nests and be located no more than 1.5 kilometers from the nest sites. d. The Habitat Restoration and Adaptive Management Plan will include native and local plant species preferred by Crotch's bumblebee within the plant palette to further support the existence and expansion of the species on-site.
AG 5-16	Comment #5: Impacts on Monarch Butterfly Issue: The Project may continue to impact the monarch butterfly overwintering site within the Project area. Specific impacts: The Project intends to apply aerial pesticides near an area that suports a monarch butterfly overwintering population. Permanent or temporary impacts to overwintering habitat could result in local population decline or local extirpation of monarch butterflies. Why impact would occur: According to the BRA, multiple monarch butterfly clusters with approximately 90 to 100 individuals each were observed north of Topanga Creek. To avoid impacts to overwintering monarchs,	In response to the comment, the following modifications have been made to Mitigation Measure BIO-2 (strikethrough/underline text is used to track changes made to the Draft EIR text): BIO-2 Monarch Butterfly: The following measures shall be implemented to protect and minimize impacts on overwintering monarchs: 1. During the overwintering season (October 15–March 15) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the

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	CDPR incorporated Mitigation Measure BIO-2: Monarch Butterfly Measures in the DEIR. The measure states that aerial pesticide or pesticides that are harmful to butterflies shall be avoided within 200 feet of overwintering sites when monarch overwintering is occurring (page 3.3-73). Use of pesticides, insecticides, and herbicides have detrimental consequences that may result in degradation of overwintering habitat, direct harm/injury to individual Monarchs, and population decline. Moreover, aerial application of pesticides is not an effective application method since chemical droplets cannot be controlled and may unintentionally drift onto surrounding habitat, posing a potential threat to nearby wildlife and natural resources. In addition, the buffer proposed in the measure may not be adequate to protect an overwintering population. According to USFWS's Western Monarch Butterfly Conservation Recommendations, use of pesticides should be avoided within 500 feet of overwintering sites (USFWS 2023). Aerial application of pesticides within 200 feet of overwintering sites would continue to have adverse impact on Monarch butterflies and overwintering habitat. Evidence impact would be significant: The monarch butterfly is included on CDFW's Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies. The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by Wildlife Agencies. Recommended Potentially Feasible Mitigation Measure(s): Mitigation Measure #3: BIO-2 Monarch Butterfly Measures - Mitigation Measure BIO-2 Monarch Butterfly Measures shall be revised to incorporate the underlined language and omit language in strikethrough: The following measures shall be implemented to protect and minimize impacts on overwintering monarchs:	locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol. 2. To prevent disturbance of monarchs during the overwintering season by construction personnel or work activity, roosting trees will be flagged, and snow fencing, or a similar technique shall be used to cordon off monarch roost trees at a reasonable distance of at least 25 feet away from the qualified biologist ~~roosting monitor~~. The qualified biologist ~~monitor~~ shall determine the placement of the fencing to protect the monarchs while allowing work to continue. 3. While work is occurring in the Project vicinity during the overwintering season, the qualified biologist ~~monitor~~ shall visit the property a minimum of two times per week to verify protection measures remain in place and document that roosting monarchs are not disturbed by work activities. The qualified biologist ~~monitor~~ shall have authority to stop work if monarchs show signs of unnatural disturbance. If monarchs are being disturbed or affected, protection measures shall be relocated by the qualified biologist ~~monitor~~ in consultation with the foreman. 4. Work crew shall be educated on the monarch protection measures and how the measures apply to their work. 5. During the overwintering season when monarchs are present, activities that could result in vibration and thus movement of monarch clusters, shall be avoided within 500 ~~200~~ feet of occupied trees. A qualified biologist can modify the buffer with approval of the regulatory agencies if adjacent activities are determined not be disturbing. 6. Aerial pesticide applications or pesticides that are harmful to butterflies shall not be applied ~~avoided~~ within ~~200~~ 500 feet of overwintering sites when monarch overwintering is occurring. Application of pesticides shall be conducted by a qualified biologist through non-harmful methods and shall occur outside of overwintering season when Monarchs are likely present. Small cut and paint efforts or directed spot spraying when it is not windy will be allowed if required to control invasive Arundo treatments or other highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines. 7. Monarch nectary plants shall be incorporated into the plant palette of the HRAMP near potential overwintering sites.

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	1. During the overwintering season (October 15–March 15) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol. 2. To prevent disturbance of monarchs during the overwintering season by construction personnel or work activity, roosting trees will be flagged, and snow fencing, or a similar technique shall be used to cordon off monarch roost trees at a reasonable distance of at least 25 feet away from the qualified biologist ~~roosting monitor~~. The qualified biologist ~~monitor~~ shall determine the placement of the fencing to protect the monarchs while allowing work to continue. 3. While work is occurring in the Project vicinity during the overwintering season, the qualified biologist ~~monitor~~ shall visit the property a minimum of two times per week to verify protection measures remain in place and document that roosting monarchs are not disturbed by work activities. The qualified biologist ~~monitor~~ shall have authority to stop work if monarchs show signs of unnatural disturbance. If monarchs are being disturbed or affected, protection measures shall be relocated by the qualified biologist ~~monitor~~ in consultation with the foreman. 4. Work crew shall be educated on the monarch protection measures and how the measures apply to their work. 5. During the overwintering season when monarchs are present, activities that could result in vibration and thus movement of monarch clusters, shall be avoided within 500 ~~200~~ feet of occupied trees. A qualified biologist can modify the buffer with approval of the regulatory agencies if adjacent activities are determined not be disturbing. 6. Aerial pesticide applications or pesticides that are harmful to butterflies shall not be utilized during and after the Project. If pesticide application shall occur, the pesticide shall not be harmful to Monarch butterflies and shall not be applied avoided within ~~200~~ 500 feet of overwintering sites when monarch overwintering is occurring. Application of pesticides shall be conducted by a qualified biologist through non-harmful methods and shall occur outside of overwintering season when Monarchs are likely present. Small cut and paint efforts or directed spot spraying when it is not windy will be allowed if required to control invasive Arundo treatments or other highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines. 7. Monarch nectary plants shall be incorporated into the plant palette of the HRAMP near potential overwintering sites.	
AG 5-17	Comment #6: Impacts on Bats Issue: The Project may continue to impact bats, especially maternity roosts. Specific impacts: The Project proposes to remove trees, vegetation, the PCH bridge, and structures (e.g., motel, beach facilities) which may impact maternity roosts in the Project area. Why impact would occur: Three bat	In response to the comment, the following modifications have been made to Mitigation Measure BIO-10 (strikethrough/underline text is used to track changes made to the Draft EIR text): BIO-10 Bat Roost Measures

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	species were documented during focused surveys. Project impacts on bat species may result from increased noise disturbances, human activity, dust, ground disturbing activities (e.g., staging, access, grading, excavating, drilling), and vibrations caused by heavy equipment. Trees and crevices in buildings in and adjacent to the Project site could provide roosting habitat for bats. Bats can fit into very small seams, as small as a ¼ inch. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Mitigation Measure BIO-10 in the DEIR outlines measures to minimize impacts on roosting bats; however, the measure does not have any specific conditions in the event that maternity roosts are identified prior to Project activities. If construction or demolition activities occur during maternity season, mature and vulnerable young bats may be negatively impacted. Impacts to the year's young may result in direct harm, abandonment of the maternity roost site, and decrease in the young's survivability (Caltrans 2021). The incorporation of maternity roost specific measures would alleviate Project impacts to the year's young and parental bats. Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, §4150; Cal. Code of Regs, § 251.1). Additionally, several bat species are considered Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065). Recommended Potentially Feasible Mitigation Measures Mitigation Measure #4: Measure BIO-10 Bat Roost Measures - CDPR shall revise Mitigation Measure BIO-10 Bat Roost Measures to incorporate the underlined language and omit language in strikethrough: The most suitable bat roosting habitats on the Proposed Project are along the PCH bridge, within the motel, lease or lifeguard and public restroom building, and within oak, palms, and other large, mature trees. Rock crevices could also be used. Bats are their most vulnerable during their maternity roosting period (March 1 to August 31) (~~May 1 to October 31~~) and during hibernation periods (November 1 to February 31). (~~December 1 to March 31~~). The following measures shall be implemented to protect and minimize impacts on protected and roosting bats: 1. When feasible, disturbance to suitable bat roosting habitat shall be scheduled ~~in November and April, or otherwise~~ outside of sensitive hibernation and maternity roosting periods. 2. Within two weeks prior to disturbance of potential bat roosting sites (large trees, structures, rocky crevices), a qualified bat specialist shall conduct a visual and acoustic pre-construction survey of the Proposed Project area and surrounding 200 feet for possible roosting habitat. Surveys shall be conducted during the daytime and nighttime when bat species are detectable. Surveys shall be conducted by a qualified bat specialist with the appropriate handling permits and familiarity in identifying bat species and roosting habitat. The bat specialist shall document all survey results and prepare a summary report to CDFW.	The most suitable bat roosting habitats on the Proposed Project are along the PCH bridge, within the motel, lease or lifeguard and public restroom building, and within oak, palms, and other large, mature trees. Rock crevices could also be used. Bats are their most vulnerable during their maternity roosting period (March 1 to August 31) (~~May 1 to October 31~~) and during hibernation periods (November 1 to February 31). (~~December 1 to March 31~~). The following measures shall be implemented to protect and minimize impacts on protected and roosting bats: 1. When feasible, disturbance to suitable bat roosting habitat shall be scheduled ~~in November and April, or otherwise~~ outside of sensitive hibernation and maternity roosting periods. 2. Within two weeks prior to disturbance of potential bat roosting sites (large trees, structures, rocky crevices), a qualified bat specialist shall conduct a visual and acoustic pre-construction survey of the Proposed Project area and surrounding 200 feet for possible roosting habitat. Surveys shall be conducted during the daytime and nighttime when bat species are detectable. Surveys shall be conducted by a qualified bat specialist with the appropriate handling permits and familiarity in identifying bat species and roosting habitat. The bat specialist shall document all survey results and prepare a summary report to CDFW. 3. In the event no roosting bats are present within the survey area, one-way exclusion devices shall be installed prior to structure demolition to exclude bat use and avoid their potential harm. 4. If potential roosting sites are identified, an additional survey to pinpoint roosting locations shall ~~should~~ occur within seven days prior to disturbing activities. The ~~biologist~~ bat specialist, in coordination with CDFW, shall refine a 200-foot or other agreed-upon buffer to keep in place during construction until the roosting site is confirmed to be no longer in use for hibernation ~~or dependent young~~. Night lighting for construction shall not be directed towards these roost sites. 5. If maternity roosts are identified, roosting locations shall be recorded within seven days prior to Project activities. Maternity roosts shall be demarcated with an appropriate buffer as agreed upon by CDFW and CDPR. Work shall occur outside of the maternity season. Trees and structures that are determined to support maternity roosts shall be left in place until the end of the maternity season and the young are flying and foraging on their own. Work near a maternity roost shall not occur between 30 minutes before sunset and 30 minutes after sunrise. 6. Large tree cutting or removal shall be supervised by a qualified bat specialist ~~biologist~~ to document the presence or absence of bats that might be affected. Trees that are known to be bat roosts shall not be buckled or mulched immediately. A period of at least 24 hours shall elapse prior to such operations to allow bats to escape. A local bat rehabilitation facility shall be available in the event tree-felling results in unanticipated injury to any bat. If an individual

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	3. In the event no roosting bats are present within the survey area, one-way exclusion devices shall be installed prior to structure demolition to exclude bat use and avoid their potential harm. 4. If potential roosting sites are identified, an additional survey to pinpoint roosting locations shall ~~should~~ occur within seven days prior to disturbing activities. The ~~biologist~~ bat specialist, in coordination with CDFW, shall refine a 200-foot or other agreed-upon buffer to keep in place during construction until the roosting site is confirmed to be no longer in use for hibernation ~~or dependent young~~. Night lighting for construction shall not be directed towards these roost sites. 5. If maternity roosts are identified, roosting locations shall be recorded within seven days prior to Project activities. Maternity roosts shall be demarcated with an appropriate buffer as agreed upon by CDFW and CDPR. Work shall occur outside of the maternity season. Trees and structures that are determined to support maternity roosts shall be left in place until the end of the maternity season and the young are flying and foraging on their own. Work near a maternity roost shall not occur between 30 minutes before sunset and 30 minutes after sunrise. 6. Large tree cutting or removal shall be supervised by a qualified bat specialist ~~biologist~~ to document the presence or absence of bats that might be affected. Trees that are known to be bat roosts shall not be buckled or mulched immediately. A period of at least 24 hours shall elapse prior to such operations to allow bats to escape. A local bat rehabilitation facility shall be available in the event tree-felling results in unanticipated injury to any bat. If an individual bat is injured, the bat specialist shall inform CDFW in writing within 24 hours of the incident. 7. If bat roosts are affected during construction, the Project applicant shall provide replacement roosts within similar habitat and with a gap no greater than 3.8 centimeters and interior surface comparable to that of the original roost. The replacement roost shall be swabbed with bat guano and urine collected from the original roost. For the replacement roost to be considered effective, the same bat species that was affected by construction shall be observed utilizing the replacement roost in numbers that are comparable to the original roost. Replacement roosts that are occupied shall be left in placed during and after the Project	bat is injured, the bat specialist shall inform CDFW in writing within 24 hours of the incident. 7. If bat roosts are affected during construction, the Project applicant shall provide replacement roosts within similar habitat and with a gap no greater than 3.8 centimeters and interior surface comparable to that of the original roost. The replacement roost shall be swabbed with bat guano and urine collected from the original roost. For the replacement roost to be considered effective, the same bat species that was affected by construction shall be observed utilizing the replacement roost in numbers that are comparable to the original roost. Replacement roosts that are occupied shall be left in placed during and after the Project.
AG 5-18	Additional Comments Acknowledgement. CDFW appreciates that CDPR has incorporated comments and recommendations from the NOP into the DEIR and looks forward to continued coordination with CDPR on this Project.	CDFW comments will be incorporated into the revised text as requested.

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AG 5-19	Alternative 2. CDFW supports Alternative 2 as the environmentally superior alternative and believes it should be the preferred alternative for the Project. The DEIR states that Alternative 3 would result in the fewest environmental effects and is considered the environmentally superior alternative (page 6-19). When evaluating the Project objectives, both Alternative 2 and 3 would meet all the objectives. However, Alternative 2 would provide the maximum lagoon habitat and restoration areas within the Project area. As a result of maximum lagoon expansion, fish passage for tidewater goby and southern steelhead would improve to its fullest potential under Alternative 2. Additionally, the DEIR notes that, "…local species would be increasingly stressed by changes in temperatures and rainfall patterns. Diversity and abundance would likely decrease. Endangered species could be extirpated" (page 2-8). Given that extirpation of endangered species may result over time as climate change and sea level rise increases, CDPR should proceed with the alternative that would afford endangered species the fullest resiliency to climate change. Alternative 3 would provide the least resilience to sea level rise as the Project area would retain much of the fill material on the east side of the creek. Furthermore, Alternative 3 proposes to retain the most motel structures than other alternatives proposed. While the motel structures have historical value, retention of these structures does not benefit wildlife species and natural resources within the Project area. CDFW strongly recommends that CDPR consider Alternative 2 as the preferred alternative since it maximizes the lagoon habitat, increases fish passage opportunity, increases habitat along Topanga Creek, and provides long term coastal resiliency through lagoon expansion.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
AG 5-20	Living Shoreline Elements. Under all build alternatives, the Project would incorporate bioengineered stabilization and living shoreline elements. The DEIR further states that living shorelines would typically feature temporary fencing and native vegetation (page 2-16). While living shoreline elements may provide biological benefits, the DEIR does not provide sufficient information for CDFW to determine if this component of the Project may have adverse effects on wildlife and natural resources. CDFW recommends CDPR provide a full description of what living shoreline elements would be incorporated as part of the Project. CDPR should also provide the specific location(s) of where the living shoreline elements would be placed along the beach in the selected alternative. Moreover, CDPR should assess if any adverse impacts would occur as a result of constructing living shoreline elements in the Project area.	The Draft EIR describes possible living shoreline designs on page 2-15 to include low impact installations above the high-water line: "Bioengineered stabilization and living shorelines typically feature low-impact installation of temporary fencing and native sand dune habitat vegetation to encourage deposition of sand and include interpretive signage and pathway guidance. These elements would be installed above the ordinary high-water mark and would be located where they could protect lifeguard facilities. Detailed design of these elements would be developed for the preferred alternative in the next design phase in accordance with best management practices (BMPs) similar to those implemented along Santa Monica, Dockweiler, and Zuma beaches." Typically living shorelines consist of cobble within the base that is buried by beach sand, and the beach sand is colonized by native dune vegetation such as beach wild rye, beach bur, yellow sand verbena, beach salt bush, and silky beach pea. Sand accumulation is encouraged by judiciously using sand fencing. Dunes, or living shorelines, are typically positioned above the combined extreme high tide and wave run-up line and thus elevated to between approximately +16 to +20 feet above NAVD88. They can occupy a footprint of approximately between 30 to 60 feet wide at the base (depending on the size of dune hummocks) and serve as a sand reservoir in the case of extreme coastal storm wave events. They may require maintenance and repair after coastal storms to replace sand that was removed by the sea.

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AG 5-21	Best Management Practices. To enhance the general BMPs outlined in the DIER, CDPR should revise Mitigation Measure BIO-7 General BMPs for Biological Resources to incorporate the underlined language and omit language in strikethrough: To minimize temporary and limited turbidity or water pollution impacts from adjacent ground disturbing activities, the following BMPs shall be implemented at a minimum. If more stringent measures are identified in the Project permits and Storm Water Pollution Prevention Plan (SWPPP), they will also be implemented. 1. Siltation fences, or other suitable material, shall be installed at the edge of the work areas to be graded to avoid movement of soil into wetted areas. 2. Vegetation removal shall be conducted so that materials are not permitted to fall into wetted areas. 3. Stockpiles shall be located a minimum distance of 100 feet ~~away~~ from the lagoon and creek corridor and shall ~~will~~ be contained by standard BMPs such as wattles, tarps, or burlap to ensure materials are not moved into the creek due to wind, rain, gravity, or flooding. 4. No equipment maintenance or refueling shall be permitted within 100 feet to avoid accidental spills from entering the lagoon and/or creek. 5. Soil shall be stabilized in bare areas with mulch, straw matting, hydroseeding (i.e., weed free hydroseed mix) or other approved methods as described in the Restoration Plan to avoid movement of soils into wetted areas. 6. Ground disturbing activities and vegetation removal shall not occur during rain events. Within 24 hours of a projected likely rain event, the site will be "buttoned up" with appropriate BMPs such as covers over stockpiles and wattle installation at graded area boundaries and along slopes so that soil and Project materials will not wash into adjacent areas. 7. Access roadways shall be periodically swept (paved) or wetted down (unpaved) to minimize soil movement into adjacent areas due to wind. 8. Construction lighting shall be directed away from non-work areas and directed downward to avoid adversely affecting adjacent species and their movement corridors.	The Draft EIR concludes on page 3.3-79 that implementation of BIO-7 imposing best management practices during construction would ensure that inadvertent significant impacts are avoided. The proposed edits to impose minimum distances may not be feasible and would be overly restrictive and have therefore not been incorporated. No additional edits are needed to support the less than significant conclusion.
AG 5-22	Rodenticides. The DEIR does not describe the use of rodenticides during or after the Project. However, because various mammals have been observed within the Project area, CDFW recommends CDPR prohibits the use of rodenticides and second-generation anticoagulant rodenticides within the Project area in perpetuity.	Construction of the Proposed Project would not include the use of rodenticides. Once constructed, facilities would be maintained by the property owners: Caltrans, CDPR, and Los Angeles County. Maintenance of facilities including the use of rodenticides would conform to applicable standards and regulations.

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AG 5-23	CESA. Several CESA protected species (e.g., southern steelhead, Crotch's bumble bee) are either present within the Project area or have the potential of being present during Project activities. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). While CDFW appreciates the avoidance and minimization measures CDPR has incorporated into the DEIR to avoid take of special status species, incidental take may still occur. Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that CDPR seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements of a CESA ITP.	The Draft EIR acknowledges in Table 2-6 that project activities that may result in take of listed species would be required to formally consult with CDFW through either Section 2081 or 2080.1 of the California Endangered Species Act.
AG 5-24	Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Online Field Survey Form (CDFW 2024). CDPR should ensure that data was submitted data properly, with all data fields applicable filled out, prior to finalizing/adopting the environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The Project proponent should provide CDFW with confirmation of data submittal.	The Draft EIR is an informational document that has compiled data from numerous sources. CDPR acknowledges that biological resources survey information documenting special status species by qualified biologists be uploaded to the CNDDB as standard practice.

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AG 5-25	Mitigation and Monitoring Reporting Plan. CDFW recommends updating the DEIR's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist CDPR in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). CDPR is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided CDPR with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).	As noted on page 1-6 of the Draft EIR, the Final EIR will contain the Mitigation Monitoring and Reporting Plan that compiles all mitigation measures as modified through public agency comment.
AG 5-26	Filing Fees The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by CDPR and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).	Filings fees will be paid when submitting the Notice of Determination to Los Angeles County clerk as required by CEQA.
AG 5-27	Conclusion CDFW appreciates the opportunity to comment on the Project to assist CDPR in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that CDPR has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. Questions regarding this letter or further coordination should be direct to Julisa Portugal, Environmental Scientist, at Julisa.Portugal@wildlife.ca.gov or (562) 330-7563. Sincerely, Victoria Tang Environmental Program Manager South Coast Region	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Caltrans		
AG 6-1	Please accept the attached comments regarding the DEIR on behalf of Caltrans District 7. Dear Mr. Ota, Caltrans, District 7 provides our enthusiastic support for the Topanga Lagoon Restoration and PCH Bridge Replacement Project. Our staff have been an integral part of the Project Development Team since the initial stages of the project development process and have had extensive input into the development of the Draft Environmental Impact Report (DEIR). Therefore, Caltrans has no further comments on the DEIR at this time. As a responsible agency, Caltrans will continue to work closely with State Parks as the project moves forward. We fully expect to be able to adopt the Final Environmental Impact Report, as well as any future NEPA document, as our CEQA and NEPA clearances to facilitate the replacement of the PCH bridge over Topanga Creek and other project elements within Caltrans right-of-way. We believe this is a project that will benefit the public and the environment and look forward to working cooperatively with State Parks and the other stakeholders/landowners during future phases of this project. Sincerely, Kelly Ewing-Toledo Deputy District Director Division of Environmental Planning Caltrans District 7	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
California Coastal Commission – Michelle Kubran		
AG 7-1	In addition to our comment letter on the draft EIR, wanted to provide the following comments on the proposed alternatives. CCC staff is supportive of the largest area of wetland/lagoon restoration feasible while also retaining overnight accommodations as an option on the site.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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AG 7-2	We would be supportive of moving hotel units, or providing other overnight accommodations on another area of the site, for instance along Topanga Canyon Blvd (possibly in the area shown as new parking) in order to provide for the maximum lagoon restoration. We encourage analyzing the feasibility of locating units in a different area of the site. Please let me know if you have any questions.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Moving of the hotel units would still constitute an adverse effect similar to removing them completely, as the Motel would lose integrity of location, feeling and setting. Restoring the Topanga Ranch Motel would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
Los Angeles County Department of Regional Planning		
AG 8-1	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1220, has a lot to say about legal nonconforming structures and uses (the motel structures are likely legal nonconforming). We would hope CCC would use these legal nonconforming standards to guide their review of the motel restoration portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-2	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1770, sets forth all the allowable uses within the O-S-P Zone. We would hope CCC would use this list of allowable uses to guide their review of the motel restoration portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-3	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1220, has a lot to say about legal nonconforming structures and uses (the motel structures are likely legal nonconforming). We would hope CCC would use these legal nonconforming standards to guide their review of the motel restoration portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-4	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1220, has a lot to say about legal nonconforming structures and uses (the motel structures are likely legal nonconforming). We would hope CCC would use these legal nonconforming standards to guide their review of the motel restoration portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 8-5	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1770, sets forth all the allowable uses within the O-S-P Zone. We would hope CCC would use this list of allowable uses to guide their review of the motel restoration portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-6	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1770, sets forth all the allowable uses within the O-S-P Zone. We would hope CCC would use this list of allowable uses to guide their review of the gateway corner portion of this project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-7	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, throughout the SMM LCP, a number of regulations are on point with respect to the siting of OWTSs.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. OWTSs will be in conformance with LCP/LIP. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-8	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP Section 22.44.950 lays out, among other things, mitigation ratios associated with oak trees. We would urge CCC to ensure mitigation is required at at least the levels set forth in the SMM LCP.	The comment suggests mitigation ratios for tree removals be identified. Since the comment is an enhancement and enlargement of habitat compared with existing conditions, the Draft EIR considers the project to be essentially self-mitigating. The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines.
AG 8-9	Is there supposed to be a "?" there?	In response to the comment, the following revision to page 2-6 of the Draft EIR has been made: This upgraded an earlier coastal~~?~~ road built in the early 1920s that terminated at the entrance to the Rindge Ranch at approximately Las Flores Canyon.
AG 8-10	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1410, sets forth parking requirements in this area of town. We would hope CCC would look to this section for information on required parking.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-11	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1310, sets forth requirements related to, among other things, walls. We would hope CCC would use these regulations in their review of these proposed walls.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 8-12	A more robust analysis of infeasibility may be helpful here.	The Draft EIR notes on page 3.3-99 that protecting all trees in the ravine is infeasible since the project requires the removal of fill material to achieve its objective. It is not feasible to lower the finished grade over an area covering many acres and preserve every tree; the trees would either not survive, or if they did, would be destabilized. Detailed tree surveys were conducted to map all trees with a Diameter at Breast Height greater than 6 inches, and construction plans were designed to maximize retention of native trees. Table 3.3-14 provides an inventory of trees to be removed due to grading for each Alternative. Many mature nonnative trees along TCB were retained due to their horticultural value and use for parking shading. Although the project design attempted to minimize tree removals, the removal of some trees is unavoidable to meet the project grading objectives. However, the Draft EIR concludes that the resulting lift in habitat value resulting from the project would result in a net benefit to habitat compared with the No Project Alternative.
AG 8-13	Under Coastal Act Section 30601.3(b), consolidated CDPs will be processed using the local government's LCP as guidance. Here, SMM LCP, at Section 22.44.1890, sets forth all the allowable uses within the various protected habitats. We would hope CCC would use this list of allowable uses to guide their review of the project.	The comment cites the Coastal Act in support of the California Coastal Commission review and is acknowledged. The CDPR will follow CDP guidelines. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-14	Consider standardizing these headers as there is some inconsistency. In some places, this header is "Santa Monica Mountains Local Coastal Program" while here it includes "Los Angeles County."	The Draft EIR standardizes the headers as much as possible while recognizing differences between topic areas. Some areas are within the City of Malibu LCP and others are within Los Angeles County LCP. Ocean impacts are retained by CCC. The project will be subject to CDP guidelines under the direction of CCC. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-15	Is the Santa Monica Mountains Local Coastal Program silent on geology, soils, seismicity, topography, and paleontology? There is no reference to it here under regional and local regulatory setting …	In response to the comment, the applicable SMM LCP goals and policies that pertain to Geology, Soils, Seismicity, Topography, and Paleontology have been added to section 3.6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). <u>Santa Monica Mountains Local Coastal Program</u> <u>The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to geology, soils, seismicity, topography, and paleontology and are relevant to the Proposed Project:</u>

Comment Number	Comment	Response
		Goal CO-8: Preservation of the area's rich and diverse archaeological, paleontological and historic cultural resources. CO-204 Protect and preserve archaeological, historical, and paleontological resources from destruction, and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible. CO-205 Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission. CO-206 Regulate landform alteration to ensure minimal disturbance of known archaeological and historic cultural sites. New development on sites identified as archaeologically sensitive shall include onsite monitoring of all grading, excavation, and site preparation that involve earthmoving operations by a qualified archaeologist(s) and appropriate Native American consultant(s). CO-207 The County should coordinate with appropriate agencies, such as the Southern California Indian Center (SCIC) and the UCLA Archaeological Center, to identify archaeologically sensitive areas. Such information should be kept confidential to protect archaeological resources. [note that Native American Heritage Commission (NAHC), and the California Historical Resources Information System (CHRIS) have retained this role] CO-208 New development within archaeologically-sensitive areas shall implement appropriate mitigation measures, designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission. CO-210 Prohibit the unauthorized collection of paleontological and historic cultural artifacts. Goal SN-1: A built environment designed and engineered to minimize the potential for loss of life, physical injury, environmental disruption, property damage, economic loss and social dislocation due to seismic- and non-seismic induced geologic phenomena. SN-1 All new development shall be sized, designed and sited to minimize risks to life and property from geologic hazard. SN-2 On ancient landslides, unstable slopes and other geologic hazard areas, new development shall only be permitted where there is substantial evidence, provided by the applicant and confirmed by the Los Angeles County Department of Public Works, that the project provides an adequate factor of safety. SN-3 Prohibit new development in areas where it presents an extraordinary risk to life and property due to an existing or demonstrated potential public health and safety hazard.

Comment Number	Comment	Response
		SN-4 In the placement of new development, emphasize avoiding areas susceptible to seismic and non-seismic geologic hazards, even when engineering solutions are available SN-5 Prohibit grading and brushing in areas that have a slope of 50 percent or greater and limit grading in areas with a slope of over 25 percent. SN-6 Prohibit the construction of new structures for human occupation in unstable geologic areas. SN-7 Limit the discretion and authority of County inspectors to modify approved grading plans at project sites to that which is necessary to address unanticipated conditions and to protect public health and safety. SN-8 In-field grading modifications shall be subject to a coastal development permit amendment to ensure that modifications will not create adverse impacts that were not considered during a project's environmental review. SN-9 Allow the remediation or stabilization of landslides or other slope instability that affect existing structures or that threaten public health or safety. Analyze alternative remediation or stabilization techniques to determine the least-environmentally-damaging alternative. Maximum feasible mitigation shall be incorporated into the project to minimize adverse impacts to natural resources. SN-10 Prohibit land divisions, including lot line adjustments, unless all proposed parcels can be demonstrated to be safe from flooding, erosion, and geologic hazards and will provide a safe, legal, all-weather access road(s), which can be constructed consistent with all policies of the LCP. SN-11 New development shall assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
AG 8-16	Is the Santa Monica Mountains Local Coastal Program silent on hazards and hazardous materials? There is no reference to it here under regional and local regulatory setting …	In response to the comment, the applicable SMM LCP goals and policies that pertain to Hazards and Hazardous Materials have been added to section 3.8 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). Santa Monica Mountains Local Coastal Program The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to hazardous and toxic materials and are relevant to the Proposed Project:

Comment Number	Comment	Response
		Goal SN-5: The transport, distribution, sale, use, storage, and disposal of hazardous material and hazardous waste in a manner that protects the health and safety of residents, workers, area visitors, and the natural environment. SN-38 Monitor through conditional approvals businesses handling, using, or storing more than threshold amounts of hazardous or toxic materials. Hazardous or toxic wastes may only be stored on a commercial site temporarily and must be disposed of as soon as possible. SN-39 Prohibit hazardous waste disposal facilities within the Santa Monica Mountains, due to the area's sensitive seismic and geologic characteristics. Goal SN-6: A land, air, and water environment with minimal cumulative impacts from the use of toxic and hazardous materials. SN-40 Protect the area's residents, workers, and visitors from the risks inherent in the transport, distribution, use, and storage of hazardous materials and hazardous wastes, recognizing that the use of these materials is necessary in many parts of society.
AG 8-17	Be aware Title 22 at-large does not apply to the Santa Monica Mountains Coastal Zone as only portions of Title 22 certified by Coastal Commission do (i.e., only Chapter 22.44).	The project would conform with applicable LCP and CDP requirements, including relevant Title 22 stipulations. The Draft EIR identifies Title 22 requirements as they are applicable to areas of the project footprint. No modifications to the Draft EIR are required. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 8-18	Why? Expand and explain …	The policies of the Coastal Act, Los Angeles County General Plan, Santa Monica Mountains LCP, and SCAG RTP/SCS are enumerated beginning on page 3.1-2 of the Draft EIR. Each of these plans outline goals and policies to protect coastal access and ecological resources. The Draft EIR on page 3.10-11 notes that that the No Project condition is not consistent with these policies since ecological resources are degraded. Improving ecological conditions under one of the Build Alternatives would provide greater conformity with the noted policies than would the No Project Alternative.
AG 8-19	May want to be more clear here. While some portions of the project may be within CCC's area of retained jurisdiction, other portions of the project (i.e., the portions within the SMMCZ) are within areas regulated by a certified LCP. CCC is processing a consolidated CDP not because of their retained jurisdiction but because the applicant, LA County, and CCC have agreed to a consolidated CDP where otherwise multiple entitlements from multiple jurisdictions would be required. See Coastal Act Section 30601.3(a) for more information.	The comment notes that some areas of the project are within the County's approved LCP and that the decision to obtain a consolidated CDP is ultimately the CCC's decision. The Draft EIR assumptions are consistent with this information. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 8-20	I'm not sure some of the alternatives have been described with enough detail to definitively make this determination. For example, just above, it indicates that, under Alternatives 3 and 4, the Topanga Ranch Motel "could include a mix of overnight accommodations …" Without providing more detail related to the proposal, and by only using permissive language, this seems a bit ambiguous.	The Draft EIR describes the proposed redevelopment of the Topanga Ranch Motel under Alternative 3 and 4 in Sections 2.6.4 and 2.6.5 the best available project designs for the repurposing of the Topanga Ranch Motel. The Draft EIR concludes on page 3.10-11 that these designs for the repurposing of the Topanga Ranch Motel would be performed consistent with the applicable land use plans. If future designs were to change subsequently such that the use of the Topanga Ranch Motel could be inconsistent with land use plans, subsequent analysis would be required prior to the approval and implementation of those designs.
AG 8-21	Is the Santa Monica Mountains Local Coastal Program silent on noise? There is no reference to it here under regional and local regulatory setting …	In response to the comment, the applicable SMM LCP goals and policies that pertain to Noise have been added to section 3.12 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). Santa Monica Mountains Local Coastal Program The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to noise hazards and are relevant to the Proposed Project: Goal SN-7: Noise sensitive lands and land uses, wildlife habitats, and public lands that are shielded from excessive mobile and stationary noise. SN-42 Require development projects to demonstrate that: 1) no adverse noise effects on adjacent uses will occur from the project, 2) no adverse effects on the project will occur from adjacent influences, and 3) that provisions of the County Noise Ordinance can be met by the project. SN-44 Prohibit, wherever feasible, new development or land uses within any natural area or sensitive land use from increasing the ambient noise levels by more than 3 dBA CNEL. If infeasible, noise impacts shall be mitigated. SN-45 Consider noise impacts in transportation system design and require that roadway extensions and capacity enhancement projects mitigate related noise impacts to acceptable levels. SN-48 Locate noise-tolerant uses within developed areas. Encourage sensitive building orientation, placing the most noise-tolerant portions of a project between sensitive portions and the noise source, and architectural design as the noise management strategies preferred over constructing noise barriers. SN-49 Private helicopter pads are prohibited. Publicly owned and operated helicopter pads and stops may be allowed on public or private land where needed for emergency services, and consistent with all applicable policies of the LCP. Locate new public helicopter pads to limit noise impacts on residential areas and public parklands.

Comment Number	Comment	Response
City of Malibu – Richard Mollica		
AG 9-1	Dear Mr. Ota: Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed Topanga Lagoon Restoration Project. The City provides the following comments on the Draft EIR: 1. Section 3.9-2 - The project must comply with the City of Malibu's Municipal Code Chapter 14.04 (Storm Water Management and Discharge Control) and Chapter15.20m Floodplain Management). This project will need to comply with the City's MS4 Permit requirements. The project will also need to be reviewed for impacts in a mapped FEMA Flood Zone.	This comment does not address the adequacy of the Draft EIR. The portion of project within the City of Malibu is within Caltrans Right of Way and will be covered by the Caltrans MS4. This part of floodplain is within LA County unincorporated area, not within the City of Malibu. Section 3.9.1 of the Draft EIR describes the water quality and flood control regulations applicable to the project including federal, state, and local regulations. The project is almost entirely within unincorporated Los Angeles County, and therefore subject to County stormwater management design requirements, including the County-wide MS4 permit issued by the Los Angeles RWQCB, noted on page 3.9-9. The portion of the project within the City of Malibu is limited to minor road work and traffic control on PCH west of the construction zone. The construction activities in this area would be subject to Caltrans stormwater BMPs and design standards including the MS4 permit.
AG 9-2	2. Section 3.9-11- The project will be required to comply with the area's MS4 Watershed Management Plan. The reference to "SUSMP" is not applicable to the new requirements in the latest version of the NPDES permit provisions. The applicant should look into each jurisdiction's requirements.	As noted on page 3.9-11 of the Draft EIR, the Los Angeles County MS4 NPDES permit requires SUSMP or equivalent for certain parts of the County. This comment does not address the adequacy of the Draft EIR. The portion of project within the City of Malibu is within Caltrans Right of Way and will be covered by the Caltrans MS4 through a Stormwater Data Report (SWDR). The portion of the project within the City of Malibu is limited to minor road work and traffic control on PCH west of the construction zone. The construction activities in this area would be subject to Caltrans stormwater BMPs and design standards including the MS4 permit.
AG 9-3	3. Section 3.9-22 - The applicant shall verify the specific local MS4 Permit requirements as stated in the Watershed Management Plans. It appears that this project would be required to meet the water quality discharge requirements as stated in the North Santa Monica Bay Watershed Management Plan (City of Malibu, County of Los Angeles, and Flood Control). The applicant shall verify the specific requirements in the adjacent jurisdiction.	This comment does not address the adequacy of the Draft EIR. The portion of project within the City of Malibu is within Caltrans Right of Way and will be covered by the Caltrans MS4 through a Stormwater Data Report (SWDR). The Proposed Project would be subject to Caltrans stormwater BMPs and the Los Angeles RWQCB MS4 permit (Order No. R4-2012-0175-A01) that imposes design standards on new development. These standards would be incorporated into the project as flow retention features described on page 3.9-25.

Comment Number	Comment	Response
AG 9-4	4. Section 4-12 -This project needs to be evaluated by the City of Malibu since it is within a FEMA mapped Flood Zone that is administered by the City. Any development within a mapped flood zone shall meet the requirements of the City's Municipal Code Chapter 15.20 and other FEMA Floodplain regulation.	This comment does not address the adequacy of the DEIR. This proposed lagoon grading is within LA County unincorporated area, and not within the City of Malibu. Topanga Creek is located within unincorporated Los Angeles County. Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations.
AG 9-5	5. Due to the potential impacts to water and water quality, the California Department of Parks and Recreation may consider sharing the DEIR to and requesting comments from the North Santa Monica Bay Watershed Area Steering Committee, consisting of members of numerous jurisdictions, water districts, and Wishtoyo Chumash.	Outreach to the North Santa Monica Bay Watershed Area Steering Committee has been indirectly through individual members to date. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.
AG 9-6	6. The soils report and geotechnical investigation could consider the impact that substantial winter rains may have on the proposed subsurface drip irrigation.	The AOWTS would be subject to County and/or Regional Water Quality Control Board design requirements that include design standards to accommodate rain events.
AG 9-7	7. The maps show the location of the proposed subsurface drip irrigation (option 1). Consider updating the maps to show the proposed location of the septic tank(s) and seepage pits (option 2).	Final designs will include detailed location and specifications of subsurface infrastructure.

Comment Number	Comment	Response
AG 9-8	8. Section 2.2.3 includes an erroneous question mark: “This upgraded an earlier coastal? road built in the early 1920s”	In response to the comment, the following revision to page 2-6 of the Draft EIR has been made: This upgraded an earlier coastal~~?~~ road built in the early 1920s
AG 9-9	9. Section 2.6.2, Option 2 discusses trucking material from Pacific Coast Highway to Malibu Canyon Road. If this option is chosen, discuss the requirements of trucking material with the City of Environmental Sustainability Department.	As clarified in the Final EIR Section 3.2, Mitigation Measure TRA-3 requires coordination with the City of Malibu if the truck hauling route traverses the City of Malibu.
AG 9-10	10. Section 3.1.1 Regulatory Setting describes local regulations from County of Los Angeles, Topanga State Park 2012 General Plan, and Santa Monica Mountains Local Coastal Program. This section should include the applicable Malibu regulations (Local Coastal Program Local Implementation Plan) since portions of the project are within the City of Malibu jurisdiction.	The portion of the project within the City of Malibu is limited to minor road work and traffic control on PCH west of the construction zone. The construction activities in this area would be coordinated with the City of Malibu consistent with any Caltrans work within PCH, including implementing applicable measures included in the consolidated Coastal Development Permit to be issued directly from the CCC.
AG 9-11	11. Do the results of the Los Angeles County Beaches and Harbor’s Coastal Resiliency study impact the sea level rise evaluated for this study?	The Draft EIR assesses impacts of sea level rise on the Proposed Project. Each Alternative would be affected slightly differently with Alternative 2 providing the greatest resilience due to the widened lagoon. The proposed project has been designed in coordination with the County of Los Angeles Department of Beaches and Harbors and is consistent with applicable County policies and development regulations.
AG 9-12	12. A coastal development permit (CDP) pursuant to the California Coastal Act from the California Coastal Commission (CCC) is required. The Draft EIR indicates State Parks would obtain a consolidated CDP and implement the permit conditions. The DEIR should acknowledge that a CDP may be required from the City of Malibu for any work that takes place within City boundaries or the City may authorize the work to be implemented under the consolidated CDP. The City understands this information will not be available until after the project alternative is selected.	The portion of the project within the City of Malibu is limited to minor road work and traffic control on PCH west of the construction zone. The construction activities in this area would be coordinated with the City of Malibu consistent with any Caltrans work within PCH, including implementing applicable measures included in the consolidated Coastal Development Permit to be issued directly from the CCC.
AG 9-13	At its April 8, 2024 meeting, the City Council considered the attached letter from Laurence Wiener, Richards, Watson & Gershon (RWG), who represents residents who live adjacent to the western boundary of the Topanga Lagoon Restoration project. The Council voted to include the letter and fully supports the comments offered by the residents and requests that the comments be given full consideration. Sincerely, Richard Mollica Planning Director	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
City of Malibu – Patricia Salazar		
AG 10-1	Attached is the City of Malibu’s comment letter on the Topanga Lagoon Restoration Draft EIR.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 10-2	Dear Mayor Uhring and Honorable Members of the City Council: We support the City of Malibu's comments on the Draft Environmental Impact Report ("DEIR") for the Topanga Lagoon Restoration Project ("Project"), appearing as Item 6.B on of the Monday, April 8, 2024 City Council meeting agenda. Furthermore, we respectfully request the addition of several other comments.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 10-3	I represent residents who live adjacent to the western boundary of the Project Site ("Residents") and who are concerned about the Project's potential impacts to their homes as well as the overall adequacy of the DEIR. We are pleased that the City is considering submitting comments on the DEIR and commend staff's work in identifying the issues raised in the draft comments. We concur that the DEIR should be revised to address those comments.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 10-4	Unfortunately, the Residents have not been adequately consulted by the State to allow meaningful participation in the planning of the Project, particularly with respect to the potential dangers to their homes as a result of the Project. As a consequence, the Residents plan on submitting comments on the DEIR that identify many concerns with the Project and deficiencies in the DEIR	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Sections 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022, and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.

Comment Number	Comment	Response
AG 10-5	From a review of the DEIR, and the potentially massive traffic and safety impacts on the City of Malibu, it appears that the City of Malibu was also not adequately consulted. As such, we have identified areas of concern with the DEIR that we believe should be of particular interest to the City of Malibu and its residents and visitors. To that end, we respectfully provide the following proposed language with the hope that the City Council will supplement the City's draft comment letter to additionally address these additional concerns.	The City of Malibu has been included in the public outreach process and has attended both the TAC and public meetings. Additionally, meetings were held with City staff on 7/27/2022 and 1/29/24. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.
AG 10-6	1. The DEIR fails to provide "an accurate, stable and finite" project description. Absent an accurate, stable and finite project description, it is not possible for the City of Malibu to understand the Project and assess its impacts. The DEIR must be revised to identify a preferred project and also identify alternatives to that proposed project. It is not sufficient to simply set forth a range of possible alternatives without identifying a proposed project. However, the DEIR does just that. See Washoe Meadows Community v. Department of Parks and Recreation (2017) 17 Cal.App.5th 277. The City of Malibu should be apprised of the project's impacts and be able to comment thoughtfully on alternatives and mitigation.	The comment suggests that the project description is not "stable" since multiple alternatives are evaluated at an equal level of detail. As noted in the Project Description of the Draft EIR, each of the Alternatives possess numerous common features including the enlargement of the Topanga Creek Lagoon, the extension of the bridge on PCH, and the modification of visitor services within State Park and on the beach. The differences between the Alternatives are refinements of the footprint associated with the grading plan that would decide the fate of the Topanga Ranch Motel. Other refinements include the type of wastewater management system to be installed and the final alignment of the newly constructed bridge. Each of these Project refinements is analyzed in detail and Mitigation Measures are identified throughout the Draft EIR that apply to all three Build Alternatives equally. None of the Mitigation Measures are specific to an Alternative. As a result, the public has been given all the information needed to understand the significance of impacts for all project components and the Mitigation Measures that will be applied irrespective of the Alternative selected as the preferred Alternative. All significant impacts are clearly identified for each Alternative. As a result, the project evaluated in the Draft EIR is stable and clearly defined both in the location and impact significance, with refinements of certain components identified as Project Alternatives. CDPR has identified Alternative 3A as the preferred Alternative. CDPR will approve the Project based on the components evaluated in detail for each of the Alternatives.

Comment Number	Comment	Response
		The comment cites Washoe Meadows Community v. Department of Parks & Recreation (2107) 17 Cal.App.5th 277, 287. However, that opinion describes situations in which the presentation of a small number of closely related alternatives would be acceptable since mitigation measures would apply equally to each Alternative, concluding that the public was given sufficient information to understand the significance of impacts of the project and the mitigation measures that would be applied. With the impacts and mitigation measures identified in the Draft EIR, applicable to each of the Alternatives, no information has been omitted. The number of comments where commentors have identified a preference for an alternative shows that the public understands and is familiar with the projects presented. As a result, the Draft EIR is consistent with CEQA's informational requirements and recirculation to identify the preferred Alternative without adding any new information is not warranted.
AG 10-7	2. The DEIR fails to adequately account for and analyze transportation and emergency access and evacuation impacts given the existing condition of SR-27 (Topanga Canyon Boulevard) which is closed indefinitely from the Pacific Coast Highway to Grand View Drive due to an unstable landslide. The DEIR should be updated to analyze transportation and emergency evacuation impacts under the present and likely recurrent scenario of an extended SR-27 closure.	The Topanga Canyon Boulevard landslide occurred during the review period of the Draft EIR. The temporary closure of the roadway is not part of the baseline condition, which is tied to the date of the publishing of the NOP. Due to the importance of the roadway to the local community, Topanga Canyon Boulevard was reopened on June 2, 2024.
AG 10-8	3. The DEIR fails to adequately discuss or analyze impacts to the adopted Evacuation Plan for the City of Malibu, which identifies Topanga State Beach Parking at 18700 Pacific Coast Hwy Malibu CA 90265 - located within the project site - as a pre-identified "Safe Refuge Area." Temporary closure of the site during construction, which will last a minimum of five years, would conflict with the adopted Evacuation Plan. This impact is not adequately mitigated. Appendix J provides a Draft Construction Traffic and Emergency Management Plan which is required by Mitigation Measure TRA-1. The Draft Construction Traffic and Emergency Management Plan, however, does not address this issue and instead defers dealing with this conflict to a future coordination between the County and City of Malibu at some point during the final design stating: "The Lead Agency/Project Sponsor and contractor will coordinate with the County and City of Malibu to identify an alternative refuge area in close proximity to the Project during the period of construction which causes the DBH [County Department of Beaches and Harbors] parking lot to be unavailable." There is no guarantee that any alternative area can be found nor are there any guidelines for identifying an alternative area. Again, Malibu should be informed of any change of this magnitude to its emergency plans.	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu and to confirm that the plan to meet City of Malibu evacuation plan components. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas to conform with the City of Malibu's objectives would be accommodated into the plan in coordination with the City in order to ensure conformity with the City's plan.
AG 10-9	4. The DEIR understates potential transportation and traffic impacts that will impact the lives of residents of and visitors to the City of Malibu, particularly during construction of the Project. Pacific Coast Highway will be severely impacted during construction, and construction is estimated to last a minimum of five years, and will likely be much longer.	This comment expresses concern regarding traffic impacts. The project requires that all four lanes of PCH remain available at all times during construction. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and

Comment Number	Comment	Response
		Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant either without or with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the land owners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. TRA-1 through 4 would address potential traffic flow disruptions that could affect emergency response and will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.

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AG 10-10	5. The Project proposes to move the existing helipad (located west of the lagoon on the Malibu side of the existing bridge) to the east of the lagoon with one of the proposed parking lots. This places the helipad on the other side of the extended bridge from Malibu. The DEIR does not discuss or analyze impacts of this to Malibu-based first responders who, to access the helipad, would need to cross the bridge, adding distance to the helipad and potential obstructions if the bridge is impacted by traffic or natural disaster (e.g., earthquake, fire, flood, landslide).	The Draft EIR describes the location of the new helipad to be accessed through the new parking lot on the east side of the lagoon. Traffic posed by the helipad would be minimal. In the event of an emergency, access through the parking lot would be maintained as required in providing "conforming" parking spaces. Impacts to traffic circulation including emergency responders to and from the City of Malibu posed by the location of the helipad would not be a significant change from existing conditions. The existing helicopter landing area on the knoll does not conform with current FAA standards and is not officially recognized as a helipad. The proposed helipad will be an asset to the community, conforming with FAA standards and designed primarily to support rescue missions along the Malibu coastline. Helicopters landing on the pad may have injured persons needing ground transportation to local hospitals. Placing the helipad on the eastern side of the bridge maintains emergency access to the urban Los Angeles area more directly than the current location to the west of the bridge should the bridge be compromised in an earthquake.
AG 10-11	6. The staff should consider supplementing comment 9 to request that the DEIR discuss the requirements of trucking material with the City Environmental Sustainability Department for all options, not just option 2. The Beneficial Sediment Reuse Study on page 11 notes that Option 3 (Mechanical Removal and Upland Landfill Disposal) may include haul routes using either Topanga Canyon Boulevard, or Pacific Coast Highway, or Malibu Canyon Boulevard. However, the DEIR doesn't appear to recognize any City interest in such haul routes. The DEIR should be revised to require consultation with the City on all haul routes which traverse the City.	As clarified in the Final EIR Section 3.2, Mitigation Measure TRA-3 requires coordination with the City of Malibu if the truck hauling route traverses the City of Malibu.
AG 10-12	7. The DEIR should be revised to fully address the City of Malibu's concerns. The DEIR should then be recirculated pursuant to CEQA Guidelines Section 15088.5 to allow the City of Malibu, and the interested public, the opportunity to meaningfully review and comment on the DEIR, including the adequacy of the revisions necessary to address the City's concerns.	The Draft EIR has been prepared consistent with CEQA requirements. No new information has been provided in the comment not already addressed in the Draft EIR or that would alter the analysis in the Draft EIR. As a result, recirculating the Draft EIR or postponing the implementation of the Project is not warranted.
AG 10-13	Should the City Council find it appropriate to supplement the draft City comment letter based on the foregoing, our recommendation is that the City Council provide staff direction to add the comments identified in items 1 through 7 of this letter to the City's comment letter and submit the revised comment letter to State Parks by the April 12 comment period deadline. Thank you for your time and consideration. Very truly yours, Laurence S. Wiener	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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Department of Beaches and Harbors – Warren Ontiveros		
AG 11-1	Dear Ms. Harrod, Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Topanga Lagoon Restoration Project (Project), which was released on February 12, 2024. As the operating and managing agency for L.A. County-owned Topanga Beach, the Department of Beaches and Harbors (Department or DBH) recognizes the collaborative efforts reflected in the DEIR and remains committed to working closely with the California Department of Parks and Recreation (State Parks) and Department of Transportation (Caltrans) as well as the Resource Conservation District of the Santa Monica Mountains (RCD) to advance the Project's concept.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 11-2	DBH has reviewed the available DEIR and hereby provides the following comments, consistent with the Department's strategic goals of enhancing public access to our coast, maximizing operational effectiveness and service excellence, and protecting coastal ecosystems while pursuing increased resilience of our beaches. As discussed in more detail below, the County requests that additional details be included in the DEIR on the environmental impacts of the identified components in order for the County to assess the impacts of the proposed project on the County. The County acknowledges that a preferred alternative has not been selected at this time, therefore the comments in this letter generally apply to all alternatives. Once a preferred alternative has been agreed upon at a future date, any associated capital improvement project(s) that affects the County's property would need to be approved by the County. For the County to carry out its role as a Responsible Agency under CEQA, the information requested in this comment letter must be provided. Further comments to the DEIR may be provided once additional information is received in response to these preliminary comments.	As noted on page 2-38 of the Draft EIR, State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 11-3	Coastal Access and Recreation – Impacts to Existing Resources and Access Based on the figures provided in the DEIR, the Department is unable to understand the full extent of the proposed lagoon restoration footprint on County beach property and how this would impact existing sandy beach and recreation areas. Figures ES-2a, ES-3a, and ES-4a identify the general location of an "Expanded Topanga Lagoon" area, however they do not provide specificity on the expansion. Please provide a figure that clearly shows the potential lagoon footprint under each proposed alternative, including areas of the beach where the lagoon could flood or breach. (Executive Summary, Pages ES-5, ES-11, and ES-14)	The figures provided in the Draft EIR for each Alternative represent the 30 percent design for the project, including the extent of grading, the re-location of the helipad, new parking configurations, and the new location for the lifeguard and public restroom building. These designs are sufficient to assess potential environmental impacts of the Proposed Project, allowing for effort to be expended to focus final designs on a single Alternative. When more refined designs are available, the County as a Responsible Agency and landowner will be notified.

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AG 11-4	Please explain in the DEIR whether any analysis was done to determine whether the conversion of beach property for lagoon widening and/or Pacific Coast Highway (PCH) bridge purposes would trigger the Park Preservation Act. In addition, DBH would like written confirmation that the Parks Preservation Act will not be an issue and that all deed conditions for the beach will be abided by should the project move forward, especially the condition regarding project cost limitations. (Parks and Recreation, Page 3.14-2, Los Angeles County Code Quimby Requirements)	A waiver for relevant deed restrictions is being prepared by State Parks. Deed restriction waivers have been prepared in the past for similar projects without issue. State Parks analyzed the potential of the project to trigger the Parks Preservation Act and determined that none of the proposed activities met the threshold of "utilizing such property for any nonpark purpose". The project goals are the restoration of public open space and improvements to visitor serving infrastructure.
AG 11-5	The DEIR states that under all build alternatives, the Topanga Beach area and depth would increase, thereby providing additional space for recreational users. Please provide more information and figures to support this statement, including proposed beach widths for each alternative and figures showing where the beach area would increase under each alternative. (Recreation and Access, Page 3.14-8, Operation)	The figures provided in the Draft EIR for each Alternative represent the 30 percent design for the project, including the extent of grading, the re-location of the helipad, new parking configurations, and the new location for the lifeguard and public restroom building. These designs are sufficient to assess potential environmental impacts of the Proposed Project, allowing for effort to be expended to focus final designs on a single Alternative. When more refined designs are available, the County as a Responsible Agency and landowner will be notified.
AG 11-6	Under the Beach Expansion/Bioengineered Stabilization/Living Shoreline Opportunities section on Page 2-15, there is a statement related to the comment above that reads: “Under all Build Alternatives, the area of Topanga Beach would increase, ranging from up to 50 ft of additional depth in Alternatives 2 and 3 on the east cove beach, and approximately 90 ft in Alternative 4. On the west side, the beach would expand 0.65 acres for all Alternatives. Together, this adds between 1 to 1.2 acres beach area.” The portion of this statement that 1 to 1.2 acres of additional beach would be added to the site does not align with other areas of the document. Specifically, the No Project alternative states that the existing beach area within the project boundary is 4.18 acres. Alternatives 2, 3, and 4 state that the new beach acreage would be 4.39, 4.42, and 4.56 acres, respectively. When calculating the difference in beach area, this does not equal 1 to 1.2 acres of additional beach. Please clarify and update the DEIR, as needed.	The comment identifies a typographic error on page 2-15. In response to this comment the following changes have been made to the text on page 2-15 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). **Beach Expansion/Bioengineered Stabilization/Living Shoreline Opportunities** Under all Build Alternatives, the area of Topanga Beach would increase, ranging from up to 50 feet of additional depth on the east cove beach under Alternative 2 or 3 to approximately 90 feet under Alternative 4. On the west side, the beach would expand by 0.65 acre under any of the Build Alternatives. Together, these expansions would add ~~1 to 1.2~~ 0.2 to 0.4 acres of beach area. These additional areas would provide opportunities for increased recreational space and would incorporate bioengineered stabilization or living shoreline elements to both protect against storm surge and SLR and restore coastal strand and foredune habitats. Bioengineered stabilization and living shorelines typically feature low-impact installation of temporary fencing and native vegetation to encourage deposition of sand and include interpretive signage and pathway guidance. These elements would be installed above the ordinary high-water mark and would be located where they could protect lifeguard facilities. Additional design of these elements would be further developed for the preferred alternative in accordance with best management practices (BMPs) similar to those implemented along Santa Monica, Dockweiler, and Zuma beaches.

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AG 11-7	The DEIR states that the Project would provide additional beach areas that would provide opportunities for increased recreational space and would incorporate bioengineered stabilization or living shoreline elements to both protect against storm surge and SLR and restore coastal strand and foredune habitats. As a living shoreline project would most likely include a fence component, how much of the additional beach area would be accessible to the public for recreation? Please provide a figure showing potential areas for living shoreline elements versus public recreational space. (Parks and Recreation, Page 3.14-13, Cumulative Impacts)	The figures provided in the Draft EIR for each Alternative represent the 30 percent design for the project, including the extent of grading, the re-location of the helipad, new parking configurations, and the new location for the lifeguard and public restroom building. These designs are sufficient to assess potential environmental impacts of the Proposed Project, allowing for effort to be expended to focus final designs on a single Alternative. When more refined designs are available, the County as a Responsible Agency and landowner will be notified.
AG 11-8	The DEIR states that "Topanga Beach also includes an ocean frontage of 21.5 acres, receives approximately 750,000 visitors each year, and is popular with surfers because of the orientation of the beach (DBH 2022)." The beach acreage provided conflicts with the acreage provided on Page 2-6, 35 acres. Please provide consistent beach acreage figures throughout the DEIR. (Parks and Recreation, Page 3.14-5 and 3.14-6, Topanga Beach)	The acreage figures provided in the Draft EIR for each Alternative represent the 30 percent design for the project, including the extent of grading, the re-location of the helipad, new parking configurations, and the new location for the lifeguard and public restroom building. These designs are sufficient to assess potential environmental impacts of the Proposed Project, allowing for effort to be expended to focus final designs on a single Alternative. When more refined designs are available, the County as a Responsible Agency and landowner will be notified. In response to the comment, the Draft EIR has been modified to be consistent with respect to the estimated acreage of the Topanga Beach as follows (strikethrough/underline text is used to track changes made to the Draft EIR text). **2.2.4 Topanga Beach** Topanga Beach is located just south of where TCB meets the Pacific Ocean at PCH (Figure 2-4). Topanga Beach includes an ocean frontage of approximately ~~35~~ 21.5 acres, receives more than 750,000 visitors each year, and is popular with surfers because of the orientation of the beach (DBH 2022). Topanga Beach is accessible via Bus 534 at Stop "PCH and TCB" and provides a metered parking lot (at the upper level) and Americans with Disabilities Act (ADA) parking (at the upper and lower levels), beach wheelchairs, a lifeguard and public restroom building, and a picnic area.

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AG 11-9	Per the DEIR, there are a total of 97 parking spaces associated with the Topanga Beach paved east lot, with 87 conforming to current standards and 10 non-conforming. DBH has previously noted that there are 94 parking spaces in the lot, which include 3 Americans with Disabilities Act (ADA) designated spaces and 3 lifeguard staff spaces at the beach level, and 1 ADA designated spot at the PCH level. The Department understands that final parking counts will be updated, as needed, during the design phase. All parking, whether conforming or non-conforming, should be replaced so as not to impact parking availability and beach access. In addition, please discuss the potential for traffic impacts if all existing parking is not replaced at the site. (Parks and Recreation, Page 3.14-5 and 3.14-6, Topanga Beach)	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of at least 26 new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. The Draft EIR evaluates impacts to traffic and parking in Section 3.16. The Draft EIR concludes that the proposed parking would not result in significant impacts. The replacement of non-conforming parking spaces along PCH with conforming spaces will improve traffic and pedestrian safety through the replacement of roadside pull-over spaces with controlled parking areas. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 97 public fee spaces in the east DBH lot. Under the proposed hybrid, the Alternative 2 design has been selected by DBH, which would include at least 87 conforming spaces (26 in the SW lot plus 61 in the SE lot). Development of refined designs that could match the previous total of 97 spaces will be pursued. Although DBH could potentially lose up to 10 spaces, the project overall provides more parking at more convenient locations.
AG 11-10	The DEIR notes that access to Will Rogers State Beach is primarily provided via parking along southbound PCH and a beach parking lot that is the eastern terminus of the Project Area. Furthermore, it is noted that this lot could be used for construction staging if wastewater Option 3 (sewer) is selected. Please update this section to clarify that there are several parking lots associated with Will Rogers State Beach, with the closest lot being the Coastline Parking Lot. Please also note in this section that the Coastline Parking Lot may potentially be used for staging purposes. (Parks and Recreation, Page 3.14-6, Will Rogers Beach)	The Draft EIR notes on page 2-41 that parking and staging during construction of the sewer line within PCH may utilize existing parking areas temporarily. Final designs and the construction contractor will determine which parking areas are needed. As noted in the comment, there are currently several areas that provide beach access parking at Will Rogers State Beach.
AG 11-11	The DEIR states that stormwater runoff would be captured in appropriate BMPs such as bioswales or rain gardens. When discussing future facilities on County property, please delete mentions of bioswales and rain gardens, and instead say “water quality BMP device”. The County will determine which specific stormwater and BMP devices are appropriate for the parking lot during the construction design phase. (Parks and Recreation, Page 3.14-8, Operation)	The comment is noted that the County will identify and approve appropriate stormwater quality best management practices (BMPs) that may be other than bioswales and rain gardens. The Draft EIR notes consistently that bioswales and rain gardens may be installed as stormwater quality BMPs. The project description notes that designs of the parking lots would conform to applicable stormwater runoff requirements, including County and RWQCB MS4 permit requirements. Final designs approved by the County will identify which BMPs are most appropriate.
AG 11-12	The DEIR states that there is a need for stormwater BMPs to address runoff generated by the expansion of the PCH bridge, however more information is needed regarding the extent of DBH’s maintenance responsibilities of such items and the nexus between DBH and Caltrans’ storm water runoff responsibilities. DBH would also like to explore other options for stormwater capture and treatment that would increase parking availability. (Parks and Recreation, Page 3.14-8, Operation)	The project description notes that designs of the parking lots would conform to applicable stormwater runoff requirements, including County and RWQCB MS4 permit requirements. Similarly, work within Caltrans right-of-way would be compliant with Caltrans BMPs and applicable stormwater permit BMPs. Final designs will provide greater details on which BMPs are most appropriate and how best to integrate Caltrans stormwater runoff responsibilities with those of DBH property.

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AG 11-13	Table 2-6 – Permits, Approvals, and Regulatory Requirements, presents a preliminary list of the agencies and entities that have authority to issue specific permits and other discretionary approvals that may apply to the proposed Project. Under the Los Angeles County section, only permits required from the Department of Public Works are included. Please include the need for project approval by the Los Angeles County Board of Supervisors e.g., for establishing any capital project(s) associated with the proposed Project and creating easements for any transfers of land to Caltrans. Furthermore, it should be noted that a right-of-entry permit would need to be issued by DBH for any construction, construction staging, repair, or installation activities that require access through or use of County property. (Project Description, Pages 2-52 and 2-53)	In response to this comment, Table 2-6 has been modified to add the following information within the County of Los Angeles (strikethrough/underline text is used to track changes made to the Draft EIR text): **Agency:** Los Angeles County Board of Supervisors **Permit**: Capital Improvement Approval and CEQA Approval … **Reason for Permit**: Project Approval
AG 11-14	Marine Biological Resources Mitigation Measures Mitigation Measure MAR-2 Avoidance of California Grunion Spawning Season includes several management measures that would be implemented after construction of the proposed Project, such as restricting mechanical beach grooming and vehicle use onsite and removing trash and debris by hand as necessary. DBH feels that Section 5 of this mitigation measure is not necessary, or not necessary in part, to address grunion habitat impacts due to Project construction because the mitigation extends beyond the construction period. Furthermore, the Department already follows best management practices to avoid grunion habitat and will continue to do so after project implementation. Additionally, the Department does not have enough resources and staffing to maintain the beach area by hand. Section 5 of this mitigation measure is not feasible for DBH to implement, unless the lead agency provides DBH with the resources and funding necessary to completely cover the costs of implementing the measure. (Marine Biological Resources, Page 3.11-31 and 3.11-32, Marine Biological Resources Mitigation Measures)	In response to this comment, Section 5 of Mitigation Measure MAR-2 has been revised to note that DBH will continue to follow current BMPs and restrict mechanical grooming to above the highest high tide line as is current practice (strikethrough/underline text is used to track changes made to the Draft EIR text). ~~5~~. The following management measures shall be implemented after construction: i. To retain the natural deposition of wrack along the beach, mechanical beach grooming will not occur ~~on-site~~ below the highest high tide line consistent with existing beach Best Management Practices ~~Trash and debris should be removed by hand as necessary.~~ ii. Vehicle use on the beach shall be limited to that required for emergency response and occasional required maintenance. All vehicles must drive above the higher high-tide line during March ~~September~~ August unless no grunion spawning occurred in the task location during the last full or new moon. Since the Los Angeles County DBH will maintain the beach following construction similar to existing conditions, the change to the mitigation measure would not result in significant impact of the project.

Comment Number	Comment	Response
AG 11-15	Public Services and Coastal Resilience There are multiple statements in the DEIR asserting that the lifeguard/public restroom building and helipad would be relocated closer to Pacific Coast Highway (PCH) to achieve more resilience from sea level rise (SLR) and coastal erosion. However, based on the information presented during the DEIR public meetings on February 24, 2024 and February 28, 2024, under Alternative 2, the new helipad would be located within the annual storm maximum inundation zone for the site, measured at one meter of sea level rise. The helipad is currently located at a higher grade than the beach and is protected from SLR. Moving the helipad from a more resilient location to a less resilient location does not accomplish the objectives of the project. Please explain how the new helipad locations for each alternative would be protected from SLR. Furthermore, please explain the impacts to the surrounding beach area should the existing helipad be removed and the grading in this area modified. (Public Services, Page 3.13-11, Operation)	The hydrological modeling summarized in **Appendix B** concludes that the existing landing area on the knoll known as the "helipad" is not creating stability of the flow channel. The current helicopter landing area is positioned landward of the mean high tide line and shows no bearing on the position of the shoreline, sand retention features are typically hard structures such as rock or sheet pile groins because they are in direct contact with the water and impacted by waves, rather than the soft earthen fill of the knoll. The reasons the current helicopter landing area has not been eroded away are due to the protection and sheltering of the large cobble delta and its distance from the water. Hence, the knoll is not functioning as sand-retaining feature. The bluff between the lagoon and the sheetpile sand retention devise to the west is located far enough back from the water to provide space for a beach to exist. The modeling indicates that helipad does not provide sand retention functions. Removing the landing area and proposed grading will not affect beach erosion requiring nourishment or sand retention to the west. See Master Response Hydrological Modeling.
AG 11-16	How far west will the lagoon inundation area spread once the berm is removed and the lagoon is expanded? Please analyze if there would be any impacts to the adjacent private properties to the west of the existing lagoon.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period which is over 100 feet east of the neighboring property line. The modeling conducted for the project estimates that the impacts to neighboring beaches would be negligible. Side scouring and encroachment onto the neighboring residential properties to the west is not anticipated as a result of the increased lagoon acreage and bridge lengthening since the development is on the upcoast of the project and the bridge abutments will be protected with rocks to prevent scour. The west abutment will prevent creek migration to the west beyond the west abutment. The proposed lengthening of PCH bridge will reduce slow down the flow and reduce erosive impacts to the floodplains. Also See Section 2.3 Master Response - Hydrologic Modeling

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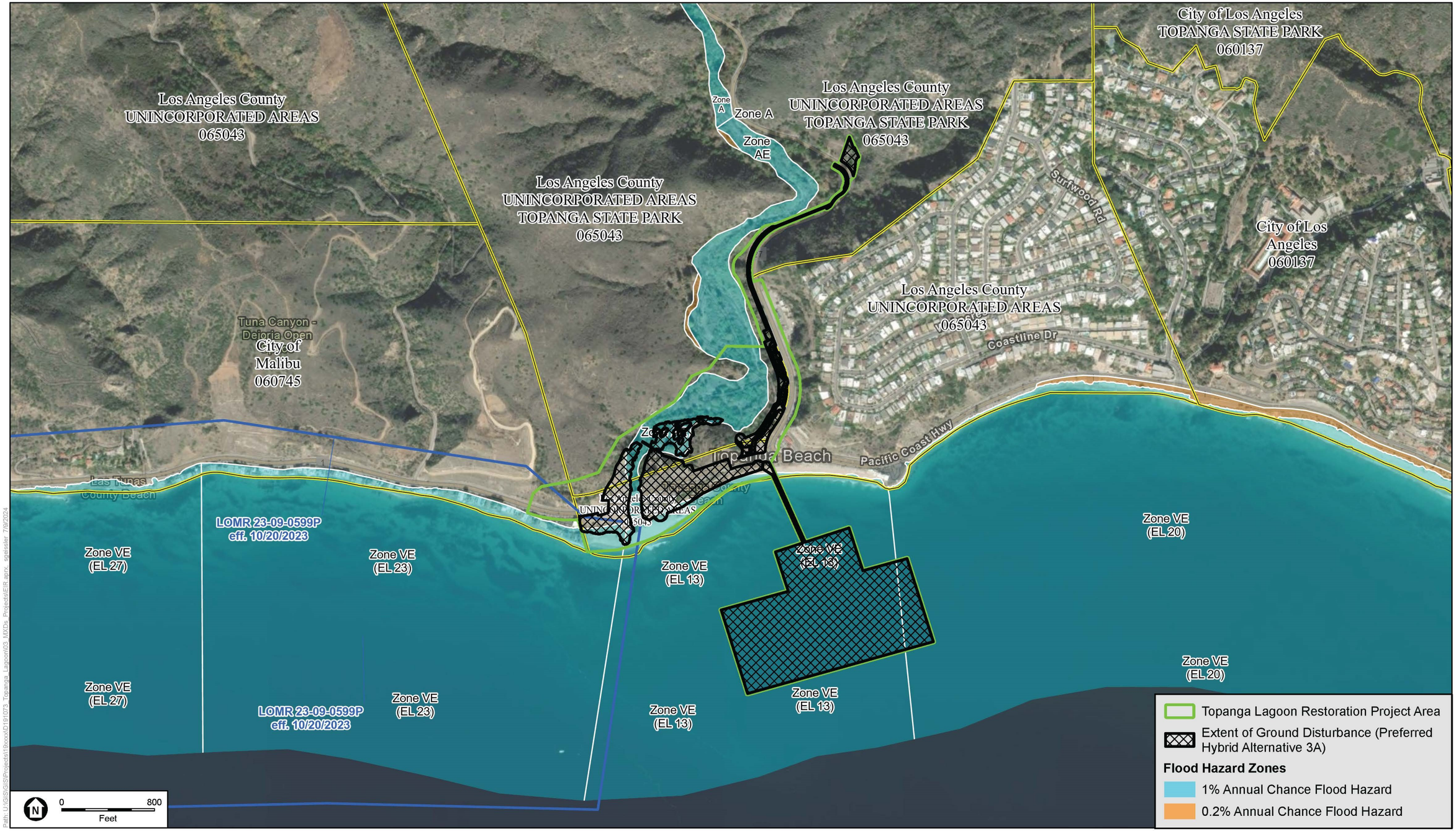
AG 11-17	Page 2-12 notes that all the proposed Build Alternatives would remove existing locally derived fill material for beneficial reuse by strategically placing it in the nearshore to naturally help renourish and restore the littoral cell, which would provide additional resilience to the beach both downcoast and within the Project area. Based on previous statements in the DEIR, the nearshore placement of sediment could provide up to 156,000-256,000 CY of suitable grain size material to renourish severely eroded areas between Mastro's Point and Will Rogers State Beach, which are outside of the Project area. Please ensure this information is consistent across the DEIR. If resilience benefits are anticipated within the Project area, please elaborate how in the appropriate sections. (Marine Biological Resources, Page 3.11-29, Alternatives 2,3, and 4 Build Alternatives	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand northeastward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions.

Comment Number	Comment	Response
AG 11-18	As this project affects County owned property and the public's access to the beach, a commitment to any alternative would require action by the Los Angeles County Board of Supervisors. The comments provided within this letter are not intended to suggest approval by the County. Lastly, we are open to reviewing and understanding the findings of the Final Environmental Impact Report and look forward to continued collaboration, consistent with DBH's strategic goals, as the Project concept advances into a preferred alternative. Should you have any questions or concerns with the information within this letter, please feel free to contact Porsche Nauls at (424) 526-7755 or PNauls@bh.lacounty.gov. Very truly yours, Warren Ontiveros Planning Division Chief	Action by the Los Angeles County Board of Supervisors is noted. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
County of Los Angeles Department of Public Works		
AG 12-1	Dear Mr. Ota: ENVIRONMENTAL PLAN (RPPL2024000906) DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) TOPANGA LAGOON RESTORATION PROJECT As requested, Public Works reviewed the Draft Environmental Impact Report for the Topanga Lagoon Restoration Project. The proposed project involves the expansion of the Topanga Creek and lagoon ecosystem, replacement of the existing Pacific Coast Highway bridge (SR-1 #53-0035) with a longer bridge to accommodate the lagoon expansion, development of visitor services in lower Topanga State Park, and relocation of Department of Beaches and Harbors facilities on Topanga Beach that are threatened by sea level rise. We offer the enclosed comments for your consideration. For questions regarding these comments, please contact Pat Wood of Public Works, Stormwater Engineering Division, at (626) 458-6131 or pwood@pw.lacounty.gov. If you have any questions, please contact Toan Duong of Public Works, Land Development Division, at (626) 458-4921 or tduong@pw.lacounty.gov. Very truly yours, MARK PESTRELLA, PE Director of Public Works CIARA BARNETT, PE Assistant Deputy Director Land Development Division	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
AG 12-2	Los Angeles County Public Works (Public Works) is the National Flood Insurance Program (NFIP) coordinator for the unincorporated areas of Los Angeles County. The State of California's NFIP coordinator is the California Department of Water Resources (DWR). Public Works has also undertaken numerous flood protection capacity restoration projects that have involved the hauling and disposal of large volumes of rock and soil.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
AG 12-3	Executive Summary ES-3 Project Description Section ES-3.3 Alternative 2: Maximum Lagoon Habitat Figure ES-1a shows the following proposed project features to be partially or entirely in a floodplain mapped by FEMA as a Zone VE (13 feet), which is a Coastal Hazard Area: · Helipad · Lifeguard station · Decomposed granite parking areas Structures built within Zone VE must comply with the flood resiliency requirements of Title 44 of the Code of Federal Regulations (44 CFR) Part 60.3, subsection (e). Also, the proposed decomposed granite areas may not be able to withstand the flooding that can occur in a Zone VE.	As shown on the conceptual alternative design the helipad, lifeguard and public restroom building. he currently mapped Zone VE. Following restoration of the lagoon floodplain it is anticipated that flood levels will decrease due to larger floodplain area, and revision of the flood map will be needed to reflect new conditions. The structures can be relocated above that elevation during the design process if needed and coordination with FEMA will occur. Final designs of the new facilities will comply with applicable regulations to ensure appropriate flood protections are implemented, in coordination with and as approved by the County.
AG 12-4	Executive Summary ES-3 Project Description Section ES-3.3 Alternative 2: Maximum Lagoon Habitat The draft Environmental Impact Report (EIR) document states: "Approximately 256,000 cubic yards (CY) of soil would be removed from the existing fill areas to contour the proposed new lagoon and, if placed nearshore for beneficial reuse, would cover up to 35 acres… An additional 1,200 CY of roadway soil and 23,000 CY of soils potentially contaminated by…lead…would also be removed and hauled off-site. Approximately 10,810 CY of construction debris from demolition of [several structures] would be hauled off-site for disposal at appropriate landfills." Consistent with California Environmental Quality Act (CEQA) documents required for other projects involving the hauling and disposal of large volumes of soil and debris, the proposed project's EIR should identify the sites anticipated to be used for off-site disposal and/or use of the soils and demolition materials and the anticipated haul routes to those sites. The communities at the disposal/use sites, and the those along the proposed haul routes to the sites, must be able to comment as they would be impacted. Also note that the receiving locations may have their own CEQA documents, so the proponents for this proposed project may only need to account for the impacts (air quality, noise, traffic, etc.) up to the region covered by those locations' documents. (It will depend on the details of those locations' CEQA documents.) The proponent of this proposed project will need to fit the project's volumes within the amount of daily loads the receiving locations put into their CEQA documents. Any excess volumes would need to be accounted for in the CEQA document for this proposed project.	The Draft EIR identifies on Section 2.6.6 page 2-36~~xx~~ that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to the project boundaries as shown on page 3 Figure 2.1 of **Appendix C** (Nearshore Dispersal Modeling for Sediment Beneficial Reuse for the Topanga Lagoon Restoration (Moffatt & Nichol) 2023). If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills as noted on page 2-37 of the Draft EIR. The ability to dispose of soils at these landfills is predicated on the landfills' capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2.

Comment Number	Comment	Response
AG 12-5	In accordance with 44 CFR, Part 60.3, the proposed project activities within the VE zones may require the project proponent to apply to and obtain from FEMA a Conditional Letter of Map Revision (CLOMR) and likely apply to FEMA for a final Letter of Map Revision (LOMR) within six months of project completion. If the contouring of the proposed new lagoon is deemed as "fill" by FEMA, or if the project includes placement of fill to raise the building pads for the proposed new buildings or the proposed helipad above the Base Flood Elevation, then please note that FEMA has suspended the issuance of Conditional Letters of Map Revision Based on Fill (CLOMR-Fs) and Letters of Map Revision Based on Fill (LOMR-Fs) for fill projects in California. Additionally, FEMA's Technical Mapping Advisory Committee (TMAC), at FEMA's request, is making recommendations to FEMA to change the calculation of the FEMA Base Flood (1% annual chance flood) and the "500-year" flood (0.2% annual chance flood). TMAC is also recommending to FEMA to introduce a new regulatory flood zone, the Flood Prone Area. Officials would be required to regulate development activities based on this Flood Prone Area. (See our comments below for Section 3.9.2, Affected Environment, Flood Hazards.)	Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. Figure 2-9 has been prepared in response to this comment to show the existing FEMA floodplain map of the area. As shown in Figure 2-9, portions of the project area are within the existing floodplain. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. In response to comments received on the Draft EIR, the following additions have been made to Table 2-6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text).: **Regulatory Agency:** Federal Emergency Management Agency (FEMA) **Permit**: Conditional Letter of Map Revision and Letter of Map Revision **Purpose for Permit:** Modification of the floodplain
AG 12-6	Since two State agencies (Department of Parks and Caltrans) are among the project proponents, and the State of California is also a participant in the NFIP and, thus, subject to NFIP requirements, it is recommended the California Department of Parks, as the CEQA Lead Agency, contact the State NFIP Coordinator at the California Department of Water Resources for more information on NFIP compliance requirements for the proposed project alternatives.	State Parks as lead agency has the responsibility to apply for the LOMR from FEMA.
AG 12-7	Section ES-3.4 Alternative 3: Limited Lagoon Habitat Expansion Figure ES-2a likewise shows proposed structures in the FEMA VE Zone. Alternative 3 likewise involves soil removal and reuse (166,000 CY), removal of contaminated soil, and removal of construction debris. Hauling to off-site locations is also proposed. Our previous comments for Alternative 2 also apply to Alternative 3.	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to within the project boundaries. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills‘ capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2. Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations.

Comment Number	Comment	Response
		Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. In response to comments received on the Draft EIR, the following additions have been made to Table 2-6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). **Regulatory Agency:** Federal Emergency Management Agency (FEMA) **Permit**: Conditional Letter of Map Revision and Letter of Map Revision **Purpose for Permit:** Modification of the floodplain
AG 12-8	Section ES-3.5 Alternative 4: Maximum Managed Retreat: Figure ES-3a likewise shows proposed structures in the FEMA VE Zone. Alternative 4 likewise involves soil removal and reuse (210,000 CY), removal of contaminated soil, and removal of construction debris. Hauling to off-site locations is also proposed. Our previous comments for Alternative 2 also apply to Alternative 4.	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to within the project boundaries. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills' capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2. Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. In response to comments received on the Draft EIR, the following additions have been made to Table 2-6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text).: **Regulatory Agency:** Federal Emergency Management Agency (FEMA) **Permit**: Conditional Letter of Map Revision and Letter of Map Revision **Purpose for Permit:** Modification of the floodplain



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SOURCE: FEMA, 2023; ESA, 2024

ESA

Topanga Lagoon Restoration Project

Figure 2-9

FEMA Flood Zone Map

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Comment Number	Comment	Response
AG 12-9	Chapter 2 - Project Description As stated in our previous comments for the Executive Summary, this EIR should be consistent with CEQA documents for other projects involving the hauling and disposal of large volumes of soil and debris, and identify the off-site disposal sites the project's soil and demolition materials and the routes to them. The project proponents will need to fit the project's volumes within the amount of daily loads the receiving locations put into their own CEQA documents. Any excess volumes would need to be accounted for in this EIR	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to within the project boundaries. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills‘ capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2.
AG 12-10	Chapter 3 - Affected Environment, Environmental Consequences, and Mitigation Measures Section 3.2: Air Quality As stated in our previous comments for the Executive Summary, this EIR should be consistent with CEQA documents for other projects involving the hauling and disposal of large volumes of soil and debris, and identify for each alternative the air quality impacts associated with the transport to and use of the off-site disposal sites for the project's soil and demolition materials, where such impacts are not accounted for in the receiving locations' own CEQA documents.	The Draft EIR provides an estimate of vehicle emissions resulting from off-site soil hauling beginning on page 3.2-51. Table 3.2-8 includes soil hauling emissions. The Draft EIR notes that sediment placement in the nearshore ocean would reduce on-road emissions associated with landfill disposal and is therefore the preferred soil handling option. As noted in the DEIR Section 3.2, a conservative estimate of emissions based on hauling off-site were modeled and results are discussed on pg 3.2-38 and results are summarized in Table 3.2-7 on pg 3.2-44 and Table 3.2-8 on pg 3.2-53. Analysis indicated that with the implementation of Mitigation Measure Air-1 there would be no significant impact to air quality.
AG 12-11	Section 3.5: Energy As stated in our previous comments for the Executive Summary, this EIR should be consistent with CEQA documents for other projects involving the hauling and disposal of large volumes of soil and debris, and identify for each alternative the energy use impacts associated with the transport to and use of the off-site disposal sites for the project's soil and demolition materials, where such impacts are not accounted for in the receiving locations' own CEQA documents.	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills‘ capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2. The energy consumption for these options is summarized in Section 3.5 beginning on page 3.5-17.
AG 12-12	Section 3.9: Hydrology/Floodplain and Water Quality/ Stormwater Runoff Section 3.9.1 - Regulatory Setting Federal Executive Order 11988 and National Flood Insurance Program As stated in our comments for the Executive Summary, since State agencies are among the project proponents, and the State of California is also a participant in the NFIP, the State agency proponents are subject to NFIP requirements as well as local agency proponents. If Federal funds are being used or being sought for the proposed project, Executive Order 14030 (Federal Flood Risk Management Standard) may also apply. It should be noted FEMA is in the process of revising 44 CFR Part 9 (Floodplain Management and Protection of Wetlands) to conform to EO 14030. It is recommended the project proponents contact the State NFIP Coordinator at the California Department of Water Resources for more information on NFIP compliance requirements.	State Parks as lead agency has the responsibility to apply for the LOMR from FEMA.

Comment Number	Comment	Response
AG 12-13	State Executive Order B37-77 Executive Order B37-77, signed by Governor Edmund G. Brown, Jr on November 26, 1977, directs State agencies to: "…provide leadership in efforts to minimize the risk of flood losses in connection with state lands and installations and state financed, insured, or assisted improvements. The heads of such agencies shall take particular care to avoid unwise or hazardous use of floodplains in connection with all activities under their authority." Executive Order S-13-08 Executive Order S-13-08, signed by Governor Arnold Schwarzenegger on November 14, 2008, and the description of it contained on page 3.9-19 of this draft EIR, should also be listed in this subsection of the EIR California Building Code It is our understanding construction activities undertaken by State agencies on State-owned lands are subject to the standards established by those State agencies. One of those standards is the California Building Code, which includes flood resiliency requirements for building construction in FEMA VE zones that meet or exceed NFIP requirements (44 CFR Part 60.3 [e]).	Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. The applicability of Executive Order B37-77 is noted. The Draft EIR notes the applicability of the NFIP on page 3.9-4. The California Building Code is described on page 3.6-3 of the Draft EIR. No changes are required to the Draft EIR. In response to comments received on the Draft EIR, the following additions have been made to Table 2-6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). **Regulatory Agency:** Federal Emergency Management Agency (FEMA) **Permit**: Conditional Letter of Map Revision and Letter of Map Revision **Purpose for Permit:** Modification of the floodplain
AG 12-14	Regional and Local Los Angeles County Code In addition to Title 12, the Los Angeles County Code also includes Title 26 – Building Code, Chapter 1, Sections 106, 110.1, and J103, which includes flood resiliency requirements for building construction in FEMA VE zones that meet or exceed NFIP requirements (44 CFR Part 60.3 [e]). However, the County Code did not adopt all of the California Building Code's requirements. It is recommended the project proponents contact the State NFIP Coordinator at the California Department of Water Resources for clarification on where the State's and/or the County's NFIP compliance requirements apply to the proposed building construction elements.	The California Building Code is described on page 3.6-3 of the Draft EIR. No changes are required to the Draft EIR. The Federal Emergency Management Agency (FEMA) is described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed.

Comment Number	Comment	Response
AG 12-15	Section 3.9.2 - Affected Environment Flood Hazards It should be noted that FEMA's Technical Mapping Advisory Committee (TMAC), at FEMA's request, is making recommendations to FEMA to change the calculation of the FEMA Base Flood (1% annual chance flood) and the "500-year" flood (0.2% annual chance flood) from using the median confidence value of data to the 95% confidence value, essentially doubling the Base Flood and "500-year" flood, and raising the Base Flood and "500-year" flood elevations. TMAC is also recommending to FEMA to introduce a new regulatory flood zone, the Flood Prone Area, which would be based on a climate change model that FEMA is leaving to the local community to select. Officials would be required to regulate development activities based on this Flood Prone Area. TMAC's final report with its recommendations is expected to be posted by TMAC in spring 2024. It is recommended the project proponents contact FEMA on whether FEMA has information or a defined timeline of adoption sufficient for this EIR to address TMAC's recommended changes in relation to the proposed project alternatives.	The project would remove soils from the Topanga Creek drainage to intentionally increase the size of the floodplain. Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. Final designs of the new facilities will comply with applicable regulations to ensure appropriate flood protections are implemented, in coordination with and as approved by the County.
AG 12-16	Section 3.9.3 - Environmental Consequences Drainage Patterns For all project alternatives, reference is made to our previous comments for the Executive Summary and Section 3.9.2, regarding Conditional Letters of Map Revision (CLOMRs) and final Letters of Map Revision (LOMRs); recent recommendations to FEMA to change the calculations of floods and impose a new regulatory Flood Prone Area; and the recommendation for the California Department of Parks, as the CEQA Lead Agency, to contact the State NFIP Coordinator at the California Department of Water Resources for more information on NFIP compliance requirements for the proposed project alternatives.	The project would remove soils from the Topanga Creek drainage to intentionally increase the size of the floodplain. Modifications to the floodplain would be required to conform with Executive Order 11988, the Federal Emergency Management Agency (FEMA) described on page 3.9-4 of the Draft EIR. The project is within the National Flood Insurance Program (NFIP) area requiring development to meet flood risk standards. For work within the lagoon, FEMA requires that modifications to the floodplain be incorporated into the NFIP with Letters of Map Revisions if needed. The Proposed Project would modify the floodplain immediately adjacent to the Topanga Creek and Lagoon. Any new structures would comply with applicable FEMA regulations. Neighboring properties would not be exposed to increased flood risk consistent with the NFIP. This project is intended to remove fill material from the floodplain, intentionally increasing the flood prone area. The project would conform with FEMA and NFIP zone designations. In response to comments received on the Draft EIR, the following additions have been made to Table 2-6 of the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text). **Regulatory Agency:** Federal Emergency Management Agency (FEMA) **Permit**: Conditional Letter of Map Revision and Letter of Map Revision **Purpose for Permit:** Modification of the floodplain
AG 12-17	Release of Pollutants in Flood Hazard Zone Reference is made to our previous comments for Drainage Patterns	With respect to water quality, the Draft EIR notes beginning on page 3.9-22 that the project could affect water quality during construction. Implementation of stormwater best management practices would reduce impacts to less than significant levels. In addition, mitigation measures HAZ-1 and HAZ-2 would reduce impacts to stormwater quality.

Comment Number	Comment	Response
AG 12-18	Section 3.9.4 - Summary of Impacts For Impacts HYD 3.9.3 and 3.9.4 for all project alternatives, reference is made to our previous comments in Section 3.9.3.	See response to comment AG 12-15 will be renumbered
AG 12-19	Section 3.12: Noise and Vibration As stated in our previous comments for the Executive Summary, this EIR should be consistent with CEQA documents for other projects involving the hauling and disposal of large volumes of soil and debris and identify for each alternative the noise and vibration impacts associated with the transport to and use of the off-site disposal sites for the project's soil and demolition materials where such impacts are not accounted for in the receiving locations' own CEQA documents.	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to within the project boundaries. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills‘ capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2. The noise impacts of soil hauling are addressed in Section 3.12 beginning on page 3.12-19.
AG 12-20	Section 3.16: Transportation and Circulation As stated in our previous comments for the Executive Summary, this EIR should be consistent with CEQA documents for other projects involving the hauling and disposal of large volumes of soil and debris and identify for each alternative the transportation and circulation impacts associated with the transport to and use of the off-site disposal sites for the project's soil and demolition materials where such impacts are not accounted for in the receiving locations' own CEQA documents.	The Draft EIR identifies on Section 2.6.6 page 2-36 that the sediment removed from the lagoon area under any Alternative would be placed in the nearshore ocean as the preferred location. Hauling of material to the nearshore is limited to within the project boundaries. If permits for this nearshore placement are not approved, the sediment would be trucked to the Calabasas, Sunshine, or Scholl landfills. The ability to dispose of soils at these landfills is predicated on the landfills‘ capacity and soil quality. Multiple landfills were identified in the analysis to capture potential landfill options. The Draft EIR provides soil volume estimates for each alternative in Section 2. The energy consumption for these options is summarized in Section 3.16 beginning on page 3.16-17.
AG 12-21	For any questions regarding the above comments, please contact Patricia wood at (626) 458-6131 or pwood@pw.lacounty.gov	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Friends of Topanga Point		
ORG 1-1	Dear Mr. Ota: Friends of Topanga Point ("FOTP") submits these comments on the Draft Environmental Impact Report ("DEIR") for the Topanga Lagoon Restoration Project (the "Project"). Our comments are intended to assist Project decisionmakers in preserving Topanga Point as a recreational and environmental resource of singular importance for surfers and the general beachgoing public. These comments were prepared by the five Topanga Point surfers who founded FOTP, though our advocacy group includes many other local surfers and beachgoers who have surfed and recreated at Topanga Beach with friends and family for decades. We founders have varying occupational backgrounds (environmental, government, medical, land use, and more) but we share deep knowledge about Topanga Point gleaned through decades of surfing here. Some of us have children who learned to surf at Topanga and hope to maintain this surf break as an important a part of their lives. All of these things make preserving this unique place a truly personal issue for us—as it is for countless other surfers and beachgoers. Background - Our Advocacy Goals. FOTP began following planning for the Project because we knew that changes to streams and other sources of coastal sediment generally have potential to affect beaches and surfing waves. We understand and generally support the salutary objectives of the Project (restoring habitat, species diversity and hydrologic function, resiliency against sea level rise, etc.), but our advocacy goals were—and continue to be—focused on avoiding unintended adverse consequences to the surf break, the beach, and to beach access. As such, our efforts to date have been directed toward ensuring that Project decisionmakers and the public have pertinent information regarding potential Project impacts to Topanga Point and Topanga Beach, as well as feasible measures to mitigate any adverse impacts to these treasured resources. Our key specific points of advocacy to date have been to urge the public agencies planning the Project to: • engage expert consultants to conduct technical studies assessing potential impacts to Topanga Beach and to Topanga Point's surfing waves from each of the Project alternatives, and • make protection of the surf break and beach recreation explicit objectives of the Project (i.e., along with the other basic Project objectives such as habitat restoration).	Protecting the surf break and beach recreation is one of the project objectives along with habitat restoration. The potential project impact on the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. Three public meetings together with online surveys were conducted to solicit input to the surf study and to present results to the public. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
ORG 1-2	In response to our requests, the public agencies managing the Project tasked the consulting coastal engineering firm Moffatt & Nichol to conduct modelling studies and prepare a Technical Report for Shoreline Morphology Analyses evaluating potential changes to the beach under the varying Project alternatives. The agencies also retained Integral Consulting to model potential impacts to the shape and quality of Topanga Point's surfing waves under each of the Project alternatives; Integral's analyses and findings are outlined in a Topanga Surf Quality Impact Assessment Report. 1 These technical studies were recently released for public review as part of the DEIR and are further discussed in comments below. In addition, in response to our requests, the Project DEIR explicitly identifies protection of the surf break and beach recreation as an objective in the same way that other basic Project objectives such as habitat restoration are listed. We wish to acknowledge the agencies' responsiveness to our requests on these issues and thank them for these actions. It is our understanding that the level of analysis of surfing impacts in the DEIR is unprecedented for such a document.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 1-3	Need for Preservation. The waves and beach at Topanga Point are uniquely deserving of preservation as an important recreational and environmental resource. As the Project's Surf Quality Impact Assessment Report notes: "Topanga Point, formed by cobbles and sediment from the Topanga Creek and Lagoon, is an important feature that provides recreational surf conditions and draws surfers year-round with different skill levels ranging from beginner to expert." (p. viii) The California Legislature recognized the social and economic importance of surfing in 2018, when it passed legislation establishing surfing as the official state sport. It is apparent that the number of surfers in California—and the number who surf Topanga Point—have continued to expand in recent years, particularly after the pandemic motivated residents to seek new types of outdoor recreation. Unfortunately, the number of high-quality venues for surfing is limited. Topanga Point is a particularly rare type of surf break: a cobblestone point. Such points create waves that many surfers—probably a large majority—consider the most desirable. Cobblestone points provide long, evenly-peeling rides that are in a different class entirely from waves at the far more common straight sand beaches, or "beach breaks." Our state, with its 40 million residents, has fewer than a dozen high-quality cobblestone surfing points that break regularly and are readily accessible to the public. They include world-renowned places such as Malibu, Rincon, and Trestles, which are centers of surf culture and emblematic of California. Topanga Point is part of this small group of cobblestone points, and importantly, is the closest one to the millions of residents of Los Angeles.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
ORG 1-4	Of course, this results in high demand and in very crowded, often “lively” surf lineups, for which Topanga Point is (in)famous. But high demand and crowded lineups are indicators of something unique and worth preserving. Add to this its sandy beach (served by conveniently located public parking) with views of the mountains to the north and the coastline to the south, and it is understandable why Topanga Point and Topanga Beach are destinations for throngs of surfers and beachgoers. Key Attributes in Need of Preservation. The following are key aspects of Topanga Point and Topanga Beach that make them valuable for surfing and beachgoers, and which the comments that follow seek to preserve: (1) shape of surfing point and nearshore bathymetry	This comment does not address the adequacy of the Draft EIR. The Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology (a large cobble delta), lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.
ORG 1-5	(2) sediment flow from lagoon to ocean	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional “Delft3D FM” morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and

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		sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a “Mike11” model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would slightly increase sediment deposition in the lagoon, it remains a “pass through” system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities.
ORG 1-6	(3) lagoon outlet in its current location near top of point (i.e., prevent creek outlet from migrating easterly more than it occasionally does now)	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional “Delft3D FM” morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The model results indicate that the thalweg may shift slightly to the west (but still within the main channel of the creek) on a historical alignment during the extreme wet storm period. Although the thalweg may shift west to some extent during the highest flood flow period, it will gradually migrate east as the flow discharge drops off due to predominant easterly longshore currents. This historic pattern of the lagoon breach occurring on the western edge of the lagoon during high flow events is followed by gradual and steady migration towards the east under the forces of longshore drift by waves and tides.
ORG 1-7	(4) width of Topanga’s sandy beach	The lifeguard and public restroom building is being moved landward and will provide more of a wide sandy beach. Also, a larger lagoon will result in more natural processes of sediment yield from the watershed and resilience along the shore. The Draft EIR has conducted a comprehensive shoreline morphology modeling analysis using an advanced Delft3D modeling suite. The modeling area stretches from Big Rock Beach to the west to Gladstones PCH Beach to the east. The properties to the west of the project are included in the modeling analysis domain. The model is calibrated with best and most recently available data. The model simulated the shoreline morphology changes under the typical dry weather, 10-year fluvial storm and extreme 100-year fluvial storm conditions for 1-year and 5-year post construction. The Draft EIR used model results and evaluated the

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		potential project impacts to public beaches and adjacent properties in all those above-mentioned conditions. The proposed project poses no impact to westerly properties, the shoreline and beaches. The project proposes to add 256,000 cubic yards of sandy material to the littoral cell immediately off Topanga Beach to benefit the shoreline and beaches in the region. The project will benefit beaches downcoast.
ORG 1-8	(5) parking on south side of PCH, including in lots and no-cost parking along PCH.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.

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ORG 1-9	Specific Comments on DEIR and Appendices The following comments seek additional information regarding Project alternatives to assist in comparing and, if necessary, adjusting them to preserve the above-listed key attributes of Topanga Point and Topanga Beach. Resiliency Measures. Analyses by the Project consultants predict that the proposed alternatives would have little to no impact on the quality of the surfing at Topanga Point. The consultants stated, however, that sea level rise would have large impacts on future shorelines at Topanga and elsewhere, but they indicated uncertainty regarding the extent of future sea level rise by evaluating significantly varying scenarios: e.g., 1.6, 3.3, and 6.6 feet of rise (corresponding to low-emission 2070, low emission 2100, and high-emission 2100 (COAST Long-term Shoreline Change Analysis, Integral, pdf p. 133). While we are reassured by these conclusions with current sea levels, given future uncertainties relating to sea levels, as well as regarding climate and weather in general (e.g., changes in precipitation, sediment, waves, etc.), the Project should be designed to provide maximum feasible assurance that key attributes listed above will be preserved. We have the following comments on this issue: Living Shoreline. We support nature-based solutions or "living shoreline" elements to protect against beach erosion resulting from storms, sea level rise, and other causes. The DEIR includes overview descriptions of such elements, but they should be fully fleshed out in the Final EIR. Installing living shorelines is feasible, as has been demonstrated at Surfer's Point in Ventura, Santa Monica Beach, and elsewhere, and should be included with specificity in all Project alternatives. Elements such as sand dunes and native planting areas should be created to the maximum extent to provide resiliency and preserve space for beachgoers. The Final EIR should evaluate and identify optimal locations for living shoreline adaptations at Topanga Beach.	This comment does not address the adequacy of the Draft EIR. As noted in Section 2.5.3 of the Project Description, each of the Build Alternatives would increase coastal resiliency to the effects of sea level rise. This includes both providing greater protections for public amenities on the beach, including moving facilities inland, as well as creating a wider lagoon area and living shoreline to attenuate fluvial storms to reduce erosion in the area. Placement of excavated sediments in the nearshore would increase sand along the coast, acting as a one-time beach nourishment for downcoast areas. Beach nourishment is a form of coastal resiliency as well. Section 2.6.1 discusses living shoreline opportunities on page 2-15 of the Draft EIR. The living shore details will be developed in the next design phase of the project.
ORG 1-10	Barriers to Eastward Migration of Lagoon Outlet. The outlet from Topanga Lagoon has a tendency to migrate east after substantial rains. Such easterly migration is one way that surfing waves at a "right"-peeling point break such as Topanga Point can be degraded. Topanga Lagoon currently has a hard barrier on its east side in the form of a concrete bridge abutment which extends toward the shoreline, as well as an earth embankment. These features appear to limit potential for easterly migration of the lagoon and, possibly, its breach location. The Project alternatives propose various designs for re-grading slopes on the east side of the lagoon, as well as for installation of structures there. The structures include a retaining wall in Alternative 4, a garage in Alternative 2, and a new helipad in all Project Alternatives. The helipad is proposed for one of several locations east of the lagoon, either on beach level or next to the raised parking lot (although it is our understanding that the location next to the raised parking lot may no longer be considered feasible). While the consultants predict that the Project would create only small impacts to the shorelines with current sea levels, given future uncertainties relating to sea levels as well as climate and weather generally, the Final EIR should evaluate whether the proposed grading and structures on the east side of lagoon would mitigate eastward migration as effectively as the current topography and barriers. If the new structures or topography would not create barriers that are as far west, as close to the	This comment does not address the adequacy of the Draft EIR. The retaining wall in Alt4 is at PCH level along the hills, not at the beach level. No garage is proposed in any alternatives. The Draft EIR has conducted a comprehensive shoreline morphology modeling analysis using an advanced Delft3D modeling suite. The modeling area stretches from Big Rock Beach to the west to Gladstones PCH Beach to the east. The model is calibrated with best and most recently available data. The model simulated the shoreline morphology changes under the typical dry weather, 10-year fluvial storm and extreme 100-year fluvial storm conditions for 1-year and 5-year post construction. The Draft EIR used model results and evaluated the potential project impacts to public beaches and adjacent properties in all those above-mentioned conditions. The proposed project poses no impact to westerly properties, the shoreline and beaches. The project proposes to add 256,000 cubic yards of sandy material to the littoral cell immediately off Topanga Beach to benefit the shoreline and beaches in the region. The project will benefit beaches downcoast. The proposed grading on eastside is located above elevation +14 feet NAVD88 and would not impact the inlet breach migration.

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	shoreline, or as durable and effective as the current barriers, the EIR should describe any feasibility issues in redesigning or locating them to at least match the current barriers in these respects. The feasibility of utilizing a buried cobble berm to achieve these results should also be evaluated, as has been demonstrated at Ventura Point.	The new bridge abutment will also be protected by rocks, similar to the current bridge, meeting Caltrans design requirements. The east abutment will prevent further easterly migration.
ORG 1-11	Project Design Assumptions. All Project design assumptions that the consultant studies relied on to reach conclusions regarding lack of significant impacts should be explicitly identified in the alternatives so they can be enforceably incorporated into any Project approval. These should include, for example: • all grading for the Project will be landward of the beach berm; • all grading, including at the location of the current helipad and lifeguard tower, will be above a specified elevation (+14-ft NAVD88) except a pilot channel under the PCH bridge; and • all deposition of Project grading spoils within the ocean to be in a specified location downcoast of Topanga Point where there will be no impact to waves at the surfing point. The Final EIR should identify any additional Project design assumptions necessary for the consultant conclusions, and they should be incorporated into the adopted Project's design development ("DD") and construction development ("CD") plans.	All project design assumptions including grading limits and material disposal methods and potential locations, etc. that the Draft EIR studies used in assessing potential impacts are explicitly identified in the alternative description and project studies. Additional project design assumptions will be added to the Final EIR if identified. These assumptions will be incorporated into the project design for the selected preferred project alternative.
ORG 1-12	Post-Construction Monitoring. All EIR alternatives should include post-construction monitoring and public reporting of any significant changes to beach widths, topography, and bathymetry. These reports should include independent expert evaluation of the causes for any such changes to the extent feasible based on reasonably collectable data. The reports should be prepared and released biennially for at least 10 years.	As required in Mitigation Measure BIO-12 noted on page 3.3-66 of the Draft EIR, post construction monitoring of the habitat restoration within the lagoon area is a project requirement. The beach sand will be controlled by ocean currents. The Draft EIR does not require monitoring of the beach sand but expects the proposed project will not result in reduced beach sand or increased erosion compared with the No Project Alternative.
ORG 1-13	Parking/Access/Community. In-lot parking spaces on the south side of PCH provide a desirable location proximate to beach and surf; they also enhance visibility of autos—helping to deter break-ins (which have been a significant problem of late) and promote a sense of community. However, parking at Topanga Point is frequently impacted, with little or no availability in the south side lots or south shoulder of PCH, particularly on days with good waves and/or optimal beach weather (think big south swell on a beautiful Saturday afternoon in July). Beachgoers are thus commonly forced to park on the north side of PCH and walk to the beach, confronting traffic safety issues on PCH, or concern about crime in the underpass which is isolated from view. The Final EIR should clearly identify the combined total number of PCH and in-lot parking spaces on the south side of PCH under each alternative, including the "No Project" Alternative No. 1. If feasible, the Project should maintain at least the total number of PCH shoulder and in-lot parking spaces (conforming and non-conforming) currently on the south side of PCH. If this is not feasible, the Final EIR should explain why not, and why the greatest feasible number is proposed. The Project should also provide the maximum feasible number of free (no-cost) parking spaces, particularly on south side of PCH. While the total number of public day-use spaces (pay and free, all locations) increases with the Project, according to the DEIR the number of public free spaces will decrease by up	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving the parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots. All Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the

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	to 28 spaces—which represents a potentially significant number of beachgoers. In addition, it is unclear specifically how many of those reduced spaces are on the more desirable, safer south side of PCH; this should be made clear in the Final EIR.	existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
ORG 1-14	Finally, Topanga point has a long and storied surfing history that spans decades and multiple generations. Pulling up early for a chilly dawn patrol while tugging on a damp wetsuit and hurriedly checking conditions from the top of the stairs is a rite of passage. Preserving and enhancing the common gathering spaces at Topanga Point, particularly those frequented by beach goers and surfers, is paramount for maintaining the cultural and social fabric of this community. These spaces serve as more than just recreational areas; they are hubs for human connection, celebration, and community building. For generations, individuals and families have gathered at this beach to share special moments, from birthday parties and picnics, to weddings and memorial ceremonies, all while enjoying the natural beauty of the ocean and cheering each other's wave riding. These spaces hold immense cultural significance and contribute to the sense of identity and belonging within this coastal community. They must be preserved. In conclusion, we thank you for the opportunity to provide these comments and look forward to continuing dialogue regarding the Project. The Founders of Friends of Topanga Point, Aaron Clark Carolyn Day Peter Greenwald Russ Kino, MD Jay Shields	The gathering area and stairs from the DBH parking lot to the beach are retained in all Alternatives. Interest to maintain gathering spaces is noted and will be considered further during the design phase. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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Santa Susana Mountain Park Association		
ORG 2-1	Here's our comments… I got them out today… we've been jammed. COMMENTS; State of California, DEIR, Topanga Lagoon Project	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 2-2	We have attended meetings and studied the DEIR with great interest. We would strongly recommend the State adopt Alternative 2, Maximize Lagoon: Will maximize lagoon/creek restoration by fully removing the Topanga Ranch Motel (which, unfortunately is in a decayed state and cannot feasibly be restored), resulting in ~9.5 wetted acres, ~23 riparian/transitional upland acres restored and beach expansion to ~4.39 acres. No change to the PCH alignment occurs. Alternative 2 maximum lagoon, gets us the most restoration while still providing visitor services and emergency access improvements.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 2-3	Thank you so much, and thank you from our community. John Luker Vice-President, Santa Susana Mountain Park Association Wendi Gladstone President, Santa Susana Mountain Park Association (Organization's mentioned for affiliation only, not to imply acceptance by the organization mentioned)	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Ocean Conservation Society		
ORG 3-1	I am writing to you on behalf of the Ocean Conservation Society, a Los Angeles-based nonprofit organization conducting long-term dolphin & whale research and supporting educational projects to protect our oceans and their inhabitants. Our field research off Los Angeles, including the waters near the Topanga Lagoon Restoration project, has been ongoing for almost three decades, and we are the only nonprofit research organization conducting long-term, year-round marine mammal research in these waters.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 3-2	This letter is in full support of the maximum lagoon restoration. We at OCS believe the Topanga Lagoon is a critical natural habitat for different species, especially endangered fish, and this project will greatly enhance the territory.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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ORG 3-3	We also believe that this project will have minimal impact on the animals that we study. Although coastal bottlenose dolphins (Tursiops truncatus) forage in the coastal waters of the bay, they regularly move back and forth along the entire California and Baja California, Mexico coast. and they are not residents of that area. This project, aiming at restoring the natural habitat of the region, can be only viewed as beneficial for keeping our fauna and flora thriving.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Xerces Society		
ORG 4-1	The Xerces Society has reviewed the draft EIR for the Topanga Lagoon Restoration Project. Please consider the attached comments and recommendations.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 4-2	Dear John Ota, Thank you for the opportunity to review the Topanga Lagoon Restoration Project Draft EIR. This document presents a comprehensive and high-level analysis of the biological impacts of the project, specifically relating to the Lower Topanga overwintering site (Site ID 3270) and potential Crotch's bumble bee habitat. The Xerces Society for Invertebrate Conservation offers the following comments for your consideration:	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 4-3	SPECIFIC COMMENTS BY MITIGATION MEASURE BIO-2: Monarch Butterfly Measures 1. "During the overwintering season (October 15–March 15) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol." Comment: It is recommended that the overwintering season be shifted to October 1-March 1. Aggregations in Southern California may begin to form in early October and surveys should be conducted in this time period to capture early season monarch butterfly counts.	The Draft EIR identifies on page 3.3-65 the use of the site by Monarch butterflies. Mitigation Measure BIO-2 expressly addresses impacts to Monarch butterfly habitats. In response to the comment, the following changes have been made to BIO-2: BIO-2: protect and minimize impacts on overwintering monarchs: 1. During the overwintering season (October 1~~5~~–March 1~~5~~) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol …
ORG 4-4	2. "To prevent disturbance of monarchs during the overwintering season by construction personnel or work activity, roosting trees will be flagged, and snow fencing or a similar technique shall be used to cordon off monarch roost trees at a reasonable distance of at least 25 feet away from the roosting monitor. The monitor shall determine the placement of the fencing to protect the monarchs while allowing work to continue." Comment: A buffer of at least a 100 ft radius from the core zone should be established when clustering monarchs are present, per management guidance implemented at other overwintering sites.	The Draft EIR requires a buffer of 25 feet around roosting Monarch butterfly trees in Mitigation Measure BIO-2. The Draft EIR concludes that this buffer is sufficient to protect the roosting colonies. The commentor does not provide any substantial evidence to support the need for a 100-foot buffer. No changes to the mitigation measure is warranted by the comment.
ORG 4-5	6. "Aerial pesticide applications or pesticides that are harmful to butterflies shall be avoided within 200 feet of overwintering sites when monarch overwintering is occurring. Small cut and paint efforts or directed spot spraying when it is not windy will be allowed if required to control invasive arundo treatments or other highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on	In response to this comment Mitigation Measure BIO-2 has been modified as follows: … 7. Aerial pesticide applications or pesticides that are harmful to butterflies shall be avoided within 500~~200~~ feet of overwintering sites when monarch overwintering is occurring. Small cut and paint efforts or directed spot spraying when it is not windy will be allowed if required to control invasive arundo treatments or other

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	monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines." Comment: The use of pesticides should be avoided within 500 ft from the edge of the shelter zone and occur outside of the overwintering season, when possible. The 500 ft application buffer is in alignment with the U.S. Fish & Wildlife Service Section 7 recommendations. The Xerces Society also recommends separate mitigation measures for aerial and spot applications which define drift mitigation criteria such as droplet size, drift mitigating nozzles, and wind thresholds. Aerial applications of pesticides have the potential to drift as far as 500 meters downwind of spray boundary as described in Woods et al (2001). Chemical classes for aerial and spot applications should also be defined and language should be explicit in that pesticides used in the project are limited to herbicides only.	highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines …
ORG 4-6	BIO-3: Crotch's Bumble Bee Measures 1. "Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist familiar with the identification, behavior and life history of the species." Comment: A plan for identifications is recommended, including the hire of an accredited taxonomist or identifier to confirm the identity of the species. Xerces Society staff may make recommendations for a qualified identifier.	In response to this comment and similar comment from CDFW, the following changes have been made to Mitigation Measure BIO-3: Crotch's bumble bees: 1. Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist with the appropriate permits and familiarity ~~familiar~~ with the identification, behavior, and life history of the species. The qualified entomologist shall conduct surveys adhering to CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. ~~A minimum of three surveys during peak flying season shall be conducted when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983), non-lethal survey methodology shall be used and photo vouchers for species confirmation will be obtained (CBBA 2023).~~ At minimum, a survey report shall provide the following: a. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. b. Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c. Map(s) showing the location of nests/colonies. 2. If Crotch's bumble bee is detected, the following shall be implemented: a. The qualified entomologist shall: i. Identify the location of all nests within and adjacent to the Project site. ii. Provide a survey report to CDFW ~~summary~~ of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

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		iii. An Avoidance Plan shall be developed with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate ~~Establish a 15-meter~~ no disturbance buffer zone around all any identified nest(s) to reduce the risk of disturbance or accidental take. The buffer zone will be expanded as necessary to prevent disturbance or take to the extent feasible. b. If complete avoidance ~~of the buffer zone~~ is not feasible, consultation with CDFW shall occur to ~~identify any additional measures needed to avoid impact on the species, confirm allowable activities within the buffer zone,~~ and determine if take authorization from CDFW is required. c. Floral resources associated with Crotch's bumble bee that require removal during restoration activities shall be replaced at a 1:1 ratio and with guidance from CDFW. Floral resources will be planted within 200 meters of the original plant location or in the most centrally available location relative to identified Crotch's bumble bee nests and be located no more than 1.5 kilometers from the nest sites. d. The Habitat Restoration and Adaptive Management Plan will include native and local plant species preferred by Crotch's bumblebee within the plant palette to further support the existence and expansion of the species on-site.
ORG 4-7	2a. "If Crotch's bumble bee is detected, the following shall be implemented: The qualified entomologist shall:" Comment: We recommend the entomologist notify CDFW for further coordination to avoid or mitigate certain impacts (CDFW, 2023). In addition, a 15-meter buffer around identified nest(s) is acceptable for light construction, however, a 30-meter minimum nest buffer should be implemented when heavy grading machinery is being used.	In response to this comment and to a similar comment from CDFW, Mitigation Measure BIO-3 has been modified as shown above.
ORG 4-8	Thank you for the opportunity to review this project. Sincerely, Sara Cuadra Conservation Biologist Xerces Society for Invertebrate Conservation	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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Surfrider Foundation		
ORG 5-1	Dear John Ota and the California Department of Parks and Recreation team, I hope this email finds you well. I am writing to submit comments on the Topanga Lagoon Restoration Project. I am attaching our comment letter, which has been collaboratively prepared by Surfrider Foundation experts and staff members, including: Zach Plopper, Senior Environmental Director, Surfrider Foundation Newara Brosnan-Faltas, Southern California Regional Manager, Surfrider Foundation Eugenia Ermacora, Manager, Surfrider Foundation Los Angeles Chapter Chanae Owens, Beach Cleanup Coordinator, Surfrider Foundation Los Angeles Chapter Paul Jenkin, Campaign Coordinator, Surfrider Foundation Ventura Chapter We have carefully reviewed the project and have outlined our concerns and recommendations in the attached letter. We kindly request that you acknowledge receipt of our comments and ensure their consideration during the project review process. Thank you for your attention to this matter. If you need any more information or have any questions, please do not hesitate to contact us.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 5-2	Dear Mr. John Ota and team, On behalf of the Surfrider Foundation, we are pleased to submit our comments on the Topanga Lagoon Restoration Project Draft Environmental Impact Report (DEIR), prepared by the California Department of Parks and Recreation (State Parks) in collaboration with the County of Los Angeles (County) and the California Department of Transportation (Caltrans). The Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves, and beaches, for all people, through a powerful activist network. With over 200 chapters and student clubs spanning 26 states and territories, we serve as a prominent grassroots advocate for coastal conservation in the United States. Our organization is committed to five primary initiatives: ocean protection, plastic pollution mitigation, ensuring clean ocean water quality, promoting beach access, and addressing climate change. The significance of our coastlines cannot be overstated. Annually, hundreds of millions of Americans visit beaches nationwide, providing vital economic support, sustaining millions of jobs, and contributing over $143 billion to our economy. Our coastal areas offer substantial habitat value, critical ecosystem services, and serve as natural buffers against adverse weather conditions such as storms, wind, and wave activity. Natural and restored wetlands, beaches, dunes, and other coastal habitats are playing an increasingly important role in the fight against climate change. Coastal communities, infrastructure, and ecosystems face numerous challenges, including ill-conceived development, coastal erosion, and the adverse impacts of climate change, such as rising sea levels and extreme weather events. Scientists have * estimated that between 25% - 70% of California’s beaches	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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	are at risk of disappearing by 2100 due to rising seas. Rapid atmospheric warming associated with climate change is accelerating glacial melt and thereby will increasingly contribute to an exponential rate of sea level rise. According to recent * studies, future sea level rise is likely to outpace even the most extreme scenarios currently put forth by the Intergovernmental Panel on Climate Change. In any projected sea level rise scenario, we will see profound changes on our coasts during this century. Surfrider believes that the only path forward for our coastlines involves urgent adaptation strategies that include the upland migration of infrastructure and other land uses and nature-based approaches such as living shorelines and habitat restoration. The Topanga Lagoon Restoration Project provides a unique opportunity to address myriad issues.	
ORG 5-3	We are thrilled about the opportunity to restore coastal wetland habitat for endangered species and biodiversity, improve water quality, and enhance coastal access and recreational facilities within Topanga Creek watershed. We also see the project as an important opportunity to strengthen coastal resilience at Topanga Point. Critical infrastructure including PCH, as well as businesses, public safety, and recreational resources are at significant risk of impacts associated with climate change. The project provides a nature-based approach to protect these resources as sea level rises and climate change-fueled weather anomalies increasingly affect our coast. We are very pleased to see the unprecedented attention paid to potential project impacts on the surf ecosystem. The surf ecosystem of Topanga Point has been created by millenia of cobble and sediment transport down Topanga Creek. Topanga Point is one of the few valued “point breaks” in Southern California and the closest one to 10.4 million Los Angeles residents. It was likely first surfed around 1927, when surf pioneers Tom Blake and Sam Reid explored the surfing potential of the Malibu coast. Today, it is a popular surf destination for Angelenos and visitors alike of all skill levels due to its accessibility, consistency, predictable peel angle, and surrounding natural beauty. Surfing resources are often overlooked in the assessment of impacts associated with any coastal project. The inclusion of a Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023) in the DEIR is a remarkable and pioneering analysis of potential surfing resource impacts and we applaud your foresight and sensitivity to community needs.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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ORG 5-4	The Surfrider Foundations has conducted thorough evaluations of the project DEIR and coordinated among experts within the organization to offer project recommendations and considerations. To achieve the maximum potential benefits to habitat, coastal resilience, and sustaining public enjoyment of local natural resources at Topanga Point and along the Topanga Creek watershed, we recommend Alternative 2 for this project. This alternative will yield the maximum increase in lagoon, wetland, and riparian bank habitats, while in our opinion, enable the most significant regeneration and long-term sustainability of beach width. We are confident that project Alternatives 2, 3, and 4 will have limited short-term impacts on wave quality at Topanga Point. Our analysis suggests that Alternative 2 may have the maximum benefit to the surf ecosystem due to the most enhanced sediment transport. Additionally, we believe that Alternative 2 will enhance water quality in the creek more so than the other alternatives and therefore provide the most benefit to safety for ocean recreators. Although we believe that Alternative 2 will have the most benefit to achieve the project's goals, there are additional considerations that should be incorporated into this selected alternative.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 5-5	Coastal Resilience: The Surfrider Foundation advocates for a maximum retreat in the relocation of the lifeguard station and helicopter pad. We understand that these features are critical to public safety at Topanga Point and must be retained in all project alternatives. Yet in order to ensure their long-term viability and to avoid costly future relocation, the helicopter pad and station should be set back from the shoreline to the maximum extent possible. The Surfrider Foundation encourages the incorporation of nature-based solutions, such as cobble berms and dunes, to bolster coastal protection and ecosystem health. We applaud the ambitious proposed replacement of revetments along PCH with bioengineered alternatives. We encourage a significant review of materials and case studies in order to ensure the success of this project component. An important consideration should be the installation of cobble along the toe of the replaced revetment in order to lessen the impacts of wave activity and provide extra buffer to PCH. While we encourage the maximum inland relocation of the helicopter pad, we are concerned about its removal and the effects that will have on the creek mouth. We believe that historically, the helicopter pad has blocked sand from migrating downwind (predominantly to the southeast) and thus maintaining a consistently open creek mouth. With the removal of the pad, this buffer will be gone and sand blown down the point could be deposited within the creek mouth thus pushing it further east and/or filling the mouth altogether and therefore requiring regular excavation to maintain an open flow. To mitigate this threat, we suggest the installation of dunes along the backshore west of the current helicopter pad. These dunes will help anchor sand in place and slow its migration down the point.	The lifeguard and public restroom building is being proposed to be retreated to a high ground and away from the ocean as much as possible while they are still serving their function and purposes. A living shoreline is proposed along the rear of the beach east of the creek but not west of the creek due to lack of space. The mouth of the creek is more influenced by ocean currents and waves moving to the east rather than wind-blown sand from the west. Therefore, the creek mouth evolution will be influenced by oceanographic forces and cannot be successfully protected from wind driven sand from the west. The natural cobbles will be considered in the next design phase of the project to provide erosion resistance and scour protection. The revetment around PCH abutments will be designed in the next phase of the project and minimized as much as possible. The hydrological modeling summarized in **Appendix B** concludes that the helicopter landing area located on a fill knoll and known as the "helipad" is not creating stability of the flow channel. The landing area is positioned landward of the mean high tide line and shows no bearing on the position of the shoreline, sand retention features are typically hard structures such as rock or sheet pile groins because they are in direct contact with the water and impacted by waves, rather than the soft earthen fill of the knoll. The reasons the knoll has not been eroded away are due to the protection and sheltering of the large cobble delta and its distance from the water. Hence, the knoll is not functioning as sand-retaining groin. The bluff between the lagoon and the sheetpile sand retention devise to the west is located far enough back from the water to provide space for a beach to exist. The modeling indicates that the landing area does not provide sand retention functions. Removing the knoll will not affect beach erosion requiring nourishment or sand retention to the west. The current emergency landing area is not officially constructed for its current use. The project proposes moving it to the east of creek to be closer to the

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		lifeguard and public restroom building and Topanga Canyon Boulevard and to be constructed to meet current standards. The knoll is a relatively small feature that does not influence the shoreline position. Rather, the cobble delta at the center of the historic creek discharge channel influences the shoreline position as a large feature that armors the shoreline and breaks up wave energy, resulting in beaches on both sides. The shoreline position at Topanga Point and the sandy beaches to the west and the east are all a function of the existence of the large cobble delta rather than the knoll. Those beaches existed prior to the existence of the knoll. As described in **Appendix B**, the cobble delta at Topanga Point serves as a large wave refraction feature that causes incoming ocean waves to bend (refract) around the delta upon approaching the shoreline. This wave refraction results in a convergence of wave energy on the delta and a divergence of wave energy on both sides of the delta. The divergence of wave energy adjacent to the delta results in lower wave energy on either side and deposition of sand creating small beaches. The knoll is not a sand retention feature and does not hold the position of the beach west of the inlet. The knoll was constructed with sandy fill materials, and it is relatively stable there due to the presence and protection of the large cobble delta. Without the large cobble delta protection, the knoll would have been eroded away by waves and currents and would no longer be there. Also, there is an existing sand retention device installed by the homeowners. The lagoon is located “downcoast” of the homes; the sand is being retained on westside of the sand retention devise. All Alternatives move the lifeguard and public restroom building and helipad inland and higher to provide greater resiliency for coastal erosion and sea level rise. Living shoreline elements are proposed and will be further evaluated during design. The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. Detailed modeling was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional “Delft3D FM” morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the Knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches.

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		Appendix E (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. Seal Level Rise impacts under the No Project/No Build Alternative is discussed on page 15. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. See Master Response Hydrological Modeling
ORG 5-6	Access: The Surfrider Foundation urges the preservation of parking to the greatest extent possible to ensure continued beach accessibility. We understand that each project alternative retains parking and improves safety and access to the resources around Topanga Creek and Point.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving the parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.
ORG 5-7	Ecological Considerations: We recommend the utilization of permeable surfaces and bioswales to manage stormwater runoff from parking areas and the helipad.	The Draft EIR notes for each Alternative in Section 2.6 that bioswales or other stormwater best management practices be integrated into the designs of the parking areas to minimize impacts to water quality from stormwater runoff.

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ORG 5-8	In conclusion, Surfrider appreciates the opportunity to provide input on the Topanga Lagoon Restoration Project DEIR. We believe that our recommendations align with the project's goals of enhancing coastal resilience while preserving ecological integrity and public access. Please do not hesitate to contact us if further information or clarification is required. Thank you for your attention to these important matters. Sincerely, Zach Plopper Senior Environmental Director Surfrider Foundation Newara Brosnan-Faltas Southern California Regional Manager Surfrider Foundation Eugenia Ermacora Los Angeles Chapter Manager Surfrider Foundation	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Santa Monica Mountains Conservancy		
ORG 6-1	Dear Mr. Ota: The Santa Monica Mountains Conservancy, a CEQA trustee agency for the Santa Monica Mountains Zone, offers the following comments on the Draft Environmental Impact Report (DEIR) for the Topanga Lagoon Restoration Project. The overriding public value of the Topanga Lagoon and its environs is the rare habitat provided for native fish, amphibians, and birds. The rarity and value of lagoon habitat in the Santa Monica Mountains cannot be overstated. The maximum protection of these resources should be the primary objective of the Topanga Lagoon Restoration Project. The public will experience great benefit from access to such enhanced natural resources.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 6-2	The Conservancy finds that DEIR alternative number Two – Maximum Lagoon Habitat best protects these rare natural resources while providing ample enhanced recreational and scenic benefits on both sides of Pacific Coast Highway. The Conservancy commends State Parks, Caltrans, and Los Angeles County Beaches and Harbors for the formulation of this exceptionally beneficial public project in the Santa Monica Mountains Zone.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 6-3	Please address any correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, of our staff at the above letterhead address or via edelman@smmc.ca.gov. Sincerely, STEVE VERES Chairperson	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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Los Angeles Conservancy		
ORG 7-1	Dear Mr. Ota: On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (DEIR) for the proposed Topanga Lagoon Restoration Project. The Conservancy supports Alternative 3, identified as the environmentally superior alternative, to best protect cultural, archeological, and natural resources while meeting the project objectives.	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 7-2	The proposed project aims to expand and restore the lagoon ecosystem; integrate public access, recreation, and visitor serving needs; proactively address sea level rise; protect existing biological, cultural and recreational resources. This would be accomplished through expanding the Topanga Creek and lagoon ecosystem, replacing the existing Pacific Coast Highway (PCH bridge with a longer bridge across the expanded lagoon, developing visitor services facility, and relocating County of Los Angeles Department of Beaches and Harbors (DBH) facilities on Topanga Beach threatened by sea level rise.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 7-3	The lagoon expansion will impact archeological and historic cultural resources, including the Topanga Ranch Motel, listed on the California Register of Historical Places and eligible for the National Register of Historic Places. The Conservancy urges Project Alternative 3, which best protects historic and cultural resources in the project area. Alternative 3 would preserve the majority of the Topanga Ranch Motel and return it to use for visitor services or park facilities and avoid adverse impacts to the ethnohistoric site of Topaa'aa village. We opposed Alternative 2, which would adversely impact the Topanga Ranch Motel by demolishing it, and have concerns about Alternative 4, which would cause significant and unavoidable adverse impact to archeological resources.	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 7-4	The Topanga Lagoon project area has numerous cultural resources beyond these identified historic sites. This includes the three legacy businesses that would be removed from the site and the historic Topanga Point Surf Break. We encourage consideration of and mitigation measures for these resources. I. Mitigation Measures for Topanga Ranch Motel The Topanga Ranch Motel was previously determined by the National Parks Service to be eligible for listing in the National Register under Criteria A and C and is therefore automatically listed in the California Register. The Topanga Ranch Motel is associated with early development of recreation and tourist facilities along the PCH and is a rare remaining example of a 1930s vernacular automobile court hotel. Early recreation at Topanga Beach was facilitated by the development of Topanga Canyon Road in 1915 and a public dirt road along the Malibu Ranch coastline in 1921. The Topanga Ranch Motel evolved from Cooper's Auto Camp, a collection of tents and cabins established on the east end of Topanga Creek in 1924. The construction of the paved Roosevelt Memorial Highway, now PCH, from 1927-1929 opened the coastline to more automobile-oriented tourism. In 1933, the Auto Court	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. This includes consultation with SHPO and local tribes regarding needed measures to protect preserve and/ or document onsite historic and tribal resources. Demolition of the Topanga Ranch Motel would conform with SOI standards and guidelines. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project.

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	was altered; new multi-unit wood frame cabins were constructed, and several original cabins were reconfigured to create a courtyard arrangement and arched entryway to appeal to motorists. Post-World War II, the Topanga Beach Auto Court was renamed the Topanga Ranch Motel. Alternative 3 would retain 20 of the existing 25 buildings, the most of any alternative. Before the beginning of construction, a historical resource monitoring and treatment plan (HRMTP) will be prepared to avoid or minimize impacts to the resources. The building would be retained and restored in the future in conformance with the Secretary of Interior's Standards (SOI) for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings. Historic fabric will be retained or restored to the degree possible or replaced in-kind in conformance with SOI Standards. The demolition of any motel structures would be documented through the National Park Service's Historic American Building Survey.	
ORG 7-5	II. Mitigation Measures for ethnohistoric village of Topaa'nga Topanga is the ancestral and unceded homeland of the Tongva/ Gabrielino peoples. The DEIR references various burial places in the area, and identifies the ethnohistoric village of Topaa'nga, buried shell midden site, and cemetery as eligible for the National Register and California Register under Criterion A/1 and Criterion D/4 and tribal cultural resource designation. The DEIR states that impacts would be significant and unavoidable in Alternative 4 due to the inability to retain sufficient cover over the pre-contact period surface (no less than two to four feet). Seismic work on Topanga Ranch Motel necessary for life safety would rely on shallow foundations to not disturb archeological resources. Mitigation Measure CUL-4 specifies the archaeological and Native American monitoring and treatment plan to be implemented pre-construction.	As noted in the comment the Draft EIR identifies the potential impact to Tribal Cultural Resources and provides Mitigation Measure CUL-4 that requires monitoring during certain construction activities.
ORG 7-6	III. Topanga Point Surf Break The Topanga Point Surf Break has been a significant hub of surfing since the mid twentieth century. The DEIR specifies the preparation of a wave uprush study and additional shoreline studies to mitigate impacts to surf conditions. We support the preservation of this break point and hope to see concrete mitigation efforts detailed in the Final EIR for Alternative 3.	The Topanga State Beach is a popular surfing area, known for its "right-hand point break" which is the result of coastal morphology (the large cobble delta), lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "based on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on

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		page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions. The wave uprush study was performed for the design of PCH bridge, not accessing surf impact analyses. As stated above, the surfing conditions are not expected to be negatively impacted by the Project; hence, no mitigation to surf impacts is necessary.
ORG 7-7	IV. Legacy Businesses support as mitigation measure Legacy businesses are generally those that have been in operation for twenty years or more. These businesses are what make each neighborhood unique by creating a rich community identity, a sense of place, and belonging for customers and neighbors. The Conservancy has long advocated for protections for legacy businesses. Recently, the City of Los Angeles launched a Legacy Business Program to support the ongoing sustainability of these community anchors. The Reel Inn (in operation since 1986), Wylies, (in operation since 1946), and Cholada (in operation since 1999) all qualify under this definition of legacy business. The Conservancy believes that mitigation measures to address the potential displacement of legacy business should be included in the plan. Such measures may include the right of return, rental and other economic assistance incentives.	A single concession will remain in all alternatives at the site of the current Reel Inn. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The Draft EIR concludes page 3.10-14 that each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurants and structures on site. **Appendix Q** includes a detailed consistency assessment of General Plan policies.
ORG 7-8	V. Conclusion The Topanga Lagoon Restoration Project is a complex plan to manage natural and cultural resources in the face of climate change. We support the expansion and restoration of the Topanga Lagoon ecosystem in tandem with the preservation of historic cultural resources including the Topanga Ranch Motel and archeological resources.	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 7-9	The Conservancy also asks for additional details regarding impacts to the Topanga Surf Break Point and legacy businesses that would be impacted by this project.	A single concession will remain in all alternatives at the site of the current Reel Inn. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The Draft EIR concludes page 3.10-14 that each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurants and structures on site. **Appendix Q** includes a detailed consistency assessment of General Plan policies. The Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration

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		(Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.
ORG 7-10	About the Los Angeles Conservancy: The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns. Sincerely, Adrian Scott Fine President & CE	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
California Native Plant Society		
ORG 8-1	Thank you for the opportunity to comment and the excellent DEIR. Dear California Department of Parks and Recreation and DEIR project reviewers; California Native Plant Society (CNPS) is a science, policy, and planning based statewide organization that is nearing 60 years in existence. We work closely with governance, academia, planners, developers, and non-profit organizations to encourage sustainable planning, conservation, and horticultural use of California native plants. CNPS employs the most state-of-the art science and design in our work. Our engagement throughout the state involves working with districts to promote use of native trees and plants to encourage urban and wildland forest health, water conservation, and ecological connectivity between open space and cities. CNPS has a long and vibrant working history working in the Santa Monica Mountains, engaging with communities, groups, and agencies. CNPS lauds the detailed research and considerations to the four project alternatives offered to the public for comment. The incorporation and balance between public access and environmental sustainability at the site indicates careful attention to policy, planning, and science.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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ORG 8-2	Alternatives 2, 3, and 4 each offer restoration and use advantages. We support Alternative 2 for the following categorical reasons: Habitat Protections Alternative 2 affords the greatest potential for riparian, transitional, and upland habitat restorations. This plan gives more opportunity for restoration successes at levels of greater acreage, numerous soil types, and multivariate aspects than the other options for upland habitat. Healthy upland environment is critical to sustaining the lower (transitional and riparian) areas. CNPS wholly supports the DEIR's plan to introduce or replace vegetation only with locally endemic plant species suitable to growing conditions inherent at the site. Modern plant science affirms this approach and shows that natively sourced species both have greater adaptability and ecologically benefit the local plant community. We appreciate that the DEIR biological studies delineated the wetland, special plant species and habitats. These focal baseline studies best inform the science that supports these rare features within the lagoon area. Long-term Environmental Preservation CNPS believes the management methods that will begin prior to restoration activities and will be part of indefinite best management practices associated with land curation over time are insurance for protections over time. Specific attention to controlling or preventing invasive plant and arthropod species in the area will safeguard native plant habitat and fauna from encroachment and establishment of noxious or deleterious non-native species. Climate Change Adaptation Alternative 2 design accommodates lagoon wetland sea level rise. Rise means that lagoon waters are likely to become more brackish over time. The proposed restoration activities will incorporate transitional aquatic and terrestrial floral intended to adapt to a changing environment. In closing, the Los Angeles/Santa Monica Mountains Chapter of California Native Plant Society looks forward to this long-awaited and necessary restoration of the iconic Topanga Lagoon. Thank you for your diligent research and efforts that will help realize the upcoming activities and legacy to return the area to high level functionality. Sincerely, Julie Clark, Conservation Co-Chair Los Angeles/Santa Monica Mountains Chapter California Native Plant Society	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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Heal the Bay, Friends of Ballona Wetlands, LA Waterkeeper, California Trout, LMU Center for Urban Resilience, and E Read & Associates		
ORG 9-1	Please find attached a comment letter from Heal the Bay, Friends of Ballona Wetlands, LA Waterkeeper, California Trout, LMU Center for Urban Resilience, and E Read & Associates on the Draft Environmental Impact Report for the Restoration of Topanga Lagoon. Thank you for the opportunity to comment.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 9-2	Dear California Department of Parks and Recreation: On behalf of the Friends of Ballona Wetlands, Heal the Bay, Los Angeles Waterkeeper, LMU Center for Urban Resilience, California Trout, and Dr. Edith Read, we offer our strong support for a robust, science-based restoration of the Topanga Lagoon. We would first like to recognize that we are on unceded Indigenous land. The scope of this project and our work takes place across the lands of coastal Indigenous Peoples and Native Nations of the Tongva, Chumash, Fernandeño Tataviam Band of Mission Indians, and Kizh Nation tribes. We acknowledge and pay our respects to elders past, present, and emerging.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
ORG 9-3	We support Alternative 2 with suggested modifications to increase climate resilience. We support beneficial reuse of excavated sediment and a wastewater management option that best protects ecological and public health. Many of the undersigned organizations are members of the Wetlands Restoration Principles Coalition Steering Committee. The Coalition developed nine principles of restoration and we advocate for projects that uphold these principles to maximize every opportunity for comprehensive and scientific restoration of degraded wetlands while ensuring climate resilience and inclusion of interested parties. Alternative 2, with some modifications to further increase climate resiliency, is strongly aligned with our nine principles of successful restoration. We support: ● Selection of Alternative 2, with modifications, as the preferred alternative ○ We request modifications to increase sea level rise resilience by reducing infrastructure south of PCH by exploring moving parking north of PCH, achieving some of the benefits of Alternative 4, without the significant and unavoidable impacts to tribal cultural resources ● Beneficial reuse of excavated sediment nearshore ● Prioritization of a wastewater management option that protects ecological and public health We expand upon these recommendations in further detail below. Support for Alternative 2 with Modifications We support Alternative 2 because it creates the maximum increase in lagoon, wetland, and riparian bank habitat (i.e., wetted habitat), which is critical for endangered species such as the tidewater goby and steelhead trout. Topanga Lagoon historically spanned 30 acres and has been greatly impacted and reduced in size to its current footprint of approximately 1 acre. The existing 3.6 acres of wetted	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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	and riparian habitat would be increased to 9.5 acres under Alternative 2. Given the tremendous loss of wetland habitat in southern California and across the state, it is the highest priority to protect, restore, and expand remaining wetland habitats. Wetlands provide unique habitat for very specific plants and animals, many of which are threatened or endangered. Wetlands are critical for our environmental and economic well-being. Alternative 2, by creating the most wetted and riparian habitat, enhances natural function to a greater degree, improving long-term sustainability. Alternative 2 provides the most resiliency for the creek and lagoon against climate change because the larger size and greater complexity of the lagoon will allow for the lagoon and creek to adapt naturally, as sea level rises. Maximizing functional native habitat for sensitive species, particularly wetlands, is paramount to preserving biodiversity in the face of habitat loss, sea level rise, climate change, and the onslaught of invasive species. We acknowledge the significant and unavoidable impacts in Alternative 2 to cultural resources through the removal of the Topanga Ranch Motel structures. We appreciate the historic nature of the motel and recognize that, if restored, the motel could provide lower-cost overnight coastal accommodations, in alignment with the Coastal Act Section 30213. However, given that the motel is not currently providing benefits to the community because it has not been in use for many years, and that opportunities for wetland habitat expansion are extremely limited, we support prioritization of functional wetland habitat over possible low-cost coastal accommodations. The restoration site as a whole is relatively small, therefore any meaningful amount of developed land that can be reclaimed to create habitat, should be reclaimed.	
ORG 9-4	Suggested modifications to Alternative 2 to increase sea level rise resilience We support elements of Alternative 4, which provides the maximum sea level rise resiliency for the beach and infrastructure through realignment of the Pacific Coast Highway (PCH). However, we have concerns about the significant and unavoidable impacts to tribal cultural resources. Further, it is not clear how much additional time or benefit Alternative 4 provides in terms of preserving the beach and infrastructure compared to other Alternatives, and whether similar benefits could be attained through implementation of living shoreline elements. Given these concerns and lack of clarity, we do not support the realignment of PCH. However, we are in strong support of actions to promote climate resilience and adaptation to sea level rise. Therefore, we recommend the following: ● Incorporate elements of Alternative 4 into Alternative 2 without moving PCH and having significant and unavoidable tribal cultural resources ○ Consider moving the Department of Beaches and Harbors (DBH) parking lot south of PCH to north of PCH at the “Gateway Corner” ● Implement living shoreline elements	The comment suggests modifications to Alternative 2. The project avoids disturbance of cultural resources by maintaining a 2-4-foot cap over sensitive areas. Your preference is noted and participation appreciated. No additional response is needed.

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ORG 9-5	We present a possible alternative layout of parking and State Park facilities to prevent the need to move the highway while also providing ample parking, moving facilities further away from the shoreline, and creating additional beach acreage (Figure 1). We suggest that only the helipad, lifeguard station, and other State Park facilities that are required to be placed south of the PCH be there. Otherwise, the bulk of the parking should be located north of the PCH in areas that are more resilient to sea level rise. Creating more parking near the visitor "Gateway Corner", where the area is already developed, would offset lost parking spaces from reducing the parking footprint south of the PCH. We recognize that this would come with tradeoffs to the proposed trails at the “Gateway Corner” and less convenient beach access. If more parking must be provided south of the PCH, then that parking should be located between the State Park Facilities and the beach, so that the additional parking can be removed in the face of dramatic sea level rise. This would increase protection for State Park Facilities that would be more expensive to move later.	The comment suggests modifications to Alternative 2. Your preference is noted and participation appreciated. No additional response is needed.
ORG 9-6	Implementation of living shorelines must be prioritized for the Alternative that is selected. The DEIR discusses living shorelines as a possibility but we recommend that it be added to Alternative 2 as part of the project. Living shorelines employ a nature-based approach, providing numerous benefits such as dune habitat, increased biodiversity, sea level rise resilience, and more.	As noted in Section 2.5.3 of the Project Description, each of the Build Alternatives would increase coastal resiliency to the effects of sea level rise. This includes both providing greater protections for public amenities on the beach, including moving facilities inland, as well as creating a wider lagoon area to attenuate fluvial storms to reduce erosion in the area. Placement of excavated sediments in the nearshore would increase sand along the coast, acting as a one-time beach nourishment for downcoast areas. Beach nourishment is a form of coastal resiliency as well. Section 2.6.1 discusses living shoreline opportunities on page 2-15 of the Draft EIR. Alternative 2 would provide the greatest resiliency both for the volume of sediment placed in the nearshore and for providing the greatest width of the lagoon to maximize fluvial storm attenuation. All proposed alternatives would provide the greatest coastal resiliency through “managed retreat,” the strategy of moving resources inland.
ORG 9-7	Support for Beneficial Reuse Option of Excavated Sediment We support the beneficial reuse of excavated sediment in the nearshore environment to ultimately replenish and nourish nearby beaches, increasing climate resilience. We support this option only if the excavated sediment is thoroughly tested and determined to be clean as well as compatible, and impacts to sensitive habitats and species are avoided. The sediment and fill that will be removed is naturally there and would have nourished the beach over time through natural processes. Further, the alternative option for the sediment is landfill disposal, which will increase truck trips and greenhouse gas emissions. For these reasons, we support the beneficial reuse option with the following comments and suggestions: ● For the beneficial reuse option, seawater will be pumped in to be mixed with the sediment to create a slurry for pumping and placement into the nearshore. It is stated that the “intake line would be screened so that organisms, debris, or other materials would not be impinged on the screen or pumped in from the ocean.” (DEIR, page 2-37). We appreciate this measure and suggest that best practices for surface or subsurface intake be utilized, such as with desalination intake, to minimize impingement and entrainment. Further, we request that amounts of	The comment suggests modifications to Alternative 2. Your preference is noted and participation appreciated. A variety of mitigation and monitoring requirements will ensure that impingement is avoided to the greatest extent possible. Extensive soil testing has been done to date and additional testing to ensure that any materials placed into the nearshore are free of contaminates will be required as noted in Mitigation Measure MAR-1. Impacts to grunion from construction activities would be less than significant with implementation of Mitigation Measure MAR-2.

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	seawater be estimated as well as documented, that impacts be quantified, and that mitigation be proposed if necessary. ● The last paragraph of Section 2.6.6 (DEIR, page 2-38), describes timing measures that will be taken to avoid grunion season, steelhead migration, and other sensitive species. These measures appear to be specific to Option 2 (mechanical removal and upland landfill disposal) but they must also be included for Option 1 (mechanical removal and hydraulic nearshore placement) or the text clarified that it applies to both options. ● Option 2 states on page 2-38, that "Soils removed below a depth of 3 feet in a roadway excavation are assumed to be clean based on soil characterization studies and do not require any special handling." We recommend testing and not assuming the cleanliness of the sediment.	
ORG 9-8	Support for a Wastewater Management Option that Protects Ecological and Public Health We support the option that protects ecological and public health to the maximum extent feasible. Based on the information in the DEIR, we support prioritization of Option 3, connecting to the public sewer system, which we feel is the most protective of water quality. We are concerned about the placement of Option 1, subsurface drip irrigation, because it is so close to Topanga Creek. The image shown in Figure 2-8 appears to show the irrigation field located within 100 feet from Topanga Creek, raising concerns about impacts to the Creek and downstream Lagoon. We are concerned about Option 2, seepage pits, because seepage pits are known to be inefficient in treatment of pathogens and nutrients. Therefore, we recommend that Option 3 be prioritized. If Options 1 or 2 are chosen, we recommend that the best available technology be used and that real-time monitoring and adaptive management practices be integrated, which will be key to addressing any unforeseen impacts to groundwater and surface water and ensuring the long-term success of the restoration project. We request that additional details be provided on the wastewater options and their possible impacts to water quality standards or waste discharge requirements in Section 3.9.3, page 3.9-26.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of

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		trenchless and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. All AOWTS options include provision of advanced wastewater treatment technology with nutrient reduction and disinfection.
ORG 9-9	Additional Comments Biological Resources, Recommended Change to Mitigation BIO-2: Monarch Butterfly Measures We appreciate that the mitigation measures for biological resources are protective and we only have one suggested strengthening of mitigation measure, BIO-2. Monarch Butterfly Measure #6 (DEIR, page 3.3-73) describes the use of pesticides that may be harmful to butterflies and states that they "shall be avoided within 200 feet of overwintering sites when monarch overwintering is occurring." It is understood that monarchs do not utilize Arundo donax and "small cut and paint efforts or directed spot spraying when it is not windy" seems reasonable to avoid impacts. However, if pesticides that may be harmful to butterflies will be applied to weeds in the project site, a 200-foot buffer may not be adequate to ensure that butterflies are not impacted. Butterflies may travel much larger distances than 200 feet to obtain nectar, and many "weeds", even if they are non-native and invasive, can be used as foraging sources for butterflies. We recommend that the CDSP consult with the Xerces Society on this mitigation measure to ensure no harm comes to any monarch butterflies.	Modification to Mitigation Measure BIO-2 has been made pursuant to the Xerces comment letter.
ORG 9-10	Hydrology/Water Quality Stormwater Runoff We appreciate and support the inclusion of bioswales and rain gardens to treat runoff on the project site before it enters the creek, lagoon, or ocean. We also recommend that runoff entering the creek upstream from the project be treated before it enters the creek in order to protect the restored lagoon to the maximum extent possible and minimize input of pollutants to the creek, lagoon, and ocean. The DEIR mentions “several culverts along Topanga Canyon Boulevard”, which convey stormwater into the creek and “another culvert, located on the east bank of Topanga Lagoon, conveys water from the parking and PCH by the bridge” (DEIR, page 3.9-17). We recommend that these culverts be prioritized for installation of best management practices (BMPs), such as bioswales, in order to minimize pollutants entering the restored habitat and impacting sensitive wildlife as well as human health.	Final designs for stormwater BMPs will be developed by each landowner pursuant to applicable NPDES permit requirements.

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ORG 9-11	Sea Level Rise We recommend that the DEIR include additional specific information on sea level rise scenarios for each alternative. Given that coastal resilience is a major project objective and very important to the undersigned groups, we would like to see a more robust discussion of the impacts of sea level rise on the project area and how the different Alternatives will provide protection for the beach and infrastructure. For instance, we recommend adding in figures to show the modeling for each alternative for the years 2070 and 2100 (DEIR, page 3.9-20 and 3.3-84 descriptions). We also ask that further information and discussion be provided for the possibility that the entire Topanga Beach is lost by 2040 (DEIR, page 2-8); how would this affect the Lagoon and could the Alternatives prevent this beach loss and over what time period? Further, we request that living shoreline elements be discussed in more depth, similarly with descriptions of how they might provide additional resilience and for how long for each Alternative.	The potential impacts of sea level rise on all the alternatives have been provided in the following locations within the Draft EIR. The Project Description notes on page 2.5.3 that each proposed Alternative would increase resilience to projected sea level rise. The Draft EIR provides an assessment of impacts to the project from sea level rise on page 3.9-33 and concludes that each Alternative would improve conditions compared with existing conditions. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The Draft EIR notes on page 2-15 that living shoreline elements may be installed as part of the project, contingent on approval from landowners, and will be studied and designed in the next phase of the project. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional “Delft3D FM” morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference in bed elevation change during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. Sea level rise projections by the State show that SLR in 2040 is insufficient to erode or overwhelm the entire beach because they are not high enough (on the order of less than 1 foot). The State Ocean Protection Council released projections for all areas of the State in 2018 and again in 2024 in the form of an update.
ORG 9-12	Beach Water Quality The DEIR describes beach water quality at Topanga Beach (page 3.9-18) but showcases 2022 only, one of the better years (in terms of bacterial water quality), presenting a somewhat limited picture. Topanga Beach was on Heal the Bay’s Beach Report Card Bummer list in 2019-2020, which means it was among the ten worst beaches on the West coast for water quality in the summer dry season. In the 2022-2023 season, Topanga Beach had an annual grade of B for summer dry season, D for winter dry season, and an F for wet weather.3 Since January of this year, Topanga Beach has consistently received weekly water quality grades of F.4 While water quality was decent during the dry summer months of 2022-2023, in recent months we have observed a decline, raising significant environmental concerns. With this year being El Niño, heavier rainfall has likely led to an increase of water pollutants and urban runoff, conveying them into the creek and lagoon. In addition, other sources of pollutants such as dog and bird feces are likely contributors to exceedances in fecal indicator bacteria levels. We suggest providing	Water quality in Topanga Lagoon is summarized in **Appendix P** (Topanga Lagoon Restoration Project Water and Sediment Quality Study Technical Report (ESA 2023) and Water Quality Pre-Construction Baseline Report (RCDSMM and Bay Foundation 2022)). Bacterial loading is mostly due to dogs, birds and occasional direct deposits of human feces in the lagoon area. Expanding the seasonally wetted lagoon footprint and associated wetland and riparian vegetation should provide additional benefits to improving water quality through natural filtration processes. Once operational, maintenance and use restrictions will be imposed by each landowner pursuant to policies and guidelines similar to existing conditions. The Proposed Project does not impose any additional management requirements on the landowners which include Caltrans, CDPR, and Los Angeles County. **Appendix S** provides a preliminary Operations and Maintenance Plan to be considered by CDPR.

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	a longer-term picture of beach water quality at Topanga Beach in the DEIR for full context. With increased and restored sensitive lagoon habitat, and water quality issues documented from dogs, it will be increasingly important to enforce the no-dogs-on-beach rule. We appreciate mention of this in the DEIR (page 3.9-26) and encourage education, signage, outreach, staff training, and staff time to be incorporated into the project implementation.	
ORG 9-13	Minor Edits/Recommendations Page ES-4 lines 2-3 – "Based on the 30 percent design, the restoration would in 9.5 wetted acres," There is a missing word or editing is needed for the bolded portion. Page 2-2 – last line of 2.2.1 "Same capitalization problem as Park." We are not sure what this means – should it be removed? Page 2-6 – section 2.2.3 – The second line has a question mark that should not be there. Page 2-12 – section 2.5.3 – The last line should be removed.	In response to this comment, the following changes have been made: Page ES-4 lines 2-3 – "Based on the 30 percent design, the restoration would result in 9.5 wetted acres," Page 2-2 – last line of 2.2.1 "~~Same capitalization problem as Park.~~" Page 2-6 – section 2.2.3 – stray question mark removed. Page 2-12 – section 2.5.3 – ~~All Build Alternatives include protection of cultural resources and development of interpretive and mitigation measures for any impacts on historical resources.~~
ORG 9-14	In summary, we strongly support a restoration project for the Topanga Lagoon that brings back unique and rare wetland habitats for the benefit of endangered species, additional wildlife, and people. We support Alternative 2 as the preferred alternative with modifications to increase sea level rise resilience.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
ORG 9-15	Thank you for the opportunity to comment on the Draft Environmental Impact Report for the restoration of Topanga Lagoon. If you have any questions concerning this comment letter, please contact Katherine Pease via e-mail at kpease@healthebay.org, or by telephone at (310) 451-1500 x141. Sincerely, Dr. Katherine Pease, Director of Science & Policy Heal the Bay Scott Culbertson, Executive Director Friends of Ballona Wetlands Benjamin Harris, Staff Attorney Los Angeles Waterkeeper Russell Marlow, Senior Project Manager California Trout Dr. Edith A. Read President, E Read and Associates, Inc. Eric G. Strauss, PhD President's Professor of Biology Executive Director, LMU Center for Urban Resilience	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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David W. Kay		
IND 1-1	I support the Proposed Project, Alternative 2 presented in the DEIR for the Topanga Lagoon Restoration Project. Alternative 2 expands natural lagoon habitat, retains the natural freshwater environment but also increases the opportunity for steelhead trout reintroduction to Topanga Creek. Additionally, Alternative 2 improves public access and resiliency against sea level rise, aids in helicopter support for rescue and firefighting operations, and potentially retains the Reel Inn popular and historic restaurant. David W. Kay 13060 Discovery Creek Playa Vista, CA 90094	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed a hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Elizabeth Tracy		
IND 2-1	What an exciting project! I firmly support Alternative 2 for the Topanga Restoration, preferring that habitat and wildlife are the top priority. Please choose in favor of the most natural solution. Thank you for all of your time and commitment to this fantastic endeavor.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed a hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Jim Robertson		
IND 3-1	I choose alternative #2	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed a hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Linda Hill		
IND 4-1	We are active Seniors (80's) and want to continue to enjoy our environment. You can help by: Eliminating all charges for Senior parking Or, at least all charges for Handicap parking.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots. Free parking will continue to be available along the shoulder of Pacific Coast Highway. State Parks provides reduced parking to seniors on a day-use and DBH provides annual passes for County-operated beaches. Please see the following link for current information regarding annual senior parking passes at County-operated beaches:: https://beaches.lacounty.gov/annual-senior-parking-pass/

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IND 4-2	Also, access is a problem when disabled. Please DO NOT assume disabled=wheelchair. I use support —walking sticks —but those new raised bumps are terrible! Bone crunching if traveling over them using a walker. Terrible hazard if unable to pick up both feet—nearly killed myself after an operation once and I am not alone! At least provide one bypass place if you must use those.	Under all Build Alternatives, ADA parking spaces would be created at the beach level and all of the State Parks and Beaches and Harbors parking lots. The comment's concern regarding slip-reduction treatments at the parking lots are standard design features to be determined in final design. The Project will provide ADA ramps per current standards as required.
IND 4-3	Seniors need some security. Beaches and paths like bike paths are currently monitored by different jurisdictions but in the past, the officials I asked were unclear about who was actually in charge. Including ongoing funding for parking security is a recommendation.	As noted on page 2-10, increasing safety at the site is a project objective. State Parks and Los Angeles County will continue to provide law enforcement services similar to current conditions. State Park rangers patrol the areas north of the Pacific Coast Highway within Topanga State Park. In addition, the Los Angeles County Sheriff's Department has jurisdiction within the County-owned portions of the site. Signage on site will provide emergency contact information.
IND 4-4	I would like to also recommend you look at the design and access to toilets. One wonders why all stalls could not have a grab bar? Even a short grab bar will help seniors avoid long waits while using stalls. Please consider that most Moms can't leave toddlers outside of the doors while using the toilets. Give extra feet in front of each stall. Don't make the auto-flush. Wastes water and annoying when mid-timed. Just put the flush mechanism button or lever to the front or side so you don't have to reach over the toilet to make it work. Thanks for considering these suggestions	Public restrooms will be improved and maintained by CDPR for facilities within the State Park and by Los Angeles County for facilities on the Topanga Beach. Wastewater management options are described in Section 2.6.7 of the Draft EIR. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Claire Sanders		
IND 5-1	I would like to ask that Alternative 2 is chosen for the upcoming restoration project. This not only offers the best protection to the iconic trout in Topanga Watershed, but will increase habitat, species diversity and richness for all the local floral and faunal species. To deny the natural environment this much needed restoration project would be a shame. Please prioritise the environment and pick alternative two!	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Margaret L. Stuber		
IND 6-1	I would like to put in a vote for Alternative 2. This does the most for this endangered fish and habitat. We need this to be our highest priority to create resiliency for unfortunately inevitable sea level rise.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Alan DeRossett		
IND 7-1	will read looking for marine restoration opertunities for Angel Sharks	The Draft EIR evaluates impacts to the marine environment in Section 3.11. Impacts are found to be less than significant. While restoration of angel sharks is not a project objective, implementation of Mitigation Measure MAR 1 will ensure that they are not harmed during sediment placementThe comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. Interest has been shared with project landowners. No additional response is required.
A Sakimoto		
IND 8-1	I would like to voice my support for Alternative 2 outlined in the EIR for the Topanga Lagoon Restoration project. Topanga Creek and Topanga Lagoon are a rarity among Southern California ecosystems in that they retain water year-round, making them a critical habitat for spawning steelhead trout and the endangered tidewater goby. We have been working for decades to preserve and restore these ecosystems - as a student, my son worked with Topanga community leaders to clear wrecked and abandoned cars from the creek in the hopes that we might enable a return of steelhead to their historical spawning routes. In the ensuing two decades, we have seen a gradual yet gratifying return of steelhead to Topanga Canyon, however the tidewater goby continues to bear its endangered status and we must do all we can to protect the few that remain. Of the various measures proposed, Alternative 2 provides the most comprehensive efforts to continue this restoration and allow these rare and endangered fishes a habitat to live and hopefully thrive.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Samir Patel		
IND 9-1	Hello, I'm interested in the restoration project and the Topanga Ranch Motel.	The comment expresses preference for Alternative 3, which would preserve much of the Topanga Ranch Motel. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 9-2	How would one be able to help restore the Topanga Ranch Motel and operate it. My family has operated small motels in the Southern California for over 40 years and would like to have the opportunity to run the Topanga Ranch Motel. Besides, we live in Sunset Mesa which will allow us to make sure it is being run properly. Any details would be greatly appreciated? Thanks, Sam Patel	As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain one onsite concession. Alternatives 3, 4 and 3A would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Anonymous Commenter		
IND 10-1	Topanga Motel should be run by the Topanga Community. We would love to be involved in creating a local hub serving their surfers, beach goers and families going to the beach with a coffee shop. We would love to run it. Hiring local people.	The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be required for Proposed Project operation. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. State Parks has previously determined that restoration is technically feasible due to the simple, uncomplicated construction of the structures. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. CDPR will be exploring several possibilities for the Motel, including concessions, with the goal of a community-serving facility.
Madelyn Glickfeld		
IND 11-1	There are so many questions from people who should be getting answers to the questions. It is not enough to document the questions and answer them in the final EIR. People need to get answers to their questions so that they can make recommendations on the alternative that is finally selected. This is a great analysis to look at four alternatives, but people need answers to their questions before the final project is selected.	The Draft EIR describes the CEQA process in Section 1.3. The lead agency must consider comments on the adequacy of the Draft EIR when considering EIR certification and project approval. The Final EIR contains responses to each comment received during the 60-day public review period. In addition, as noted in Section 2.3 of the Draft EIR, the project development team has hosted numerous community design meetings to engage public input. The public review process has exceeded CEQA requirements. Following the closing of the Draft EIR public review period, representatives of each of the three landowners (Los Angeles County DBH, Caltrans, and State Parks) met on two occasions (4/22/24 and 5/6/24) to review and discuss the comments received on the Draft EIR and to identify a Preferred Alternative. The result of these meetings produced Alternative 3A as the Preferred Alternative that combines elements from each of the Build Alternatives and avoids all significant impacts. As noted in Section 1.5 of the Final EIR, the Final EIR will be made available to all commentors for a 30-day period. State Parks will hold a public meeting during that period to receive additional comments on the Final EIR and preferred Alternative. Those comments will be included as an Appendix to the Final EIR when considered by the State Parks acting as lead agency for CEQA compliance.

Comment Number	Comment	Response
Madelyn Glickfeld		
IND 12-1	I understand that this motel could have historic significance. However there are two reasons why it should not be preserved. One, find out if it can be restored at all—it has not been upgraded or used for decades and would be extremely difficult and costly to restore. Two, if you are talking about historic cultural significance, it appears to me that the restoration of some land to the Tongva Tribe for their uses and for educational purposes, and their participation in managing the resources would be a far superior historic cultural preservation alternative. I suggest that a historic re-creation of a Tongva Village based on historic information and possibly using artifacts that have already been put in museums, along with activities organized by the tribe (if they would like to do that), should be done. It would be great for this to be operated by State Parks along with tribal representatives.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. This includes consultation with SHPO and local tribes regarding needed measures to protect preserve and/ or document onsite historic and tribal resources. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. State Parks has previously determined that restoration is technically feasible due to the simple, uncomplicated construction of the structures. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. Tribal consultation to date has not resulted in a request for a re-created village, but rather the involvement and incorporation of aspects of the contemporary Tongva community while preserving their past heritage.
IND 12-2	I suggest that the Malibu Feed Bin also has been there for a long time, and illustrates the farming and ranching in the Santa Monica Mountains. The current farming and many domestic farm animals and horse barns are also big users. The Feed Bin (in some form) maybe at a smaller footprint would make this whole visitor experience richer and help keep what is important to the community.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site, as well as the Feed Bin, as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Madelyn Glickfeld		
IND 13-1	I am concerned with adding parking to land side of PCH without adequate opportunity for safe pedestrian access to the beach and back. People parking on the land side of PCH exit their cars too close to traffic. They carry a lot of stuff to take to the beach. They also take small children to the beach while carrying stuff. No one needs to explain the problems of speeding cars and drunk, speeding or inattentive drivers to anyone who drives or crosses the highway. There must be a pedestrian safety plan and real visitor information about where they should and should not cross the highway. Despite the, I think that there will be more injuries and deaths. Increasing the parking should not cause this.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots. Additional "No Pedestrian Crossing" signage will be provided along PCH.
IND 13-2	In addition, The Department of Beaches and Harbors and the California Department of Parks and Recreation should start designating areas for arriving and departing Ride Hailing App services. If people can park in the Valley or Santa Monica and take a ride hailing app to this location and others up and down the coast it would provide much more access than you can provide on the site, and at no public cost. I realize that putting in ride hailing locations does not generate big parking fees (or it should not, as an incentive to use it) but the risk to pedestrians, visitor frustration with inadequate public transportation (public schedules for recreational activities have much less priority that for work transportation) would be greatly mitigated by this option of designating places both on the seaward and landward side of the highway for ride hailing app pick up and delivery.	As noted on page 2-16 of the Draft EIR, "Coastal access improvements are part of all Project Build Alternatives and include new trail construction and connectivity, improved parking availability and configuration, incorporation of pedestrian safety measures, and inclusion of amenities to support increased bicycle and bus use." No ride hailing pull out areas are proposed. However, the parking areas on either side of PCH may be used as riding hailing pick up and drop off locations.
Madelyn Glickfeld		
IND 14-1	I need to look at the studies but it is clear that the residents and visitors don't fully understand what the future of beaches are under climate change. The map you showed about projected sea level rise shows that there will be very little beach left over time. The people don't understand that the excavated sediment that you will deposit may augment beaches to the south, but not likely to this beach as the movement of sand in the ocean is southward. The whole idea that sand comes from inland watersheds and it is what keeps beaches alive is not understood by the average person in this public meeting. It is probably not well understood by most of the specialists working on this EIR. There should be a sea level rise expert on this team and they should be in the meetings to give a further explanation of what kind of beach will be left (if any). The Department of Beaches and Harbors recognizes the need to move their current facilities landward, but doesn't say enough about whether there will be any beach left to visit. I need to look at the studies but it is clear that the residents and visitors don't fully understand what the future of beaches are under climate change. The map you showed about projected sea level rise shows that there will be very little beach left over time. The people don't understand that the	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The climate change related sea level rise will generally result in beach erosion and narrower beaches. It becomes more important to maximize sediment delivery from coastal streams to the coast to nourish the beaches, and this project presents an ideal opportunity. This project should maintain sand delivery to the

Comment Number	Comment	Response
	excavated sediment that you will deposit may augment beaches to the south, but not likely to this beach as the movement of sand in the ocean is southward. The whole idea that sand comes from inland watersheds and it is what keeps beaches alive is not understood by the average person in this public meeting. It is probably not well understood by most of the specialists working on this EIR. There should be a sea level rise expert on this team and they should be in the meetings to give a further explanation of what kind of beach will be left (if any). The Department of Beaches and Harbors recognizes the need to move their current facilities landward, but doesn't say enough about whether there will be any beach left to visit.	coast over time due to its design; it may also be an opportunity to nourish the littoral cell directly with suitable, clean surplus material during construction. The proposed longer PCH bridge will reduce erosive flood velocity and constriction of sediment delivery from the watershed to the beaches. The project proposes to beneficially reuse the excavated sediment from the lagoon via nearshore placement that will benefit the downcoast beaches as the net longshore sediment transport direction is from west to east. The project team has coastal engineers who are specialized in performing sea level rise vulnerability assessment and adaptive measure design, so they are qualified to address this issue relative to the future condition of the beach. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during dry weather, 10-year, and 100-year fluvial storms. The analysis concludes on pages 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference in bed elevation change during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll with the non-standard helipad and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** -Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on pages 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are carried out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each proposed Alternative would increase fish passage opportunities. The placement of sediments southeast of the lagoon is downcoast as documented in **Appendix C**. The prevailing currents move sand southward. As a result, Topanga State Beach would not directly benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.

Comment Number	Comment	Response
IND 14-2	Most importantly, clean dredged sediments of the correct size will be desperately needed to help our beaches survive in the long run, and yet the public doesn't not understand this at all. They will fight efforts to "dispose" sediments into the ocean unless they are convinces that it is not polluted, will not be put on rocky habitat in the ocean and reduce kelp reefs and that it will be critical to preserve some beach. There needs to be a big public education effort for this project and others up and down the coast to help people understand why they should go through the traffic and noise problems and how important these projects are.	The Draft EIR provides substantial information to inform and educate the public on the dynamics of sediment and sand movement in the nearshore environment. **Appendix B and E** provide technical evidence to inform the issue, specific to the Topanga State Park area. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. In addition, **Appendix C** (Nearshore Dispersal Modeling for Sediment Beneficial Reuse for Topanga Lagoon Restoration), provides a detailed evaluation and modeling of the projected movement of sediment downcoast. As the project was being designed, the team recognized the opportunity to address the deficit of sediment along the coast and narrowing beaches with a surplus of sediment at the lagoon. Therefore, the group proposed to use the suitable surplus sediment from the project to "nourish" and add sediment to the coastal system to offset the deficit. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. To better understand where the sediments might move to after placement in the ocean, a modeling effort was conducted to understand sediment dispersion of the sediment placed in the nearshore zone. This nearshore material dispersal modeling analysis was conducted to: 1) determine the most suitable placement site to maximize the beach nourishment benefits and 2) avoid or minimize the impact to marine habitats while still being constructable without too much risk. Existing data were reviewed to identify a gap in the area of sensitive resources off of Topanga State Beach as a potential sediment placement site. A suitable placement location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending on approvals from the agencies included on the DMMT such as the California Coastal Commission, National Marine Fisheries Service, Regional Water Quality Control Board, USEPA, and the USACE. The Draft EIR

Comment Number	Comment	Response
		identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is considered "downcoast." The prevailing ocean currents move sand eastward. As a result, Topanga State Beach may not directly benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach and reduce constriction of flow and sediment delivery under the PCH bridge but would not decrease sediment loads delivered to the ocean compared to existing conditions as the lagoon is a pass-through system.
IND 14-3	They will also fight making the lagoon bigger if they are not convinced that floods coming down the canyon will not impact their homes.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and thereby affect the homes.

Comment Number	Comment	Response
IND 14-4	I think that flooding through the creek to the ocean will be increasing in volume and speed no matter what happens here. But I think a wider lagoon will dissipate the speed of flow that would happen through a narrow channel, rather that make it worse. I hope. But you should have expert analysis if you already have not.	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project will not change flood discharge or flood volume, but climate changes could increase the storm intensity and frequency. The proposed project of enlarging the lagoon will provide room for the storm flows to attenuate and for energy to dissipate, and lengthening the bridge would reduce the flood velocity and water level; hence, improving flood protection. This would occur while not altering the existing wetted lagoon, but it would modify flood flow dynamics to be less concentrated and erosive which could lead to sustaining improved morphological changes in the lagoon and at the beach. A detailed hydraulic modeling study was conducted, and results indicate that flood flow velocity and water level will be reduced under all proposed alternatives compared to existing conditions as documented in **Appendix E** of the Draft EIR.
IND 14-5	People still have their heads in the sand about climate change. There is so much change in people's lives and they need to understand why they should endure the inconveniences (real) of doing this project. People are very supportive of nature here but those in the room, don't see this as a benefit to the environment. The benefits to nature (bringing back nature, and important wetlands productivity and habitat) is the main purpose of this project. You did a great job of explaining what the possible project is but after so many decades and public discussion, you need to do that conversation again. Last, don't expect everyone to read the EIR. You did more than you have to—putting real analysis into alternatives before you select one. But when a final alternative is selected and detailed, you will need to do another "Final Draft EIR" That you circulate for comments, answering all of the questions people will raise in these hearings. Getting final answers when they don't have the final plan is not going to play well. These are my initial comments based on the public meeting you held this morning. Thank you for all you DID do!	The Draft EIR describes the CEQA process in Section 1.3. The lead agency must consider comments on the adequacy of the Draft EIR when considering EIR certification and project approval. The Final EIR contains responses to each comment received during the 60-day public review period. In addition, as noted in Section 2.3 of the Draft EIR, the project development team has hosted numerous community design meetings to engage public input. The public review process has exceeded CEQA requirements. Following the closing of the Draft EIR public review period, representatives of each of the three landowners (Los Angeles County DBH, Caltrans, and State Parks) met on two occasions (4/22/24 and 5/6/24) to review and discuss the comments received on the Draft EIR and to identify a Preferred Alternative. The result of these meetings produced Alternative 3A as the Preferred Alternative that combines elements from each of the Build Alternatives and avoids all significant impacts. As noted in Section 1.5 of the Final EIR, the Final EIR will be made available to all commentors for a 30-day period. State Parks will hold a public meeting during that period to receive additional comments on the Final EIR and preferred Alternative. Those comments will be included as an Appendix to the Final EIR when considered by the State Parks acting as lead agency for CEQA compliance.
Judy Villablanca		
IND 15-1	Please add me to your mailing list. I would favor maximum restoraiton of the lagoon, since we have lost the majority of California coastal wetlands.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Steve Levin		
IND 16-1	In my perspective, the optimal approach for the Topanga Lagoon Restoration Project is to prioritize alternatives that maximize the lagoon habitat. A key focus should be on expanding the lagoon wetland and restoring the bank habitat. Rather than allocating resources to renovate the dilapidated Topanga Ranch Motel and its 25 structures, these funds could be more effectively utilized in enhancing the lagoon habitat and addressing other crucial areas.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 16-2	The Topanga Ranch Motel, currently in a state of disrepair, lacks the significance of historical or cultural value. Therefore, it seems reasonable to suggest the removal of these structures. The remaining businesses have no historical or cultural value and should be removed. By doing so, the obstacle posed by the proximity of these structures would be eliminated, facilitating the restoration of the lagoon habitat.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. This includes consultation with SHPO and local tribes regarding needed measures to protect preserve and/ or document onsite historic and tribal resources. Additionally, the SHPO concurred in October 2009 that the Topanga Ranch Motel is eligible for the National Register of Historic Places under criteria A and C and was added to the California Master List of State-owned Historical Resources. The Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of that Alternative. Alternative 3A described in Section 1.3 of the Final EIR would retain much of the Topanga Ranch Motel and avoid the significant impact.
IND 16-3	"Moreover, it is essential to acknowledge the prevalence of non-native, invasive plants, particularly the unmanageable and out-of-control nasturtium, within the project area. The removal of approximately 256,000 cubic yards of soil is proposed as a means to maximize the lagoon habitat, but in addition it will help in eradicating these invasive species. This approach not only addresses the immediate concerns within the project area but also ensures a more sustainable and ecologically sound restoration process.	As discussed in Section 3.3, Mitigation Measure BIO-12 would include measures to minimize the potential for habitat degradation and avoid the spread of invasive plant species to sensitive natural communities. The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR. The effects of the grading on the existing condition is assessed in Section 3.3 Biological Resources of the Draft EIR.

Comment Number	Comment	Response
Anonymous Commenter		
IND 17-1	1) Does Alternative 4 (optimizing for SLR) also have a bridge to allow sediment from the moutnains to replenish the beach?	Alternative 4 does include a bridge at PCH over the lagoon to allow sediment from the watershed to move downstream through the lagoon and replenish the beach. Analyses of the proposed creek, lagoon, and beach processes and conditions are provided in documents such as **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)). These studies provide detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a “Mike11” model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on pages 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a “pass through” system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. As discussed on page 2-35 of the Draft EIR, the Caltrans bridge would be lengthened from 79 feet to approximately 460 feet for all proposed alternatives including Alternative 4.
IND 17-2	2) Why is the motel (at its current location) culturally significant? Who are the stakeholders here and what specifically do they need? Could their needs be solved in a different way than keeping the current motel?	The Topanga Ranch Motel is owned and managed by California State Parks. As described on pages 2-17-2-18 of the Draft EIR, it has the potential to be partially restored under Alternatives 3 and 4, and developed for visitor services that could include use as an interpretive space, day-use activities, parks offices or employee housing, or low-cost overnight accommodation, among other options. Development of the Gateway Corner under Alternatives 2-4, also provides opportunities for visitor services development and uses, but on a smaller scale. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. As a result of this eligibility, the State Historic Preservation Officer (SHPO) considers the resource to potentially be a significant historic resource. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project.

Comment Number	Comment	Response
IND 17-3	3) If we used a tunnel for this part of the PCH (maybe instead of a bridge or moving it inland) might that more efficiently reconnet the moutnain and coastal ecosystems? And potentially help keep some of the existing homes/restaurants that people love? Would love to see an alternative that explores this direction.	As discussed on page 2-10 of the Draft EIR, one of the project objectives includes expanding the lagoon ecosystem to improve estuarine hydrologic functions, protect endangered species and improve fish passage. Tunneling under the PCH embankment will not be able to meet the fish passage requirement of a 200-foot free span, hence, it would not meet the project objective. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each Alternative includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR. The proposed trail network has the potential to connect with regional systems such as the California Coastal Trail and Coastal Access Trail, which would facilitate connectivity between upper Topanga State Park and areas along the coast. The Backbone Trail is located to the north of the project area within a different portion of Topanga State Park and is not included as part of the proposed project.
IND 17-4	"4) It seems absolutely essential that this project: -Get the mountain sediment to the beach to restore the natural benefits of this ecosystem; -Make the coastline more resilient to sea level change.	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon, but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach over time. The benefits of this project are that sediment will be conveyed effectively from the watershed to the ocean to replenish the beach, provide for fish passage, and restore significant areas of wetland habitat, while rendering the entire site more resilient to climate change. The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the sediment delivery from the watershed to the ocean, although it will reduce constriction of the PCH bridge for flood conveyance and sediment delivery. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or nearshore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality, energy consumption (fossil fuels), and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of nearshore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**.

Comment Number	Comment	Response
		A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably.

Comment Number	Comment	Response
Dennis Washburn		
IND 18-1	It's important to include the councils of government including: Las Virgenes - Malibu Council of Governments = LVMCOG, Western Cities COG - Santa Monica, Beverly Hills, WeHo, Culver City, City of Los Angeles, Pacific Palisades & surrounds, SCAG - SoCal Council of Governments. Also Metropolitan Transportation Agency - MTA & their Public Transportation Service Councils. Assess project uses by - MTA, CHP, :LACoSD, LAFD, Business & Recreation Orgs - Chambers of Commerce, Surfrider Foundation, CalTrout, LAUSD SMMUSD, Topanga Town Council, HOAs in LA Malibu Sanita Monica Mts Conservancy, MRCA, the Bay Foundation.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. The documents are also sent to the State Clearinghouse to be available for other agencies to assess. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
IND 18-2	Replace motel with manufactured shelters like those offered by ArcBuild (ArcSapce) Sites. MTA has property and funds for "housing", transit stops, cycling, tourism, etc.	The Topanga Ranch Motel is owned and managed by California State Parks. as described on pages 2-17-2-18 of the Draft EIR, it has the potential to be partially restored under Alternatives 3 and 4, and developed for visitor services that could include use as an interpretive space, day-use activities, parks offices or employee housing, or low-cost overnight accommodation, among other options. Development of the Gateway Corner under Alternatives 2-4, also provides opportunities for visitor services development and uses, but on a smaller scale. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project.
IND 18-3	SCAG can get funding for long range transportation planning, implementation & operations & maintenance. COGs can help with recreation, quality of life, water quality, tourism & economic development. LA Community College District & community colleges can provide trained personnel certificate programs to help with science, engagement, and community outreach. Any chance to link project to the "Back Bone Trail"?	Each Alternative includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR. The proposed trail network has the potential to connect with regional systems such as the California Coastal Trail and Coastal Access Trail, which would facilitate connectivity between upper Topanga State Park and areas along the coast. The Backbone Trail is located to the north of the project area within a different portion of Topanga State Park and is not included as part of the proposed project.

Comment Number	Comment	Response
IND 18-4	What can we do to accelerate the project - Funding? Collaboration? Policy & Political Allies? 501C3 contribution (e.g., Annenberg 101 Crossing)?	The Project is anticipated to begin construction in 2027+ dependent upon procurement of funding. After completion of the environmental phase, a multiyear design effort is required. Prior to construction, several permits and approvals are required from the California Coastal Commission, Caltrans, and the US Army Corps of Engineers among others listed in Table 2-6. The Project construction schedule is discussed in Section 2.7.1.
IND 18-5	Measures M & R County Support, Measure W LA Co. Funds, Measure H Housing LA County, Measure HH Housing LA City. TAP League of CA Cities (Association) for experiences in other Coastal Areas or Watershed Projects. TAP Natural Resource Conservation Service for EQIP Funds & Help.	A variety of potential funding sources will be explored to assist with project implementation. Project costs are not considered environmental impacts to be considered under CEQA. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Andrew McPhee		
IND 19-1	How can we maximize day and night facilities for locals and visitors	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

Comment Number	Comment	Response
Anonymous Commenter		
IND 20-1	As a local and city resource Topanga Beach is missing better visitor facilities like a cafe, accommodations better toilets and showers.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places.
Anonymous Commenter		
IND 21-1	It looks like project #2 is the best option. I don't see how Project #3 could be more environmentally friendly if it keeps the motel & requires more sewage & construction. There seems more unknown financial impacts to Project #3.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 21-2	I didn't see any financial projections for the different projects and how they will affect long-term maintenance & project usefulness.	Detailed cost estimates for each Alternative have not been determined at this time. Funding for the grading, site contouring, lagoon expansion, bridge expansion, and visitor services amenities would be raised by State Parks largely through state and federal grants in coordination with the other landowners, Caltrans and DBH. The actual costs of implementing the project and funding opportunities will be developed as final designs are completed. Project costs are not considered to environmental impacts to be considered under CEQA.
IND 21-3	Motel restoration seems like not very useful as there is no specific use and will only increase price of the project.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Alternative 3A would avoid this impact by retaining much of the Topanga Ranch Hotel. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

Comment Number	Comment	Response
David Tokofsky		
IND 22-1	Does the location fall within LAUnified or both LAUSD and SM Unified	There are no schools belonging to either the Santa Monica School District or Los Angeles Unified School District on or near the project site. As discussed on page 3.8-12 of the Draft EIR, no schools are located within one-quarter mile of the Project area. The nearest school is Westside Waldorf School, a private school approximately 2 miles east of the Project area. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Chloe Kim		
IND 23-1	My name is Chloe Kim and I have been surfing at Topanga since 2014 and started being regular at Topanga from 2020 onwards. I am a frequent user of the beach parking lot, even on days when roadside parking is available I prefer to use the paid parking lot. I feel unsafe using the roadside parking due to road side noise, road side accidents, or vehicle vandalism. Safe parking is a necessity for surfers and Topanga has been great at providing it, as much as it provided consistent surfing. I have read through the EIA report and fully agree to the objectives and proposed project outline. Restoring the lagoon, preparing for coastal erosion, and connecting the beach to the trail is a wonderful idea. I agree that not moving the PCH should be one of the key considerations to minimize traffic disruption and CA budgets.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations via trails under PCH on both sides of the lagoon. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots. Table 6-1 in the Draft EIR summarizes the comparison of coastal access parking between all Project Alternatives.
IND 23-2	However, one thing I notice is that the paid parking at the beach will be reduced to about 60% of current capacity by doing a quick spatial analysis of the maps provided in the EIA. Including street parking it reduces to about 40% of current capacity. Reduced beach side parking for us surfers is a major concern than a non-surfer can imagine; especially when you carry a 9' board and other gears around OR when you are a family and need to take young kids to the beach. Carrying surfboard and beach gear around across PCH is stressful and unsafe.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and include a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2 and 5, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a

Comment Number	Comment	Response
		total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
IND 23-3	I think there are possible modifications to the current plan we can consider to maximize parking at the beach. Here is my rather simple suggestion that the expert team can take as an additional consideration. 1. Make the landscaping area (bush area) along the ramp a new lot area - achieve paid lot capacity to 80% of current, reduce unmanaged bush area. 2. Move the ramp access away from upper parking lot exit. Make ramp access exit only. - achieve road safety and minimized user confusion. achieve lot capacity to 100%. 3. Separate emergency vehicle access path Below are details for each suggestion; 1. Make landscaping areas from the parking lot to the beach access a lower parking area. Achieve 80% of current paid lot capacity + Increased parking revenue a.The landscaping area (I call it the bush area) is poorly maintained except near the top of the north stairs where local surfers made a garden. Rest of the bush area collects trash, urine, and rodents. Vegetation often grows out and obstructs views to the beach/ocean. The plan could make clean retainer walls of this bush area and make parking alongside the ramp to the lifeguard tower. It would be able to provide a clean environment, great access for surfers to the beach, and minimize reduction of parking spaces near the beach. With the lagoon restoration the area would have a lot more natural resources than the wall side bush too. image.png b. Eligibility for this lot can be only for max 3 hr use and pricing of this newly added lot can be higher time based, for example El Porto's $1.5/hour (or was it $2/hr) so it has a quicker turnaround and users with limited time at the beach can leverage the time based parking. For a quick morning surfer or 1 hr surfer like my friend who has a new born baby, this lot would be a perfect use case. c. We could also make it for "carpool only" so whoever is driving with more than 2 passengers can use the convenient lot. d. It could simply have a more expensive tariff too, given the accessibility. Please see the diagram below and added red blocks for the added lot area. image.png	The comment suggests design recommendations. We appreciate the design recommendations and will take them under consideration. All designs along PCH and TCB will comply with current Caltrans design standards. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
	2. Ingress & egress path to the lower ADA lot is too close to the beach parking egress path, and needs to move farther apart. Achieve ~ 100% of current paid lot capacity + Increased parking revenue	
IND 23-4	Currently ramp users can use the signal at the TCB and PCH to access the ramp. However, in the plans there is a separate ingress egress too close to the beach parking lot exit without any mention of traffic control. I believe there are experts for this, but the way it is designed currently is likely to create increased potential accidents by multiple way traffic and not a clear traffic management plan.	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The mitigation measures include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan and TRA-4: Public Outreach Campaign. TRA-1 would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
IND 23-5	By moving the ramp's ingress egress further apart, more beach side parking can be created. Close to 100 % current beach paid lot capacity. Also ramp having its separate access and difficult ingress egress is likely creating traffic congestion. If the upper and lower lot can be connected through a north ramp it could be the best case of all protecting drivers from making rouge turns and managing minimized congestion. Please see below diagram and added red block for parking and further out placed ramp in blue. image.png	The comment suggests design recommendations. We appreciate the design recommendations and will take them under consideration. All designs along PCH and TCB will comply with current Caltrans design standards. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR.
IND 23-6	3. Lastly, separate emergency vehicle access from parking congestion in any case. I have seen lifeguards and firefighters clearing the access to the helipad or to the lifeguard tower. a. Moving the helipad to the beach would need to consider uninterrupted access to the helipad by emergency vehicles. b. The only way I think it is possible is by providing a separate access path to it that only emergency vehicles can use. Please see below image. I've added a suggested helipad access route in yellow so emergency vehicles do not deal with traffic at the parking lot. image.png As much as I wish to attend the hearing on Wednesday, I can't due to work travel. Hope this suggestion can be read out and considered with the alternative plans.	Under all Project Build Alternatives, the helipad would be relocated to the east side of the lagoon for improved access by lifeguards and emergency responders. As noted on page 2-17 of the Draft EIR, an unpaved emergency route from PCH to the beach level would be constructed to allow lifeguard access to both limit vehicle usage along the lagoon berm and provide access to the western beach even when the lagoon mouth is open. We appreciate the design recommendations and will take them under consideration. All designs along PCH and TCB will comply with current Caltrans design standards. Under all Project Build Alternatives, the existing lifeguard and public restroom building would be rebuilt closer to the realigned access road at a higher elevation and farther from the ocean to provide additional protection from sea level rise. The helipad would be relocated to the east side of the lagoon for improved access by lifeguards and emergency responders. As noted on page 2-48 of the Draft EIR, removal of fill on the east side would be coordinated with maintenance of the helipad functioning at all times. The size and built elements of the new helipad would conform to all Federal Aviation Administration and County requirements and a new hydrant would provide water for wildland fire response.
IND 23-7	Not suggesting a silver bullet but asking for consideration to minimize reduction of beach parking. The beach parking lot has been a valuable resource for peace in mind surfing at Topanga.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a

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		total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
Beate Nilsen		
IND 24-1	I am happy to be returning this land to wetlands, asserting that Topanga Creek is one of the last free-running streams in Southern California. However, in 2002, Malibu times said the project also included "massive construction planned for Pacific Coast Highway, which may take as long as 10 years to complete and millions of dollars. There are 1,649 acres of land at issue. Are you proposing to make an influx of visitors & pave over Paradise, or are you truly wanting to protect essential wetlands, which protect the coastline from inundations of water from the seaside? Our local beaches struggle to get good "Grades" and, as you know, runoff from hard surfaces like concrete, asphalt, and rooftops is a leading cause of water pollution. Development [which this sounds like it will include]and agriculture in the canyons contribute extra nutrients, pesticides, and silt to local waterways. Wetlands trap and filter these impurities, maintaining healthy rivers, bays, and beaches. EPA just put this up 2 days ago: bringing together seven federal agencies with programs and authorities that manage coastal wetlands.https://www.epa.gov/climate-change-water-sector/coastal-wetlands-initiative	As discussed in Section 2.4 of the Draft EIR, some of the project objectives include expanding the lagoon ecosystem to improve estuarine hydrologic functions, to protect endangered species, improve water quality and restore coastal wetland habitat and species diversity within the Topanga Creek watershed. Section 2.5.1 of the Draft EIR notes that expansion of the lagoon would protect and create essential wetland and riparian habitat for the tidewater goby, the juvenile southern steelhead, and many other native aquatic and terrestrial species. Additionally, under all Project Build Alternatives, parking areas would be permeable to the extent feasible, with surface runoff directed to bioswales to reduce pollution and improve water quality. The proposed project will improve the water quality with a larger lagoon ecosystem and stormwater treatment before discharge. The proposed project construction duration is estimated to be 5-years, and the area included in the project boundary is less than 50 acres.
Tom		
IND 25-1	In my opinion I think Alternative #2 is the best. This alternative best meets all of the restoration goals and prioritizes the survival "of the rarest fish and wildlife species". We once had 30 acres of pristine and we now have less than one acre. The plan would increase the wetland's and area. It may not get it to back to the 30 acres, but it will make the wetlands a priority and increase the wetlands area the most.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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R.C Brody		
IND 26-1	Please consider a hybrid. Alt 4 - Max managed retreat + Alt 2 - Max Lagoon habitat.	The comment expresses preference for Alternatives 2 and 4. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 26-2	Also, please consider allowing concession to continue to operate as an evening restuarant.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. All Project Build Alternatives would include one concession and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan which identified that any concession needs to be consistent with the Park's vision (https://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf).
IND 26-3	Also consider the sewer option.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping existing wells, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside

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		of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless methods and some open trench are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. As noted on page 2-38 of the Draft EIR, only one option is included in the preferred alternative. State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option.
James Erickson		
IND 27-1	I support opening the Topanga Beach Motel with needed modifications.	The comment expresses support for Alternative 3 or 4. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

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IND 27-2	I also support camping in the park.	Camping is not proposed as an option. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 27-3	ABSOLUTELY keep Cholada Thai & Reel Inn open.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each of the Build Alternatives would result in a removal of most of the amenities currently operating on site. Consistent with the 2012 General Plan, these facilities do not conform with current building standards. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Although the final type has yet to be determined, the concession will meet the requirements of the General plan which identified that any concession needs to be consistent with the Park's vision (https://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf). Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
Anonymous Commenter		
IND 28-1	Please leave the feed, leave Reel Inn, leave all the business, leave bait shop and leave Topanga Ranch Motel.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project.

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		Restoring the Topanga Ranch Motel would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. Each of the Build Alternatives would result in the removal of most of the amenities currently operating on site. Consistent with the 2012 General Plan, these facilities do not conform with current building standards. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan which identified that any concession needs to be consistent with the Park's vision (https://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf). Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
Michael Anapol		
IND 29-1	First comment of the evening pointed out the fact that Malibu Lagoon which went through a similar process has suffered in the quality in the surf break at all three points	The Topanga State Beach is a popular surfing area, known for its "right-hand point break" which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "based on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.

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IND 29-2	2) You need to keep lifeguard station, bathrooms and parking open as long as posable so as to let the surfers access to enjoy their surf spot and beach	The Draft EIR concludes in Section 2.61 that coastal access would be maintained during construction and improved under all Project Build Alternatives. Construction would close portions of the beach for five to seven months, but a temporary accessway out to the surf break would be maintained at all times. As discussed on page 2-47 of the Draft EIR, the construction sequencing notes that the area for the new lifeguard and public restroom building would be prepared and available for use prior to the relocation and removal of existing structures. Pathways and signs will direct the public to parking and access points during construction. As noted in Section 2.7.2 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible. As discussed on page 2-47 of thew Draft EIR, the construction sequencing notes that the area for the new lifeguard and public restroom building would be prepared and available for use prior to the relocation and removal of existing structures. As noted in Section 2.5 of the Draft EIR, protecting and enhancing coastal access and visitor services is one of the purposes of the Proposed Project. The California Coastal Act establishes coastal land use, access, and management policy in California that strives to balance public trust asset management with sound development and habitat conservation policy. As stated in Section 30001.5 of the California Coastal Act, one of the goals of the state for the coastal zone is to "Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners." Both State Parks and the County have developed coastal land use plans that identify beneficial uses, goals, and development policies to manage the Project Area consistent with the California Coastal Act. The Proposed Project has been developed to facilitate implementation of recreation and coastal access policies outlined in the Topanga State Park General Plan and the Santa Monica Mountains Local Coastal Program that are currently underdeveloped on the Project site. Once constructed, all Build Alternatives would improve recreational opportunities and facilities by improving or retaining coastal access and visitor services within Topanga State Park compared to existing conditions.
IND 29-3	3)How could the major reconstruction of the bridge not interfere with traffic flow on PCH	This comment expresses concern regarding traffic impacts. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final

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		design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures shown in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

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IND 29-4	4)If you plan on widening the beach and making more parking and sand space for more beach goers is their a pan in place for more sanitation workers, bathrooms, trash receptacles which will all be needed	The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management.
IND 29-5	5) How is it possible to control what this excavation sends into our ocean, bacteria, pollutants, pesticides.	The excavation during construction is controlled and done “in the dry” while the lagoon mouth is closed. There will be no ocean connection during excavation so there will not be conveyance of bacteria, pollutants, and pesticides into the ocean though the mouth. However, material will be placed directly in the ocean so there is the potential for constituents to be contributed to the ocean during construction. To address any potential for compromised material to be placed in the ocean, a detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. The nearshore placement is being pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. As discussed on pages 3.8-16 - 3.8-17 in the Draft EIR, Mitigation Measure HAZ-1 would require that samples of soils and the Topanga Hotel be analyzed and appropriately remediated or removed if soils contain hazardous quantities of contaminants. No contaminated soils or fill materials will be eligible for nearshore placement. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. **Appendix C** (Nearshore Dispersal Modeling for Sediment Beneficial Reuse for Topanga Lagoon Restoration (Moffatt & Nichol 2023)) provides a detailed evaluation and modeling of the projected movement of the sediment downcoast. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study

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		(Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions. An offshore habitat and species distribution analysis (found in Appendix S CRM 2023 which is an appendix to **Appendix K** Biological Resources Assessment (RCDSMM 2023)) was conducted to determine the most suitable placement site based on proximity and accessibility from the project site but avoiding any sensitive marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized.
IND 29-6	6) What happens to animals that presently make this area their home	An offshore habitat and species distribution analysis (found in Appendix S CRM 2023 which is an appendix to **Appendix K** Biological Resources Assessment (RCDSMM 2023)) was conducted to determine the most suitable placement site based on proximity and accessibility from the project site but avoiding any sensitive marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. Section 3.3 Biological Resources of the Draft EIR recognizes that there will be temporary disturbance to areas and species surrounding the lagoon during construction. However, mitigation measures would ensure that biological resources are not cumulatively affected by construction. Over the long term, the proposed Project would result in a significant net benefit to the availability and quality of lagoon and sensitive habitats, both locally and regionally.

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IND 29-7	6) Providing 1 to 1 temporary parking, what does this mean in real world	As noted in Section 2.6.9 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible.
IND 29-8	7) Concession stands. Who decides who stays and what new food comes in. Topangan's are fussy health conscious eaters and would prefer something other than a fast food chain	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. All Project Build Alternatives would include one concession and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan which identified that any concession needs to be consistent with the Park's vision (https://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf, and outlined in Concessions https://www.parks.ca.gov/?page_id=29362).
IND 29-9	8). What will happen to the free parking along PCH that is presently used everyday 9). Has any thought been put into putting parking meters in the parking lot to do away with those horrible frequently broken ticket purchasing machines that are presently there.	Free parking along the shoulder of PCH will be retained upon completion of the project but may not be fully available during construction. As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. Types of ticket machines will be more fully considered during the design phase. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the

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		new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. Although there will be a slight reduction in free parking, parking availability and configuration would be improved under all Project Build Alternatives and the new distribution system would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
IND 29-10	As you might have noticed from this Topanga meeting our surfers don't really want a years long project that only makes a busy beach more crowded with no guarantees as to the negative effects that most certainly will occur no matter what your report claims. Look back over history at this sort of project and the negative outweighs the positive especially in regards to the locals who use it daily. Thank You M F Anapol	Analysis of the project impacts on the surf has been detailed in **Appendix H** (Surf Quality Impact Assessment for Topanga Lagoon Restoration (integral 2023)). Results indicate that since the project does not change the beach face under any Alternative, there is no impact to the surf. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Chad White		
IND 30-1	"To Whom It May Concern, My name is Chad White, Topanga resident and lifelong Topanga surfer 1978-2024 (so far). I am vehemently opposed to this project for myriad reasons listed below, each meritorious enough to put a stop to the insanity of this proposal;"	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 30-2	"1. Health and Safety The proposed park flanking PCH and Topanga will be overrun by the unhoused and with no security to mitigate the issue, the park will be unusable and unsafe within one week of opening (human feces, litter, used needles, mental health dangers). Many fires have been started by the unhoused population in Tuna canyon during Santa Ana wind events during cold nights and this is 100% going to happen here. "	Concerns about the unhoused use of Topanga Beach, as well as fires are noted. Lifeguards call the Los Angeles County Sheriff for assistance with these issues and the Park Rangers also respond to the area. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management. The Operations and Maintenance Plan is included in the Final EIR as **Appendix S**.
IND 30-3	"2. Fire Trap! Reducing the Traffic to two lanes north and Southbound PCH will have a knock-on effect of impacting southbound Topanga canyon blvd traffic. Even with the roads fully open, rush-hour backups are typically up to the s-curves meaning residents will be unable to escape in the event of a fire or other emergency. Cal Trans can not be claim this won't be an issue when it already is every day. One lane each direction will back up traffic all the way to the 10 freeway and past the maybe pier every single day that the project is ongoing leading to a massive loss in productivity and increased emissions from gridlock traffic along the entire coast. "	As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and

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		Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.
IND 30-4	3. Danger of assault. Parking on the land side of PCH means that the only safe access (safe from traffic) is under PCH. Close to 50% of surfers that frequent Topanga Beach in the pre-dawn twilight hours are women who will need to decide take the chance of crossing under PCH with the likelihood of encountering the unhoused population (come to the beach and see for yourself) or cross the highway as opposed to now when they can park directly at the access points. (Leave your office and go have a look at the situation first hand and ask yourself if you, your wife, daughter or friend should feel safe in this situation).	Concerns about the unhoused use of Topanga Beach, as well as fires are noted. Lifeguards call the Los Angeles County Sheriff for assistance with these issues and the Park Rangers also respond. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management. The Operations and Maintenance Plan is included in the Final EIR as **Appendix S**.

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IND 30-5	4. PCH Becomes more dangerous As mentioned above, the danger of PCH is real. Those looking for a shortcut will jaywalk and put themselves in harms way, especially the younger teens who are in a hurry to check the surf. Moving the majority of the parking to across the street is a terrible idea because everyone will need to cross the street even just to assess the surf, even if there are underpasses. More traffic means less patience at a time where PCH is already making headlines for being so deadly, dozens killed within a stones throw of this project.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with trails under PCH on both sides of the lagoon connecting to preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.
IND 30-6	5. Death of a100 years of deep, multicultural community For over 100 years, Topanga beach has been a critical part of surf culture and there are a minimum of 200 people who surf the wave daily and have done so for a century. I started surfing Topanga when I was 11 years old, I am now 57 (46 years), my son started surfing Topanga when he was 4, he is now 24 (20 years), my wife started surfing at AGE 60 (3 years) and has been so warmly embraced by the surfing community and she feels safe parking in the existing lot for that reason. That's 69 years for my small family alone. ITS NOT ABOUT THE SURFING! It's about the parking lot, the stairs, checking the surf, having conversations, sharing losses and looking out for each other, business connections, mental health–like every other community we need it now more than ever.	The community connection to Topanga Beach is recognized as important and the alternatives designs developed reflect input from numerous public workshops. Each of the Build Alternatives would result in the removal of most of the amenities currently operating on site. Consistent with the 2012 General Plan, these facilities do not conform with current building standards. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain one onsite concession. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan which identified that any concession needs to be consistent with the Park's vision (https://www.parks.ca.gov/pages/21299/files/02finalgp-ch2.pdf). Alternatives 3, 4 and would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 30-7	Reconfiguring the lot will displace and disperse our community.	The gathering area and stairs from the DBH parking lot to the beach are retained in all Alternatives. Interest to maintain gathering spaces is noted and will be considered further during the design phase. As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH

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		lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. Although there will be a slight reduction in free parking, parking availability and configuration would be improved under all Project Build Alternatives and the new distribution system would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
IND 30-8	6. Crime There have been a rash of break-ins and auto thefts recently in broad daylight at Topanga Beach. Check the CHP record if you doubt me. Parking across the street without clear visibility will make the problem exponentially worse. We catch them from Tim to time but without visibility, this type of crime will explode	Concerns about the crime near Topanga Beach are noted. The parking proposed in all alternatives provides visibility comparable to what exists. Lifeguards call the Los Angeles County Sheriff for assistance with these issues and the Park Rangers also respond to the area. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management. It is anticipated that additional staff will be needed and there would be increased parks presence through the increased use of a maintenance facility, employee housing and other visitor services. The Operations and Maintenance Plan is included in the Final EIR as **Appendix S**. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be required for Proposed Project operation.

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IND 30-9	7. Unintended consequences This project is not needed, the population that uses Topanga Beach didn't ask for it and it will result an environmental and cultural disaster just like the Malibu Lagoon "RESTORATION" project that when completed resulted in the death of over ten thousand fish whose stinking, rotting corpses were a stark reminder the the interested parties got it wrong. All of the army corps of engineering and heal the bay studies amounted to nothing and there is zero accountability. The flow of the lagoon soon undermined historical landmarks that had been there for 100+ years (Adamson House and the world famous Malibu Wall) and required the installation of groins and seawalls which caused further erosion and created additional hazards on the beach. The interested parties absolved themselves of any responsibility for the damage done (damage that continues to worsen to this day). That project has been an unmitigated disaster for Malibu and has resulted in the destruction of 2 of 3 perfect surfing points that will never come back with no benefit to the ecosystem, just destruction, dead birds and fish on a grand scale, the main attraction that Malibu scared forever leading to dangerous overcrowding at the one remaining point. A CRIME.	The concerns raised about the Malibu Lagoon restoration are not applicable to this project as that system has many different physical, chemical, biological and social conditions. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 30-10	8. Storm water flow As with the Malibu example, the feasibility and hydrology reports are purely theoretical and academic but even to the causal observer, they are so clearly misguided and illogical as to be laughable–seemingly attempting to defy basic physics and fluid dynamics. To suggest that the project will direct floodwater to the west while also claiming an increase in beach sand is so ridiculous that I hardly believe you're trying to claim it. The ocean currents 100% of the year flow north to south all day, every day (observably west to east if standing on Topanga Point) so all flow will be in the direction of Chart House point (Mastros) and will inundate the entire beach during storm activity. There wiil be NO flow to the west because the ocean current will not allow it and without the narrow channel caused by the bridge, the flow will overtake the entire beach rather than breaching at the top of the point. But you say we'll dig a channel right? See above Malibu. During storms, the ocean currents are even stronger so when there is a breach it will be to the east (south) and it will cross the entire beach at high tide all the way to the Signal at Topanga. A heavy rain event + a tide of five feet or more and a swell over six feet or more will erode the entire beach and undermine your overbuilt infrastructure	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. This comment does not address the adequacy of the Draft EIR. The work was done using numerical modeling tools coupled with information from person experience on-site, historic aerial photography, measurements, experience from other similar projects, and engineering judgment. It was intended to provide a well-rounded, comprehensive, and realistic prognosis of the future with and without a project. The numerical models used in Draft EIR studies were state of the art and calibrated with the most recent and available data, so that the model predictions are considered to be highly reliable. Predictions are for the thalweg may breach slightly to the west from its present breach point during the extreme wet fluvial storm series. The thalweg will then gradually migrate to the east due to waves and easterly currents. There should not be any loss of the entire beach due to this project, and infrastructure is purposely moved back from the shoreline to provide more room for future natural shoreline changes during sea level rise rendering the entire site more resilient. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the

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		changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on pages 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference in bed elevation change during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on pages 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably.
IND 30-11	8. The surf The above sand and debris flow will destroy the fragile reef structure that makes the waves at Topanga so unique and RARE. There are only a handful of classic cobblestone point breaks in California and Topanga is a classic. Similar projects ruined Malibu as I mentioned and this will be no different, changing the river mouth changes the wave and the wider the river mouth the words the wave shape will be. Thousands of surfers enjoy this wave every year, the spend money locally, they take care of the beaches and keep the area relatively crime free. The wave itself benefits the local economy and provides mental health and solace in an increasingly stressful world.	Sand and debris from the creek during storms will not destroy the cobble delta of the surf site. Topanga Point is a popular surfing area, known for its "right-hand point break" which is the result of favorable bathymetry causing waves to break steadily toward the east for a considerable distance. Avoiding impacts to the surf break and preserving its quality and accessibility is an important objective of the project. Any potential project impacts on the surf break and recreational surf quality were evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. It also relied on input from a stakeholder group of surfers called Friends of Topanga Point that provided input from beginning to the end of the study. This outreach was done to assure the proponent and the public that the project design would adequately consider surfing as a critical resource that is not to be impacted. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Existing conditions of rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "based on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.

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IND 30-12	9. More Trash and more Poop More people means more trash and more need for functioning bathrooms, the current septic is already stressed and the solutions put forth are slapdash at best and I've yet to hear a solution on the other sanitation issues that will arise if there is an increase in demand for the beach/lagoon.	As discussed on page 2-18 of the Draft EIR, an additional restroom facility as part of the small outdoor interpretive pavilion at the proposed Gateway Corner is included under all Project Build Alternatives. The potential location of the proposed restroom facility is shown in Figures 2-5a, 2-6a, and 2-7a. The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer. The Preferred Alternative includes the on-site seepage pits option. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be require for Proposed Project operation.
IND 30-13	10. Fill Dirt dumping There is reef out there adjacent to the proposed dumping site. When the fill dirt hits the water it will migrate with the tide, current, swell etc. it will cover natural habitat for Seabass, Halibut, Lobster, Sheapshead etc. You're killing a thriving habitat to possibly resotore one and the irony is lost on no one except your team. The other unintended consequence is the surf spot, again the environmental impact reports are academic but I can poke holes in them so easily it makes me wonder if you're even trying to be convincing or do you assume those of us who've observed this beach and it's changes year over year for 4 plus decades are too stupid to understand? All this so MAYBE some fish can thrive someday on the other side of PCH?	As discussed on pages 3.8-16-3.8-17 in the Draft EIR, Mitigation Measure HAZ-1 would require that samples of soils and the Topanga Hotel be analyzed and appropriately remediated or removed if soils contain hazardous quantities of contaminants. No contaminated soils or fill materials will be eligible for nearshore placement. The Draft EIR acknowledges the existence of the cobble delta and other sensitive marine habitat in the vicinity, but not located specifically at the proposed sediment placement site. Sediment placed in the ocean will move under the forces of tides, waves, and currents. The dispersion of this sediment was modeled in detail to determine its fate and to identify and quantify any adverse environmental impacts. The two sediment handling options are placement upland and/or in the ocean. The Draft EIR describes in Section 2.6.6 these two options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast to an eroding shoreline while also reducing impacts to air quality, energy consumption, and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach

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		nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. Multiple site reconnaissance dives by marine biologists and a nearshore morphology analysis were conducted to: 1) determine the most suitable placement site based on proximity and accessibility from the project site; 2) balance the temporary marine environmental impact and beach nourishment benefits, and 3) determine and quantify the fate of the material after dispersion in the ocean. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending on approvals from the agencies included on the DMMT such as the California Coastal Commission, National Marine Fisheries Service, Regional Water Quality Control Board, USEPA, and the USACE. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is considered “downcoast.” The prevailing ocean currents move sand eastward. As a result, Topanga State Beach may not directly benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach and reduce constriction of flow and sediment delivery under the PCH bridge but would not decrease sediment loads delivered to the ocean compared to existing conditions as the lagoon is a pass-through system. An offshore habitat and species distribution analysis (found in Appendix S CRM 2023 which is an appendix to **Appendix K** Biological Resources Assessment (RCDSMM 2023)) was conducted to determine the most suitable placement site based on proximity and accessibility from the project site but avoiding any sensitive marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates.
IND 30-14	This project can't be allowed to continue. I vote YES ON OPTION ONE (1) NO CHANGE.	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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IND 30-15	Everyone involved should be ashamed for even considering this folly, what a disgraceful bunch you all. Shame on you all. SHAME! Sincerely, Chad E White 516 Fernwood Pacific Drive, Topanga CA 90290 310-418-1196	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Chester Griffiths, Michael Bedner, Ron Kurstin, Cami Colbert, Christine Lee Griffiths, Lloyd Ahern		
IND 31-1	Issues/Concerns of Adjacent Residential/Commercial Land Owners and Westward Las Tunas Beach Front Residential Owners: 1. NONE of the Immediate Adjacent Impacted Residents or Commercial Owners (Listed Above) were contacted related to the imminent dangers to their residential/commercial properties.	Contrary to the comment assertion, all neighboring properties within a half mile radius were included on the mailing list announcing each stage of the CEQA process. In addition, representatives of the Santa Monica Mountains RCD toured the site with a neighboring property owner to discuss the proposed project objectives. In addition, CDPR has implemented a robust public outreach and participation process throughout the developmentand analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Public workshops and meetings attended by members of the adjacent residential landowners and businesses were held (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community. Meetings (6/6/22 C. Stevens) and 3/28/24 were held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to

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		the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.
IND 31-2	NONE of the impact studies included the residential/commercial properties and the potential damage to the properties with the "Westward Expansion of the Topanga Lagoon" not limited to flooding, foundation damage, change to the already beach erosion leading to ocean wave damage or complete loss of function of the Properties. Nor were any studies performed on the impact on the westward Residential Homes of Las Tunas Beach.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focus on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more 200 feet away from the proposed west bridge abutment. Over time, the channel breach may migrate within the lagoon depression toward the west. However, the modeling conducted for the project estimates that the thalweg of the Creek will remain in the proposed main channel which is more than 300 feet away from the westerly properties. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the abutments will be protected with rocks to prevent scour from occurring toward the west and prevent any westerly migration. The west bridge abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. No impacts to neighboring beaches and properties is expected from the proposed project. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.

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IND 31-3	Furthermore, no studies presented evaluated the impact of displacing 100,000's of Tons of "Dirt" into the Eastward Pacific Ocean off Topanga Beach on the Westward Residential Properties or Beach erosion especially in light of downdraft effect of the potential "land mass" resembling a current impedimentary structure (ie: Natural Groin"). The only presented data evaluated by residents was the impact on the "Surf" and "Wave Break" at the Point.	The material to be placed in the nearshore ocean off of Topanga Beach is sandy as defined by a thorough investigation required by the government. The material will not be placed as a "land mass, impedimentary structure or natural groin." Rather, the material is proposed to be placed as a layer of sediment on the seabed over a relatively large area during the construction period. The sediment deposit will not cause any downcoast effects to downdrift beaches. The project will actually provide a downcoast benefit of supplying sand to the downcoast beaches. The beaches west of the project site will not be affected because that direction is located "upcoast" of the project and is outside of the window of project influence along this coast. Multiple site reconnaissance dives by marine biologists and a nearshore morphology analysis were conducted to: 1) determine the most suitable placement site based on proximity and accessibility from the project site; 2) balance the temporary marine environmental impact and beach nourishment benefits, and 3) determine and quantify the fate of the material after dispersion in the ocean. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. The placement of sediments southeast of the lagoon is downcoast which avoids impact to surfing and sensitive marine habitats. The prevailing currents move

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		sand northeastward. As a result, Topanga State Beach may not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by the information in **Appendix G.**
IND 31-4	a. The “Lead Agencies” that are engaging in the Topanga Lagoon Restoration Project must formally conduct studies on the impact of the project on the adjacent residential p/commercial properties and furthermore indemnify the property owners with a corresponding Protective Bond for any damage or loss to the homeowners related to the Restoration Project in perpetuity as no one can predict the ultimate future impact of such a project on the residential/commercial properties despite the forecasted analysis.	The comment does not address the adequacy of the Draft EIR. However, information is provided herein to address the comment. State Parks is the CEQA lead agency for this project, while Los Angeles County and Caltrans are responsible agencies under CEQA. The Draft EIR includes a detailed hydrologic modeling effort summarized in **Appendix B and Appendix E** that estimates flood flow dynamics at the Topanga Beach during a 10-year and 100-year flow event. The report represents the best available science of the lagoon's flooding and breaching dynamics conducted by Moffatt Nichol, an established coastal engineering firm with extensive experience along the Malibu coast. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline

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		morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4 foot difference during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably and that each Alternative would increase fish passage opportunities. The modeling predicts no impact to properties or the shoreline west of the lagoon based on the predicted thalweg position which is constrained by 1) topography of the surrounding areas, 2) the western-most bridge abutment (Abut4) and embankment, and 3) the underlying cobble delta. Due to these factors, the stream course will continue to be constrained and prevent a western shift of the creek thalweg toward the neighboring properties. State agencies typically do not post a Property Damage Bond for adjacent properties and CDPR has determined this is not warranted.
IND 31-5	b. Caltrans, the Coastal Commission and Interested Agencies must conduct a study to address the "Erosion of the Beach" adjacent to the Lagoon Project as part of the planning as mandated to bea in compliance with SB 272 (10-7-2023) Sea Level Rise Planning and Adaptation.	The comment does not address the adequacy of the Draft EIR. However, information is provided herein to address the comment. As noted in Section 2.5.3 of the Project Description, each of the Build Alternatives would increase coastal resiliency to the effects of sea level rise. This includes both providing greater protections for public amenities on the beach, including moving facilities landward, as well as creating a wider lagoon area to attenuate fluvial storms to reduce erosion in the area. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 52, the beach width changes seasonally and periodically depending on winter storm conditions and sediment delivery from the watershed. The trend of retreating shorelines will continue, and the Project will not change this trend, however, sea level rise will cause more beach erosion in the future. The proposed Project would include

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		nearshore sediment placement as a means of providing beach nourishment that will benefit the downcoast beaches. Erosion of the beach west of the lagoon is a large-scale process occurring throughout the local littoral cell that is independent of the project. The western beaches are located upcoast of the project and therefore out of the reach of project effects due to the west to east ocean current direction in this location. In addition, the beach west of the project site is within the City of Malibu and the City recently did complete a sea level rise vulnerability assessment.
IND 31-6	c. Representatives the City of Malibu to our knowledge has not been engaged in the Topanga Lagoon Restoration Project which is concerning as the LCP of the Coastal Commission grants jurisdiction to the City of Malibu up to the Western boarder of the Project.	The City of Malibu has been included in both the Technical Advisory Committee and the public outreach process and has attended the public meetings. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Public workshops and meetings attended by members of the adjacent residential landowners and businesses were held (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.

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IND 31-7	2. The Noise, Dirt and Disruption from the construction of PCH-Bridge and excavation of landfill was never addressed to the adjacent.	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.12, Noise and Vibration, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.12, Noise and Vibration, of the Draft EIR, the analyses of noise issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix N**, Air Quality, Greenhouse Gas Emissions, and Energy Data, Modeling, and Noise Calculations (ESA 2023). As described in Section 3.12, all Noise and Vibration impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include NOISE-1, NOISE-2, and NOISE-3. Mitigation measure NOISE-1 would address noise impacts associated with operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work. Mitigation measure NOISE-2 would monitor construction noise to verify compliance with the applicable noise limits. Mitigation measure NOISE-3 would mitigate vibration and noise impacts related to pile driving. Details of these mitigation measures are discussed in Section 3.12 of the Draft EIR. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022) and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. The Sediment Beneficial Reuse Study (Moffatt & Nichol 2022) also includes the nearshore place methods and routes.
IND 31-8	3. Impact of Beach Bathroom Replacement: Local Wastewater Treatment Facility or hook up with LA City Sewer.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping existing wells, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property

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		directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. As noted on page 2-38 of the Draft EIR, only one option is included in the preferred alternative. State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option.
IND 31-9	4. Final Decision regarding the disposal 100.000's tons of excavated landfill dirt: Is the Coast Commission going to allow dirt to be placed in the Ocean? Is the presence of large hauling trucks permissible on PCH?	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The

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		analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. Large haul trucks are not intended to run on PCH, but rather on the beach from the lagoon to the beach near the foot of Topanga Canyon Boulevard. If haul trucks are needed to convey materials off-site to local landfills, they would conform to Caltrans standards for vehicles on state highways. As discussed on pages 3.8-16 through 3.8-17 in the Draft EIR, Mitigation Measure HAZ-1 would require that samples of soils and the Topanga Hotel be analyzed and appropriately remediated or removed if soils contain hazardous quantities of contaminants. No contaminated soils or fill materials will be eligible for nearshore placement. The nearshore placement location selected to receive the clean, native soils contained in the historic fill surrounding the lagoon will avoid any sensitive marine resources. The removal process uses smaller trucks that follow a path on the upper area of the beach to transfer materials to be placed. Approval by the Dredge Management Team, which includes members of many regulatory agencies including Coastal Commission, EPA, USACE, NMFS, CDFW and others is required. The potential impacts of trucking material offsite have been analyzed in the Draft EIR Air Quality and Greenhouse Gas Sections 3.2 and 3.7 respectively. Trucking is not the preferred method of handling these materials as it could have impact to traffic, but analysis indicates that even if all the material was trucked away, the project would not exceed the local Air Quality requirements. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**.

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		The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.
IND 31-10	Requests: 1. Formal Meeting with all Homeowners of Topanga Beach Drive 2. Action Plan to investigate impact of the Topanga Lagoon Restoration Project on the Homeowner's Properties. 3. Property Damage Bond in case of future Homeowner Damage due to the Topanga Lagoon Project 4. Engage City of Malibu in the Planning Process 5. Future issues will be addressed as they are encountered. Thank You.	A formal meeting with the HOA occurred on 3/28/24 Sas requested. At that meeting and in these Response to Comments, the concerns regarding the impacts of the project to adjacent properties was discussed. The models used to understand the project extended to the west to Big Rock and included analysis of the properties to the west of the project boundary. State agencies typically do not post a Property Damage Bond for adjacent properties and CDPR has determined this is not warranted. The City of Malibu staff has been engaged in the development of the project as a participant in the Technical Advisory Committee meetings and directly with CDPR and RCD. Their participation will continue to be included as the project evolves. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west, but will still remain

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		in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment.
Sally Reinman		
IND 32-1	To whom it may concern: We are residents of Santa Monica and own property in Topanga Canyon. Having attended two of the public meetings for this project and reviewed the DEIR, we would like to offer our full support for Alternative 2. It is rare that we are afforded the opportunity to restore and renew a habitat that we have damaged. We have this possibility with the Topanga Creek and Lagoon. It is an important watershed and we can reverse years of damage and revitalize a coastal wetland habitat supporting species diversity.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 32-2	In alternatives 3 and 4, the restoration of the Topanga Ranch Motel and preserving several of the businesses in the area are proposed at the cost of the lagoon. Firstly and importantly, where is this "importance" of the Topanga Ranch Motel coming from? It has not been open to the public since 2002, that is more than 20 years! During that time it has been vacant and deteriorating. No one cared enough to maintain it. Restoration of this facility at this site will be very expensive since it is in such a poor state and must comply to today's codes. Add to the restoration expenses, the need to hook it up with a sewer system miles away and it is even more expensive, in time and money. For what? Maybe 20 cabins open for public lodging? Really? With so few lodgings it becomes exclusive not inclusive, serving only those able to nab a reservation. Office space? How will it be functional for today's office needs when the restoration must comply with preserving historic aspects? Visitor serving for what? And what couldn't be better served in a newer facility? If this structure is so important that it needs to be saved, it makes more sense to move it in its current configuration to another site where it can be restored and maintained more easily.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Moving the structures would also constitute an adverse effect as it would lose its historic integrity aspects of location, setting and feeling. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 32-3	The businesses that are nearby have been staples for the community. They have served the community well and it is too bad that they may be victims of this project but they can move. Pacific Coast Highway is lined with businesses and homes. There is no lack of them. There is a lack of natural wetland habitat, habitat that contributes to the health of the mountains, sea, and divergent species, including man.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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IND 32-4	Only one alternative addresses this fully. The alternative that restores and renews the coastal wetland habitat. Trying to make right what we altered. Please support Alternative 2. Thank you, Dr. Sally Reinman Mr. Marcel Geloen.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Andy Cracchiolo		
IND 33-1	As a regular snorkeler at Topanga I am very concerned about the stresses huge amounts of water flowing out of the creek has had on the marine life. Most people don't know, but just off the sand I see many species there, some year-round. I've made friends with a Garibaldi that I have photos of going back several years. I also frequently see and photograph Calico Seabass, Opaleye, Perch, Octopus, Smelt, Sargo. and even a Giant Seabass. These fish are native to the area, just like the species mentioned in the DEIR but are there RIGHT NOW. We need to clean up the creek water before thinking about expanding the lagoon.	The Draft EIR evaluates water quality impacts to the creek and ocean on page 3.9-25. The analysis concludes that enhanced lagoon and ecosystem will improve the water quality in the lagoon. Although ocean water may be affected by increased nutrient loads when connected with the lagoon, but the proposed project does not change flood water discharge or volume and breaching pattern. With respect to the nearshore environment, an offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized.
Keon Smith		
IND 34-1	My name is Keon Smith, Las Tunas beach resident. I was at the meeting on February 28, 2024 at Topanga town hall. To restate my opinion I strongly support alternative 3.	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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IND 34-2	I feel that it would be in the communities best interest to restore Topanga Ranch Motel, turning each building into a business space. Ideally for local vendors. There could even be a small percentage of each transaction that is charged to go towards the upkeep and full restoration of the park and beach. Having the motel restored with working facilities along with the art, music, Chumash education center, and food suppliers a space will be provided for those of the Malibu and Topanga communities to gather and enjoy Topanga beach to a greater extent.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 34-3	I also had the idea of the park being turned into a temporary drive in movie theater, access being the right of Reel Inn along the dirt road. Each vehicle could pay 100 dollars, as it would be a fundraiser, and bring about a greater awareness of the park and its improvements. I would happy to provide more of my ideas of reaching the younger demographic and community involvement. Again, the Topanga Ranch Motel should be preserved, reserved, and shown as a cultural site and the site should be open for local businesses to take space and exhibit art, music, and food preserving Malibu and Topanga's cultural and historical creative roots. Please reach out if you need volunteer involvement. Thank you,	As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. CDPR will be performing a visitor services study to address possible community-serving uses for the restored Topanga Ranch Motel.
Lucinda Mittleman		
IND 35-1	I live near Will Rogers State Beach and I am a long time Topanga Canyon Docent. I was able to attend the presentation at the Annenberg Community Beach House. I am very much in favor of the lagoon restoration project and support the Alternative 2 plan to maximize the lagoon. I consider myself a preservationist when it comes to preserving important architectural and cultural landmarks. In this case, though, the importance of restoring one of the last coastal wetlands in California outweighs the importance of some buildings that were inappropriately placed in the fragile landscape, served the public a relatively short period of time, and are mostly of sentimental value.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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IND 35-2	If necessary, keep one structure and make use of it as a visitor center with displays of the natural and cultural history of the lagoon area. In the end, I would think the renovation and upkeep of these structures would be costly to an under budgeted State Parks. If the goal of this project is to restore the lagoon, then do it in a way that will have the most positive impact on the lagoon ecosystem. What a wonderful enhancement to our coast it will be to have the restored lagoon, and what a nice addition to Topanga State Park.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
Angela de Mott		
IND 36-1	Please use all your efforts to restore the lagoon with Alternative Plan 2. It's the nature that's most important, NOT the buildings! Thank you, Angela de Mott	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Karen Martin		
IND 37-1	Thank you for the opportunity to comment on the Topanga Restoraton DEIR. This is an impressive amount of work with excellent detail and clear explanations. It is exciting to see this project take shape. I provide some corrections for the biology and mitigation of impacts to California Grunion Leuresthes tenuis and some relevant recent publications (see below). This iconic endemic na(ve fish spawns onshore during semilunar high tides, leaving its eggs out of water throughout incuba(on, buried under a few inches of warm beach sand. Topanga Beach is host to large, frequent grunion runs. 1) ES-47, MAR-2, #3: the Walker Scale estimates the total density of grunion rather than counting them (Martin et al. 2021, cited in DEIR).	In response to the comment, Mitigation Measure MAR 2, sub-bullet 3 has been revised as follows (strikethrough/underline text is used to track changes made to the Draft EIR text): 3. Grunion monitoring shall be conducted by a qualified biologist for 30 minutes before and two hours after the predicted start of each nightly spawning event. Sufficient qualified biologists shall be employed to ensure that the entire construction site is monitored during the predicted grunion run. The magnitude and extent of a spawning event shall be defined in 300-foot segments of beach using the Walker Scale (Martin et al. 2021). ~~Every individual fish shall be counted~~ The number of fish will be estimated to determine the Walker Scale value (e.g., 0, 1, 2, 3, 4, or 5) of each 300-foot segment within the proposed work area.
IND 37-2	2) Last line on 3.11-20, The grunion is now classified as a member of the New World Silversides family, Atherinopsidae, along with jacksmelt and topsmelt (Dyer and Chernoff 1996).	In response to the comment, the following text edit has been made to page 3.11-20 (strikethrough/underline text is used to track changes made to the Draft EIR text): The grunion is a member of the New World ~~S~~silversides family, Atherinopsidae ~~Atherinidae~~, along with the jacksmelt and topsmelt.
IND 37-3	3) On 3.11-21, grunion have now extended their range northward and regularly spawn in San Francisco Bay and Tomales Bay (Roberts et al. 2007, Martin et al. 2013).	The comment is noted but does not change the description of the potential presence in the project area. No changes have been made to the document.
IND 37-4	4) 3.11-21, more recent citations for grunion hatching (Griem and Martin 2000); for extended incubation (Moravek and Martin 2011).	The comment and additional references are noted, but they do not change the characterization of the species substantially. No changes have been made to the document.
IND 37-5	5) Section 3.11-21, last para., August is likely the latest date for spawning, not September. Grunion have a unique recreational fishery with bare hands only, and are protected from hunting by a closed season from April through June, with no take permitted. Gear restrictions and a bag limit during the open season, along with fishing license requirements, also help to protect this resource. Beach grooming effects on grunion (Martin et al. 2006) and effects of beach nourishment on grunion (Martin and Adams 2020) include deep burial of eggs preventing release of hatchlings, and disturbance of sand leading to surface exposure and desiccation of eggs.	The comment is noted but does not add substantively to the characterization or impact evaluation of the species. No changes have been made to the document.
IND 37-6	6) Section 3.11-27, first para., the spawning zone between the MHT and the Highest High Tide lines of the sandy beach meets the definition of Essential Fish Habitat for reproduction of grunion, according to the Magnuson-Stevens Act.	The referenced section in the Draft EIR notes the jurisdiction of NOAA under the provisions of the Magnuson-Stevens Act and the Draft EIR acknowledges the presence of grunion habitat in the project area. No changes are needed in the document.

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IND 37-7	7) section 3-11.30, The mitigation measure MAR-2, 3rd para., mis-characterizes the limit of the spawning zone as the Mean High Tide when it is actually the Highest High Tide from any semilunar syzygy tide during the spawning season. The egg zone is located between the MHT and the Highest High Tide lines, keeping the eggs out of water throughout incubation, buried under a few inches of warm beach sand. Below the MHT is not suitable for grunion spawning.	In response to the comment, the following change has been made to the 3rd paragraph of page 3.11-30 in the Draft EIR (strikethrough/underline text is used to track changes made to the Draft EIR text): California grunion is known to spawn along Topanga Beach. California grunion could be directly affected during sediment placement activities, through direct mortality of egg masses and potential temporary loss of suitable spawning habitat. The temporary loss of spawning habitat could potentially be a significant impact if the placement activities were to occur during California grunion spawning season (usually late February through July) and if the sediment placement equipment were located below the ~~mean high-tide~~ Highest High Tide. **Mitigation Measure MAR-2** would be implemented to avoid potential significant impacts on California grunion during Proposed Project construction. This measure requires the Proposed Project to avoid sediment placement activities during the spawning season and ensure that sediment placement equipment and activities remain above the ~~mean high-tide~~ Highest High Tide line, or that the equipment be installed and not need to be maintained until after the spawning season. With implementation of this mitigation measure, impacts of Proposed Project construction on California grunion would be less than significant.
IND 37-8	8) Mar-2, 3.11-32, #3, the Walker Scale estimates the total density of grunion rather than counting them (Martin et al. 2021). #5, ii., the grunion season ends in August in this location, not September.	In response to the comment, **Mitigation Measure MAR-2** 3 and sub-bullet 5ii has been corrected as shown below (strikethrough/underline text is used to track changes made to the Draft EIR text): 3. Grunion monitoring shall be conducted by a qualified biologist for 30 minutes before and two hours after the predicted start of each nightly spawning event. Sufficient qualified biologists shall be employed to ensure that the entire construction site is monitored during the predicted grunion run. The magnitude and extent of a spawning event shall be defined in 300-foot segments of beach using the Walker Scale (Martin et al. 2021). ~~Every individual fish shall be counted~~ The number of fish will be estimated to determine the Walker Scale value (e.g., 0, 1, 2, 3, 4, or 5) of each 300-foot segment within the proposed work area. ~~5~~. The following management measures shall be implemented after construction: ii. Vehicle use on the beach shall be limited to that required for emergency response and occasional required maintenance. All vehicles must drive above the higher high-tide line during March ~~September~~ August unless no grunion spawning occurred in the task location during the last full or new moon.
IND 37-9	9) Figure 3.3-4, the fish habitat map, the grunion spawning / egg incubation zone in the upper intertidal sand could be added to this map. The area moves with the tides and with coastal erosion, so the zone is somewhat labile in location. Comments on Appendices:	The comment is noted but does not modify the characterization of grunion habitat substantively. No changes have been made to the document.
IND 37-10	10) Appendix K, Mitigation Measure 16, p. 121 (p. 885 of Appendices pdf) is very good. On p. 122 (p. 886 of Appendices), the time for protection of the grunion egg zone is March through August at this location, not September.	The comment is noted and reflected in the revision to mitigation measure MAR-2 noted above.

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IND 37-11	11) Appendix N of Appendix K, p. 78 (p. 1668 in Appendices pdf), Topanga Beach is used for spawning by grunion every year consistently throughout the season. Ratner Beach is used when sand conditions permit. Both are important grunion spawning beaches. The grunion is a member of the New World Silversides family, Atherinopsidae, along with jacksmelt and topsmelt.	The comment is noted and reflected in the revision to text on page 3.11-30 of the Draft EIR as noted above.
IND 37-12	12) Appendix N of Appendix K, p. 79 (p. 1669 in Appendices pdf), grunion have now extended their range northward and regularly spawn in San Francisco Bay and Tomales Bay (Martin et al. 2013). Beach grooming effects on grunion (Martin et al. 2006) and effects of beach nourishment on grunion (Martin and Adams 2020) include deep burial of eggs preventing release of hatchlings, and disturbance of sand leading to surface exposure and desiccation of eggs.	The comment is noted but does not modify the characterization of the species' habitat substantively. No changes to the document are needed.
IND 37-13	13) Appendix K p. 85 (p. 1675 and 1677 in Appendices pdf), Fig. 64 and 66, moving the dredged materials: The mitigation measures state that trucks will stay several meters above the highest high tide line while driving on the beach to avoid grunion eggs. In my experience that will be very difficult for the trucks coming across the bar of the lagoon mouth, as that area in spring is usually quite narrow and covered with water at highest tides. In addition, most summers, the cobble at the rocky point on the lifeguard building is usually fully exposed and erosive, meaning that at high tide, no sand is exposed in that area and there would be no path for a truck. If that building is demolished before this process, or if the truck were to divert its path landward above the building, that would solve the problem of navigation over that area above the highest tideline.	Mitigation Measure MAR-2 provides for the protection of grunion nesting areas during construction. Trucks on the beach within the high tide line would only be permitted when grunion spawning is not occurring in the area. No changes to the document are needed.
IND 37-14	14) Appendix N, p. 118 (p. 1708 in Appendices), Table in Appendix 4 of states that there is “moderate potential” for grunion runs at Topanga Beach but “level of use is unknown from year to year.” This is incorrect; Topanga Beach is one of the ten most important beaches for grunion spawning in their entire habitat range and they appear consistently throughout the season every year (Martin et al. 2020).	The comment is noted. Mitigation Measure MAR-2 provides for the protection of grunion nesting areas during construction. No changes to the document are needed.
IND 37-15	15) Appendix P of Appendix N, p. 2 (p. 1730 in Appendices pdf), a source for grunion presence at Topanga Beach is Martin et al. (2020).	The comment is noted. Mitigation Measure MAR-2 provides for the protection of grunion nesting areas during construction. No changes to the document are needed.
IND 37-16	16) Appendix R, p. 2 (p. 1751 in Appendices pdf), California Grunion, last column: Present in the ocean and lagoon, adults observed annually throughout the season spawning on beaches. Eggs incubate out of water in the upper intertidal zone of the sand, between one semilunar high tide and the next, from March to August. Larvae may use the lagoon as a nursery area.	The comment is noted. Mitigation Measure MAR-2 provides for the protection of grunion nesting areas during construction. No changes to the document are needed.

Comment Number	Comment	Response
Stacy Sledge-Baldino		
IND 38-1	I have participated in the Topanga Lagoon public workshop and recent forum and can say that I fully support having this project's main focus be to restore the lagoon to its fullest.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 38-2	With that said, I realize the importance of having a local restuarant operate near the location, but this may not be possible.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 38-3	I DO NOT support keeping the entire Topanga Ranch Motel as an over-night operation, but rather support preserving one building, if possible, to act as visitor or informational space. I STRONGLY OPPOSE ANY OVER-NIGHT ACTIVITIES AT THIS LOCATION.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 38-4	Topanga and Malibu are high-fire severity zones, and with TCB South to PCH being the main evacuation route for Topanga, camping with any open flames should be outlawed and off-limits. If there is any camping, it should be highly supervised on a 24/7 basis with an ONSITE RANGER. I appreciate all the work done to make this project a reality.	Camping is not proposed as a potential future use. As discussed on page 3.9-26 of the Draft EIR, the proposed Project's improvements to public access and improved visitor services, which would include more State Parks staff present, may help with achieving greater enforcement of the no-camping rule.

Comment Number	Comment	Response
Larissa Hadijo		
IND 39-1	My comment is about the Topanga Motel. We have an interest in the Motel remaining on the actual site, as well a vision on how it would be run. We'd love to talk with you about it ! Topanga Beach Motel must be an integral part of the Lagoon Conservation vision. It has a unique history to serve locals and visitors alike. We want to follow in its historic footsteps and serve the community with a considered approach. A successful place not only has great design but a truly personal touch. We would love to create a Topanga Motel that would host the local community and nature lovers from further afield alike. A cultural and environmentally aware business. Community - We want to start serving the community. Connecting with local beachgoers, surfers, and hikers, as well as nature enthusiasts from all over alike. The Motel and cafe operate as one where locals and visitors get introduced to the Lagoon conservation efforts as well as can meet one another at the cafe's large communal tables that serve as a simple gathering spot. Offering the locals surfboard storage and healthy post-swim beverages will make this a space the local community will truly embrace. The Cafe - Thousands of Topanga beachgoers and surfers would be the core audience alongside the Topanga natives and PCH commuters, to create a sustainable business, who would stop in for a coffee and a simple meal. Set in beautiful nature and a garden curated with native plants. Offering the locals surfboard storage and healthy post-swim beverages will make this a space the local community will truly embrace. As well as where they can learn about the Lagoon. The Motel - These same thousands of visitors and Angelitos who do weekend trips to Ojai or Santa Barbara would stay for a night at the Topanga Beach Motel, as it offers a unique experience. The motel would offer affordable bunk beds in a bunk house for surfers, and a surfboard shed where surfers can leave their boards overnight; to cater to the surf community and hikers on a tighter budget. To make it a financially viable business, the rest of the houses are a mix of mid-price to up-scale price points. The Motel design would feel welcoming for all price point accommodations alike, using natural materials for the interior and connected to its surroundings, whilst keeping the original exterior. Culture + Conservancy - The cafe has a conscious point of view and a considered approach to the products we sell and serve. As well as the people who would work with us, and the way we live our lives. Caring for the earth. We want one of the units to be used as a store and gathering space. This would be used to help create a culture around conservancy, a space in which we can host projects around conservation, the store would sell considered products that follow the narrative of local culture and conservation. And we would invite all local conservation workers to use the Cafe as a gathering spot. Seating everyone AROUND ONE TABLE. Many thanks Larissa Hadjio Ps I have emailed the pfd for our Topanga Beach Motel vision to TopangaLagoonRestoration@gmail.com	The comment expresses a preference to restore the Topanga Ranch Motel under Alternative 3. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Alternative 3 would restore the Topanga Ranch Motel. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. In the event the motel is retained, State Parks will determine its development and if a manager is required. In this event, State Parks will provide the opportunity for competitive bids to interested parties as is outlined in Concessions https://www.parks.ca.gov/?page_id=29362.

Comment Number	Comment	Response
Jessica Thompson		
IND 40-1	Regarding the Topanga Lagoon Restoration project: As a lifelong residents of Pacific Palisades and now Topanga Canyon this project both pleases and concerns us. We absolutely support conservation efforts to restore the lagoon and wetlands for animal and plant habitat and to protect against sea water rise. We hope these efforts move forward.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 40-2	We are however greatly concerned by any effort to commercialize the area with new development that will congest and bring more cars and people.	The Gateway Corner will have a small interpretive facility with restroom, parking, and potentially as much as 5,500 square feet of buildings to support maintenance and employee housing as noted on page 2-18 of the Draft EIR. Any uses in the project area will need to comply with the CDPR General Plan to meet the mission of the Park and would be for public benefit. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes and would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures shown in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The

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		Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.
IND 40-3	There are very few natural and peaceful locations left in Los Angeles. If it is the projects intent to bring a Malibu like development to the foot of our canyon we will fight it with every tool we have. We don't want anything that resembles Malibu or Santa Monica. Developers should stay away. They have ruined many once lovely parts of the City. Topanga has a long history of protecting our Canyon from development projects that will ruin the historic community here.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The Draft EIR identifies the scale of development proposed. The area would retain the beach access and parking while reducing the development and concessions compared to existing conditions. Each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurant and structures on site.

Comment Number	Comment	Response
IND 40-4	Furthermore we want to protect the businesses that are currently part of the fabric of lower Topanga. This includes the Malibu Feedbin, Cholada, and the Reel Inn. If the intent is to truly improve the wetland, then wonderful! If there is a behind the scenes effort to simultaneously redevelop for tourism, and commerce then we are completely against it. I am quite sure the bulk of the Topanga community will have the same general opinion. What reassurances will we have that the intent is as stated, and is not driven by commercial interests? We would like to know.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. All CDPR concessions are required to comply with the relevant Public Resources Code, including Sections 5080.03(b) “Concessions shall not be entered into solely for their revenue producing potential” and 5080.03(c) “With respect to any unit of the state park system for which a general development plan has been approved by the commission, any proposed concession at that unit shall be compatible with that plan”.

Comment Number	Comment	Response
Brad Folb		
IND 41-1	How will this project affect the beaches to the north of this project? How will it affect the homes to the north of this project? Will there be additional erosion? Will sand levels be affected? There are some existing groins in the ground. Will these be removed or modified as a result of this project? What effect will this project have on the groins in the beach to the north some of which have been removed and some of which have not? Will there be potential increase chance of liquefaction on the beaches to the north as a result of dredging and expanding the lagoon? Potential subsistence? Could it affect the foundations of the homes?	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes. See Section 2.3 Master Response - Hydrologic Modeling.
IND 41-2	Will this bring a greater number of visitors to the beaches to the north of the project that presently have light visitation? If there is heavier visitation, what would be the environmental impact of such?	The Draft EIR concludes on page 3.16-17 that the proposed project would not increase operational VMT significantly. That is to say, the project would not increase visitorship by over 110 trips per day. An assessment of anticipated VMT is included in **Appendix R**. The analysis estimates a reduction in visitorship due to the removal of several existing restaurant concessions.

Comment Number	Comment	Response
IND 41-3	How will human waste and homeless populations be impacted at the project and adjacent areas? There is a significant homeless population in the area and this project will surely affect them.	The Draft EIR concludes that the proposed project would not increase the potential for trash and human uses of the site compared to exiting conditions. Future maintenance of the various components of the project area would be managed by the landowners as is currently the case. The Draft EIR states on page 3.9-29 as noted in the comment that the improved visitor services facilities proposed by the project may result in reduced impacts of trash and water quality degradation. It is also anticipated that additional staff will be needed. Additional details can be found in **Appendix S** Operations and Operations and Maintenance Plan. The Draft EIR then concludes that the proposed project impacts would not result in a significant increase in trash and water quality degradation from visitor use.
IND 41-4	Will there be an increase in the threat of wildfire in the area as a result of the project?	Impacts related to wildfire are analyzed in Section 3.18, Wildfire, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. The mitigation measures include TRA-3 and FIRE-1. Mitigation measure TRA-3 would address potential traffic flow disruptions and would maintain operation of PCH for use as an emergency evacuation route at all times during construction in coordination with the City of Malibu Evacuation Plan and Los Angeles County emergency plans. Mitigation measure FIRE-1 would require State Parks to submit a fuel modification plan to the State Fire Marshal and Los Angeles County Fire Department to identify fuel modification zones around the Project area and the type of landscaping allowed. Details of these mitigation measures are discussed in Section 3.18 of the Draft EIR.
IND 41-5	What effect will this have on local plantlife and wildlife including protected marine life during and after the project?	An offshore habitat and species distribution analysis (found in **Appendix S** CRM 2023 which is an appendix to **Appendix K** Biological Resources Assessment (RCDSMM 2023)) was conducted to determine the most suitable placement site based on proximity and accessibility from the project site but avoiding any sensitive marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. Section 3.3 Biological Resources of the Draft EIR recognizes that there will be temporary disturbance to areas and species surrounding the lagoon during construction. However, mitigation measures would ensure that biological resources are not cumulatively affected by construction. Over the long term, the proposed Project would result in a significant net benefit to the availability and quality of lagoon and sensitive habitats, both locally and regionally.

Comment Number	Comment	Response
IND 41-6	If any of the answers to the above is that there will be no significant impact, what is the specific basis of this finding other than speculation? If there are impacts on the issues above which are not addressed in the draft EIR, then what steps are being taken to mitigate them?	The Draft EIR evaluates each of the topics raised in the comments above as noted in the responses. CEQA requires that a lead agency disclose potential impacts of a proposed project and identify significance thresholds in order to evaluate the significance of the potential impacts identified in the analysis. The Draft EIR does this and summarizes all impacts, mitigation measures, and significance conclusions in Table ES-1.
IND 41-7	This looks like a wonderful project with many great benefits. Please study the effects on the adjacent environments which are ignored completely in the draft EIR and absolutely will have a significant effect on the local environment and implement reasonable measures to mitigate those effects. By incorporating thought and planning into the neighboring environments as well, it will be an even better project.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west, but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.
Florence Nishida		
IND 42-1	I would like to see a maximum amount of the Topanga lagoon area rebuilt and restored to a more natural lagoon.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
IND 42-2	Preserve some less than 50% portion of the old Topanga motel buildings for use of Park office, mgmt, or meeting space. Expand as much as possible the outlet of Topang Cyn creek to the ocean, and rebuild the PCH bridge to accommodate that. A small walking trail along the lagoon natural areas would be very good. Build parking space either farther north along PCH or slightly farther inward from PCH, to avoid filling up much of the space for the lagoon with asphalt and cars. Build the lagoon as "natural" in function and appearance as possible. Florence Nishida good luck getting started ! It's been well over 20 yrs since the first talk of this, and since people were moved off	Trails are proposed that would connect to the beach under PCH on both sides of the lagoon. Parking at the Gateway Corner is proposed. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Gilbert Dembo		
IND 43-1	Dear Topanga restoration planning committee This park and beach was for the use of all of the people of the Los Angeles area. When the land was purchased from the Los Angeles athletic club, the state said that it would be a visitor serving regional park. The lagoon and wet land should come 2nd. Look at the facts.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 43-2	For over a hundred years the existing bridge worked. Work the expansion of the beach park and lagoon around the old bridge. Spend more money on the beach and park restoration for the visitors, not the fish. You will cut the cost of the restoration by 50% without the new bridge and be finished in a shorter time with less disruption.	The comment expresses preference for visitor services. Alternative 3 provides the greatest enhancement of visitor services of those evaluated in the Draft EIR. Each Alternative would include the widening of the PCH bridge from 79 feet to as much as 460 feet as described on page 2-15 of the Draft EIR in order to meet project objectives. The expanded bridge span provides the opportunity for an improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise All of the proposed restoration avoids changing the beach and the wetted areas. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places.

Comment Number	Comment	Response
IND 43-3	Also, the exporting of dirt should, if being dumped in the ocean in a location with a depth of 300 feet or more, not off shore to save money. the Topanga Brake must be presevered.	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast, which would not impact the surfing. The prevailing currents move sand northeastward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions.

Comment Number	Comment	Response
Tam Taylor		
IND 44-1	"To all who have brought these plans to us: I would like to enter my comments on the proposed alternatives for the Topanga Lagoon. I enthusiastically endorse Alternative 2 as it provides for the fullest level of restoration of the lagoon. Our natural resources are finite, and we should take every opportunity to give nature its due. The land/sea/creek/vegetation in Topanga are a benefit to us; we should repay it by protecting, preserving and expanding the valuable asset that it represents to the health and well being of plants, animals—and people. I have attended many of the meetings as these plans have been developed, and I want to commend all the participants—agencies, consultants, residents and businesses—who have worked so tirelessly to give residents of Topanga an opportunity to make our voices heard. There are a lot of trade-offs in this enormous project, and would they we could do it all. But we are forced to make choices, and mine is to give as much primacy to the expansion of the lagoon—and its related attributes—as possible. And it is now necessary to make these choices as the elements are forcing these changes upon us. We can't do nothing, so let's do the thing that gives the lagoon its rightful place. What makes Topanga unique, and why we live here, is its natural environment, which has been expanded and preserved with great effort and commitment by residents, businesses and public agencies. Those benefits that residents enjoy will also be greatly enhanced for visitors to Topanga, making the state park and even greater contributor to the well being of us all. I feel strongly that our responsibility is to extend that legacy, providing generations to come as much of the wonder, beauty and solace that comes from our hills."	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Candace De Puy		
IND 45-1	Please note I agree with option two.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
William Alford		
IND 46-1	"As a Topanga resident that enjoys our local eateries- I ask that the Reel Inn be kept as is and we can still dine at our familiar restaurant. We don't need another fancy place, a chain place, a celebrity chef place or a cafeteria. We need our place that looks like Topanga and holds our memories. We need to keep OUR heritage in tact and recognizable just as those past heritages you are striving to salute in your plans. The Reel Inn is our gathering place, our place of our discussions, our shared ideas and our food. Don't let it become a "Fond Memory". We love the lagoon and your plan. Just please preserve our place in history. We are a historic people too."	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The CDPR prepared the Topanga State Park General Plan in 2012. The Draft EIR concludes page 3.10-14 that each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurants and structures on site. **Appendix Q** includes a detailed consistency assessment of General Plan policies. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
Scott Dittirich		
IND 47-1	I love our parks and ride my mountain bike in the Santa Monica Mountains at least once a week, alternating between parkland and MRCA. Having lived in the Rodeo Grounds for 28 years and next to the Feed Bin for two years before that, I have some familiarity with this land. I fought the takeover of the land by State Parks because that takeover was built on the lie that the land would provide a bridge between Topanga State Beach and Topanga State Park and that there was not a clear path forward to provide recreational opportunities for the public. (We quickly discovered that State Parks was attempting to circumvent our State's Relocation Act by a subterfuge using a private entity to officially purchase the land from the L.A. Athlete Club. They had owned but leased it to residents since the late twenties when they discovered that the cost of building their planned boat harbor was too high. In 2001, the residents formed an association, of which I was Co-President, and we hired attorneys Frank Angel and Craig Dummit to force State Parks to follow State Relocation Law. We attended many meetings at the time and soon realized that State Parks was not interested in public opinion but was only going through legally required motions. I hope that is not the case now, since I believe that this project as now conceived fails on many levels.	Thank you for providing your recollection of that history. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
IND 47-2	The land that the motel sits on is fill dirt, placed there when PCH was built. It was discovered that dumping the dirt removed when the bluffs were bulldozed was 1/3 the cost of dumping the excess dirt in the ocean. Now it is proposed to dump that same dirt in the ocean. Has anyone analyzed this dirt to learn the environmental impact of dumping? Those familiar with the land know it was a never pristine and a dumping ground for things such as old cars and other toxic trash.	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. As discussed on pages 3.8-16 - 3.8-17 in the Draft EIR, Mitigation Measure HAZ-1 would require that samples of soils and the Topanga Hotel be analyzed and appropriately remediated or removed if soils contain hazardous quantities of contaminants. No contaminated soils or fill materials will be eligible for nearshore placement. The nourishment proposal is being assessed by DMMT and would require agency approval.

Comment Number	Comment	Response
IND 47-3	There are a number of alternatives in the proposal. Before proceeding further, I'd suggest State Parks refine these to one proposal so that the public can correctly evaluate the actual proposed project. I suggest every considers some of the proposals:	The Draft EIR does not identify a preferred alternative. Following the closing of the Draft EIR public review period, representatives of each of the three landowners (Los Angeles County DBH, Caltrans, and State Parks) met on two occasions (4/22/24 and 5/6/24) to review and discuss the comments received on the Draft EIR and to identify a Preferred Alternative. The result of these meetings produced Alternative 3A as the Preferred Alternative that combines elements from each of the Build Alternatives and avoids all significant impacts. Section 15088(b) of the CEQA Guidelines requires that the lead agency provide written responses to all agency comments no less than 10 days in advance of the meeting at which the EIR is considered for certification. Since State Parks has chosen a Preferred Alternative that is a hybrid of the three Build Alternatives described in the Draft EIR, the Final EIR will be made available to all commentors for a 30-day period. State Parks will hold a public meeting during that period to receive additional comments on the Final EIR and preferred Alternative. Those comments will be included as an Appendix to the Final EIR when considered by the State Parks acting as lead agency for CEQA compliance.
IND 47-4	The Motel During the various meetings surrounding the proposed purchase by State Parks in 2001, we saw that a variety of NGO's were salivating at the potential opportunity to take over the motel cabins. Even then, it was extremely run down and now is in such terrible shape as to make restoration unfeasible. Yet, on a larger scale, one must ask what purpose would rebuilding the cabins accomplish? Somehow the idea of showing these structures to be classic motor courts of the 30s would better be served with a fantastic on-line presentation, which is how people now get information today. And though it is not a pleasant memory, you might want to include the late 60s association with Charlie Manson, drugs, and ritual beheadings of chickens hung from Topanga Bridge into the mix, and, of course, the Topanga surfing culture that the low-cost housing offered from the 60s to the 90s.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Restoring portions of the Topanga Ranch Motel under Alternatives 3, 4 and 5 would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

Comment Number	Comment	Response
IND 47-5	Visitors Center. The idea of a visitors' center bringing what some have called Disneyland at the beach is another idea whose time has long passed. (They cut all the trees and put them in a tree museum). Again the information would be much better presented on-line.	The proposed visitor center could be either set up in the restored structurers of the Topanga Ranch Motel or at the small restroom/ interpretive area at the Gateway Corner. The trees located within the proposed parking area of the Gateway Corner will be retained for shade to the greatest extent feasible. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurant and structures on site.
IND 47-6	It is also counter to what makes Topanga and Malibu such a desirable location for visitors. Have you studied what L.A. County residents really want? I don't mean the activists who respond to EIRs, but visitors. Have you polled those who come to Topanga and Malibu currently. Not to do so will give you a very skewed picture.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.

Comment Number	Comment	Response
IND 47-7	You will find that they much prefer the funky old Feed Bin, the Oasis, and the Bait Shop to some concrete and glass building with some officials name on it. In keeping the existing rural themed structures, you would in truth preserve a lost era of Malibu that has disappeared elsewhere on the coast - much better than anything that is being proposed.	The proposed visitor center could be either set up in the restored structurers of the Topanga Ranch Motel or at the small restroom/ interpretive area at the Gateway Corner. The trees located within the proposed parking area of the Gateway Corner will be retained for shade to the greatest extent feasible. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 47-8	And we already have Malibu Creek State Park. I'd suggest you get the restorations there right before embarking on Topanga.	The concerns raised about the Malibu Lagoon restoration are not applicable to this project as that system has many different physical, chemical, biological and social conditions The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 47-9	Topanga Beach Widening Topanga Beach is a total waste of funds. Topanga is a rock beach and not friendly for swimming. Try walking into the water even when the surf is minimal. You'll be walking on rocks and twisting your ankle and perhaps stepping on sea urchins. The rocks are why it was too expensive to build a boat harbor in the twenties and why it is a good surfing break. It is not Zuma or Santa Monica with expanses of sand.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 47-10	The Bridge. We already have a perfectly adequate bridge and the state is broke. As to the construction of the almost 6 times longer bridge, this is an environmental disaster. Trucking all the material needed for construction would add to an already burdened Coast Highway. And because of existing rock slides on PCH below Big Rock and the one at Paseo Miramar, plus Malibu Canyon being periodically closed, traffic is now terrible. This is having a negative impact on Malibu residents and businesses. as well as visitors.	This comment does not address the adequacy of the Draft EIR. The current bridge is too short to accommodate the lagoon restoration and to meet the Caltrans fish passage requirement. The extreme storm flow from the watershed passes through the current bridge like a fire hose. The 100-year velocity reaches 18 fps; hence, it is very erosive and causes flood water to back up upstream from the bridge, raising water levels and causing sedimentation upstream of the bridge. The lengthening of the bridge will accommodate habitat restoration, and reduce the constriction, erosive velocity, sedimentation, flood water level while improving fish passage. The reduced velocity would also reduce the erosion along the creek banks, which could prevent undermining of the Topanga Ranch Motels and failure into creek. The project will increase the resilience of Topanga Beach and adjacent infrastructure.

Comment Number	Comment	Response
		Each Alternative would include the widening of the PCH bridge from 79 feet to as much as 460 feet as described on page 2-15 of the Draft EIR. The expanded bridge span provides the opportunity for an improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise All of the proposed restoration avoids changing the beach and the wetted areas. This comment also expresses concern regarding traffic impacts. Maintaining all four lanes of PCH open during construction is a project requirement. Coordination with local jurisdictions for emergency evacuations will be required. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Route Plan and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.

Comment Number	Comment	Response
IND 47-11	Construction of the so-called Lagoon restoration will be a traffic nightmare for years. Noticed how many houses and apartments in Malibu are now for rent - partly because of the extended commute all these road closures have caused.	Parking access locations will vary during construction, but signage will be provided to ensure that parking is available at all times. This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The mitigation measures include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
IND 47-12	Have you considered the negative impact all this construction will have on businesses along the Coast Highway - or where surfers will park?	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. The Draft EIR concludes in Section 2.61 that coastal access would be maintained during construction and improved under all Project Build Alternatives. Construction would close portions of the beach for five to seven months, but a temporary accessway out to the surf break would be maintained at all times. As noted in Section 2.7.2 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible.

Comment Number	Comment	Response
IND 47-13	The proposal promises to keep four lanes open. Unless of course there is an unforeseen issue which, as we know, never happens in construction projects.	It is a project requirement that four lanes will be available at all times during construction. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the land owners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.

Comment Number	Comment	Response
IND 47-14	The Lagoon. While reintroducing Steel Head Trout is a noble idea, spending untold hundreds of millions of dollars (your estimates are off by a factor of four according to non-biased experts) for an untested project that will ruin an existing eco-system is foolish. Where in Southern California has the model been tested?	The Draft EIR describes on page 2-6 that Southern California steelhead already occupy Topanga Creek and lagoon. The Project would improve conditions in the creek to expand the population. Section 2.4 of the Draft EIR lists the project objectives, which include enhancing coastal resilience, protecting the surf break, increasing safety, coastal access, and recreational facilities, improving evacuation and emergency service routes, in addition to enhancing the lagoon system to improve hydrologic functions and to protect endangered species.
IND 47-15	And if anyone claims that the lagoon area is pristine, how can that be when people have lived there – and upstream thousands still do – and the homeless have always lived in the creek bed. There are cars buried in the creek and I have footage of a dumpster sailing along during a flood.	Water quality in Topanga Lagoon is summarized in **Appendix P** (Topanga Lagoon Restoration Project Water and Sediment Quality Study Technical Report (ESA 2023) and Water Quality Pre-Construction Baseline Report (RCDSMM and Bay Foundation 2022)). Bacterial loading is mostly due to dogs, birds and occasional direct deposits of human feces in the lagoon area. As discussed in Section 2.2.2 of the Draft EIR, the lagoon and adjacent creek habitat are degraded due to the use of locally sourced materials from surrounding hillslopes constraining the lagoon that were installed to support the PCH bridge and that impedes the natural hydrologic connection to the ocean. As discussed in Section 2.2.2 of the Draft EIR, the lagoon and adjacent creek habitat is significantly degraded due to the use of locally sourced fill dirt to support the PCH bridge that impeded the natural hydrologic connection to the ocean. Much of the sediment that is to be managed is from naturally occurring sources that generally supply the nearshore of this area through bluff erosion but were artificially impounded in the lagoon during the construction of PCH. The current lagoon and bridge configuration is too constrained to support a healthy ecosystem, especially one under the threat of SLR. The Proposed Project would expand the seasonally wetted and riparian habitat areas from the existing 3.6 acres to 7.5 to 9.5 acres, depending on alternatives, and lengthen the PCH bridge to improve fish passage, sediment conveyance to the ocean and flood protection. Page 3.3-33 notes non-native and invasive plant species observed within the BSA. Under the No Project Alternative, invasive plant species would remain present and continue to outcompete native plant species and reduce native habitat quality. Mitigation measure BIO-13 would require the removal of invasive species and revegetation with native species for areas temporarily affected.

Comment Number	Comment	Response
IND 47-16	Recreation If State Parks wants to serve La County residents and others, please provide low-cost accommodations with a campground in the Rodeo Grounds and Topanga Lane. This should be simple with just tent sites with a charcoal pit. And unlike other proposed campgrounds in Malibu, fire is not much of a danger because the area is very wet and even during a Santa Ana wind event, there are no houses downwind. It could require a foot bridge over Topanga Creek for access when water is in the creek. Such a campground can be built quickly and at a reasonable cost and provide the recreational resources that is the very purpose of the best of our state park system. And it can be done while rethinking the entire project to focus on what is really needed.	Camping is not proposed. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 47-17	All this means the proper solution is not the proposed huge intrusive construction that will forever change the character of the area from rural to urban. We must fight to preserve the reason people enjoy coming to Malibu and Topanga. So I ask that this entire proposal be reconsidered and the litany of negatives that such a grandiose scheme be considered. Sincerely, Scott Dittrich	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Ken Torimaru		
IND 48-1	In the past two years we have experienced bigger than average rainfall and hence sediment flow. Has this new information been examined? Previous studies appear to be limited to drought years.	This comment does not address the adequacy of the Draft EIR. Hydrologic modeling of the Topanga Creek was conducted for both an average storm period and a wet storm period. Results of the modeling are included in **Appendix E**.
Lloyd Ahern		
IND 49-1	To Whom It May Concern, I lived on Topanga Beach from 1966 to 1979, and now live on Las Tunas Beach. In my nearly 60 years here, I've seen how floods and storms impact the beach. The flood of 1969 washed cars and even houses into the ocean. A Volkswagen van got stuck in the surf line for a year until it finally deteriorated. The flood of 1994 sent a surge down Tuna Canyon and threw 15 beach houses. Here are some reasons why I think the Draft Environmental Impact Report (DEIR) is flawed.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
IND 49-2	1. The DEIR calls for the lagoon's berm to be removed and dumped offshore, but the dirt is too contaminated by Coastal Commission standards. It was generated from past construction projects.	The proposed project alternatives all start inland of the top of the beach berm and are not expected to change the beach characteristics. The native fill material surrounding the lagoon was gathered from local hillslopes and placed to support the 1933 PCH bridge construction. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. As discussed on pages 3.8-16 - 3.8-17 in the Draft EIR, Mitigation Measure HAZ-1 would require that samples of soils and the Topanga Hotel be analyzed and appropriately remediated or removed if soils contain hazardous quantities of contaminants. No contaminated soils or fill materials will be eligible for nearshore placement. The nourishment proposal is being assessed by DMMT and would require agency approval.

Comment Number	Comment	Response
IND 49-3	2. The berm also serves a function to protect Las Tunas Beach homeowners from floods, and to prevent sand erosion from Topanga Beach State Park. The DEIR has no sand replenishment plan. I recommend partnering with the Army Corps of Engineers and studying the San Clemente Shoreline Project to create a plan for sand replenishment, and to better inform the restoration project overall.	This comment does not address the adequacy of the Draft EIR. The hydrological modeling summarized in **Appendix B** concludes that the knoll with the non-standard helipad is not creating stability of the flow channel. The knoll is positioned landward of the mean high tide line and shows no bearing on the position of the shoreline, sand retention features are typically hard structures such as rock or sheet pile groins because they are in direct contact with the water and impacted by waves, rather than the soft earthen fill of the knoll. The reasons the knoll has not been eroded away are due to the protection and sheltering of the large cobble delta and its distance from the water. Hence, the knoll is not functioning as sand-retaining groin. The bluff between the lagoon and the sheetpile sand retention measure to the west is located far enough back from the water to provide space for a beach to exist. The modeling indicates that the knoll does not provide sand retention functions. Removing the knoll will not affect beach erosion requiring nourishment or sand retention to the west. The knoll is currently used as an emergency landing area and was not officially constructed for its current use. The project proposes moving it to the east of creek to be closer to the lifeguard and public restroom building and Topanga Canyon Boulevard and to be constructed to meet current standards. The knoll is a relatively small feature that does not influence the shoreline position. Rather, the cobble delta at the center of the historic creek discharge channel influences the shoreline position as a large feature that armors the shoreline and breaks up wave energy, resulting in beaches on both sides. The shoreline position at Topanga Point and the sandy beaches to the west and the east are all a function of the existence of the large cobble delta rather than the knoll. Those beaches existed prior to the existence of the knoll. As described in **Appendix B,** the cobble delta at Topanga Point serves as a large wave refraction feature that causes incoming ocean waves to bend (refract) around the delta upon approaching the shoreline. This wave refraction results in a convergence of wave energy on the delta and a divergence of wave energy on both sides of the delta. The divergence of wave energy adjacent to the delta results in lower wave energy on either side and deposition of sand creating small beaches. The knoll is not a sand retention feature and does not hold the position of the beach west of the inlet. The knoll was constructed with sandy fill materials, and it is relatively stable there due to the presence and protection of the large cobble delta. Without the large cobble delta protection, the knoll would have been eroded away by waves and currents and would no longer be there. Also, there is an existing sand retention device installed by the homeowners. The lagoon is located “downcoast” of the homes; the sand is being retained on westside of the sand retention devise. Hence, the lagoon restoration will not impact the shoreline near the homes. The project proposes to add 256,000 cubic yards of sandy material to the littoral cell immediately off Topanga Beach to benefit the shoreline and beaches in the region. The project will benefit beaches downcoast.

Comment Number	Comment	Response
IND 49-4	3. The DEIR's surf report was completed before the decision was made to dump dirt into the ocean. Therefore, the surf report is no longer adequate.	The comment is not accurate, nor does it address the adequacy of the DEIR. The surfing study was completed after the project description included placing material in the nearshore ocean. The Topanga State Beach is a popular surfing area, known for its "right-hand point break" which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "based on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions. The project proposes to add up to 256,000 cubic yards of sandy material to the littoral cell immediately off Topanga Beach to benefit the shoreline and beaches in the region. The proposed placement is located east and downcoast of the popular surging spot to avoid impacts to the recreational use. The project will benefit beaches downcoast.

Comment Number	Comment	Response
IND 49-5	4. The DEIR promises to keep four highway lanes open during construction, but that's not enough. In an emergency, responders and motorists need the middle lane and the shoulder to maneuver. Otherwise, there's catastrophic gridlock. Bicyclists also need a bike lane.	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures shown in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
IND 49-6	5. On a summer weekend, beach parking overflows the lots, and backs up Topanga Canyon. The DEIR proposes removing beach parking not only during construction, but even in the final plan.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points both during and following construction. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code.
IND 49-7	6. Constructions projects in our area have historically taken years longer than estimated, and this project is the biggest. It will certainly take longer than five years, amplifying the issues listed above.	As noted in Section 2.7, Project Construction, and Section 2.7.1, Schedule, construction activities would be conducted in phases, beginning with the Gateway Corner to provide continued coastal access parking. Construction and demolition in the Project area is anticipated to begin in 2027 with a total construction duration of 60 months. If an off-site sewer is chosen for wastewater management, it is anticipated that it would take an additional two to three years to obtain required permits and funds for this effort, with construction expected to take approximately one year.
IND 49-8	I ask the project managers to reevaluate the DEIR with better statistics and guarantees. Sincerely, Lloyd Ahern	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Susan Duenas		
IND 50-1	Our Evacuation Plan identifies the Topanga State Beach parking lot as a potential safe refuge area. Safe refuge areas are defined as, “temporary staging areas in a mandatory evacuation. They may also be used to help move traffic off the road to speed up the movement of people out of the immediate danger area.” I’ve reviewed the alternatives for restoration of the lagoon and it doesn’t appear to have a big impact on the parking area, but I wanted to confirm. Please let me know if my interpretation is correct.	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas as included in the City of Malibu’s objectives would be addressed in the plan in coordination with the City. As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As described in Section 3.16, the Transportation Management Plan would address potential traffic flow disruptions and shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles.

Comment Number	Comment	Response
Jaz Bennassar		
IND 51-1	Hello, My name is Jaz, I am a Topanga resident. I care deeply for the Steelhead trout and wildlife that will thrive from taking full action to restoring the Topanga lagoon and I believe that the public will immensely benefit from a state park where they may recreate. This is why I support restoring the lagoon to its prior acreage. Thank you so much for all your work.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Natasha Roit		
IND 52-1	"First, thank you for your extraordinary efforts on such an important project. I have observed firsthand how this project took shape from its inception and have been fortunate to communicate with you for many months. Your professionalism and responsiveness are noteworthy and very much appreciated. I write to comment on the proposals' wastewater management portion and to express my strong support for extending the sewer line along PCH. This extension has a multitude of benefits: 1. It is environmentally beneficial because it can connect the businesses along that stretch of PCH to the sewer and remove them from septic systems with their concomitant environmental problems. 2. It will relieve the Sunset Mesa community from taking on additional risk, especially given ongoing hillside movement where potential spillage can create not only significant environmental issues, including ultimately seeping into the ocean and Malibu Creek, but also further destabilizing an already fragile hillside. 3. This extension is doable from an engineering perspective, and I have previously shared with you the engineering plans for this extension. I will be happy to provide them again if needed. And 4. Through a prism of a broader perspective, your project looks to the future -- the future of endangered life and its protection, as well as the future of the community for the next generation and beyond. This present-future view should include an improvement that will move the affected community into the future in terms of waste management, in step with other communities, such as Malibu City. Thank you again for all of your efforts, and if there is anything I can do to answer questions or assist in any way, please do not hesitate to reach out.	This comment expresses preference for extending the sewer line along PCH. The benefits identified are noted but are not included as project objectives in the Draft EIR. The Draft EIR evaluated options for serving the Topanga State Park visitor services needs only. No additional response is needed.

Comment Number	Comment	Response
Karin Bens		
IND 53-1	I am a long time Topanga Canyon resident and a Topanga Canyon Docent as well. I listened to the presentations online. I am in favor of the lagoon restoration project and support Alternative 2 plan to maximize the natural lagoon ecosystem. "	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Catherine Tirr		
IND 54-1	Please include my vote for Option 2 of the restoration.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Lisa Rand		
IND 55-1	Alt 2!	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Dorothy Steinicke		
IND 56-1	TopangaLagoonRestoration@gmail.com I am urging the adoption of Alternative 2, to provide maximum restoration and the best chance for the survival of endangered steelhead trout. This opportunity will not come again. I urge you to take it.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Patt Healy		
IND 57-1	I recommend alternative 2 be adopted since it restores the most habitat.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Kraig Hill		
IND 58-1	Please find attached my 7-page comment on the DEIR for the Topanga Lagoon Restoration Project.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 58-2	Danielle LeFer et al: Here are comments on the Topanga Lagoon Restoration Project Draft EIR, as presented at https://www.topangalagoonrestoration.org/. First, a little about my background, so that you can weigh these comments accordingly. I've spent most of my career doing policy analysis for both non-profit environmental organizations and forprofit resource extraction companies (fisheries, mining), to help them operate in environmentally sustainable ways. In my Master's work on Coastal Zone Management at the University of Washington (where I also earned a law degree), I studied a variety of potentially relevant things, including something about both estuarine restoration and anadromous fish behavior. I grew up in Big Rock, a few miles up the Highway from Topanga, and returned here in the late 1990's. I've surfed at Topanga (though not for years). I've hiked all over the general lagoon area over the years, and as recently as last week. I am currently Chairperson of the City of Malibu Planning Commission – in which role I represent foremost the public interest (which is often but not always coincident with that of the City government). I've watched the public meeting on Youtube, read the summary pages and skimmed the whole report (please forgive me if I've missed anything essential). As I've thought about the project over the years, and more recently read and listened in a more focused way, I had been thinking that Option 3 made sense: restoring some habitat and also some of the "historic" Topanga Ranch Motel. But the more I've read, and the more I've listened to Topanga and Malibu locals, the more I've come to favor a "less is more" approach, one which doesn't come directly under any one stated alternative. Broadly, there's an inherent contradiction in attempting both to restore the lagoon habitat and create more recreational opportunities for humans. These goals are at odds with each other in that locale. Perhaps the proposal has gone this way because, with at least seven different agencies directly involved, it's susceptible to being a "too many cooks" situation, with each agency's contribution necessarily	No additional response is needed. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
	based in its own institutional agenda. Well, the plan has some good aspects, but other aspects seem to be solutions searching for problems. Foremost, the project needs to better focus, prioritize and articulate its priorities.	
IND 58-3	How exactly is the word “restoration” being used in the project title? Be more accurate in your word choice. In this location, restoration would mean, at a minimum, removing the entire 20-30 foot depth of fill upon which PCH was built, from the ridgeline that ends in Charthouse Point to theridgeline West of Cholada restaurant. Historically, it appears that the creek has meandered and made outfall at different points North and South between those two ridges. So, short of restoring the terrain and the suite of ecological interactions that are implied by that, what you’re really proposing is a sort of “new, improved” ecosystem, one which is no less inherently artificial than what exists there now. That’s not necessarily bad, but it points up that there’s a certain arbitrariness in the mission; that it would be difficult to measure “success” in the end. I appreciate that there may be too much institutional momentum for the agencies to consider the “do nothing” alternative. Collectively you seem determined to do a longer bridge and some amount of lagoon restoration. (By the way, increasing the length of the bridge from 79 ft to 460 ft would make it not “four times as long” as was said in the public meeting, but rather 5.8 times as long.)	Project alternatives incorporate some of the historic footprint of the lagoon as mapped by the 1875 T-sheet on the west side of the creek. Historical ecology is helpful when considering restoration opportunities but needs to be considered in light of current competing purposes. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 58-4	I understand the rationale for widening the bridge, but am skeptical that Topanga Creek, with its inherent topography and flow characteristics, through miles that include steep rocky gorges, will ever support sustained populations of Steelhead trout. (Tidewater gobies, maybe.)	The Draft EIR notes on page 2-6: "Topanga Lagoon and Creek still host a robust population of the federally listed endangered tidewater goby (Eucyclogobius newberryi) and the only currently reproducing population of the federally listed endangered and state candidate endangered steelhead trout (Onchorynchus mykiss) within the Santa Monica Mountains (State Parks and RCDSMM 2022)." As discussed on page 3.3-42 of the Draft EIR, "Topanga Lagoon is one of the last remaining coastal systems supporting a reproducing population of steelhead trout in the Southern California Distinct Population Segment. Topanga Creek is identified as a Core 1 priority habitat for southern steelhead trout (NMFS 2012), with replacement of the PCH bridge and expansion of the lagoon identified as recovery actions. Restoration of Topanga Lagoon, including the replacement of the constraining bridge supporting PCH, is listed as a high priority for Caltrans District 7 in the statewide Fish Passage Barrier Removal list (PAD ID#716891)." The RCD has been conducting routine steelhead surveys in Topanga Creek for years and there is extensive documentation supporting the fact that steelhead are in Topanga Creek, as discussed in **Appendix K.**

Comment Number	Comment	Response
IND 58-5	It's more a seasonal storm runoff than a year-round watercourse. Some years it doesn't even open to the ocean. And, while you refer to the Topanga watershed as "pristine" in your Powerpoint presentation, with thousands of residences upstream, it's not that. Even if every septic system in Topanga were working properly (not likely), would you ever drink from the stream?	The project is designed to function under the natural hydrologic regime, which has little imported water added in the upper watershed and little groundwater extraction. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities. Water quality in Topanga Lagoon is summarized in **Appendix P** (Topanga Lagoon Restoration Project Water and Sediment Quality Study Technical Report (ESA 2023) and Water Quality Pre-Construction Baseline Report (RCDSMM and Bay Foundation 2022)). Bacterial loading is mostly due to dogs, birds and occasional direct deposits of human feces in the lagoon area. AOWTS will provide advanced treatment with nutrient reduction and disinfection. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 58-6	My educated guess is that the odds are stacked against the fish, in terms of terrain dynamics and water quality. Such a high-risk gamble does not seem to provide sufficient rationale for the project, in terms of total costs and benefits (accounting for all so-called "externalities" and long range projections).	The Draft EIR describes on page 2-6 that Southern California steelhead already occupy Topanga Creek and lagoon. The Project would improve conditions in the creek to expand the population. Discussion of existing habitat conditions supporting steelhead are found in **Appendix K** Biological Resources Assessment (RCDSMM 2023).

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IND 58-7	That said, it's worth cleaning up the greater delta area. There is a significant amount of concrete chunks of old foundations, chunks of asphalt roadway, several old rusty vehicles, all readily apparent on the surface. Given the presence of that material and the historical uses of the site, one wonders what other toxic materials are impregnated throughout. One paradigm in cleaning up shipping harbors that have experienced long-term toxic pollution is to leave the seabed in place, optionally capping it with clean material ("cap in place"), rather than dredging it and taking the risk of spreading more toxins into the environment in the process. I wonder whether this approach might work best here, after removing the obvious surficial debris.	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.

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IND 58-8	Toxicity testing should be done to identify areas that might be best left in place versus others that might be okay to excavate and/or dredge. The extent of lagoon excavation might be constrained by such a determination. Let the plan follow the science, not vice versa. The plan discusses excavating and removing 200,000 cu. yards of material from the lagoon area (I don't recall if that number corresponds to the 8-acre version or the 10-acre version), and dumping it offshore. But I haven't seen what the plan is to clean the contamination out of all that material.	This comment does not address the adequacy of the Draft EIR. A detailed assessment of the material to be excavated from the historic fill areas surrounding the wetted area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. No material from the wetted area will be removed.
IND 58-9	Section 2.6.2, Option 2 discusses trucking material from PCH to Malibu Canyon Road. And then where? That sounds like it could add more chaos in the highest traffic areas in Malibu.	As noted on page 2-37 of the Draft EIR, "For material heading to the Calabasas Landfill, trucks would be staggered to either travel west on PCH and north on Malibu Canyon Road or travel east on PCH to Interstate 10 (Santa Monica Freeway), then west on U.S. Highway 101, to reduce traffic congestion and the need for highway crossings." Impacts to traffic from the added truck traffic are assessed on page 3.16-11 of the Draft EIR and found to be less than significant with implementation of Mitigation Measure TRA-1 requiring a traffic management plan.
IND 58-10	No concept of restoration could be fulfilled without a massive effort to remove invasive plants, some of which are notoriously difficult to eradicate. The area is full of plants like bamboo, spurge, mustard, nasturtiums, palm trees, various (European) grasses, etc. It wouldn't be surprising if the majority of the biota is non-native. Throughout the Santa Monica Mountains, efforts to remove nonnatives, while valiant, have been piecemeal. I don't know how you can begin to talk about restoration when the invasive species problem is so evidently intractable.	The effects of the grading on the existing condition is assessed in Section 3.3 Biological Resources of the Draft EIR. As discussed in Section 3.3, Mitigation Measure BIO-12 would include measures to minimize the potential for habitat degradation and avoid the spread of invasive plant species to sensitive natural communities.
IND 58-11	Perhaps the bridge length need not be as long as specified. Perhaps making it twice as long, for example, rather than nearly six times as long, would provide some benefit to the movement of fish (which might not take to the canyon anyway), while still providing the social benefit of a cleaner, safer pedestrian underpass. In terms of flow dynamics, roughly doubling the width of the underpass would have the greatest effect; increasing its width beyond that out to 5.8x would have increasingly marginal benefit, while creating exponentially more disruption of both the local environment and things like traffic impacts. A less-long bridge would avoid a substantial amount of excavation and removal of the fill material on which the PCH was laid. And it would likely shorten the project timeline and minimize the sorts of anomalies that tend to make Caltrans projects sometimes take longer and cause more traffic delays than expected.	Each Alternative would include the widening of the PCH bridge from 79 feet to as much as 460 feet as described on page 2-15 of the Draft EIR. The expanded bridge span provides the opportunity for an improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise. All of the proposed restoration avoids changing the beach and the wetted areas.

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IND 58-12	A less-long bridge would also require less concrete (and steel). Consider that concrete cement production is the third highest single category contributing to global greenhouse gases, behind only energy production and transportation. (Multiple sources, e.g., the journal Nature, Scientific American, etc. attribute 9% of GHG to it, when including all gases such as methane; and 12% of global CO2 emissions alone.) Make sure the project complies with the California Global Warming Solutions Act of 2016, SB-32 (building on AB-32 of 2004), to require that the State reduce GHG emissions to 40% below the 1990 levels by 2030. That implies minimizing concrete usage to the extent practicable. Also, using more concrete than necessary would cause the project violate CEQA provisions requiring that the project be the alternative of least environmental impact.	The Draft EIR estimates GHG emissions associated with construction on page 3.7-34 and notes that bridge construction including concrete deliveries would add to GHG emissions. **Appendix N** provides estimates of GHG emissions associated with construction. The analysis concludes that GHG emissions associated with construction would not exceed the significance thresholds used by SCAQMD. No more concrete than necessary will be used. This project was included and modeled in SCAG's regional air quality and GHG analyses.
IND 58-13	Caltrans says that throughout the bridge construction there will always be two lanes of PCH in each direction, by virtue of a temporary bridge South of PCH. Malibu residents have seen from Caltrans' approach with the Trancas Cyn bridge, the proposed Malibu Seafood Crosswalk and the Corral crosswalk and underpass (to name a few) that they seem to improvise more often than one might expect of an agency that deals with semi-permanent infrastructure. Given Malibu's recent experiences with Caltrans' approach, could the public be given any material assurances that the project would happen as planned, on schedule, without any traffic bottlenecks? Perhaps a performance bond tied to specific targets, or some inducement along those lines?	This comment expresses concern regarding traffic impacts and potential construction delays. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). Although construction duration estimates may vary, and unforeseen delays can occur, the proposed schedule durations provided in Section 2.7.1 on page 2-48 of the Draft EIR provide a reasonable estimate of construction duration. As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures shown in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have authority within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.

Comment Number	Comment	Response
		As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.
IND 58-14	The overall vision, with humans recreating on both sides of PCH, implies more pedestrian traffic from one side of PCH to the other. Yes, a new underpass could become more relevant than the current one is now. But is that enough? With more people generally, wouldn't there be more impetus for pedestrians to cross PCH directly? That's one of the top accident spots on PCH in the greater Malibu area. I'm not sure what the solution should be, but it probably means somehow isolating pedestrians from PCH. Maybe it's a freeway-style center divider (more than just K-Rail?), running from Topanga Canyon Blvd (TCB) to Cholada restaurant – but then I don't know how westbound cars would get into the parking lot on the beach side without providing an opening, which pedestrians could abuse. People tend to take shortcuts where they find them. In any case, having recreation areas on both sides of PCH means that hazards to pedestrian will become an even bigger problem. This is another fundamental contradiction still unresolved: how to increase interaction between both sides of the highway without increasing interaction across the highway.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces via trails under PCH on both sides of the lagoon with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon.
IND 58-15	Moving the lifeguard/restroom building further back from the Mean High Tide Line makes sense. But there is insufficient rationale to cut down the bluff/berm above the beach to create a wider beach. Rocky Topanga Point will never be sandy like Santa Monica Beach. A wider, flatter storm wave zone would invite sea rise to come further on shore, sooner, eroding closer to the PCH. Plus, that higher terrain is both scenically aesthetic and provides a spot for surfers to survey the swell. It's part of the "cultural terrain."	No bluff cutting is proposed except for grading associated with creating room to accommodate the bridge lengthening and lagoon expansion. Creating a beach similar to Santa Monica Bay is not one of the objectives. Living shorelines features are proposed to improve climate resilience. Higher terrain will remain near the parking area to provide a spot for surfers to survey the swell.

Comment Number	Comment	Response
IND 58-16	The vision about the Topanga Ranch Motel is neither clear nor convincing. "Restoration" would be impossible. It's so crappy and rotted, you could tear it down and build some facsimile, but to what end? Sure, preserving some historical memory would be appropriate, but that could be done with no more than an "interpretive" roadside plaque. It might be better to make the motel's flat area the one visitor-serving park, with a few picnic tables and a basketball court. And a public pool! (I'm half kidding, but there would be a demand for it.) A "park" there could also keep humans out of the lagoon area below to the North as much as possible. (Yes, people should be allowed to quietly hike in a wilderness context, but no, don't develop it as a Disney-esque "interpretive trails experience.") In calling the area where the Feed Bin is now the "Gateway Corner," you are envisioning some sort of visitor center to encourage recreational use of the Santa Monica Mountains. But first, the need to promote greater use of the mountains is questionable.	The proposed visitor center could be either set up in the restored structurers of the Topanga Ranch Motel or at the small restroom/ interpretive area at the Gateway Corner. The trees located within the proposed parking area of the Gateway Corner will be retained for shade to the greatest extent feasible. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurants and structures on site. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain one onsite concession. Alternatives 3, 4 and 5 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes.
IND 58-17	From the City's perspective, the more our area becomes an Instagram destination, the more traffic we experience. There'd be yet more pressure on local businesses to be tourist-serving rather than resident-serving (not that there isn't a little overlap). Sure, let's serve some visitors, but the greater area doesn't need additional promotional the expense of the region's rustic lifestyles. Visitors too don't appreciate getting stuck in several hours-worth of beach traffic, which already happens inevitably on Summer weekends, and at other times with increasing frequency. Why aim to create more traffic?	The Draft EIR estimates that visitor traffic may decrease as a result of the project with improvements to public transportation and the removal of several existing restaurant concessions.
IND 58-18	Second, even if more visitor promotion isn't obviously a perverse goal, the need for visitor center building(s) is unclear; it might have made more sense a few decades ago. Nowadays, the visitor center is the Internet – if you want to go hiking, you can go online and look up a map. Maybe the most that visitors would need is the sort of kiosk you see at a campground or trailhead, with a "you are here" map of the greater area, and a few interpretive panels (perhaps about the hoped-for Salmonidae and maybe something about the prehistoric humans).	As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain one onsite concession. The proposed visitor center could be either set up in the restored structurers of the Topanga Ranch Motel or at the small restroom/ interpretive area at the Gateway Corner. The trees located within the proposed parking area of the Gateway Corner will be retained for shade to the greatest extent feasible. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each Alternative will result in modified concessions including the development of the Gateway

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		Corner and the elimination of several of the existing restaurant and structures on site. ~~The proposed visitor center could be either set up in the restored structurers of the Topanga Ranch Motel or at the small restroom/ interpretive area at the Gateway Corner. The trees located within the proposed parking area of the Gateway Corner will be retained for shade to the greatest extent feasible. These amenities would be consistent with the Topanga State Park General Plan adopted by CDPR in 2012.~~ Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 58-19	Apropos, the prehistorical narrative here appears to have been "captured" by Tongva supporters. My understanding (my late father was a UCLA archaeologist) is that, over many millennia, Topanga Canyon was a shifting boundary between pre-Tongva and pre-Chumash, perhaps centuries per occupation. I suspect it may have more often been Tongva, but if there's to be any cultural/ educational component, the Chumash should have their due. Has the Project been in touch with Julie Tumamait-Stenslie to hear what she thinks? I haven't spoken with her for several years – is she still the Chief?)	The Draft EIR provides an ethnographic background and setting beginning on page 3.4-16. Native American groups were contacted pursuant to CEQA and AB-52 requirements. Potential impacts to Tribal Cultural Resources are evaluated beginning on page 3.15-3. The Draft EIR concludes that impacts to Tribal Cultural Resources would be less than significant for Alternatives 2, 3 and 5 but potentially significant under Alternative 4. Additionally, the project retains a cap of 2-4 feet above native materials in order to avoid disturbance of any sensitive resources. Malibu Canyon is identified as the boundary between Chumash and Tongva groups, and Julie Tumamait-Stenslie is no longer the chair of the Barbareno-Ventureno Band of Mission Indians.
IND 58-20	All that said about limiting structural development, it would be nice if you had an espresso cart concession and a few tables, so Topangans and Malibuites would have a place to meet people from Santa Monica and points East for coffee. And please let's keep the Feed Bin, even if eliminating other businesses. It's a local institution, and at least informally, an historical feature. As a "gateway" to the Santa Monica Mountains, you can't get more iconic than the Feed Bin.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places.
IND 58-21	Regarding sewage treatment options, if the only restroom is the one south of PCH, then perhaps the OWTS 1/2-mile upstream would be sufficient. But if you were to include a visitor center and other places such as the Reel Inn and the gas station(?), then the connection to the sewer pipe at CoastlineDrive starts to make more sense. (I'm not qualified enough to say how much treatment you'd need for X amount of hypothetical new development.) But then, traffic impacts – if you choose the Coastline sewer option, the additional year of lane closures will likely be more than "intermittent," as suggested.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I,** Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property

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		directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless methods and some open trench are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. As noted on page 2-38 of the Draft EIR, only one option is included in the preferred alternative. State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option.
IND 58-22	Experience says you'd have one lane closed consistently for some months. (Even now, Caltrans has dropped the ball about the slide at Porto Marina – I've climbed around on that slide enough to see that the portion that's on the highway is detached from the body of the slide above, so is no longer functioning as a "toe" stabilizing the rest. That detached "toenail" could be removed right now, graded away in a day or two, without affecting the main slide at all – which would then still need a retaining wall like the one near Coastline.)	As noted on page 2-38 of the Draft EIR, State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 58-23	The traffic impacts associated with a sewer pipe, and those associated with bridge construction, need to be analyzed in terms of wort-case scenarios due to the hundreds of thousands of daily lives they would affect over weeks, months or even years.	The Draft EIR notes on page 2-44 that construction of a sewer would require an additional year to construct following completion of the bridge and lagoon elements and could require closure of one lane. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less

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		than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). Alternative 3A identifies that the sewer option was not selected and potential traffic impacts associated with it are no longer a consideration. As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the land owners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

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IND 58-24	If the project area were connected to the sewer, who else would benefit – the Reel Inn, the gas station? (Possibly not Cholada, as they're on the other side of what could be a wider creek.) Would they each pay into the system? What does the Regional Water Quality Control Board have to say?	Connection to the sewer would only serve the State Park and possibly County facilities. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. As noted on page 2-38 of the Draft EIR, State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option.
IND 58-25	There is no rationale for additional parking spaces. Unlike areas in Malibu, this area is never overparked. Plenty of surfers park on PCH, but that's to avoid the parking fee; the lot is never full. (Maybe the project could dedicate funds to reduce the parking fee, so fewer would park on PCH?) In any case, you should expect to install a small handful of electric car chargers.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks leasee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks leasee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks leasee

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		retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
IND 58-26	In Malibu we've struggled with how to develop bike lanes. (I've been an avid cyclist where I've lived elsewhere in the world, with it having been my main transportation, but you couldn't pay me to ride on PCH.) Bikes Lanes are more hazard than benefit if implemented in isolation – if you were to put in a mile or two here or there it would become an attractive nuisance with respect to the unsafe stretches before and after. To have safe, viable bike lanes, you'd need to have an integrated system extending from Santa Monica that keeps bicycles isolated from vehicles as much as possible. (And good luck with that.) Otherwise, the highway is a de facto freeway, as much as we wish it weren't. Integrating short-distance bike lanes here and there in a piecemeal way is just asking for trouble.	As noted on page 2-16 of the Draft EIR, the Proposed Project would strive to improve bicycle access to the beach and maintain the Class III bikeway consistent with regional planning guidance documents. The Draft EIR identifies bicycle facilities in the area on page 3.16-8. PCH is designated as a Class III Bicycle Route and an additional Class III Bicycle Route is proposed along TCB, according to the County of Los Angeles Bicycle Master Plan. As noted on page 3.16-12, Class III Bicycle Routes on PCH would subject to Caltrans standards and approvals. Bike safety is addressed on page 3.16-20. Project designs would conform to Caltrans safety standards.
IND 58-27	You should ensure that all lighting complies with the strictest dark sky requirements. Malibu's Dark Sky Ordinance is a start, but even it allows too much ambient and reflected light for the sensitive ecosystem that's being proposed. (And remember, there is no longer much need for bright safety lighting, because modern cameras can work in virtually no light at all.)	This comment expresses concern regarding lighting impacts. Impacts related to lighting are analyzed in Section 3.1, Visual/Aesthetics, of the Draft EIR. All impacts were concluded to be less than significant with mitigation. As described in Section 3.1, all lighting impacts were concluded to be less than significant with mitigation. The mitigation measures include AES-1, AES-2, and AES-3. Mitigation measure AES-1 would require lighting used during daytime or nighttime construction to be shielded and pointed away from surrounding light-sensitive land uses. Mitigation measure AES-2 would require that all new permanent exterior lighting associated with proposed Project components to be shielded and directed downward to avoid any light spill onto neighboring lands or into nighttime skies. Mitigation measure AES-3 would require all proposed aboveground facilities to be designed with non-glare exterior materials and coatings to minimize glare or reflection. Details of these mitigation measures are discussed in Section 3.12 of the Draft EIR.
IND 58-28	What is the long-term staffing? Maintenance? You say you will monitor plantings for five years, but you need an overall plan that's designed to run in perpetuity. (By comparison, the MRCA does some good things but consistently fails to maintain and monitor the sites it develops. Don't be them.)	The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be require for Proposed Project operation.

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IND 58-29	Relatedly, how frequently will the Lagoon need to be dredged to remove the rocky material that washes down the canyon into it? Every ten years? Wouldn't that necessarily disrupt habitat, which might need to be "restored" pretty much from scratch each time? In other words, what is the project lifespan, realistically? How long before the isolated eddies in the lagoon turn eutrophic, killing more life than they sustain? That's a real concern, given how intermittently the lagoon breaches to the ocean.	**Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably and that each Alternative would increase fish passage opportunities. The fill in the lagoon was placed in 1930s when the PCH bridge was reconstructed. There were many large extreme fluvial storms that occurred (including the 100-year storm in 1980) since then as described in **Appendix E,** but the fill is still there and not moved by the fluvial storms. Hence, restoration is necessary to remove the fill. Dredging of the lagoon is not anticipated as a maintenance requirement of the Proposed Project. Rather, the creek and lagoon system would be restored to a more natural state with sediment conveyed to the ocean during high storm flows.
IND 58-30	You have not articulated any benefits of the "no action" alternative. Surely there must be some. One might be that whenever humans intervene to engineer "nature," almost invariably something goes wrong, often catastrophically. Think Biosphere II, or cane toads in Australia… or Malibu Lagoon and the breach pattern that's currently (no pun) undermining the Adamson House lawn. Not intervening, or intervening minimally with a soft touch, might by the most environmentally sustainable option.	Section 6 of the Draft EIR provides a comparison of the project Alternatives including the No Action Alternative, which avoids the significant impacts associated with Alternatives 2 and 4 but continues the managed decline that will eventually result in the need for action.
IND 58-31	I don't think that this project has been adequately publicized in Malibu, one of the communities that it will affect the most. I've seen no ad or notice in the Malibu Times, for example. When the City Council held a hearing about it on Monday April 8th, there were only three public speakers – two of whom are neighbors adjacent to the project with their own private concerns, and the third was someone I myself notified, knowing that he used to live in "the Snakepit." No one else commented, in a community that would have a lot to say if they knew about this. For that matter, I don't recall ever hearing about any EIR Scoping meeting, despite having always been fairly tuned-in to matters of environment and development in the area. This project will affect Malibu more than just about anywhere beyond the site itself. After waiting for ~22 years, perhaps you could toll the process a bit longer to get more feedback from Malibu folks?	The City of Malibu has been included in the public outreach process and has attended the public meetings. Project team members also met with Malibu staff on 1/27/2022 and 1/29/24. Outreach has also occurred to the Malibu area via postings at City Hall, website updates, email and social media outreach as well as press releases to the Malibu area media. A press release was sent to the Malibu Times, who published a notification in addition to past public and CEQA meetings. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). ~~The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public~~. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public

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		review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.
IND 58-32	By way of summary, here I'll try to be more prescriptive, incorporating more of my subjective preference. Given that there is no single "preferred alternative articulated; and given that the mission of "restoration" per se is, in the end, arbitrary (as noted above, at 1), a more critical consideration of project goals is called for. Which among all of the elements is clearly beneficial and likely to succeed? Here's a short list: • Removal of the debris (concrete, asphalt, etc.) and toxic material (only where found in concentration in finite areas susceptible to removal). • Demolish the Topanga Ranch Motel, which is currently an attractive nuisance (whether anything else is built in its place or not). • Move the lifeguard/restroom structure currently near the surf zone further upshore. • Make sure the helicopter landing zone works optimally. • Keep the Feed Bin and the Reel Inn.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 58-33	That might be all. I still have questions about how essential (or not) either sewage option might be.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million.

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		Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless methods and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. As noted on page 2-38 of the Draft EIR, State Parks has developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR. This Alternative 3A has been selected as the Preferred Alternative as described in detail in Section 1.3 of the Final EIR. State Parks has also selected Option 2, seepage pits, as the preferred wastewater option.
IND 58-34	Beyond that, the next plausible options might include: • Widening the creek mouth with a PCH bridge perhaps twice as long as the existing one, in order to (A) provide for a safer, more attractive pedestrian access walkway from one side of PCH to the other, and (B) substantially mitigate the most significant hydrological and biological constraints imposed by the now too-narrow bridge. Any more widening (lengthening the bridge) is likely to have marginal benefit (at much greater cost), aimed at habitat goals (gobies, steelhead) that remain too hypothetical, while requiring significantly more displacement and haulage of fill dirt, and greater likelihood of construction-related traffic impacts on PCH. • A systematic program to remove invasive species from the greater lagoon area. This is likely a necessary step if you wanted to create an ecosystem than can sustain (re)introduced fish species. • Perhaps a minor amount of dredging in the lagoon – an acre or two – enough to attract a few more bird species, and to create a few scenic options for short hikes, but without expecting to reinvent the whole ecosystem or open up the whole area to easy human intrusion. Less is more.	The wider bridge will allow the lagoon wetted area to adapt and expand based on natural storm or sea level rise processes. Trails are proposed to connect under PCH on both sides of the lagoon,and will facilitate safer crossing under the PCH. Invasive species removal will be part of the restoration management plan. With the exception of the removal of the existing bridge supports, all work starts outside the wetted area to avoid disturbance of sensitive aquatic species. I Topanga Ranch Motel structures would be restored in accordance with historic requirements and would be used for visitor serving purposes consisntent with the Park mission. Electric car chargers will be incorporated into all future parking areas. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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	• Sprucing up the motel site – as distinct from the lagoon area – with a small, conventional park consisting of a few picnic tables, a restroom, and perhaps a basketball court or the like. (Personally, I'd like a pool; I know that must seem farfetched, but maybe it could be an option under the category of climate change cooling/resilience adaptations). The park could have a kiosk with local info (trails map, environment, historic motel blurb, prehistoric peoples) – no need for a big visitor center anywhere. In a corner of the park, an espresso cart, so Topangans and Malibuites have a place to meet Santa Monicans for coffee. That could even be under an open gazebo-like structure, to be functional even on a rainy day. • Between the park and parking lot, a handful of electric car chargers. • If creating any sort of recreational opportunities on the North side of PCH (such as a park), then measures to prevent pedestrians from crossing PCH would become crucial. (e.g., K-Rail or taller barrier – but as I said, I don't ultimately know how to engineer this human-behavioral problem).	
IND 58-35	Beyond that, the rest of the proposed elements seem to be in the realm of diminishing returns and/or beyond the alternative of least environmental impact. Respectfully, Kraig Hill Big Rock, Malibu	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Gerlinde Gautrey		
IND 59-1	After years of planning and meetings I am hoping that the "All Go" will finally be given to this project. Alternative 3 seems to a layperson like me the best solution. It will enhance the water quality in and around Topanga Beach and Lagoon and provide for better and safer access to the beach. With more storms and raising sea levels a project that improves coastal resilience needs to be done sooner rather than later. I am looking forward to see all the improvements!	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Louise Ratliff		
IND 60-1	Dear Restoration folks. Endangered fish and habitat that can not occur anywhere else should be a high priority, and resiliency for sea level rise is also very important. Based on the recommendations of my fellow members of CNPS, I agree that Alternative 2 in the EIR is the best possible plan.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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Charley Griffiths		
IND 61-1	Attached are my comments for the Topanga Lagoon draft EIR. Topanga Lagoon Draft EIR Public Comment: I was raised close to the proposal site and feel concerned about the project. Below are my comments and concerns coming from a local resident. The potential to restore the lagoon host promise, yet I believe the project's scope is concerning. I admire the detail in the EIR and look forward to engaging with the final draft.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 61-2	Bridge Size and Construction Area Mass: In ALL 3 of the plan alternatives, the lagoon bridge length is recommended to be 460 feet from the existing size of 79 feet. Yet, the temporary bridge, which will be the first thing constructed, AND beach side, will be 170 feet by 31 feet. Why is the only recommendation in all 3 alternates, for the bridge size to be 460 feet, which is nearly 6 times bigger? What is the justification and requirement to make the bridge that big? Do the Steelhead Trout need 460 feet to be able to swim upstream, if so where will they be removed to during that 5-7 years of construction? Will they be in a habitat that adheres to those standards proposed and required in this project? The construction area is massive and it feels deceiving for all of the Malibu residents, commuters, school and public buses, least of all surfers and visitors who will be navigating it daily, to see the visual plan that they will be living with for 5-7 years.	Each Alternative would include the widening of the PCH bridge from 79 feet to as much as 460 feet as described on page 2-15 of the Draft EIR. The expanded bridge span provides the opportunity for an improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will also provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise. All of the proposed restoration avoids changing the beach and the wetted areas.
IND 61-3	I feel concerned about the traffic and accidents that would come from this construction. The threat of increased traffic doesn't merely suggest potential inconvenience—it forewarns of a greater likelihood of horrific accidents, fatalities and unbearable congestion. We cannot stand by as the situation deteriorates, risking more lives in the process. We owe it to ourselves and future generations to address these pressing issues head-on, with immediate action and profound care for the well-being of our community: I imagine the construction of the new bridge would further exacerbate the already existing problems with PCH.	As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction. The Draft EIR assesses impact to traffic hazards beginning on page 3.16-19 and concludes that with implementation of Mitigation Measure TRA-1 impacts to safety during construction would be less than significant. One objective of the Proposed Project as noted on page 2-10 of the Draft EIR is to improve pedestrian safety compared with existing conditions by designing new underpasses and cross walks for pedestrians to access the beach from the north of PCH as described beginning on page 2-16.

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IND 61-4	Concessions: Proposal is to first eliminate 5 of the 6 longstanding concessions in the area: Cholada, Wiley's, Rosenthal, Oasis, and the Feed Bin. The only existing concession kept in the plan is the Real Inn with 20 parking spots. It is further allocated that the Visitation center will create/ house future concessions, and most of the plan parking for visitation or beach access, will be fee based. In lieu of conservation and restoration, I feel concerned that removing these concessions will cause monetary losses for the local businesses that the community enjoys. If this plan goes into effect, I urge the government to provide monetary compensation for the local businesses that will be removed.	The CDPR prepared the Topanga State Park General Plan in 2012 that identified future visitor services amenities appropriate for the Park. The Draft EIR concludes that the proposed retention of one concession would be consistent with the General Plan's vision for retention of local businesses. Furthermore, the closing of the existing concessions would be conducted in compliance with CDPR's lease agreements with each of the tenants.
IND 61-5	Adjacent Residential/ Business Stakeholders The report does not adequately address the concerns and involvement of the borderline adjacent residents whose lives and properties, already facing the real threat of Sea level rise, and erosion, stand to be directly affected by the project. I have a growing concern that the project, in its current form, poses unacceptable risks to our community, environment, and way of life.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that the impacts to neighboring beaches would be negligible. Side scouring and encroachment onto the neighboring residential properties to the west is not anticipated as a result of the increased lagoon acreage and bridge lengthening since the development is on the upcoast of the project and the bridge abutments will be protected with rocks to prevent scour. The west abutment will prevent creek migration to the west beyond the west abutment. The proposed lengthening of PCH bridge will slow down the flow and reduce erosive impacts to the floodplains. Also See Section 2.3 Master Response - Hydrologic Modeling

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IND 61-6	The Draft EIR, while extensive, glaringly omits a critical component: the impact of those most directly impacted the local stakeholders and community. This oversight is not merely procedural but indicative of a project that has fundamentally misjudged its potential to inflict irreversible harm on our community and environment.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022, and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.
IND 61-7	Under Alternative 2, the maximum increase in lagoon has the potential to cause drastic environmental effects on the current adjacent residents west of Topanga Beach. Through removing the existing berm, to widen the lagoon, indicating a breach of the water to turn westerly, during storm drainage, the EIR has failed to investigate if this plan will affect the existing coastal residential properties, which reside along and below Pacific Coast Hwy. I am concerned about unintended consequences such as increased risk of flooding, elevated erosion, changes in drainage patterns, or other environmental hazards that could affect our homes directly and our safety.	The proposed grading west of the creek is the same for all proposed alternatives. Alternative 2 Maximum Lagoon Expansion would remove the Topanga Ranch Motel and expand the lagoon to the east. The area used as a helicopter landing area known as the "helipad" or knoll is a relatively small feature that does not influence the shoreline position. Rather, the cobble delta at the center of the historic creek discharge channel influences the shoreline position as a large feature that armors the shoreline and breaks up wave energy, resulting in beaches in its lee and on both sides of the delta. The shoreline position at Topanga Point and the sandy beaches to the north, west and the east are all a function of the existence of the large cobble delta rather than the knoll. Those beaches existed prior to the existence of the knoll. As described in **Appendix B**, the cobble delta at Topanga Point serves as a large wave refraction feature that causes incoming ocean waves to bend (refract) around the delta upon approaching the shoreline. This wave refraction results in a convergence of wave energy on the delta and a divergence of wave energy on both sides of the delta. The divergence of wave energy adjacent to the delta results in lower wave energy on either side and deposition of sand creating small beaches. The landing area is not a sand retention feature and does not hold the position of the beach west of the inlet. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on

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		elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that the impacts to neighboring beaches would be negligible. Side scouring and encroachment onto the neighboring residential properties to the west is not anticipated as a result of the increased lagoon acreage and bridge lengthening since the development is on the upcoast of the project and the bridge abutments will be protected with rocks to prevent scour. The west abutment will prevent creek migration to the west beyond the west abutment. The proposed lengthening of PCH bridge will reduce slow down the flow and reduce erosive impacts to the floodplains. Also See Section 2.3 Master Response - Hydrologic Modeling
IND 61-8	The DEIR claimed that “The total area graded would be 15.89 acres. No excavation is proposed within regulated waters and wetlands; however, limited disturbance to this area (approximately 0.33 acres) would occur temporarily during bridge demolition”. I argue that this limited disturbance claim is inaccurate and an oversight. Construction and eventual visitor traffic could drastically alter the tranquility and natural soundscape of our area, impacting the quality of life for residents and potentially disrupting wildlife behavior that the project is aiming to protect. The proposed 5-7 years of construction will produce significant harm for the current community members and has the potential to disrupt the current environment.	This comment does not address the adequacy of the Draft EIR. In accordance with regulatory permits, work in the wetted area will be limited to the removal of the old bridge. Grading starts outside the banks and works landward. The Proposed Project conforms to CDPR's 2012 Topanga State Park General Plan that envisions upgrading and modernizing visitor services within the Gateway portion of the Park while improving the natural habitats of the creek and lagoon. The Draft EIR addresses impacts of construction throughout the document and identifies mitigation measures where necessary to minimize impacts to the local community and environment. Once constructed, the Draft EIR concludes that the improvements to the habitats will benefit native species and will provide recreational values as well, consistent with the General Plan as well as Coastal Land Use Plan. **Appendix Q** provides a consistency assessment with all applicable land use plans.
IND 61-9	Recommendation: ● The EIR must be redrafted as the governing body must investigate the impact on the western Adjacent neighboring residents and local businesses. The governing body has failed to study the environmental effects on residents and the economic impact on existing businesses.	The Draft EIR provides detailed analysis of the western edge of the site as described in section 2.3 Master Response - Hydrological Modeling. Impacts to local businesses are clearly identified in the Project Description, resulting in a reduction of the existing restaurant concessions, consistent with the CDPR 2012 Topanga State Park General Plan. The comment does not provide any new information that would change the conclusions of the Draft EIR.
IND 61-10	● I suggest an immediate and binding commitment to not proceed with any construction or implementation until unanimous approval from the local community and city council is obtained. ● I suggest a transparent and inclusive Malibu stakeholder engagement process for the future before plans are finalized.	The Draft EIR has been prepared consistent with CEQA requirements. No new information has been provided in the comment not already addressed in the Draft EIR or that would alter the analysis in the Draft EIR. As a result, recirculating the Draft EIR or postponing the implementation of the Project is not warranted. The project does not extend into the jurisdiction of the City of Malibu with the exception of some roadway striping and signage. If as design evolves that should change coordination with the City will occur. The decision-making body for this project is the California Coastal Commission Consolidated Development Permit. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR ~~Section 2.3 describes this outreach process that included participation by~~

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		~~many agencies and members of the public.~~ Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
Kenneth Widen		
IND 62-1	I prefer option 2, but I would not want a visitor center built. I would prefer to see more area for wetlands and wildlife.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Elisabeth Bersin		
IND 63-1	I support Alternative 2 the Maximum Lagoon Habitat I believe this is crucial to our precious Ecosystem Thank you	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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Stephanie Faulkner		
IND 64-1	To Whom it may Concern :-) I am in favor of alternative #2 Maximum Lagoon habitat.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Lou Porter		
IND 65-1	My name is Lou. But surfers, surfer girls and groms at Topanga Beach know me as Topanga Lou or Malibu Barbie. I've been coming to Topanga Beach since i was a little girl. I've been taking pics of the beach sunrise, what's been going on at Topanga Beach throughout the day, the Topanga Beach iconic palm tree on the bluff, and filming surfing videos for 9 years now. I film for about 6 hours per beach day. Then i hang out at the beach bc I'm a beach girl at heart for several hours after I'm done filming. A few years ago the locals at Topanga Beach named me the official Surfing Photographer at Topanga Beach. Which i take that title very seriously with great humility. They invited me to sit in front of the lifeguard station to film, which is the primo spot to sit & film. I'm also disabled & park in the handicap parking spot near the lifeguard station at the beach level. My camera gear & beach gear are too heavy for me to carry from the parking lot on the street level down to the beach.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 65-2	I hope you will keep the Topanga Beach iconic palm tree on the bluff. It's what makes Topanga Beach Topanga Beach. On that bluff I've seen: Weddings, hula dancers, native peoples from the area perform sacred rituals. I hope you'll keep the bluff as is.	The Proposed Project description provided in Section 2 of the Draft EIR identifies the removal of the knoll including the palm tree under each Build Alternative. The Draft EIR concludes that the removal of the knoll is unavoidable to accommodate the expanded lagoon. Views to the ocean and public open space areas would be retained at the new parking area east of the lagoon to replace the functions of the existing knoll. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional “Delft3D FM” morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches.

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IND 65-3	I watched the online meeting and the handicap parking was never addressed. Where will that be when you start changing everything? I need to park very close to where i sit & film.	ADA parking spaces will be retained at the beach as well as within all other parking areas for all alternatives. As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.
Tamara Gould		
IND 66-1	I am greatly in favor of Alternative 2. Thank you! Tamara	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Dr Chris Harz		
IND 67-1	Please do NOT tear up the corner of Topanga and PCH. The wetlands proposed would be great now, while it's been raining, but would be dry and smelly on a normal year. I am a longtime (40 years plus) resident of Topanga Canyon. Please add me to your mailing list.	Expansion of the lagoon area will enable restoration of riparian, transitional, and upland revegetation that is drought tolerant and will provide important habitat during both wet and dry conditions as described in **Appendix K** Biological Resources Assessment (RCDSMM 2023).
Michael Hari		
IND 68-1	Hi there hope you are doing well! Here are some things I think might be important	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 68-2	•i hope there are some 3D renderings of the final proposal being presented to the public. I get that there's a lot of data to present and the drawings are fine, but some kind of virtual tour with a view like Google Earth would be really helpful. Seems like a giant expensive project, and all the more reason to invest in graphic/animation and make the project more tangible to residents.	The Draft EIR provides detailed site plans in Section 2 Project Description. At this time, no further visual renderings or animations have been prepared.

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IND 68-3	•the berm is awesome for viewing surfers and seeing the whole beach and meditating etc. would be sad to lose that perspective. It also provides wind blockage that allows for setting up a beach hangout but have wind and sand and cigarette/illegal fire smoke blocked … Can we at least get a lookout tower near the lone palm tree? Or make the new lifeguard station with a lookout with public access?	The Proposed Project description provided in Section 2 of the Draft EIR identifies the removal of the knoll including the palm tree under each Build Alternative. The Draft EIR concludes that the removal of the knoll is unavoidable to accommodate the expanded lagoon. Views to the ocean and public open space areas would be retained at the new parking area east of the lagoon to replace the functions of the existing knoll. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches.
IND 68-4	•I'd like to see some of the hotel preserved, but seems like those buildings are pretty far gone and such a bummer that no effort was made to preserve them since lower Topanga evictions 20 years ago.	The comment expresses preference for Alternative 3, which would preserve much of the Topanga Ranch Motel. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 68-5	•Seems like Malibu Feed Bin being demolished os forgone conclusion. Please don't build ultra modern welcome center and expansive parking lot that looks like a shopping center or community college or police station/town hall combo. This is the entrance to nature and recreation and should fit in with land and culture. Hell, make it look like Malibu Feed bin …	A single concession located at the place now known as the Reel Inn is retained in all alternatives. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places.
IND 68-6	•please don't destroy Reel Inn. Imagine being able to have dinner overlooking the new lagoon. •rosenthal wines, maybe there's space for them in new configuration but this is lowest on my list of places to keep. Maybe they and Cholada and bait shop could all be above the lagoon on flood proof pylons.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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IND 68-7	•That rendering of just a huge guardrail that whole stretch seems really unnatural and uninviting. At the least make it a bit of a boulevard with some planters and natural design elements, not just brutalist concrete and steel.	Bridge designs will conform to Caltrans standards. No additional artistic treatments are proposed. The Draft EIR addresses impacts to visual quality on page 3.1-29 and concludes that compared to existing conditions, the changed infrastructure would not significantly impact visual character or quality in the area. New facilities are expected to freshen the local views, improving visual character and quality.
IND 68-8	•what can be done to hold contractors responsible for time and cost overruns?	Contractor costs are not considered an environmental impact under CEQA and are not addressed in the Draft EIR.
IND 68-9	•would be nice if new parking lots were porous pavers and not heat absorbing asphalt, that drain into sewage treatment system. runoff from bridge and gas station could do into same system	The Draft EIR notes for each Alternative in Section 2.6 that bioswales or other stormwater BMPs be integrated into the designs of the parking areas to minimize impacts to water quality from stormwater runoff, including appropriate treatment BMPs.
IND 68-10	• new parking and structures along 27 on west side on last curve near pch should be well integrated with the land and trees and ideally not very visible from any hiking paths around the lagoon	Visual renderings of the Gateway area are included as Figure 3.1-10 in the Draft EIR. The views include anticipated visual screening with both retained and planted trees and other vegetation. The Draft EIR addresses impacts to visual quality on page 3.1-29 and concludes that compared to existing conditions, the changed infrastructure would not significantly impact visual character or quality in the area. New facilities are expected to freshen the local views, improving visual character and quality.
IND 68-11	•hiking path up the big hill behind Reel Inn is so awesome and would be nice if this whole area had integrated hiking trails and easy access to beach under PCH at both west and east end of the new bridge.	The Draft EIR notes on page 2-16 that each of the Project Alternatives would include improvements to the trail system.
IND 68-12	•What tech might exist in a few years that makes on site water treatment more manageable, and help avoid an extra year of shutdowns for new sewers, that are just gonna end up dumping into the ocean anyways	The Draft EIR identifies three feasible wastewater management options. The Final EIR will identify a preferred treatment option as part of the preferred Alternative.
IND 67-13	• there needs to be more parking for the disabled and for surfers and for families near the beach, not less. reducing parking on south side of PCH increases chances for pedestrian accidents	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.

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IND 68-14	• what can be done to hold the sheriffs department and beaches & harbors accountable for upkeep and security of the beach both pleasantly and in the future? It seems that other beaches to the east get regular maintenance and tractor combing for trash and Topanga Beach is always a wreck. Also, there are constantly both leashed and unleashed dogs, cigarette smokers, and often illegal camp fires. Lifeguards say they don't even bother calling police because they don't show up.	Lifeguards currently must contact the Los Angeles Sheriff when there are violations on the beach. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be require for Proposed Project operation.
IND 68-15	•would be nice if there was a small dog park nearby or back corner near surf shop so people would have an option besides bringing their dog illegally onto beach and ruining experience for people with children or just wanting some peace away from barking dogs	The operations and maintenance of the beach would remain the responsibility of the Los Angeles County Department of Beaches and Harbors which restricts dogs from beaches.
IND 68-16	• please make sure bridge designs are put through appropriate wind and noise tests so we don't end up with some low resonant hum or unstoppable whistling	Bridge designs would be approved by Caltrans to ensure functionality and performance standards that include noise generation deterrents.
IND 68-17	•how many college campus style emergency stations will there be in parking lot and near beach and who will they be connected to?	The operations and maintenance of the beach would remain the responsibility of the Los Angeles County Department of Beaches and Harbors. The lifeguard and public restroom building, garage, and helipad would be the only permanent facilitiesother than the parking areas. The use of emergency stations, ticket machines and other parking amenities will be developed in the design phase.
IND 68-18	•there needs to be family and all gender bathrooms included in the facility designs both at the beach and at welcome center.	Restrooms would be replaced as noted on page 2-17 of the Draft EIR.
Becky Rickley		
IND 69-1	To whom it may concern, I have reviewed the proposed plans for Topanga Lagoon Restoration and would like to offer support for Alternative 2.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 69-2	My issue with Alternative 3 is the use of Topanga Ranch buildings for overnight use by State personnel. If Topanga Ranch were instead used for a public purpose, that would be an improvement on any plan that intends to leave them in place.	Restoring the Topanga Ranch Motel would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes as would the preferred hybrid Alternative 3A.Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

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IND 69-3	Alternative 4 expands the beach which is a great benefit in California, but beach expansion is not the point here and the proposed retaining wall is a future problem, as can be seen up and down the coast where other retaining walls have been built and have failed. Generally, it is my belief that if this is a lagoon project, maximizing lagoon habitats and restoring the lagoon environment would seem to be the point.	The comment expresses concerns with Alternative4. The concerns of the scale of the retaining walls and associated geotechnical work was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 69-4	To that end I strongly disagree with the use of seepage pits or anything other than a sewer connection at PCH and Coastline. Sewage and alternate methods of its disposal have been a struggle in Malibu for decades and the ocean, waterways, and environment have suffered irreparable harm because of these shortsighted solutions. These half measures that negatively impact the environment need to stop. I was especially displeased and disappointed to see these suggestions within this project that purports to restore the lagoon. Further, I think the description of the sewer connection at PCH and Coastline is at best skewed. I have seen multiple estimates for this sewer line installation and none as high as the plan projected. Moreover, there is no discussion that a connection to the sewer at PCH and Coastline is a permanent, safer plan. Additionally, the commentary within the report (that I found no studies included to support) indicates that the soil conditions in this area are amenable to alternate methods of wastewater disposable. That is not an accepted conclusion by experts and entities who have performed soils and groundwater tests, come to the opposite determination, and opine that the County would not permit alternatives to sewer. Further, the plan omits that the County reimburses the costs of a sewer line when the sewer is dedicated to the County, so the actual cost is zero, not 9-10 million dollars. Additionally the report omits that other business along the sewer route are required to share the initial cost of installation. As there are at least 2 businesses to share in the cost, the lagoon restoration would be initially responsible for 3 million dollars, even accepting the report's 9-10 million dollar estimate. Further still, in providing analysis, the report neglects to factor in the offset cost of maintenance that the County would assume after dedication, as opposed to the ongoing maintenance of seepage pits and the like.	The existing DBH facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project

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		construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. The comment suggests that the cost of a sewer line would be borne largely by the County. However, it should be noted that the developer (in this case State Parks) would be responsible for the costs of constructing a public sewer extension and would be charged for use and maintenance. State Parks developed a hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative, including Wastewater Management Option 2 Seepage Pits. Field sampling at the seepage pit area showed the proposed site provided a large upland area with good percolation rates. System reviews and approvals required by the RWQCB and Los Angeles County would ensure that the system would meet public health standards. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 69-5	Further, the plan to bring the sewer connection into Sunset Mesa has already been tried and failed magnificently with the gas station. These hillsides are moving. The gas station admittedly dumped 35,000 gallons of sewage into the hillside and the environment before the spill was discovered. What should we assume the actual spill amount was if 35,000 gallons is what the gas station admitted? Further, as a resident of Sunset Mesa and downhill from the proposed sewer connection into Sunset Mesa's sewer system, I have an additional concern. The infrastructure in Sunset Mesa was built in the 1960's. It is not suitable to handle the homes that exist today and it is grossly unfair to tax Sunset Mesa further. Additionally, all residents here know that when sewer saddles need to be replaced or upgraded, it is the residents who are paying those costs. I personally paid those costs 3-4 years ago. Moreover, how long has Topanga Canyon now been closed because of a sliding hillside, which still cannot be contained, with no clean up in sight? Multiple sections of PCH are still cordoned down to one lane. How many times have homes in Sunset Mesa been uninhabitable because of slides? Who does not remember the slide under Coastline Dr. homes and onto PCH that cut off access to Malibu for months and required a specialty crane be brought in with the reach to clear the slide debris? These are known, ancient slides. Placing a sewer on this hillside is a ticking time bomb.	The Draft EIR identifies the need for Mitigation Measure GEO-1 and GEO-2 that require geotechnical studies be conducted during certain phases of the project to confirm adequacy of project designs. The Draft EIR concludes on page 3.6-23 that the installation of the sewer within PCH would conform to all appliable regulations to ensure impacts would be minimized. Although the need for appropriate geotechnical studies to inform the sewer design is implied as best practices under existing regulations, in response to this comment Mitigation Measure GEO-1 has been modified to require geotechnical studies of the wastewater option alignments to ensure best design practices. GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design. State Parks developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative, including Wastewater Management Option 2 Seepage Pits. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 69-6	You are bringing more people into the area and that will increase overtime. The number of parking spaces trumpets that. That is fantastic, as all Californians should be able to enjoy the natural beauty of the State we all support. Areas, such as Topanga Lagoon, that were mistreated in the past should be restored.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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IND 69-7	However, this project needs to address sewage issues and not repeat errors of the past and leave future generations to deal with the damage we create. Do it once and do it right.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. State Parks developed a hybrid alternative (Alternative 3A) that combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative, including Wastewater Management Option 2 Seepage Pits. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 69-8	Thank you for the opportunity to provide input.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Susan Mahler		
IND 70-1	I don't feel I know enough to make a choice. However, I remember many years ago the lower Topanga community of homes was completely removed so that the state could develop trails and other outdoor benefits for the public. I knew someone who lived there for years and was brokenhearted at the destruction of his community. The lower Topanga community was close knit and devastated when they had to move. As far as I know the state never opened the area up to the public with the trails and opportunities for hiking and walking and being in those natural surroundings. Now again we are being told that by removing the businesses and more, the public will benefit by being able to enjoy nature. Not sure this will happen. It didn't happen before and a close knit community was destroyed.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 70-2	What monies will be used to fund the projects including the proposed welcome center?	Funding for implementation has not yet been secured but is anticipated to be a mix of state and federal grant funds.
Karen Harper		
IND 71-1	To Whom it May Concern, I feel that the endangered fish, local habitat and rising sea level should be a top priority when making decisions regarding the Topanga Lagoon Restoration. Thank you for your consideration of the local natural habitat and its important role in the ecosystem.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Susan Nissman		
IND 72-1	To Whom it Concerns: Thank you for this opportunity to comment on the subject DEIR. And, thank you all who have dedicated themselves over the past many years to shepherding this critical restoration forward. As a 47+ years resident abiding within the Topanga Creek Watershed, home to Topanga Creek and its many tributaries, all still free-flowing natural streams without barriers or cemented channels — the vision that our currently threatened and compromised lagoon will finally and more naturally receive these waters, while also enhancing fish passage, native habitat, beach size, cleaner waters, public access, public safety, and protect against sea rise erosion, is clearly most comprehensively represented in Alternative 2. I was also struck by the many common actions proposed in all three alternatives, but believe Alternatives 3 & 4 unnecessarily limit the scope of improved and expanded habitats and beach expansion that Alternative 2 offers without sacrificing historical, interpretive elements, bridge and roadway improvements and public access benefits. Alternative 2 supports ALL beneficial uses for the public and the native habitat. Thank you again for this opportunity.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Cohen		
IND 73-1	I approve option two	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Christine Griffiths		
IND 74-1	Dear Mr. Ota: As a resident of Malibu since 2005, I've been drawn to this community for its rural charm and the natural beauty of its coastal environment. In my endeavor to contribute constructively to the decision-making process concerning the Topanga Lagoon Restoration Project, I've thoroughly immersed myself in the comprehensive 904-page Draft Environmental Impact Report (DEIR) and its additional appendices spanning nearly 3000 pages. This thorough review has enabled me to grasp the project's scope and implications, and I'm grateful for the opportunity to offer my insights to the lead agency tasked with making crucial decisions.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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IND 74-2	After careful consideration, I find myself advocating for Alternative 1: No Project/No Build, where it states there would be “no change to the lagoon footprint and now new bridge constructed.” This option, as outlined in the DEIR, represents a deliberate choice to preserve the existing environment and avoid potential negative consequences associated with the proposed project alternatives. My endorsement of Alternative 1 is grounded in several key concerns:	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 74-3	1. Lack of Post-Project Oversight and Enforcement Plan: The DEIR reveals a significant oversight in all three build alternatives: the absence of plans for additional staff or a united multi-agency department to manage day-to-day (and Nightly) issues post-construction. This oversight is particularly concerning given the documented degradation resulting from human activities, including graffiti, littering, water contamination, as well as current issues not mentioned in the DEIR which are 24/7 unhoused individuals camping, nightly building and use of fire pits, daily dog attendance and a growing number of theft and illegal activity, all of which pose ongoing threats to the area. Some of these current issues may be beyond the State Parks and Department of Beaches and Harbor Staff duties, but if the Project does not have a more unified and multi-agency oversight department, with a stringent and enforceable plan, it’s hard to imagine, these same type of issues will not be a threat in the future.	The Draft EIR concludes that the proposed project would not increase the potential for trash and human uses of the site compared to exiting conditions. Future maintenance of the various components of the project area would be managed by the landowners as is currently the case. The Draft EIR states on page 3.9-29 as noted in the comment that the improved visitor services facilities proposed by the project may result in reduced impacts of trash and water quality degradation. It is also anticipated that additional staff will be needed and will provide more staffing presence. Additional details can be found in **Appendix S** Operations and Operations and Maintenance Plan. The Draft EIR then concludes that the proposed project impacts would not result in a significant increase in trash and water quality degradation from visitor use.
IND 74-4	2.Uncertain Environmental Impact: The proposed relocation of endangered species, for the 5-7 years duration of construction, raises questions about the project's efficacy and the hypothesized successful outcome. Given the speculative nature of monitoring reports, the investment risk of $70 million, to increase the population and survival of Steelhead trout in the Topanga Lagoon watershed, seems unjustified without a clear understanding of the project’s success rate.	Impacts to Southern California steelhead are addressed on page 3.3-68 of the Draft EIR. Expansion and improvement of the lagoon to accommodate Southern California steelhead is a key objective of the project and identified as a priority recovery action by NMFS. The Draft EIR acknowledges in Table 2-6 that a Streambed Alteration Agreement would be necessary for work within CDFW jurisdictional drainages and compliance with the California Endangered Species Act through either Section 2081 or Section 2080.1 would be needed. As a result, CDPR will consult with CDFW as necessary to ensure compliance with the state requirements within CDFW's jurisdiction.
IND 74-5	3.Unnecessary Changes to Beach Access and Increased Fee-based Parking: Contrary to claims in the DEIR, current access to Topanga State Beach is not a significant issue, as there is direct access for the entire length of Topanga State Beach, ample free and fee-based parking (though the lot is often only ½ full) and an under-bridge pedestrian crossing pathway already in place. (Though there is NO signage or management/enforcement to the pedestrian pathway) The proposed alterations, in fact, restrict direct access, reduce free parking, re-introduce an under-bridge pedestrian crossing pathway but increase a fee-based parking lot. Restricting all parking for the 460 foot width of the bridge in each alternative, further creates potential walking congestion on PCH, radically changing the rural charm and accessibility that attract visitors, surfers and locals alike to this cherished coastal destination.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon.

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IND 74-6	4.Preservation of Historical Landmarks: The removal of the historical landmark Topanga Beach berm, (helipad) a clifftop edge offering the closest and unparalleled white water views of the coastline, in favor of expanding the lagoon mouth, represents a profound oversight with irreversible environmental and cultural implications. Other beachside, coastal landmark's, Arch Rock (1906) and Castle Rock (1920) were destroyed to make way for the roadway, in the same area. Moreover, such actions directly contradict the Coastal Commission's commitment to preserving unobstructed coastal access and view corridors for the public.	The fill area supporting the use of the knoll as a non-standard helipad is not eligible for listing. As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel is the only facility that has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32.
IND 74-7	In conclusion, Alternative 1: No Project/No Build offers a prudent course of action that prioritizes environmental preservation, community values, and responsible stewardship of our coastal resources. By reevaluating the project's objectives and embracing appropriate approaches to address existing challenges, we can ensure the long-term sustainability and vitality of Malibu's cherished coastal ecosystem for generations to come.	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 74-8	In light of these concerns, I urge stakeholders to reconsider the allocation of funds for the project and prioritize addressing existing threats and challenges facing the area. This includes enhancing enforcement efforts, maintaining crucial amenities such as the Topanga Beach Berm, and investing in infrastructure improvements that align with the community's needs and values. RECOMMENDATIONS FOR AGENCY STAKEHOLDERS: Move lifeguard station back - With the threat of sea level rise, the lifeguard station can be moved back Now and not have to wait for a project this big and EIR restricted to be proposed. Convert Topanga Ranch Motel to be low income housing for an artist community the area once housed. Add signage and Paint - add signage and paint over graffiti on pedestrian pathway under bridge. North side of Lagoon Restortation: Create dog friendly walking pathway around similar to George Wolfberg Park at Potrero Canyon in Pacific Palisades -	Regarding future uses of the Topanga Ranch Motel and other visitor services at the State Park, the Draft EIR acknowledges throughout the document that future improvements including the restoration of the Topanga Ranch Motel would likely require subsequent assessment and is therefore covered at a Programmatic level in this EIR. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Marti Whitter		
IND 75-1	We attended both of the local meetings that presented the findings of the DEIR to the public. We were extremely impressed by the quality of the analyses of the potential benefits and impacts under the alternative scenarios, especially that done for the nearshore environment and the surfing community. We were both born (1937,1952) and raised in southern California and spent much of our childhood and young adult years at southern California beaches, so we have witnessed first hand the transformation of the coastal built and recreational environment along with the drastic loss of significant coastal habitat over that time.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
IND 75-2	While the Topanga Motel is a wonderfully nostalgic reminder of a place where many people experienced memorable family beach adventures, it was part of a time with much less population pressure and greater social equality and accessibility. The same experience can not reasonably be recreated today, and the decades long controversies at Crystal Cove State Park highlight the problems that can arise by trying to re-create historic recreational facilities that can only be experienced by a miniscule proportion of the population. Preserving the motel buildings to serve other purposes (such as state park offices) at the expense of reducing unique and irreplaceable lagoon habitat does not appropriately balance the long term benefits and impacts of Alternative 2 vs 3. The development of the Topanga Ranch Motel was enabled largely because of the massive fill associated with the construction of the current PCH bridge. It seems perverse to consider the impact to the Topanga motel as a significant impact of Alternative 2, when maximizing the lagoon restoration would partially undo the massive damage that allowed for the motel development.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Restoring the Topanga Ranch Motel would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for visitor serving purposes that are aligned with State Parks mission. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 75-3	Only the native American cultural resources and the unique lagoon habitat with its associated rare and endangered species are truly irreplaceable going into the future. The alternative that best maximizes lagoon habitat area and climate resilience is Alternative 2 and should be adopted as the preferred alternative.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Chester Griffiths		
IND 76-1	See attached. Many thanks,	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 76-2	Introduction As a resident of Las Tunas Beach, I am encouraged to see the involvement of leading organizations in the Topanga Lagoon Restoration Project. The commitment to restore the lagoon to a more natural and rural state is a worthwhile effort; however, the broad scope and built-in alternatives of the project raise concerns. Outlined in the DEIR are focuses unrelated to the lagoon's environmental protection and rehabilitation; the project's extraneous proposals, separate from lagoon rehabilitation, ultimately challenge the entire project's efficacy and threaten a state of unnecessary environmental impacts for the lagoon's immediate communities - including, but not limited to, adjacent residents of Las Tunas Beach, residents and businesses of Topanga Canyon, the city of Malibu, public and private school busses, communicating drivers from the surrounding communities, and the longstanding Topanga Beach surfing community. Having lived and grown up on Topanga Beach Drive, I applaud the efforts to rehabilitate the Topanga Lagoon, Creek, and Topanga Motel, to a more natural, self-	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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	sustaining condition. As collective purveyors of this land and its identity, it is in the stakeholder's best interest "to preserve [the] unaltered natural resources and rural characteristics" 1 of the area. Any project that diverts from this collective mindset would be considered a failure. To honor the sanctity and spirit of the southern Topanga Basin, I recommend a process of incremental change, a piece-by-piece adaptation tackling the speedy and practical "fixes" of the area, rather than an extensive multi-scope restoration.	
IND 76-3	Benefits, continued areas of focus - Habitat restoration. The state of the lagoon is in dire neglect. As mentioned in public meetings, the presence of bird and dog excrement and human deposits is a primary cause of contamination and should be addressed accordingly. Increased state park staffing and public awareness of human involvement in water contamination will subside the human factor (signage, informative diagrams, and advocacy for best care practices).	As discussed on page 3.9-26 of the Draft EIR, the proposed Project's improvements to public access and improved visitor services, which would include more State Parks staff present, as well as additional support from the Los Angeles County Sheriff's Department may help with achieving greater enforcement of the no-dog and no-camping rules, which could help to reduce dog and human fecal sources.
IND 76-4	Restoring the lagoon north of PCH allows for increased biodiversity and a self-sufficient natural system that filters bacteria and maintains healthy water oxygen levels. North of PCH is mapped in the DEIR as a potential wetland, this area presents the best area for new walking paths and interpretive information as it would avoid the construction of a new bridge.	As discussed on page 2-10 of the Draft EIR, one of the project objectives includes expanding the lagoon ecosystem to improve seasonal estuarine hydrologic functions and to protect endangered species. As discussed on page 2-15 of the Draft EIR, the bridge improvements would provide a wider lagoon and improve fish migration and refugia. Under the No Build Alternative, there would be no change to the lagoon footprint, which is constrained by the narrow bridge span width, resulting in degradation of habitat quality in the lagoon and riparian areas and would not meet the project objective. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan.

Comment Number	Comment	Response
IND 76-5	Building a bridge in the way the DEIR presents will cause unnecessary issues of prolonged construction and traffic congestion. (further detailing pg.2)	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the landowners. The mitigation measures shown in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
IND 76-6	The Gateway Corner. Historically, this area was the “rodeo grounds,” a low-rent housing community that fostered a lively ensemble of artistic expression. This is an exceptional opportunity to restore what was once lost through public land capture. Opportunities include affordable overnight accommodations for beachgoers or campgrounds similar to Leo Carrillo.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. Each Alternative will result in modified concessions including the development of the Gateway Corner and the elimination of several of the existing restaurant and structures on site. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner and would retain one onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. The selection of hybrid Alternative 3A as the preferred alternative includes restoration of 15 units of the Topanga Ranch Motel and therefore also allows for development of additional visitors’ services. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.
IND 76-7	Emergency facilities and beach safety. Reallocating threatened emergency beach facilities, including the lifeguard tower, and infrastructural improvements to the emergency procedural resources and system are beneficial. Investing in these facilities will ensure a high degree of safety precautions and allow for more efficient means of evacuation from the beach in critical circumstances. The helipad’s location on the berm services much of central and eastern Malibu’s emergency evacuation needs, moving this crucial evacuation point onto the beach would threaten the speed and efficiency of emergency procedures. Centralized beach emergency facilities, including moving the lifeguard tower to a less threatening area along with improved beach surveillance infrastructure and storage for new and existing equipment, will create a safer, more responsible beach.	Under all Project Build Alternatives, the existing lifeguard and public restroom building would be rebuilt closer to the realigned access road at a higher elevation and farther from the ocean to provide additional protection from sea level rise. The helipad would be relocated to the east side of the lagoon for improved access by lifeguards and emergency responders. As noted on page 2-48 of the Draft EIR, removal of fill on the east side would be coordinated with maintenance of the helipad functioning at all times. The size and built elements of the new helipad would conform to all Federal Aviation Administration and County requirements and a new hydrant would provide water for wildland fire response. As noted on page 2-17 of the Draft EIR, an unpaved emergency route from PCH to the beach level on the southwest side of the lagoon would be constructed to allow lifeguard access. The building footprints of the proposed beach facilities would be similar to existing facilities and would therefore be similar in scale and size and would not have the scale to obstruct views of the Pacific Ocean.

Comment Number	Comment	Response
IND 76-8	Strategies for sea level rise. The DEIR presents motions to increase beach resilience against the threat of sea level rise - the most immediate being the relocation of the lifeguard and emergency facilities. Among the same provisions is dealing with the degree of sand displacement and erosion along the beach. The most vulnerable area to sand loss located at markers (1,2) 2 needs protection. A stable groin positioned west of marker 2, replacing the existing metal groin, will subdue the threat of sand erosion. Groins between markers 1 or other sand protection alternatives should be considered.	As noted in Section 2.5.3 of the Project Description, each of the Build Alternatives would increase coastal resiliency to the effects of sea level rise. This includes both providing greater protections for public amenities on the beach, including moving facilities inland, as well as creating a wider lagoon area and bridge length to attenuate fluvial storms to reduce erosion in the area. Placement of excavated sediments in the nearshore would increase sand along the coast, acting as a one-time beach nourishment for downcoast areas. Beach nourishment is a form of coastal resiliency as well. The placement location is carefully selected to avoid impacts to the current beach activities, minimize impacts to the marine environment and habitats, and maximize the benefits of beach nourishment. No new groins are proposed as part of the Project. The existing metal groin located west of the proposed project is outside of the project boundary and is located upcoast of the proposed project; hence, the proposed project will pose no impacts to the properties located west of the proposed project.
IND 76-9	Concerns - The Bridge. In all built alternatives, the existing bridge will be replaced to six-fold its size. The plan for new construction suggests an alternative bridge that diverts towards the beach through existing parking during the intermediate period until completion. This is not a viable option.	The design of the new bridge will be finalized to ensure that flows are directed towards the ocean and not towards the west. Each Alternative would include the widening of the PCH bridge from 79 to as much as 460' as described on page 2-15 of the Draft EIR. The expanded bridge span provides the opportunity for an improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise All of the proposed restoration avoids changing the beach and the wetted areas. The longer bridge will reduce constriction and allow flow, sediment, and debris to fan out to reduce the flood velocity and its erosive force. In addition, it will also lower the flood water level to improve flood protection. Allowing more sediment yield from the watershed to be delivered to the coast is positive for the beaches, potentially reducing the sand deficit due to upland development. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. As addressed in Comment 2, westward migration of the thalweg is constrained. The proposed pilot channel is within the main span of the bridge, and the modeling study has demonstrated that the thalweg will still be within the main span channel. The proposed bridge abutment and its erosion protection device will prevent further westerly migration. See Section 2.3 Master Response - Hydrologic Modeling
IND 76-10	Issues with this approach: construction delays lasting more than 5-6 years timeline, considerable noise pollution, added congestion to an already busy PCH, heavy construction equipment in a large public zone, the area is prone to flooding and mudslides, limited accessibility for emergency vehicles. PCH is the main artery in and out of Malibu, these 4 lanes must be recognized as the only access/.	As noted in Section 2.7, Project Construction, and Section 2.7.1, Schedule, construction activities would be conducted in phases, beginning with the Gateway Corner to provide continued coastal access parking. Construction and demolition in the Project area is anticipated to begin in 2027 with a total construction duration of 60 months. If an off-site sewer is chosen for wastewater management, it is anticipated that it would take an additional year for construction. Hybrid Alternative 3A has been selected however and includes development of seepage pits, not sewer.

Comment Number	Comment	Response
		Impacts related to noise are analyzed in Section 3.12, Noise and Vibration, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.12, Noise and Vibration, of the Draft EIR, the analyses of noise issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix N**, Air Quality, Greenhouse Gas Emissions, and Energy Data, Modeling, and Noise Calculations (ESA 2023). This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the land owners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. The new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
		As described in Section 3.12, all Noise and Vibration impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include NOISE-1, NOISE-2, and NOISE-3. Mitigation measure NOISE-1 would address noise impacts associated with operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work. Mitigation measure NOISE-2 would monitor construction noise to verify compliance with the applicable noise limits. Mitigation measure NOISE-3 would mitigate vibration and noise impacts related to pile driving. Details of these mitigation measures are discussed in Section 3.12 of the Draft EIR. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes. The Draft EIR identifies the need for Mitigation Measure GEO-1 and GEO-2 that require geotechnical studies be conducted during certain phases of the project to confirm adequacy of project designs. The Draft EIR concludes on page 3.6-23 that the installation of the sewer within PCH would conform to all appliable regulations to ensure impacts would be minimized. Although the need for appropriate geotechnical studies to inform the sewer design is implied as best practices under existing regulations, in response to this comment Mitigation Measure GEO-1 has been modified to require geotechnical studies of the sewer alignment to ensure best design practices.

Comment Number	Comment	Response
		GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design.
IND 76-11	Before any bridge alterations, other areas mentioned above should be handled first. Progression with achievable goals in mind will ensure a stable restoration. Considering that one of the project's primary objectives is to support the conservation of endangered species, such as steelhead trout and freshwater goby, it is imperative to address this aspect in the proposal.	As noted in Section 2.7, Project Construction, and Section 2.7.1, Schedule, construction activities would be conducted in phases, beginning with the Gateway Corner to provide continued coastal access parking. Construction and demolition in the Project area is anticipated to begin in 2027 with a total construction duration of 60 months. The project has been developed in a way to minimize the duration of disturbance to people and the environment, As discussed in Section 2.4 of the Draft EIR, some of the project objectives include expanding the lagoon ecosystem to improve estuarine hydrologic functions and to protect endangered species, improving water quality and restoring coastal wetland habitat and species diversity within the Topanga Creek watershed, and replacing the narrow 1933 PCH bridge to accommodate lagoon restoration and recovery of anadromous steelhead trout. Section 2.5.1 of the Draft EIR notes that expansion of the lagoon would protect and create essential wetland and riparian habitat for the tidewater goby, the juvenile southern steelhead, and many other native aquatic and terrestrial species.
IND 76-12	The Malibu Lagoon Restoration project, located approximately five miles away, is a successful precedent for facilitating fish passage. Given that this project positively impacted the same community, the proposal to undertake a similar initiative in Malibu—which could last between five to seven years—and cause substantial unintended results (erosion of sentiment near the Adamson house).	The concerns raised about the Malibu Lagoon restoration are not applicable to this project as that system has many different physical, chemical, biological and social conditions The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required
IND 76-13	This concern is heightened by the fact that the community is already vulnerable to natural disasters such as fires, flooding, and mudslides, in addition to experiencing significant traffic fatalities along the Pacific Coast Highway, which traverses the narrow 21-mile by 1-mile area.	Impacts related to wildfire are analyzed in Section 3.18, Wildfire, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. The mitigation measures include TRA-3 and FIRE-1 Mitigation measure TRA-3 would address potential traffic flow disruptions and would maintain operation of PCH for use as an emergency evacuation route at all times during construction in coordination with the City of Malibu Evacuation Plan and Los Angeles County emergency plans. Mitigation measure FIRE-1 would require State Parks to submit a fuel modification plan to the State Fire Marshal and Los Angeles County Fire Department to identify fuel modification zones around the Project area and the type of landscaping allowed. Details of these mitigation measures are discussed in Section 3.18 of the Draft EIR. The Draft EIR identifies the need for Mitigation Measure GEO-1 and GEO-2 that require geotechnical studies be conducted during certain phases of the project to confirm adequacy of project designs. The Draft EIR concludes on page 3.6-23 that the installation of the sewer within PCH would conform to all appliable regulations to ensure impacts would be minimized. Although the need for appropriate geotechnical studies to inform the sewer design is implied as best

Comment Number	Comment	Response
		practices under existing regulations, in response to this comment Mitigation Measure GEO-1 has been modified to require geotechnical studies of the wastewater alignments to ensure best design practices. GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design. This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan and TRA-4: Public Outreach Campaign. TRA-3 would address potential traffic flow disruptions and shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
IND 76-14	Existing concessions. Cholada, The Feed Bin, and Wylie's Tackle are valued within the community. They are integral to Topanga and Malibu residents as well as visitors of the area.	CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. This was considered when determining which buildings would be retained in the project alternatives. Also considered were the location of the buildings in relation to the alternatives for the lagoon footprint. The hybrid Alternative 3A was selected as the preferred alternative and includes retention of 15 units associated with the historic Topanga Ranch Motel and the building currently used by the Reel Inn. These buildings will be used for visitor services meeting the goals of the 2012 Topanga State Park General Plan. The concession(s) to be integrated into the visitor services area have not been determined and would occur through Parks standard competitive process. Furthermore, the closing of the existing concessions would be conducted in compliance with State Parks' lease agreements with each of the tenants.
IND 76-15	Traffic. By starting on an incremental and existing need for restoration, progressive construction around the basin will be minimal and sectioned, avoiding drastic traffic increases	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant with mitigation. The Draft EIR identifies mitigation measure TRA-1 that includes the preparation of a Caltrans-required Traffic Management Plan as well as other features. In response to comments received on the Draft EIR, TRA-1 has been divided into four separate mitigation measures to better assign responsibilities of implementation among the land owners. The mitigation measures show in Section 3.2 of this Final EIR include TRA-1: Traffic Management Plan, TRA-2: Construction Parking Plan, TRA-3: Emergency Evacuation Plan, and TRA-4: Public Outreach Campaign. The Transportation Management Plan would address potential traffic flow disruptions and shall comply with Caltrans standards and require Caltrans approval. TRA-3 also requires preparation of an Emergency Evacuation Plan that will incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan. The Emergency Evacuation Plan would be developed in coordination with City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments and police departments that have jurisdiction within the Project area. The Construction Parking Plan required under TRA-2 would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR.

Comment Number	Comment	Response
		As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.
IND 76-16	Conclusion The way forward is step by step. An approach that recognizes the achievable and timely aspects of restoration will be successful.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 76-17	An additional recommendation is to involve community members in the design process. The community already exists, and the leading agencies have a responsibility to design in accordance with their values. Locals are a wealth of knowledge and an excellent resource to solve for design solutions. Consider the legacy of restoration, who will be involved in its creation, and which voices will contribute.	Comments expressing interest in the design phase are noted. It is anticipated that public meetings will be held at milestone steps (such as an initial design charette and at 60%, 90%, etc. during the design process. No additional response is required.
IND 76-18	Thank you for your consideration.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Brian Cinadr		
IND 77-1	I'm a 30 year resident of Topanga. It's my belief that maximizing the lagoon, which I believe is alternative 2, should be the priority. Investing in "restoring" the natural habitat will easily pay dividends as opposed to spending money on man made infrastructure that won't add to the environment.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Holly Beverly		
IND 78-1	"I'm a Topanga resident and strongly support the "maximum lagoon habitat" proposal. Please let me know if you need any additional information from me, thank you."	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Sunset Mesa Property Owners		
IND 79-1	Dear Sir or Madam: This will provide the comments of Sunset Mesa Property Owners Association, Inc. (SMPOA), a community of 450 residential homes, on the Draft Environmental Impact Report (DEIR) dated February 2024 for the Topanga Lagoon Restoration Project (Project). The SMPOA homes are those depicted in the DEIR in Figure 2.1. All of the homes depicted closer (west) to the Project and not within the denoted "City Limit" line in that figure are part of SMPOA. As Figure 2.5 shows in an inset, all of the SMPOA area is within unincorporated Los Angeles County. Although the SMPOA community is outside the defined boundary of the Project as depicted in the DEIR, it is immediately adjacent to the Project and the California Environmental Quality Act (CEQA) requires a regional perspective. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 575 ["an EIR may not ignore the regional impacts of a project proposal, including those impacts that occur outside of its borders; on the contrary, a regional perspective is required"]. As a residential community whose sole entrance to and egress from its residential neighborhood is via Pacific Coast Highway (PCH), SMPOA has the following comments. 1. We generally agree with the need to restore the Lagoon and upgrade various beach facilities in the Project area.	The Draft EIR provides a comprehensive analysis of potential environmental impacts locally and regionally. The scale of the assessment is defined in each Environmental Setting section in Chapter 3. Each topic area has a different study area. Regional impacts including impacts to neighboring residential areas that may be affected bu construction are assessed throughout the Draft EIR. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
IND 79-2	2. SMPOA prefers the wastewater upgrade option that the DEIR describes as an Advanced On-Site Wastewater Treatment (AOWTS). This type of on-site disposal seems to better accommodate sustainable growth (or restoration) in this area and avoids the multi-million-dollar construction project that would be required in the alternative— connection to a public sewer connection.	The comment expresses preference for AOWTS as the wastewater option since it avoids impacts of Option 3, installation of a sewer in PCH. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 79-3	3. SMPOA prefers the AOWTS because it also will reduce traffic impacts caused by the alternative (public sewer connection in the Cal Trans right-of-way) due to the need in that public sewer alternative to have trucks idling (with associated diesel fumes) at the Coastline Parking Lot. (See Figure 2-8 in DEIR). PCH is a fragile road system, as is demonstrated currently by the impactof the Tramanto landslide, which has closed one of two northbound lanes immediately south of the Coastline Parking Lot and compounded driving problems for all individuals in this immediate area.	The comment expresses preference for AOWTS as the wastewater option since it avoids impacts of Option 3, installation of a sewer in PCH. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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IND 79-4	4. SMPOA is concerned that any substantial construction in the Project area could likely result in a "spill-over" of beach traffic into the very limited public parking areas on PCH directly opposite Sunset Mesa. Our community has been adversely impacted (and still is impacted today) by individuals with RVs or bus-like vehicles who elect to park on a full-time or nearly full-time basis in this limited parking. SMPOA has contacted Supervisor Horvath's office about this problem and has also complained to the County Sheriff's Department about this issue. Any construction within the Project area should not be an excuse to simply shovel individuals seeking parking access "further down" (east) toward Sunset Mesa.	Illegal parking is the responsibility of Caltrans on PCH, CDPR north of PCH, and the County of Los Angeles DBH south of PCH. As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of illegal parking and unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.
IND 79-5	5. SMPOA requests that to the extent that the final selected alternative does involve a public sewer connection, that connection should not in any way run through Sunset Mesa. Any sewer line connection should be routed through an existing CalTrans right-of-way on PCH and not through this community.	The Draft EIR describes installation of a sanitary sewer within PCH as Option 3 of the wastewater system solutions. As described on page 2-41, the sewer alignment would be maintained within the Caltrans alignment and would not encroach onto neighboring properties to the extent feasible. Installation of a sewer within PCH would be required to conform with Caltrans Utility and Encroachment policies. State Parks in coordination with project partners has selected hybrid alternative (Alternative 3A) as the preferred alternative, which includes Wastewater Management Option 2: Seepage Pits. A sewer line is not part of the preferred alternative. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 79-6	6. SMPOA requests that to the extent that the final selected alternative does involve a public sewer connection running through the Cal Trans right-of-way at the bottom of the hillside below Sunset Mesa (Figure 2-8), SMPOA requests that a separate geological-hydrogeologic study be conducted to ensure that there are no environmental impacts to the slope and hillside due to construction of sewer pipeline materials at the bottom of the hill. Again, we reiterate that we are in an area of known landslides, with both slides at Tramanto and also in Topanga Canyon Road. While the slope supporting Sunset Mesa has not recently experienced a landslide, it is fragile and an additional study to ensure no adverse environmental impacts is appropriate pursuant to CEQA.	Installation of a sewer within PCH would be required to conform with Caltrans Utility and Encroachment policies. The Draft EIR identifies the need for Mitigation Measure GEO-1 and GEO-2 that require geotechnical studies be conducted during certain phases of the project to confirm adequacy of project designs. The Draft EIR concludes on page 3.6-23 that the installation of the sewer within PCH would conform to all applicable regulations to ensure impacts would be minimized. Although the need for appropriate geotechnical studies to inform the sewer design is implied as best practices under existing regulations, in response to this comment Mitigation Measure GEO-1 has been modified to require geotechnical studies of the wastewater alignments to ensure best design practices. GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design.

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		After considering this concern and other agency and public comments, State Parks in coordination with project partners has selected hybrid alternative (Alternative 3A) as the preferred alternative, which includes Wastewater Management Option 2: Seepage Pits. A sewer line is not part of the preferred alternative. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
IND 79-7	7. To the extent that the final selected alternative does involve a public sewer connection, then SMPOA requests that the proposed "Public Sewer Pipeline Proposed Staging Area" shown at the Coastline Parking and View Deck area (Figure 2-8 in DEIR) be strictly limited in times used for those trucks. SMPOA further requests that all trucks be either electric vehicles or hybrids to reduce the potential emission of diesel fumes from idling trucks. Wind patterns in this area often result in emissions from PCH impacting Sunset Mesa residents. Both Greenhouse Gas (GHG) emission considerations and human health considerations strongly support a mandatory "EV-only" policy for such trucks.	The Draft EIR identifies the potential impact to traffic from construction in Section 3.16 and to air quality in Section 3.2. The Draft EIR requires implementation of Mitigation Measure TRA-1 which applies to all construction activities associated with the Proposed Project including the sewer along PCH. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. A sewer option is not included. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

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RWG Law – Laurence Wiener		
IND 80-1	Attached please find a copy of my letter. The original will be sent to you via U.S. Mail. Dear Mr. Ota: Our firm represents an unincorporated association of concerned residents and homeowners who live to the west of the Topanga Lagoon (the "Association"). On behalf of the Association, we submit the following comments on the Draft Environmental Impact Report (State Clearinghouse No. 2022050478), dated February 2024, which was prepared for the proposed Topanga Lagoon Restoration Project (the "Project"). The Draft Environmental Impact Report ("DEIR") was prepared by ESA for the California Department of Parks and Recreation ("State Parks"). Based on the numerous comments set forth below and attached hereto, the Association believes the DEIR fails to comply with the requirements of the California Environmental Quality Act (Pub. Res. Code §§ 21000, et seq.) ("CEQA"), and the State of California Guidelines for the California Environmental Quality Act (14 Cal. Code Regs §§15000 et seq.) ("CEQA Guidelines"). The Association's interests in this matter include ensuring that the proposed project does not adversely impact their homes. Based on the glaring defects and inadequacies in the DEIR, the Association requests that State Parks suspend any further consideration of the Project until the Project is revised to eliminate serious adverse impacts to their homes and the surrounding area and until a DEIR that fully discloses the potential impacts of the Project and fully complies with all other CEQA requirements has been prepared and recirculated for public review and comment. The Association objects to any further action on the Project until the necessary Project revisions and environmental review has been completed. The Association believes, for the reasons explained in the comments below and in the comments provided in the letter prepared by ENGEO Incorporated dated April 12, 2024 and incorporated herein, that the DEIR fails to conform to the requirements of CEQA, is fundamentally misleading and incomplete and thus fails to meet CEQA public disclosure policies, and must be substantially revised and recirculated for more meaningful public review before it can be relied upon by State Parks to make any determination as to the Project. While the Association is dismayed by the lack of involvement to date of the closest property owners, the Association hopes to be notified early of a revised and recirculated DEIR or any alternative project. The Association reserves the right to submit further comments. Very truly yours, Laurence S. Wiener	The comment makes unsupported claims about the adequacy of the Draft EIR but defers specific comments to the body of the letter. This comment does not provide new information or analysis. No additional response is required. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public, as well as email, mailings, social media postings and website updates about the project over the last four years. A separate landowner meeting was held on 3/28/24 during public review for the residents, Details on these meetings are provided in responses to comments later in this letter.
IND 80-2	The DEIR fails to provide "an accurate, stable and finite" project description on which to comment. "[A] project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading. [Citation omitted.] 'Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against	The comment suggests that the project description is not "stable" since multiple alternatives are evaluated at an equal level of detail and a preferred alternative is not identified. As noted in the Project Description of the Draft EIR, each of the Alternatives possesses numerous common features including the enlargement of the Topanga Creek Lagoon, the extension of the bridge on PCH, and the modification of visitor services within the State Park and on the beach. The differences between the Alternatives are refinements of the footprint associated

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	its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal i.e., the 'no project' alternative[ ], and weigh other alternatives in the balance.' [Citation omitted.]" " '[A]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.' " [Citation omitted.]" Washoe Meadows Community v. Department of Parks & Recreation (2017) 17 Cal.App.5th 277, 287. The DEIR does not identify a proposed project, but describes four different alternative projects under consideration and relies on these alternatives, or shifting amalgamations of the three build alternatives, to assess potential environmental impacts. The EIR must identify a proposed or preferred project and also identify alternatives to that proposed project; it is not sufficient to simply set forth a range of possible alternatives without identified a proposed project. Id. The failure to present a proposed project and several clear, distinct alternatives leads to faulty analysis through the document making it impossible for the public to adequately evaluate the Project and for a decisionmaker to make an informed assessment on the environmental impacts of the Project. A decisionmaker, member of the public, or other interested party therefore has no way to assess the impacts of the proposed projects, or the distinct alternatives with varying project features, without a stable project description. For example: (i) how much will the lagoon footprint be expanded and how many channels will be included (how much grading is needed, where will it occur, and what grading plan will be followed?)?; (ii) how will wastewater be managed?; (iii) will the Project realign PCH? (iv) will the Project reuse the sediment dredged from the lagoon beach, or dispose of it off site?; (v) will the Project keep the Topanga Ranch Motel and restore it, or completely remove it?; (vi) where are the emergency access routes and beach facilities to be located? These are just a few examples of questions about how shifting Project features are described throughout the document. "A DEIR that states the eventual proposed project will be somewhere in 'a reasonable range of alternatives' is not describing a stable proposed project. A range of alternatives simply cannot be a stable proposed project." Id. at 288. Here, the DEIR does just that, describing the "Project" in Section ES 3.1 as one of several potential alternatives or some yet-to-be described hybrid alternative: "Four alternatives were identified to restore Topanga Lagoon….These alternatives allow consideration of the benefits and challenges of the different restoration approaches. A final "preferred" alternative will be selected at the end of the environmental review process that best meets the Project's needs while minimizing adverse environmental impacts. The Proposed Project alternatives provide different road maps to restoring the lagoon area and adjacent seasonally wetted and riparian habitats, buffering resources from future SLR, providing visitor serving functions, and meeting the Project objectives….[¶]This EIR has identified and analyzed a range of possible Project alternatives. Each alternative includes multiple components that have been fully analyzed for potential environmental impacts. As State Parks considers which alternative to approve, some components from multiple alternatives may be combined to create a hybrid alternative. These could include inclusion of more than one wetted lagoon channel on the west side; road alignment and Topanga Ranch Motel configurations; implementation of living shoreline elements; alternative	with the grading plan that would decide the fate of the Topanga Ranch Motel. Other refinements include the type of wastewater management system to be installed and the final alignment of the newly constructed bridge. Each of these Project refinements is analyzed in detail and Mitigation Measures are identified throughout the Draft EIR that apply to all three Build Alternatives equally. None of the Mitigation Measures are specific to an Alternative. As a result, the public has been given all the information needed to understand the significance of impacts for all project components and the Mitigation Measures that will be applied irrespective of the Alternative selected as the preferred Alternative. All significant impacts are clearly identified for each Alternative. As a result, the project evaluated in the Draft EIR is stable and clearly defined both in the location and impact significance, with refinements of certain components identified as Project Alternatives. The comment cites Washoe Meadows Community v. Department of Parks & Recreation (2107) 17 Cal.App.5th 277, 287. However, this same opinion describes situations in which the presentation of a small number of closely related alternatives would be acceptable since mitigation measures would apply equally to each Alternative, concluding that the public was given sufficient information to understand the significance of impacts of the project and the mitigation measures that would be applied. With the impacts and mitigation measures identified in the Draft EIR, applicable to each of the Alternatives, no information has been omitted. As a result, the Draft EIR is consistent with CEQA's informational requirements, providing a comprehensive analysis of potential impacts for each project component. Recirculation merely to identify the preferred Alternative without adding any new information is not warranted. The Draft EIR notes in several locations (e.g., Draft EIR pp. 1-1 and 2-14) that a preferred Alternative will be selected prior to the Final EIR being considered for certification. The reason for this approach is to allow the lead agency (CDPR) and Responsible Agencies (Caltrans and County) the benefit of receiving public input on the environmental impacts of the Alternatives and stated preferences by stakeholders prior to determining the final designs. Allowing the public to opine on a preferred Alternative increases public participation in the process and is a common practice by both CDPR and Caltrans, who is a partner and Responsible Agency in this process. In fact, of the approximately 100 commentors on the Draft EIR, the majority stated a preference for one or another Alternative, which demonstrates that commentors were well aware of what they were commenting on. CDPR has identified a preferred Alternative that will be available to the public prior to the certification of the Final EIR. CDPR will consider approving the Project based on the analysis conducted for each Alternative and stakeholder feedback provided during the Draft EIR public review process. (See Final EIR, Section 1.3 Preferred Alternative)

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	emergency access routes to the beach; and final placement of relocated beach facilities and helipad." (p. ES-2 to 3.) This is contrary to CEQA's requirements. The presentation of different alternative projects in the DEIR without the designation of a stable project is an obstacle to informed public participation. Thus, the DEIR is fundamentally flawed and needs to be significantly revised to include a stable project description and recirculated pursuant to CEQA Guidelines Section 15088.5.	
IND 80-3	The DEIR fails to identify and analyze the significance of the impacts before proposing mitigation measures. The DEIR universally fails to separately identify and analyze the significance of the impacts before proposing mitigation measures. The DEIR includes Mitigation Measures in the analysis of each impact discussed in Chapter 3 of the DEIR. Further, for each impact section the DEIR does not provide a significance determination of the impact prior to incorporating mitigation measures, but rather solely provides a significance determination for each impact that includes mitigation measures as applicable. These failures to meet the CEQA requirements subvert the purposes of CEQA by omitting material necessary to informed decision making and informed public participation. See Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645, 658. The DEIR precludes both identification of potential environmental consequences arising from the Project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. For a specific example of this failure, see the analysis of AES 3.1. The construction light and glare impacts are described as less than significant with mitigation incorporated. There is no analytical discussion of the potentially impact; rather simply a cursory statement that mitigation measure AES-1 would shield lighting from light-sensitive land uses. The EIR must indicate whether the Project's environmental impacts would be potentially significant if mitigation measures were not adopted and separately determine if mitigation measures described in the EIR would substantially reduce or avoid the identified significant impacts. Thus, the DEIR should describe the impact. Light and glare would create a significant impact to the nearby homes, which are considered sensitive uses. While this letter cites this specific example, this flawed analytical approach exists throughout the document across impact analysis sections. The DEIR must be significantly revised to identify and analyze the significance of each impact before proposing mitigation measures so informed decisions can be made and recirculated pursuant to CEQA Guidelines Section 15088.5.	The Draft EIR clearly identifies the significance of impacts both in the analysis and in the summary tables provided in each resource topic section. For every potential impact, a summary table is provided listing impacts that are less than significant with mitigation or for impacts that are not significant and do not require mitigation. For example, Section 3.1.4 summarizes the impact conclusions for aesthetic impacts on page 3.1-38; Section 3.2.4 summarizes the impact conclusions for air quality impacts on page 3.2-72; Section 3.3.4 summarizes impacts to biological resources on page 3.3-105, etc. for each topic addressed in the Draft EIR. The intent of the summary table is to provide the distinction between significant impacts that are reduced to a less than significant level due to the imposition of mitigation measures. Inserting a pre-mitigation conclusion of significance statement prior to mitigation often confuses the reader. As a result, for impacts requiring mitigation to be less than significant (such as the example provided in the comment for light and glare), the Draft EIR is consistently formatted to describe the impact and then identify whether mitigation is required to result in less than significant impacts. An impact conclusion statement is included after every impact in the Draft EIR concluding whether an impact is less than significant with mitigation or does not need mitigation. The reader is provided all the information needed to understand the nature of the impact and its significance compared with the clearly provided thresholds and whether mitigation is required to reduce the impact to a less than significant level. For example, using the assessment of light and glare (impact 3.1-4, page 3.1-34) referenced in the comment, the Draft EIR states the following: "The proposed beach facilities could require new exterior daytime and nighttime lighting for operational and security purposes. These facilities could also create glare depending on the kinds of paint and coating, windows, or other features used for the buildings. This lighting and reflective surfacing could create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area." This statement identifies that an impact could result if the project were poorly implemented. To ensure that the potential impact is considered and a consequent significant impact avoided, the analysis continues: "Implementation of Mitigation Measure AES-2 would require any permanent exterior lighting on buildings/structures to be shielded and directed downward to avoid light intrusion onto surrounding land uses. Mitigation Measure AES-3 would ensure that the proposed beach facilities would be designed to minimize glare or reflection. As a result, impacts associated with light and glare during operation of proposed beach

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		facilities would be reduced to a less than significant level." (Draft EIR page 3.1-35) This impact identification and the requirement of mitigation to avoid a potentially significant impact is compliant with CEQA analysis standards outlined in Section 15126 et. al. of the CEQA Guidelines. This same method is appropriately used for each of the topics addressed in the Draft EIR where mitigation is needed to avoid potentially significant impacts.
IND 80-4	The DEIR failed to meaningfully involve and consult nearby residents and community members in the project or DEIR. An EIR is intended "to demonstrate to an apprehensive citizenry that the agency has … analyzed and considered the ecological implications of its action." No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 86, supplemented (1975) 13 Cal.3d 486. An EIR is intended to give the public and public agencies the information they need to make informed decisions, advancing "informed self government." Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 563. To these ends, agencies preparing an EIR should consult with persons or organizations concerned with environmental effects of a project early in the CEQA process. CEQA Guidelines § 15083. Residents and landowners adjacent to the western Project Site boundary line, and further westward down Las Tunas beach, should have been contacted related to the potential imminent dangers to the environment, including the general area west of the Project Site containing their properties, as a result of the Project early in the CEQA process. Their concerns with respect to project impacts to their property should be evaluated and disclosed in the DEIR, and avoided or mitigated to the extent possible. As a result of the failure to meaningfully engage this community early in the CEQA process, the DEIR, as stated elsewhere in these comments, fails to adequately describe and analyze Project impacts.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). Residents from the adjacent homes participated in these meetings. Also of note, press releases were sent out to all local papers for NOP, NOA and annual public meetings. Emails, social media updates, and website updates have occurred in advance of each annual meeting. Onsite posting occurred for these periods as well. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. A separate landowner meeting was held on 3/38/24 during public review for the residents, and some residents also attended a surf technical meeting during which local surfers provided information for modeling efforts.
IND 80-5	The DEIR fails to study for impacts within the generally affected area of the Project, including those related to the damage of properties immediately adjacent to the Project site. CEQA requires that an EIR describe and analyze significant effects of a proposed project on the environment. PRC § 21100(b)(1); CEQA Guidelines § 15126.2(a). CEQA broadly defines the "environment" as the physical conditions "existing within the area which will be affected by a proposed project. PRC §21060.5. The project area does not define the relevant environment for purposes of the CEQA when a project's environmental effects will be felt outside the project area; thus, agencies have an obligation under CEQA to consider geographically distant environmental impacts of their activities. "[T]he purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the	The Draft EIR identifies project boundaries throughout the document, noting the residential properties adjacent to the project to the southwest on page 3.2-28 and 3.12-20. The Draft EIR Section 3.2 Air Quality conducts an extensive analysis on sensitive receptors that expressly include the residences to the southwest of the project area. Further, the Draft EIR Noise Section conducts a construction noise analysis that expressly identifies impacts to residences southwest of the project site in Table 3.12-5. Impacts to traffic near the residence are clearly described in the Draft EIR Section 3.16.3. Significance thresholds are clearly identified in each section. Mitigation Measures for air emissions, noise, and traffic are identified to ensure impacts are reduced to less than significant levels. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This

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	effects a project will have on areas outside of the boundaries of the project area." Muzzy Ranch Co. v. Solano County Airport Land Use Com. (2007) 41 Cal.4th 372, 387, as modified (Sept. 12, 2007). Here, the CEQA process is undermined and the DEIR is flawed because it fails to describe and analyze impacts to the environment in general to the areas west of the Project boundary. For example, the DEIR fails to study potential damage, due to the Project, to the single-family homes west of Topanga State Park, approximately 100 feet from the Project boundary, which includes the westward expansion of the Topanga Lagoon in the various iterations of the Project described in the EIR, changes to the beach, and removal of current topographic features like the existing dirt knoll to the west of the current lagoon mouth and the helipad. These homes may be damaged due to flooding, foundation damage, changes to beach erosion leading to ocean wave damage, or debris flow due to a westward-shifted and widened lagoon. The DEIR lacks description of the potential impacts and fundamental analysis of the severity of such potential impacts necessary to enable a decisionmaker to make an informed decisions on the Project, require mitigation measures to avoid such impacts, if possible, or revise the project to avoid such impacts. The DEIR provides conclusory statements that: "No residences would be condemned or displaced by the Proposed Project construction or operation activities." (p. 3-6.) The DEIR does not, however, support this conclusion or adequately describe or analyze whether the potential impacts described above would cause impacts that would cause a loss of function of these properties or effectively displace these residents. Further, the DEIR does not adequately describe or analyze impacts related to noise, dirt and air quality, and traffic disruption from the excavation of the beach or construction of PCH-Bridge specifically with respect to the adjacent properties to the west of the Project site. The failure to address potential impacts to adjacent properties extends to the Appendices. For example, the morphology study (Appendix B) fails to analyze the beach abutting the single-family homes west of Topanga State Park, approximately 100 feet from the Project boundary, as a potentially impacted area. (p. 3 of Appendix B.) The DEIR must be revised to study and describe project impacts on these properties.	conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in Appendix B focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.
IND 80-6	The DEIR fails to analyze the impacts of depositing the beach fill in the ocean on the properties west of Topanga State Park adjacent to the Project boundary if removed fill is placed nearshore. Some iterations of the Project appear to involve movement of fill to be placed nearshore. This option is subject to approval by the United States Army Corps of Engineers (USACE). There is limited description or analysis of the potential impacts from the option to place such fill nearshore with respect to potential impacts to the area west of Topanga State Park, including to the homes adjacent to the Project site. Impacts of this decision should be fully evaluated and disclosed, including	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study

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	impacts to the properties and impacts related to contributing to potential beach erosion, especially in light of downdraft effect of the potential “land mass” resembling a current impedimentary structure.	(Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. A nearshore morphology analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and balancing the marine environmental impact and beach nourishment benefits. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The modeling conducted for the project also estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Erosion of the beach west of the lagoon is a large-scale process occurring throughout the local littoral cell that is independent of the project. The western beaches are located upcoast of the project and therefore out of the reach of project effects due to the west to east ocean current direction in this location. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand northeastward. As a result, Topanga State Beach may not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions.

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IND 80-7	The DEIR must describe and analyze additional alternatives that avoid or reduce impacts. An EIR must describe a reasonable range of project alternatives sufficient to permit informed decision making and public participation. 14 Cal Code Regs §15126.6(a). An EIR must focus on alternatives that eliminate or reduce significant environmental impacts. Pub Res C §21002; 14 Cal Code Regs §15126.6(a)–(b). The DEIR fails to include adequate alternatives to allow decision makers to make informed decisions to reduce Project impacts. For example, there is no alternative where the western bank of the lagoon remains undisturbed from existing conditions. This alternative would reduce construction noise impacts by shifting grading and other construction activates away from the sensitive uses adjacent to the western boundary of the Project Site. Furthermore, this alternative would preserve the existing berm/dirt knoll upon which the helipad is located, providing several project benefits, including: 1) maintaining a feature that protects against flooding of nearby homes and prevents beach erosion, 2) maintaining more direct emergency access for first responders traveling from Malibu to the helipad, and 3) maintaining a high viewer exposure vantage point on the knoll. The DEIR must be revised to include adequate alternatives that avoid potentially significant project impacts with respect to the properties adjacent to the Project boundary.	The EIR assesses four Alternatives including the No Project Alternative at an equal level of detail. Section 6.0 provides a clear comparison of these Alternatives and identifies the environmentally superior Alternative. This conclusion is based on the ability to avoid significant impacts of the project. Hydrologic modeling was conducted for each of the Alternative designs as described in **Appendices B and E.** None of the Alternative grading plans would result in potentially significant foll impacts to neighboring residences. See Master Response Hydrologic Modeling
IND 80-8	The DEIR fails to adequately disclose maintenance requirements and related impacts at the Project Site. An EIR must identify and describe the significant indirect environmental impacts that will result from the project. 14 Cal Code Regs §15126.2(a). An indirect environmental impact is a change in the physical environment that is not immediately related to the project but that is caused indirectly by the project. 14 Cal Code Regs §15064(d)(2). Indirect effects are changes to the physical environment that occur later in time or farther removed in distance than direct effects. 14 Cal Code Regs §15358(a)(2). Both short-term and long-term effects should be included in the analysis. 14 Cal Code Regs §15126.2(a). The DEIR fails to adequately disclose and analyze impacts related to maintenance of the proposed Project. As Association members can testify, maintenance in and around the Project Site is an extremely poor and their appears to be no plan to improve it. The DEIR states that: “A detailed operations and maintenance plan is found in Appendix M, which provides roles and responsibilities for each landowner, especially with regard to the restored lagoon area.” (p. 2-52.) Appendix M is a the Topanga Lagoon Restoration Ecohydrology Report: Fish Passage, Fish Habitat Suitability and Habitat Zone Elevations. There does not appear to be a detailed operations and maintenance plan in Appendix M as noted in the DEIR. Appendix L is the Conceptual Habitat Restoration and Adaptive Management Plan. Section 5 briefly discusses a 5 year maintenance plan and Section 7.2 provides a cursory discussion on long term management. However, the discussion largely indicates that long-term management will be the responsibility of the Project landowners and that such landowners will need to identify sources of long-term	The Draft EIR addresses impacts of the proposed project based on the baseline condition, defined in CEQA 15125 as the condition at the time the NOP is published. The comment notes that under the existing condition, the “Project Site is an extremely poor and there appears to be no plan to improve it.” This statement does not address the adequacy of the Draft EIR, but rather points out a need for future maintenance to occur. The comment correctly points out that the proposed Operations and Maintenance Plan was not included in the Draft EIR. This was an accidental omission. To rectify this omission, the proposed Operations and Maintenance Plan has been included in the Final EIR as **Appendix S**. The addition of the Operations and Maintenance Plan addresses the comment’s initial point that some sort of Operations and Maintenance Plan is needed to improve conditions. The comment references the 5-year Operations and Maintenance Plan identified in **Appendix K** Biological Resources Assessment and **Appendix L** Conceptual Habitat Restoration and Adaptive Management Plan. These plans refer to maintenance of the planted vegetation and restored lagoon habitat only. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management. It is anticipated that additional staff will be needed. The Draft EIR concludes that the project site would be subject to an updated maintenance regime that would be implemented by each of the landowners. The Draft EIR concludes that implementation of this new Operations and Maintenance Plan would not worsen the existing condition, but rather may improve

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	maintenance funding. There is inadequate discussion in the DEIR of the impacts associated with failure to maintain the Project Site which is a foreseeable result if there are not sufficient commitments to fund maintenance of the property and facilities at the Project Site. Furthermore, the DEIR is internally inconsistent and misleading with respect to the maintenance required by the Project. When describing the proposed Project, the DEIR occasionally acknowledges that the "Operation of the Proposed Project would require periodic maintenance similar to existing maintenance in the Project area." (p. 3.8-26.) Yet at other times describes the maintenance requirements as significantly more than existing conditions, for example stating that: "Management and maintenance of the restored lagoon area and any expanded visitor services could require significantly more operations and maintenance efforts at least for the first five to 10 years post-implementation." (p. 2-52.) The DEIR does not clearly or consistently describe ongoing maintenance obligations, how those would be supported, or the impacts associated with the failure to maintain the Project Site. Additionally, the DEIR fails to support assumptions that existing conditions will be improved due to enhanced maintenance. When describing the no build alternative, the DEIR often describes the Project Site as subject to deterioration and unauthorized use. For example, the DEIR references unauthorized fires set by the unhoused. (p. 3.18-21.) But, the DEIR fails to address how the proposed Project will marshal sufficient maintenance resources to prevent the existing maintenance and management related deterioration and resulting impacts the site faces in existing conditions from persisting. The DEIR must be revised to accurately, consistently, and completely describe maintenance obligations and the potential impacts resulting from inadequate maintenance during the Project's operational life.	maintenance compared with existing conditions as more staff will be present in the project site.
IND 80-9	The Project does not universally increase current access to the coastal area. The DEIR on one hand cites improved access to the coast and ocean to fulfil Coastal Act policies, yet on the other hand notes that the Project - in Alternatives (Alternatives 2, 3 and 4) - is forecast to result in fewer daily vehicle trips as compared to the existing commercial uses and further the Project provides less available parking to the public to facilitate access to the coast. Thus, the Project does not universally increase current access to the coastal area. The DEIR should accurately reflect where the Project could reduce coastal access.	Coastal access IS improved by the project via additional and more appropriately distributed parking and access routes to reach all key areas of the beach (parking is not currently available near E and W end of beach, a developed trail system that allows connect across PCH on both sides of the creek (only one side currently exists). Current concessions (2 restaurants, one farm/furniture store, one wine bar and one bait shop) are generally not focused on coastal access/recreation and their parking lots are generally available to customers only and not the visiting public. The project improves coastal access by developing visitor serving facilities. Parking levels are intended to maintained during construction, although its location will change based on construction timing. Parking spaces post construction are increased, although there is a possible shift to fewer free and more paid spaces. The Draft EIR notes on page 3.16-11 that the circulation improvements would provide additional and improved coastal access that accommodates a similar number of cars but also enhances multi-modal transportation opportunities. As noted in Section 2.6.9 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking

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		would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible. As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots. Table 6-1 in the Draft EIR summarizes the comparison of coastal access parking between all Project Alternatives. Each Alternative includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR. The proposed trail network has the potential to connect with regional systems such as the California Coastal Trail and Coastal Access Trail, which would facilitate connectivity between upper Topanga State Park and areas along the coast. The Backbone Trail is located to the north of the project area within a different portion of Topanga State Park and is not included as part of the proposed project. As noted in Section 2.5 of the Draft EIR, protecting and enhancing coastal access and visitor services is one of the purposes of the Proposed Project. The California Coastal Act establishes coastal land use, access, and management policy in California that strives to balance public trust asset management with sound development and habitat conservation policy. As stated in Section 30001.5 of the California Coastal Act, one of the goals of the state for the coastal zone is to "Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners." Both State Parks and the County have developed coastal land use plans that identify beneficial uses, goals, and development policies to manage the Project Area consistent with the California Coastal Act. The Proposed Project has been developed to facilitate implementation of recreation and coastal access policies outlined in the Topanga State Park General Plan and the Santa Monica Mountains Local Coastal Program that are currently underdeveloped on the Project site.

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		Once constructed, all Build Alternatives would improve recreational opportunities and facilities by improving or retaining coastal access and visitor services within Topanga State Park compared to existing conditions.
IND 80-10	The DEIR Appendices are mislabeled and therefore misleading and detracting from the informational value of the DEIR. There appear to be errors with the Appendices. For example, the DEIR purports to discuss the methodology for projecting emissions in Appendix N of the DEIR. (p. 3.7-37; p. 3.7-43.) The DEIR fails to include the referenced Appendix N which purports to provide the Air Quality, Greenhouse Gas Emissions, and Energy Data, Modeling, and Noise Calculations as there only appears to be a cover page for that Appendix. Did the DEIR intend to reference one of the documents labeled Appendix P (labeled GHG Calculations and Modeling, not the Appendix P labeled Topanga Lagoon Restoration Project Water and Sediment Quality Study Technical Report (ESA 2023) and Water Quality Pre-Construction Baseline Report (RCDSMM and Bay Foundation 2022))? The Appendices appear to be mislabeled and out of order causing the DEIR to be misleading and lack the requisite informational value to allow the public to review and comment on the document and for decisionmakers to make informed decisions.	The comment states that Appendices were mislabeled or missing. However, the correct Appendices were available during the public review process both on the CDPR website and at local public libraries. The website information was made available in the Notice of Availability. In addition, public informational meetings were held on Saturday, February 24 and Wednesday, February 28 The comment states that **Appendix N** does not include the air, noise, greenhouse gas and energy data. However, this is not the case. **Appendix N** includes air emission, energy assumptions and noise modeling results as labeled and referenced. In addition, **Appendix P** includes the report on restoration water and sediment quality as labeled and referenced. The referenced material was available for public review wherever noted in the Draft EIR. **Appendix S** Operations and Operations and Maintenance Plan was inadvertently omitted from the Draft EIR, but has been included as **Appendix S** in the Final EIR
IND 80-11	The DEIR fails to adequately discuss and analyze project impacts on the City of Malibu. The Association understands that the City of Malibu is submitting comments on the DEIR. The Association supports the City of Malibu's comments. The DEIR must be revised to fully address the City of Malibu's concerns raised in the City's comment letter. The DEIR should then be recirculated pursuant to CEQA Guidelines Section 15088.5 to allow the City of Malibu, and the interested public, the opportunity to meaningfully review and comment on the DEIR, including the adequacy of the revisions necessary to address the City's concerns.	Responses to the comment letter submitted by the City of Malibu are available at Comment AG-9 and AG-10 of this chapter in the Final EIR. The City of Malibu has been included in the public outreach process and has attended both the TAC and public meetings. The project meetings were noted by the Malibu Times. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public (2/29/20, 2/27/21, 6/11/22, 6/17/23, 2/24/24, 2/28/24). CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Resource Conservation District of the Santa Monica Mountains have met with individual groups throughout the process in an effort to address concerns of the local community. Additionally, there have been postings on site at the beach for outreach to the visiting public.

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IND 80-12	The DEIR fails to adequately discuss and analyze how widening the lagoon may impact the shoreline properties west of the Topanga Lagoon, particularly given potentially significant impacts related to erosion, flooding, and downstream debris flows from wildfires. Included with this letter is a letter dated April 12, 2024 prepared by ENGEO Incorporated, an engineering and earth sciences consulting firm with expertise in hydrologic, hydraulic, geologic, geotechnical, environmental, and coastal engineering. Walter F. Crampton, PE, GE, D.CE, has close to 50 years of experience in geotechnical, coastal, and hydraulic engineering as set forth in the attached document. The ENGEO letter sets for several additional issues with the DEIR and calls for further analysis to evaluate how widening the lagoon may impact the shoreline properties west of the Topanga Lagoon, particularly given the potentially significant impacts related to erosion, redirection of flood flows, and exposure to post-fire debris flows. The ENGO Incorporated letter, and the comments contained therein, is incorporated by this reference and included as a material part of this comment letter.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west, but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that the impacts to neighboring beaches would be negligible. Side scouring and encroachment onto the neighboring residential properties to the west is not anticipated as a result of the increased lagoon acreage and bridge lengthening since the development is on the upcoast of the project and the bridge abutments will be protected with rocks to prevent scour. The west abutment will prevent creek migration to the west beyond the west abutment. The proposed lengthening of PCH bridge will reduce slow down the flow and reduce erosive impacts to the floodplains. Also See Section 2.3 Master Response - Hydrologic Modeling
IND 80-13	Section 3.1 - Aesthetics 1. The Project site contains a natural bluff, dating pre-1933, which may have been added to as the PCH was constructed. The Project proposes to remove the bluff/berm top on the western bank of the lagoon upon which the existing helipad is located. The bluff/berm is the highest accessible whitewater view point along the beach, and the most westerly, accessible from the PCH and as a result provides high viewer exposure. The DEIR fails to provide views from the berm/dirt knoll and a comparisons to views from the alternatives where there is no vantage point on the beach overlooking the ocean. The DEIR fails to analyze the impact to aesthetic resources from removing this high viewer exposure vantage point. Furthermore, removal of this high ground vantage point of the ocean accessible from the PCH is inconsistent with Santa Monica Mountains Local Coastal Program Policies CO-125 through CO-127 which call for the preservation of vistas along identified Scenic Routes, such as the PCH, and view of the ocean. The DEIR needs to be revised to describe and study this potential impact.	The proposed project would remove imported fill material that forms a knoll, and that was brought to the site during the construction of the PCH bridge in the 1930s. As noted on page 3.1-24 of the Draft EIR, the proposed project would not block or obstruct any scenic vistas. Views of the surf would be retained at the parking lot elevation and would be widely available along the PCH. **Appendix Q** includes a consistency review of the Santa Monica Mountains Land Use Plan. The analysis notes that the new bridge and coast improvements would change the views of the beach from elevated areas. The analysis concludes that the proposed project is “potentially consistent” with the Santa Mountain Mountains Local Coastal Program Policies CO-125 and CO-127, with incorporation of design features that retain views and vistas from elevated areas. The removal of the elevated area at the existing knoll would be replaced by viewing opportunities at the edges of the new parking areas. Views overlooking the surf will therefore be retained. As shown on Figures 2-5a, 2-6a, and 2-7a, the new parking areas on either side of the bridge would retain elevated views of the beach. As a result, views would be retained, consistent with the Land Use Plan goals and policies, and the Draft EIR concludes on page 3.1-25 that impacts to scenic vistas would be less than significant.

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IND 80-14	2. The construction light and glare impacts are described as less than significant with mitigation incorporated. There is no analytical discussion of the potentially impact; rather simply a cursory statement that mitigation measure AES-1 would shield lighting from light-sensitive land uses. As noted above, the EIR must indicate whether the project's environmental impacts would be potentially significant if mitigation measures were not adopted and separately determine if mitigation measures described in the EIR would substantially reduce or avoid the identified significant impacts. Lotus v. Department of Transportation (Jan. 30, 2014) 223 Cal.App.4th 645. Thus, the DEIR should describe the impact. Light and glare would create a significant impact to the nearby homes, which are considered sensitive uses. The EIR fails to apprise decision makes of the environmental impact prior to mitigation.	The Draft EIR identifies on page 3.1-34 that light and glare is a potentially significant impact of the project. The analysis describes the purpose of Mitigation Measure AES-1 and concludes, "Therefore, light and glare construction impacts associated with the lagoon expansion would be reduced to a less than significant level." Table 3.1-2 clarifies which impacts are less than significant with imposition of mitigation. The potential impact is clearly described, and the conclusion of the Draft EIR clearly states that mitigation would be needed to ensure a less than significant conclusion. This impact conclusion format used throughout the Draft EIR complies with CEQA's informational requirements to identify the potentially significant impact and then make clear conclusions that significant impacts are avoided through implementation of mitigation. This format supports the logical assumption that impacts would be significant but for implementation of mitigation. Since the impacts are clearly identified prior to the imposition of mitigation, the analysis of impact significance is not lacking. The reference to Lotus v. DOT is inappropriately associated with this Draft EIR.
IND 80-15	3. Certain Build Alternative descriptions of the Project propose including parking spaces on the west edge of the Project area where no spaces currently exist. The impacts of these spaces on the adjacent residential uses is not analyzed during either the construction or operational phases of the Project. Such impacts should be studied and disclosed. With respect to the operational phases, there should be mitigation to prevent impacts such as impacts of vehicle headlights on adjacent properties. There is no discussion, for example, of the parking lot hours, how lot access will be restriction and enforced overnight, etc. These potential impacts must be described and analyzed.	The new parking area to the west of the lagoon would be located in an area currently closed off to the public. The parking lot will be maintained by DBH. Overnight parking would not be allowed in the lot, and parking hours would be similar to the east lot. Further, the parking lot is adjacent to the neighboring business and does not abut residences. Traffic noise from PCH would remain the dominant noise sources to receptors in the area. The Draft EIR concludes that the additional parking area would not increase disruption, noise, or lighting impacts since it is adjacent to PCH and would not allow nighttime use.
IND 80-16	3.6 - Geology 1. Geo 3.6-2 states that the Project would not result in substantial erosion and loss of topsoil, and that impacts in this category would be "less than significant." (p. 3.6-19). The EIR, however acknowledges that "the substantial grading proposed for the Project would expose bare soils that would be subject to erosion before the establishment of emergent vegetation. Substantial soil erosion could occur if exposed soils are subjected to heavy rain." The EIR should acknowledge that this impact is not less than significant and appropriate mitigation measures to prevent erosion impacts should be identified. Furthermore, the EIR does not adequately discuss the impact of erosion of topsoil at the lagoon and beach area on the adjacent properties. As noted in the attached letter from ENGEO Incorporated, the Project proposes to shift the lagoon westward, and remove the existing helipad which acts as a sand retention groin. The DEIR fails to fully and adequately analyze this issue, including but not limited to discussing and analyzing required stabilization measures to prevent erosion impacts. For example, in comment 4, ENGEO concludes that: "It is our professional opinion that it is therefore not appropriate to conclude that since the beach was stable prior to the Helipad being constructed, it will remain stable once the Helipad is removed." And, in comment 5, ENGEO concludes that: "It is our professional opinion that sand retention infrastructure should be considered for the project, and a sand monitoring	The Draft EIR notes on page 3.6-19 that erosion could occur during construction and prior to restoration of vegetation. The Draft EIR notes that this erosion potential would be minimized with implementation of required design features imposed by the MS4 permit. As a result, the potential impacts of erosion would not be significant and would not require additional mitigation. Permits required (CDFW 1600 SAA and CDP) will incorporate requirements outlined in approved Habitat Restoration Plan and restoration design plan sheets and specs and will include any additional measures that the agencies warrant to be required. Beach morphology was modeled for each of the project Alternatives. The modeling efforts are described in detail in the technical **Appendices B and E**. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches.

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	and nourishment plan should be developed as part of the DEIR to ensure the public beach to the west of the lagoon is not lost due to the removal of the Helipad." Therefore, the DEIR must be revised to remove the inaccurate assumption that that since the beach was stable prior to the Helipad being constructed, it will remain stable once the Helipad is removed, and all analysis that relied on that assumption but be revised.	**Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities. With respect to the consulting geologist letter provided in the comment, State Parks has considered the assertions made that the channel may not perform as expected by the modeling. The analysis included in the appendices presents the best available science on the issue, supported by state-of-the-science modeling tools. However, as noted in Section 15151 of the CEQA Guidelines, in the event that there are differing opinions among experts, for an EIR to be adequate, the lead agency may make reasonable conclusions based on the evidence in the record including differing expert opinion. The Draft EIR makes conclusions based on the evidence and expertise contained in the appended technical studies. The information provided in the comment is not supported by technical assessment, but rather reflects the opinion from a consulting geologist that the channel may behave in unpredictable ways. This assertion does not constitute new information that could alter the conclusions of the hydrological analysis supporting the Draft EIR's significance conclusions.

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IND 80-17	2. In Section 3.6.1 (Regulatory Setting) the EIR references California Coastal Act Coastal Resources Planning and Management Policies, specifically identifying as an applicable regulation Section 30253 therefor, which provides: Section 30253 Minimization of adverse impacts. New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard, (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs The EIR, however, fails to adequately assess the Project's contribution to flood risks or wildfire debris flows, particularly in light of erosion concerns and due to the impacted topography of expanding the lagoon near the adjacent homes and removing the existing protective berm/dirt knoll and helipad which has been acting as a sand retention groin.	The Draft EIR concludes on page 3.9-33 that the proposed project would not result in erosion concerns to neighboring properties or along the beach. The Draft EIR concludes that the project would be consistent with the Coastal Act with respect to potential impacts to existing structures. The commentor merely makes a conclusory statement as to the adequacy of the Draft EIR, without providing any substantial evidence to support the statements. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas, including from debris flows that could be made worse by wildfires in the watershed. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. See Master Response Hydrologic Modeling. The proposed project with a lengthened PCH bridge will reduce the flood velocity, flood water level, and the flood water backup effect and improve flood and wildfire debris flow from the lagoon to the ocean. The proposed project will not change the volume and transport of wildfire debris from the watershed to the lagoon.
IND 80-18	3. As noted above, the DEIR is fundamentally flawed in that it fails to provide a stable project description. The failure to identify and accurately describe the Project impacts each analytical section of the DEIR. For example, the morphological analysis relies on different grading plans. In comment 1 of the ENGEO comment letter, ENGEO concludes that: "It is our professional opinion that a preferred grading plan alternative should be identified in the DEIR and the morphological analysis updated accordingly." Therefore, the DEIR must be revised to select a preferred grading plan to reflect the proposed Project and the morphological analysis must be revised to reflect the preferred grading plan.	As described in response to comment **IND 80-2** above, the project evaluated in the Draft EIR is stable and clearly defines both the location and impact significance, with refinements of certain components identified as Project Alternatives. See response to comments **IND 80-2** and **IND 80-43**.

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IND 80-19	3.7 - Greenhouse Gas Emissions/Climate Change 1. The DEIR's description and of the Projects operational emissions is misleading. Section 3.7-31 states that: "Only construction emissions will be quantified because the Proposed Project's operational emissions would be less than existing emissions." Elsewhere, the proposed operational GHG emissions are described as "comparable to or likely less than existing GHG emissions at the Project site." (p. 3.7-37.) There is a fundamental lack of accurate quantitative or qualitative assessment that leads to varying impact conclusion descriptions through the analysis. Existing Site Emissions are themselves not quantified, nor are they qualitatively described and assessed accurately. The DEIR notes: "The Project site includes Topanga Creek and Topanga Lagoon, a narrow Pacific Coast Highway (PCH) bridge and visitor services such as parking, lifeguard and public restroom building, State Parks employee housing, restaurants, and other business leases. Everyday operational activities at these businesses result in the emission of GHG emissions associated with vehicle trips, landscaping equipment, on-site combustion of natural gas for heating and cooking, the generation of electricity for building energy and water conveyance, and from wastewater and solid waste decomposition. In order to provide a conservative assessment, existing emissions estimates were not modeled." (p. 3.7-29) Thus, there are not grounds for the EIR to state that operational emissions, of one of the project alternatives, would be less than the existing emissions. Further, it is unclear how operational emissions could be reduced, a problem compounded by the failure of the EIR to select a proposed project in addition to several alternatives. For example, the EIR claims on page 3.7-31 that project changes to the Topanga Ranch Motel would result in a decrease of Project operational emissions. The Topanga Ranch Motel, however, is primarily vacant and not operational for visitor accommodations and therefore should not be framed as an existing emissions contributor. So, compared to Alternatives 3 and 4 which would retain and restore 20 and 15 buildings respectively, the Project would have anywhere between 15 to 20 additional operational buildings contributing to Project operational emissions with uses proposed like hosting overnight visitor accommodations. The EIR is misleading in claiming that this is a reduction in operational emissions compared to the baseline, and fails to accurately account for increased in operational emissions of the project build scenarios. Additionally, the EIR claims that "all Build Alternatives would not provide new recreational facilities or substantial additional beach area that would result in additional visitors traveling to the area and would provide improved bus stops, pedestrian access, and bicycle access, which would reduce vehicle miles traveled." (p. 3.7-32.) It fails to account, however, for the parking provided on site and thus the increased capacity for site visitors relying on driving rather than availing themselves to bus and bike access. Further, there are new recreational facilities that may attract additional visitors, such as the proposed visitor services center and outdoor interpretive pavilion.	As noted in the comment, the Draft EIR states on page 3.7-37 that "Operational emissions would be comparable to or likely less than existing GHG emissions …" The Draft EIR assumes that there would be no change in traffic/number of beach goers and recreation users. The Draft EIR concludes on page 3.7-37 that the future operational emissions would be less than existing conditions is based on improved public transportation facilities to access the beach. Also, the proposed project would reduce the number of restaurant concessions operating within the State Park and would therefore experience a reduction in vehicle traffic. Otherwise, the Draft EIR assumes that the project would not alter the number of beach goers and recreation users substantially. The air quality in the area under existing conditions is summarized in Table 3.2-3. Operational emissions would be similar to existing conditions due to no change in traffic/number of beach goers and recreation users. Regarding future uses of the Topanga Ranch Motel and other visitor services at the State Park, the Draft EIR acknowledges throughout the document that future improvements including the restoration of the Topanga Ranch Motel would likely require subsequent assessment and is therefore covered at a Programmatic level in this EIR. With respect to greenhouse gas emissions, the Draft EIR describes emissions once the Topanga Ranch Motel is restored on page 3.7-44. Visitor services to be developed by State Parks are described on page 2-17 of the Project Description. State Parks will further develop these facilities including the Gateway Corner, the Topanga Ranch Motel, and the concessions. Since the final designs for the visitor services on State Parks property are not finalized, the Draft EIR provides a programmatic assessment of future visitor services to be developed by State Parks. For every impact addressed in the Draft EIR, a programmatic assessment of future visitor services is provided. As these future amenities are developed and final designs are prepared, State Parks will consider input provided during the public review period. State Parks will also determine whether additional environmental review is required prior to construction. If a component of future visitor services results in amenities that could significantly increase visitorship, additional environmental review will be required.

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IND 80-20	2. The DEIR fails to justify why the SCAQMD's significance threshold of 10,000 MTCO2e per year for industrial projects is the most relevant GHG significance threshold and is used as a benchmark or the Project which is not an industrial land use project.	The Draft EIR uses the 10,000 MTCO2e significance threshold in order to be consistent with SCAQMD recommendations. As noted on page 3.7-32 of the Draft EIR, there is no bright line suggesting a significance threshold, and so the precedent has been set by SCAQMD to use the 10,000 MTCO2e quantity. The commentor provides no alternative significance threshold.
IND 80-21	3.8 - Hazards and Hazardous Materials 1. The DEIR fails to adequately assess impacts to emergency evacuations. With regards to construction phase impacts, the DEIR relies on Mitigation Measure TRA-1 to avoid a significant impact to emergency response plans. MM TRA-1 requires development of a construction and emergency traffic management plan to be developed in coordination with Caltrans, the City of Malibu, the County, State Parks, DBH, and emergency service responders, which would include fire departments, police departments, and ambulances with jurisdiction within the Project area. MM TRA-1 does not provide sufficient specific performance standards to support this as future mitigation. This traffic management plan must be analyzed prior to Project approval to ensure it fully mitigates the impact described.	The Draft EIR concludes on page 3.16-23 that emergency access and evacuation routes could be affected if not planned for. As a result, the Draft EIR concludes that the preparation of an Emergency Evacuation Plan is needed to reduce impacts to a less than significant level. In the Draft EIR, this Plan was included in TRA-1. However, to clarify the content requirements of the Caltrans-required TMP, which is the focus of TRA-1, the Emergency Evacuation Plan has been moved to its own mitigation measure TRA-3 (as shown in Section 3.2 of the Final EIR), and provides substantial details on the required contents of the plan to ensure that it mitigates the identified impact. One stipulation in TRA-1 is for the TMP to conform with the California Manual on Uniform Traffic Control Devices, committing to the performance standards outlined therein. The mitigation measures TRA-1 and TRA-3 provides a clear assurance that emergency access and evacuation will be maintained throughout the construction timeframe subject to Caltrans-required standards. The commentor provides no other standards on which to evaluate effectiveness of the mitigation.
IND 80-22	2. The DEIR fails to adequately discuss or analyze impacts to the adopted Evacuation Plan for the City of Malibu, which identifies Topanga State Beach Parking at 18700 Pacific Coast Hwy Malibu CA 90265 - located within the project site - as a pre-identified "Safe Refuge Area." (Evacuation Plan p. 7.) Safe Refuge Areas are temporary staging areas in a mandatory evacuation. They may also be used to help move traffic off the road to speed up the movement of people out of the immediate danger area. Temporary closure of the site during construction would impair or physically interfere with the adopted Evacuation Plan. This impact is not adequately mitigated. Appendix J provides a Draft Construction Traffic and Emergency Management Plan which is required by Mitigation Measure TRA-1. The Draft Construction Traffic and Emergency Management Plan, however, does not address this issue and instead defers addressing with this conflict to future coordination between the County and City of Malibu at some point during the final design and prior to issuance of demolition, grading, or any construction permits issued for the Project, stating: "The Lead Agency/Project Sponsor and contractor will coordinate with the County and City of Malibu to identify an alternative refuge area in close proximity to the Project during the period of construction which causes the DBH parking lot to be unavailable." Alternative refuge areas should be identified and be evaluated with the proposed project to assure that there is an adequate and feasible alternative and that mitigation is not improperly deferred.	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu, as well as Caltrans, Los Angeles County, State Parks, DBH, and emergency service responders. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas as included in the City of Malibu's objectives would be addressed in the plan in coordination with the City.

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IND 80-23	3. The DEIR fails to analyze the operational impacts of relocating the helipad used for emergency services from the existing location - on the southwest wide of the lagoon, on Malibu side of the bridge, and directly accessible from the PCH from Malibu - to the proposed location - on the eastern side of the lagoon, on the other side of the bridge from Malibu, and not directly accessible form the PCH but accessible through an upgraded parking lot. This bridge could be rendered unusable in the event of an earthquake or similar natural disaster. These impacts need to be described and analyzed.	The existing non-standard helipad located on the knoll is an asset designed primarily to support rescue missions along the Malibu coastline. Helicopters landing on the pad may have injured persons needing ground transportation to local hospitals. The location of the relocated helipad on the east side of the lagoon was identified as preferable by County lifeguard staff due to its colocation with the lifeguard and public restroom building and improved access and use. Placing the helipad on the eastern side of the bridge maintains emergency access to the urban Los Angeles area more directly than the current location to the west of the bridge should the bridge be compromised in an earthquake. Access to the helipad via the parking area and beach on the southwest side of the project is maintained unless the lagoon is breached and connected to the ocean.
IND 80-24	4. See comments on Section 3.16 below regarding the failure to analyze impacts with respect to baseline conditions involving closure of SR-27.	The Topanga Canyon Boulevard landslide occurred during the review period of the Draft EIR. The temporary closure of the roadway is not part of the baseline condition, which is tied to the date of the publishing of the NOP. Access was regained on June 2, 2024.
IND 80-25	3.9 - Hydrology/Floodplain and Water Quality/ Stormwater Runoff 1. The DEIR fails to assess impacts of the Proposed Project on beach erosion, flooding, and debris flow conditions for the homes adjacent to the project site.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain under the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that the impacts to neighboring beaches would be negligible. Side scouring and encroachment onto the neighboring residential properties to the west is not anticipated as a result of the increased lagoon acreage and bridge lengthening since the development is on the upcoast of the project and the bridge abutments will be protected with rocks to prevent scour. The west abutment will prevent creek migration to the west beyond the west abutment. The proposed lengthening of PCH bridge will reduce slow down the flow and reduce erosive impacts to the floodplains. The commentor merely makes conclusory statement as to the adequacy of the Draft EIR, without providing any substantial evidence to support the statements. Also See Section 2.3 Master Response - Hydrologic Modeling.

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IND 80-26	2. The DEIR cites existing poor water quality as due in part to deteriorating structures and feces/trash from increasing homeless activity and fecal contamination from dogs and gulls (p. 3.9-25.) The EIR states that the "Proposed Project's improvements to public access and improved visitor services, which includes more State Parks staff present, may help with achieving greater enforcement of the no-dog and no-camping rules, which could reduce dog and human sources." (p/ 3.9-29.) This is entirely speculative. There is no reference or commitment in the document that increased staff will be present to monitor and enforce these water quality protection measures. In fact, State Parks staff is likely to be located inside the proposed visitor center. See comments regarding the DEIR's failure to appropriately discuss and analyze maintenance obligations. In addition to this being a conclusory and speculative analysis, it is not backed up by an enforceable mitigation measure. Further analysis should be done with respect to water quality impacts and mitigation measures are needed to reduce these contamination sources that are not covered by Mitigation Measures HAZ 1 and 2.	The Draft EIR concludes on page 3.9-29 that the proposed project would not increase the potential for trash and human uses of the site compared to existing conditions. Future maintenance of the various components of the project area would be managed by the landowners as is currently the case. The Draft EIR states on page 3.9-29 as noted in the comment that the improved visitor services facilities proposed by the project may result in reduced impacts of trash and water quality degradation. The Draft EIR then concludes that the proposed project impacts would not result in a significant increase in trash and water quality degradation from visitor use. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and facility management. The Draft EIR notes on page 3-6 that an additional three employees are anticipated. Ultimately, staffing would be established by the Operations and Maintenance Plan. The Operations and Operations and Maintenance Plan is provided in **Appendix S** of the Final EIR.
IND 80-27	3. The DEIR fails to analyze impacts resulting from changes in drainage patterns on the site to the surrounding area, including the adjacent homes, which would be closer to the expanded lagoon and no longer separated by a protective berm/dirt knoll. The DEIR cannot credibly conclude there are no potential impacts to HYD 3.9-3 without adequately studying this issue. Please see attached letter from ENGEO. In comment 2, ENGEO concludes that: "It is our professional opinion that flooding and erosional impacts of 10-year and 100-year return period fluvial storms should be evaluated assuming the thalweg has established in the location as shown in blue, or further west." Therefore, the DEIR must be revised to describe and analyze the flooding and erosional impacts of 10-year and 100-year return period fluvial storms assuming the thalweg has established in the location as shown in blue, or further west.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. See Section 2.3 Master Response - Hydrologic Modeling. With respect to the consulting geologist letter provided in the comment, State Parks has considered the assertions made that the channel may not perform as expected by the modeling. The analysis included in the appendices presents the best available science on the issue, supported by state-of-the-science modeling tools. However, as noted in Section 15151 of the CEQA Guidelines, in the event that there are differing opinions among experts, for an EIR to be adequate, the lead agency may make reasonable conclusions based on the evidence in the record including differing expert opinion. The Draft EIR makes conclusions based on the evidence and expertise contained in the appended technical studies. The information provided in the comment is not supported by technical assessment, but rather reflects the proposition from a consulting geologist that the channel may behave in unpredictable ways. This assertion does not constitute new information that could alter the conclusions of the hydrological analysis supporting the Draft EIR's significance conclusions.

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IND 80-28	3.10 - Land Use and Planning The following Coastal Act policy incorporated into the Santa Monica Mountains LCP is applicable to the Proposed Project: "Protection against loss of life and property from coastal hazards." (p. 3.10.4) Impacts contributing to loss of life and property, with respect to the properties to the west of the Project boundary, should be adequately diclosed and analyzed. See comments above. A mitigation measure is needed to ensure compliance with CO-17 so that no earthmoving can occur during rainy or potentially raining conditions.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. The modeling efforts are described in detail in the technical Appendices B and E. See Master Response Hydrologic Modeling. **Appendix Q** provides a detailed assessment of the project's consistency with the Santa Monica Mountains Land Use Plan that includes all the policies of the Local Coastal Plan element. The analysis concludes that the project would restore the coastline to a more natural state while being protective of the beach to maximize recreational access and minimize erosion. The placement of sediment within the nearshore just south of the lagoon will nourish beaches downcoast, reducing the impacts of erosion. The proposed project is not responsible for increasing protection of existing residences that are subject to natural coastal erosion hazards that are projected to increase in the future due to anticipated sea level rise. With respect to work occurring during a rain event, standard permit requirements limit work outside of rain events. Mitigation Measure BIO-7-6 provides language to ensure this. The contractor will be responsible for ensuring the safety of workers and the project objectives and will schedule construction to avoid potential flood events. No mitigation is required to ensure this assumption of basic safety protocols.
IND 80-29	3.12 - Noise The Project would generate substantial increases in ambient noise levels in the vicinity of the Proposed Project - specifically the noise-sensitive residential uses to the southwest, of the Project Site, south of the Pacific Coast Highway and as near as 100 feet from the construction site - in excess of standards established in the local general plan or county noise ordinance. Construction noise associated with the Proposed Project that exceeds state and federal standards will interfere with human daily activities. This should be classified as a significant and unmitigable impact. Table 3.12-5 includes a 5 dBA reduction of noise levels from acoustic shielding from intervening buildings between the Project site and off-site sensitive receivers analyzed. This reduction is inapplicable with respect to the noise-sensitive residential uses to the southwest, of the Project Site, south of the Pacific Coast Highway and as near as 100 feet from the construction site which are not shielded from the Project Site with any intervening buildings. Thus, Table 3.12-5 inappropriately presents reduced estimated construction noise levels for these sensitive receptors. This should be revised to remove the reduction with respect to these sensitive receptors. Nonetheless, the improperly reduced estimated construction noise levels still exceed applicable standards and create a significant impact. The DEIR fails to show how mitigation measures NOISE-1 and NOISE-2 would reduce the impact to a less than significant level. Furthermore, while mitigation measures NOISE-1 and NOISE-2 may reduce some noise, the impacts will still be significant and unavoidable, particularly in the event that construction occurs outside the allowed hours for construction activity. Noise from the construction on the PCH and extension of the	The Draft EIR evaluates construction noise impacts thoroughly in Section 3.12. Table 3.12-5 provides the results of the noise attenuation model conducted to estimate noise levels at local sensitive receptors during peak construction activities. The noise model results are also included in **Appendix N**. Construction near the residences within 100 feet west of the construction area would only occur during daytime hours, in conformance with County requirements. The Draft EIR provides a detailed analysis of noise impacts during each phase of construction including during the installation of a sewer line within PCH that may require nighttime construction. Mitigation Measures NOISE-1 and NOISE-2 require noise levels to remain within County thresholds. To accomplish this, NOISE-2 outlines specific measures needed to ensure noise levels do not exceed significance thresholds, which are specifically described and include the use of noise enclosures and barriers if necessary to minimize noise at the closest sensitive receptor, including during nighttime hours. No residences are located adjacent to PCH on the coastal side within this stretch of PCH. The closest residences are inland at higher elevations and on Coastline Drive north of PCH. The Draft EIR concludes that with implementation of the two Mitigation Measures, noise levels at these locations and all local residential areas would be kept below significance thresholds. The comment suggests that the analysis underestimates noise at local residences but provides no evidence for this assertion. The analysis summarized in Table 3.12-5 identifies the closest sensitive receptor which includes residences at the western edge of the project and estimates the peak noise levels during construction. The analysis appropriately includes attenuation caused by local buildings and topography. The analysis concludes that mitigation is needed since

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	sewer extension within PCH must happen during nighttime hours per Mitigation Measure TRA-1 (p. 3.16-14.) The DEIR notes that: "In general, noise from a point source decreases approximately 6 dBA for each doubling of distance." (p. 3.12-19.) Thus, reducing the western expanded footprint of the lagoon and eliminating the western parking lot would reduce the need to grade adjacent to the residences and avoid the significant impact which cannot otherwise be mitigated. The noise analysis should be revised to reflect the flaws identified above and an alternative should be added to address the significant, unmitigable noise impacts of the proposed build alternatives project.	noise would otherwise be a significant impact. The mitigation measures NOISE-1 and NOISE-2 provide noise controls and monitoring to ensure noise is minimized to the extent practicable. The Draft EIR concludes that this mitigation is sufficient to result in less than significant impacts. With respect to nighttime noise, the Draft EIR concludes that a noise variance would be obtained by the contractor. With the variance, nighttime activities would comply with the County noise ordinance. The temporary nighttime work would be subject to mitigation NOISE-2 that would include nighttime restrictions. Impacts would be less than significant as a result. The information provided in the comment is not supported by technical assessment. The assertion that noise will interfere with human daily activities does not constitute new information that could alter the conclusions of the analysis supporting the Draft EIR's significance conclusions.
IND 80-30	3.13 - Public Services 1. The EIR fails to analyze impacts associated with moving the helipad from the western side of the lagoon to the eastern side of the lagoon on the other side of the extended PCH bridge. The DEIR in a rather conclusory fashion asserts that: "The lifeguard and public restroom building, and helipad would be located adjacent to each other and closer to PCH to enhance emergency response times. Emergency access to the beach would also be enhanced via provision of year round emergency and pedestrian access on both sides of the lagoon under the highway and the realigned access road. Staff parking and access at the beach level would be improved. Therefore, no expansion or construction of fire protection and emergency services would be needed. No significant impacts related to fire protection and emergency services would occur, and further, a net benefit would occur as a result of the proposed improvements to emergency access." This however fails to reflect that the helipad is now further away from the City of Malibu. The DEIR does not discuss or analyze impacts of this to Malibu-based first responders who, to access the helipad, would need to cross the bridge, adding distance to the helipad and potential obstructions if the bridge is impacted by traffic or natural disaster (e.g., earthquake, fire, flood, landslide).Further the build alternatives show that the helipad is not directly accessible form the PCH but accessible through an upgraded parking lot.	The knoll area used as a non-standard helipad supports rescue missions along the Malibu coastline. Helicopters landing on the pad may have injured persons needing ground transportation to local hospitals. The proposed location of the new helipad on the east side of the creek was requested by emergency staff due to its colocation with the lifeguard and public restroom building, and improved access. Placing the new helipad on the eastern side of the bridge maintains emergency access to the urban Los Angeles area more directly than the current location to the west of the bridge should the bridge be compromised in an earthquake or disaster. Access to the helipad via the parking area and beach on the southwest side of the project is maintained unless the lagoon is breached and connected to the ocean. The comment does not provide new information that was not considered in the Draft EIR.
IND 80-31	2. The DEIR fails to discuss or analyze impacts to the adopted Evacuation Plan for the City of Malibu (adopted August 2020), which identifies Topanga State Beach Parking at 18700 Pacific Coast Hwy Malibu CA 90265 as a pre-identified "Safe Refuge Area." (Evacuation Plan p. 7.) Safe Refuge Areas are temporary staging areas in a mandatory evacuation. They may also be used to help move traffic off the road to speed up the movement of people out of the immediate danger area. Temporary closure of the site during construction would impair or physically interfere with the adopted Evacuation Plan. This impact is neither disclosed nor mitigated.	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas as included in the City of Malibu's objectives would be addressed in the plan in coordination with the City.

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IND 80-32	3. The DEIR asserts that the build alternatives would not involve new operational activities that would require additional fire and police protection services. This fails, however, to account for the new uses and facilities involved in certain build alternative iterations of the project. For example, under Alternatives 3 and 4, additional visitor services are provided and 15–20 structures associated with the historic Topanga Ranch Motel would be retained and restored. These structures would be used for the development of future visitor services that could include a mix of overnight accommodations and park facilities such as employee housing, a maintenance facility, park offices, and storage. The additions of overnight accommodations uses may create an added public services demand that does not currently exist on the site. This issue should be studied and analyzed in the EIR.	The Draft EIR evaluates the construction of future visitor services at a programmatic level of detail throughout the document. As plans for these areas are finalized, including the development of overnight accommodations, impacts will be evaluated in subsequent documents pursuant to CEQA requirements. The Draft EIR applies a project-level analysis to the proposed lagoon restoration, bridge construction, nearshore sediment placement, beach improvements, wastewater treatment options, parking and coastal access components of the project that include the grading footprint and site restoration.
IND 80-33	3.14 - Parks and Recreation The DEIR asserts that: “Reconstruction of the lifeguard and public restroom building closer to PCH would provide a clean and safe environment for recreational users.” (p. 3.14-8.) However, there is no support that such facilities will be sufficiently maintained over the project life to avoid becoming deteriorated. The DEIR does not describe or analyze maintenance capabilities and commitment to maintaining the project park facilities. See comment above regaining DEIR failure to adequately disclose or analyze maintenance obligations and related impacts.	The Draft EIR concludes that new visitor serving amenities would improve conditions at the site. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and facility management. The Operations and Maintenance Plan is provided in **Appendix S** of the Final EIR.
IND 80-34	3.16 - Transportation and Circulation 1. See comment above regarding Section 3.8 - Hazards and Hazardous Materials pertaining to the conflict with the City of Malibu Mass Evacuation Plan and inadequate mitigation.	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas as included in the City of Malibu’s objectives would be addressed in the plan in coordination with the City.
IND 80-35	2. The DEIR assumes that the Project will not entice additional visitors to the project site and increase VMT. (p. 3.16-17.) This assumption fails to account for several features that could increase trips to the project area and increase VMT above baseline conditions, including but not limited to: the new uses and facilities involved in certain build alternative like Alternatives 3 and 4, where additional visitor services are provided and 15–20 structures associated with the historic Topanga Ranch Motel would be retained and restored and could be used for the development of future visitor services that could include a mix of overnight accommodations and park facilities such as employee housing which would increase trips to the site. Potential future connection to regional trail systems would provide new recreational opportunities that, in addition to being pedestrian accessible, may entice hikers to drive to the upgraded parking at the beach and then walk to the trailhead, which would entice people to travel to the area and increase VMT. The DEIR fails to explain how such enhanced and expanded facilities would not increase traffic volumes and result in increases to VMT. Absent such analysis, there are no grounds for the EIR to conclude the Project would result in a reduction to VMT.	The Draft EIR concludes on page 3.16-17 that the proposed project would not increase operational VMT significantly. That is to say, the project would not increase visitorship by over 110 trips per day which is the County threshold for significant new trips. Visitorship would be less than existing conditions since the proposed project would reduce the number of restaurant concessions operating within the State Park and would therefore experience a reduction in vehicle traffic. Otherwise, the Draft EIR assumes that the project would not alter the number of beach goers and recreation users substantially. An assessment of anticipated VMT is included in **Appendix R**. The analysis estimates a reduction in visitorship due to the removal of several existing restaurant concessions.

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IND 80-36	3. The design of Project Build Alternatives, like 2 and 4, that places the helipad as accessible through the parking lot is not described or analyzed as a potential circulation traffic hazard. This should be studied and impacts should be described and mitigated. Alternatively, leaving the helipad on the western bank of the lagoon would avoid this potential impact.	The Draft EIR describes the location of the new helipad to be accessed through the new parking lot on the east side of the lagoon. Traffic posed by the helipad would be minimal. In the event of an emergency, access through the parking lot would be maintained as required in providing "conforming" parking spaces. Impacts to traffic circulation posed by the location of the helipad would not be a significant change from existing conditions.
IND 80-37	4. The DEIR fails to accurately describe existing conditions of SR-27 (Topanga Canyon Boulevard). The DEIR notes that "TCB ends at Topanga Beach, providing access to both eastbound and westbound PCH… TCB within the Project area provides three travel lanes (one northbound and two southbound) with one right-turn lane for southbound turns heading west on PCH and two left-turn lanes for southbound turns heading east on PCH. According to the County Mobility Element, TCB is designated as a major highway. It is also a designated Disaster Route." (p. 3.17-7). The DEIR does not reflect, however that as of the date of these comments SR-27 has been closed indefinitely from the PCH to Grand view Drive due to an unstable landslide. While the baseline for analysis of the environmental conditions is generally the date of publication of the Notice of Preparation, the conditions as of the date of the Notice of Preparation are not appropriate to accurately describe transportation and evacuation impacts due to the markedly changed conditions of the environmental conditions with respect to the closure of this major highway that serves as one of the limited access points and disaster routes in the area. Thus, the EIR should be updated to additionally analyze transportation and emergency evacuation impacts under the present and likely recurrent scenario of an extended SR-27 closure.	The Topanga Canyon Boulevard landslide occurred during the review period of the Draft EIR. The temporary closure of the roadway is not part of the baseline condition, which is tied to the date of the publishing of the NOP. The roadway was reopened on June 2, 2024.
IND 80-38	3.17 - Utilities and Service Systems The DEIR fails to adequately disclose or analyze the potential impacts of utility disconnections as a result of the Project, in particular during the construction phase and to the adjacent residents. The DEIR merely notes that there would be "minimal service disruption." (p. 3.17-10.) The timing, duration, or extent of such service disruption is not described or analyzed. Further, the Mitigation Measure UTS-1 does not address these potential impacts.	The Draft EIR clearly states on page 3.17-11 that utilities would be temporarily disrupted for short periods of time in order to construct the new bridge. Mitigation Measure UTIL-1 requires CDPR to coordinate with utility providers to plan for outage minimization. Temporary electricity, water, or telecommunications outages would occur during short periods (eg., up to 2-4 hours) as the new connections are made. Longer outages are not anticipated. The Draft EIR concludes that these temporary outages would not constitute a significant impact to utilities or local utility customers.
IND 80-39	3.18 - Wildfire 1. See comment above regarding Section 3.8 - Hazards and Hazardous Materials pertaining to the conflict with the City of Malibu Mass Evacuation Plan and inadequate mitigation	Mitigation Measure TRA-3 requires CDPR to coordinate the evacuation plan with the City of Malibu. **Appendix J** includes a draft emergency plan to be finalized when final designs are completed. Identification of safe refuge areas as included in the City of Malibu's objectives would be addressed in the plan in coordination with the City. The new helipad will have a dedicated hydrant so it can assist as needed in wildfire response.
IND 80-40	2. See comment above regarding 3.16 - Transportation and Circulation pertaining to the failure of the DEIR fails to accurately describe existing conditions of SR-27.	The Topanga Canyon Boulevard landslide occurred during the review period of the Draft EIR. The temporary closure of the roadway is not part of the baseline condition, which is tied to the date of the publishing of the NOP. The roa was reopened on June 2, 2024.

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IND 80-41	3. The DEIR states that: "The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant." (p. 3-18-23.) The DEIR, however, fails to adequately discuss or analyze impacts to the homes near the western boundary of the Project site which will be near the expanding and westward shifting lagoon and potentially subject to downstream flooding or debris flows, particularly if the lagoon mouth fans westward and in light of the inadequately described or analyzed stabilization measures on the western bank of the lagoon. See the attached ENGEO comments. In comment 3, ENGEO concludes that: "It is our professional opinion that inundation and erosional impacts of a debris flow occurring in the Topanga Creek watershed (and flowing to the coastline) should be evaluated assuming the thalweg has established in the location as shown in blue, or further west." Therefore, the DEIR must be revised to describe and analyze the inundation and erosional impacts of a debris flow occurring in the Topanga Creek watershed (and flowing to the coastline) assuming the thalweg has established in the location as shown in blue, or further west. The DEIR needs to fully discuss and analyze these potential impacts. This is a particular concern give the well-known history of fire risk in the area including the Topanga fire of 1993.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas, including from debris flows that could be made worse by wildfires in the watershed. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical **Appendices B and E**. See Master Response Hydrologic Modeling.
IND 80-42	ENGEO COMMENT 1 The grading plans for Alternatives 2, 3, and 4 used in the shoreline morphology analysis are from 2020 (Figure 2.1 of Appendix B), and do not match the grading plans dated February 2021 shown in the alternatives analysis (Figures 2.1 through 2.4 of Appendix E). Because of this, it is unclear which proposed grading plan alternatives are being considered for the project, and if the most up-to-date grading plan alternatives have been considered in the shoreline morphology analysis. The proposed lagoon bathymetry used in the morphological modeling (Figure 4.1 of Appendix B) appears to be based on outdated grading plan alternatives. It is our professional opinion that a preferred grading plan alternative should be identified in the DEIR and the morphological analysis updated accordingly.	In response to this comment, the footnote in Figure 2.1 of **Appendix B** will be updated to reference the correct date of "2023". The most up-to-date grading plans for all three built alternatives were used in the shoreline morphology analysis. Figures 2.1 through 2.4 of **Appendix E** in the alternatives analysis report were an older version of the grading plans. The alternatives analysis was not updated since these more recent changes in grading plans don't change conclusions of the alternatives analysis.
IND 80-43	ENGEO COMMENT 2 Section 2.5.4 of the DEIR states that under all build alternatives, the lagoon mouth is anticipated to continue trending west rather than east because the lagoon and bridge would be widened predominantly to the west. Each of the DEIR grading plan alternatives includes a pilot channel to the west of the existing thalweg. The thalweg is the line of lowest elevation within the lagoon, often referred to as the flowline. As discussed in Section 6.2 of Appendix B, the purpose of the pilot channel is to encourage westward migration of the thalweg. We understand the location of the proposed western pilot channel is based on the location of the lagoon's historic thalweg alignment. Exhibit 1 below shows the grading plan for Alternative 3 overlain on a 2019 Google Earth aerial image. The current thalweg location is shown in red, and the proposed western pilot channel is shown shaded in purple. Over time, the thalweg will likely shift to be within the western pilot channel, similar to its historic alignment. If the	The Draft EIR includes a detailed modeling effort summarized in **Appendix B**. The report represents the best available science of the lagoon's flooding and breaching dynamics conducted by Moffat Nichol, an established coastal engineering consulting firm. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of

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	thalweg shifts to the location shown by the purple line, the highest flow velocities in the lagoon during storm events will be concentrated along the western bank of the pilot channel due it being an outer bend in the channel's alignment. If there are not proposed stabilization measures within the pilot channel, the thalweg may eventually shift further west to a hypothetical location shown in blue, or even further west than shown in blue (again, due to the highest flow velocities being concentrated along the outer bend). We note that bioengineered stabilization measures or living shoreline elements are proposed to be included as part of the project; however it is unclear what these measures will consist of and where they will be located. Are stabilization measures proposed within the western pilot channel, or will the pilot channel be allowed to migrate? If the thalweg eventually migrates to the position shown in blue in Exhibit 1, velocities would be highest along the western perimeter of the lagoon during storm events, which could exacerbate erosion of the proposed parking lot and public beach. In addition, the westward migration of the thalweg would place the mouth of the lagoon closer to the adjacent properties to the west, which could expose them to potentially significant impacts related to erosion and flooding. It is our professional opinion that flooding and erosional impacts of 10-year and 100-year return period fluvial storms should be evaluated assuming the thalweg has established in the location as shown in blue, or further west.	the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably and that each Alternative would increase fish passage opportunities. The Draft EIR outlines on page 3-15 the potential for bio-engineered "living shoreline" features that could be employed to increase beach resiliency. These features typically include features to encourage native vegetation on the sand to improve stability of dune habitats. The features would be developed during final designs and would be implemented with County approval. The comment includes a graphic with a stream channel drawn in blue at the western edge of the creek. This line is not substantiated by any hydrologic modeling but appears to be drawn as a suggestion of a potential future channel. The hydrologic modeling does not support the potential creation of a channel this far west. Rather, the modeling predicts a thalweg near the center of the creek which is constrained on the west by 1) topography of the surrounding areas, 2) the western-most bridge abutment (Abut4) and embankment, and 3) the underlying cobble delta. Due to these factors, the modeling concludes that the stream course will continue to be constrained and prevent a western shift of the creek thalweg toward the neighboring properties. The thalweg may shift west to some extent during the highest flood flow period as predicted by the model, and then gradually start migrating east as the flow discharge drops off due to predominant easterly longshore currents. The historic pattern will continue of the lagoon breach occurring on the west edge (but certainly not nearly as far west as the blue line in the comment) under flooding, followed by gradual and steady migration towards the east under the forces of longshore drift by waves and tides. The longer-term position of the mouth is farther to the east nearer to the lifeguard and public restroom building and it will close after storm drainage drops off and ocean forces dominate the condition. See Section 2.3 Master Response - Hydrologic Modeling and Figure xxx that shows the modeled western extent of creek migration possible.

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IND 80-44	ENGEO COMMENT 3 It is well known that the Santa Monica Mountains are prone to wildfires and subsequent sediment-laden floods, mud flows, and debris flows. The existing bridge is approximately 79 feet long (per Section 2 of Appendix O), and is proposed to be widened to 460 feet long per the DEIR. Increasing the length of the bridge would allow a debris flow to fan out more widely when it reaches the coastline. The potential westward migration of the thalweg (as discussed in Comment 2) would place the mouth of the lagoon closer to the adjacent properties to the west, which could expose them to potentially significant impacts related to post-fire mud/debris flows. It is our professional opinion that inundation and erosional impacts of a debris flow occurring in the Topanga Creek watershed (and flowing to the coastline) should be evaluated assuming the thalweg has established in the location as shown in blue, or further west.	The longer bridge will reduce constriction and allow flow, sediment, and debris to fan out to reduce the flood velocity and its erosive force. In addition, it will also lower the flood water level to improve flood protection. Allowing more sediment yield from the watershed to be delivered to the coast is positive for the beaches, potentially reducing the sand deficit due to upland development. As addressed in Comment 2, westward migration of the thalweg is constrained. The proposed pilot channel is within the main span of the bridge, and the modeling study has demonstrated that the thalweg will still be within the main span channel. The proposed bridge abutment and its erosion protection device will prevent further westerly migration. See Section 2.3 Master Response - Hydrologic Modeling
IND 80-45	ENGEO COMMENT 4 Section 5.1 of Appendix B notes that, based on review of historical aerial imagery, Topanga Point has been stable before and after the Helipad was constructed (indicating the Helipad does not contribute to shoreline stability). However, it should be noted that, prior to the construction of the Helipad in the 1940s, the beach along this stretch of coastline was much wider than it is today (which provided natural stabilization by dissipating wave energy further from the shoreline). Over the last century, Southern California beaches have experienced a significant reduction in sand replenishment due to upland development, dam construction, dredging, and other human activities that have reduced the volume of sediment making its way to the coastline. Recent aerial images along this stretch of coastline show significant beach loss compared to the 1940s when the Helipad was constructed. It is our professional opinion that it is therefore not appropriate to conclude that since the beach was stable prior to the Helipad being constructed, it will remain stable once the Helipad is removed.	As described in **Appendix B** of the Draft EIR, the position of the beach along Topanga Point and immediately up- and downcoast is the result of the large cobble delta feature than any other factor. With the large cobble delta remaining in place, the shoreline position will remain relatively stable. The knoll is currently used as an emergency landing area and was not officially constructed. The project proposes moving it to the east of creek to be closer to the lifeguard and public restroom building and Topanga Canyon Boulevard and to be constructed to meet current standards. The position of the shoreline at this location is well-anchored by the resistant and unmoving cobble delta. The delta serves two functions: 1) to anchor the position of the shoreline due to its armoring effect on the shore, and 2) to cause wave energy to focus on the delta (wave refraction and convergence) and dissipate adjacent to the delta (wave diffraction and divergence). The result of wave refraction over the delta is that wave energy is expended across the delta and less is available to erode the beach landward of the delta, forming a beach. It also results in sand being deposited on either side of the delta in small pocket beaches in the areas of lower wave energy just up- and downcoast of the cobble delta feature. The knoll was constructed with sandy fill materials, and it is relatively stable there due to the presence and protection of the large cobble delta. Without the large cobble delta protection, the knoll would have been eroded away by waves and currents and would no longer be there. Also, there is an existing sand retention device installed by the homeowners visible in Figure 5. They likely have the responsibility to maintain and repair it if they need it to continue to provide benefits. This lagoon restoration project is located “downcoast” of the homes and will not impact the shoreline near the homes and should not be held responsible for shoreline changes at the homes. Also, the project proposes to add 256,000 cubic yards of sandy material to the littoral cell immediately off of Topanga Beach to offset the sediment deficit. This action, plus other unrelated actions currently being planned by the State and County may serve to help offset the sediment deficit and render the local

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		coastline more resilient in the future. See Section 2.3 Master Response - Hydrologic Modeling
IND 80-46	ENGEO COMMENT 5 Section 6.1 of Appendix B says the morphological model results show that removing the Helipad would have little impact on adjacent beaches. While numerical models are beneficial tools to help evaluate potential impacts, a numerical model is only as good as its assumptions. The limitations and assumptions of the numerical modeling are noted in Appendix B, and the challenge of simulating sediment transport and long-term morphological changes on beaches with mixed sandy and rock materials is recognized (Section 3.6.9 of Appendix B). Because estimating sediment transport over long-time periods is particularly difficult, model results should be understood to have a high degree of uncertainty. Additionally, the morphological modeling appears to be based on outdated grading plan alternatives (see Comment 1). Based on our review of historical aerial images and extensive experience working along the Southern California coastline, the Helipad appears to be acting as a sand-retaining groin, likely helping prevent sand on the westerly public beach from continuing to be transported east down the coast. Exhibit 2 outlines the Helipad on a 2019 Google Earth Aerial Image and the westerly public beach that is partially stabilized by the Helipad. The DEIR should evaluate the impacts to the project, public beach, and adjacent properties in a situation where there is significant sand loss west of the lagoon. It is our professional opinion that sand retention infrastructure should be considered for the project, and a sand monitoring and nourishment plan should be developed as part of the DEIR to ensure the public beach to the west of the lagoon is not lost due to the removal of the Helipad.	Detailed hydrological modeling was conducted to evaluate potential channel dynamics within the historic lagoon delta. The Draft EIR includes the summary report of this modeling effort prepared by Moffat Nichol in **Appendix B**. Moffat Nichol is an established coastal engineering consulting firm with extensive experience along the Malibu coast. The report represents the best available science based on substantial effort and applied expertise to assess the potential flow patterns and potential channel morphological responses of the lagoon, beach, and breaching dynamics. The report concludes that the knoll that currently is used as a non-standard helipad is not creating stability of the flow channel. The knoll is positioned landward of the mean high tide line and shows literally no bearing on the position of the shoreline. In addition, sand retention features are typically hard structures such as rock or sheet pile groins because they are in direct contact with the water and impacted by waves, rather than the soft earthen fill of the knoll. The reasons the knoll has not been eroded away are due to the protection and sheltering of the large cobble delta and its distance from the water. Hence, the knoll is not functioning as sand-retaining groin. The knoll bluff is located far enough back from the water to provide space for a beach to exist. The modeling indicates that knoll does not provide sand retention functions. Removing the knoll will not affect beach erosion requiring nourishment or sand retention to the west. The knoll is a relatively small feature that does not influence the shoreline position. Rather, the cobble delta at the center of the historic creek discharge channel influences the shoreline position as a large feature that armors the shoreline and breaks up wave energy, resulting in beaches on both sides. The shoreline position at Topanga Point and the sandy beaches to the west and the east are all a function of the existence of the large cobble delta rather than the knoll. Those beaches existed prior to the existence of the knoll. As described in **Appendix B**, the cobble delta at Topanga Point serves as a large wave refraction feature that causes incoming ocean waves to bend (refract) around the delta upon approaching the shoreline. This wave refraction results in a convergence of wave energy on the delta and a divergence of wave energy on both sides of the delta. The divergence of wave energy adjacent to the delta results in lower wave energy on either side and deposition of sand creating small beaches. The knoll is not a sand retention feature and does not hold the position of the beach west of the inlet. The Draft EIR has conducted a comprehensive shoreline morphology modeling analysis using an advanced Delft3D modeling suite. The modeling area stretches from Big Rock Beach to the west to Gladstones PCH Beach to the east as shown in Figure 7. The properties to the west of the project are included in the modeling analysis domain. The model is calibrated with best and most recently available data. The model simulated the shoreline morphology changes under the typical dry weather, 10-year fluvial storm and extreme 100-year fluvial storm conditions for 1-year and 5-year post construction. The Draft EIR used model results and evaluated the potential project impacts to public beaches and adjacent properties

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		in all those above-mentioned conditions. The proposed project poses no impact to westerly properties and the shoreline. The project proposes to add 256,000 cubic yards of sandy material to the littoral cell immediately off Topanga Beach to benefit the shoreline and beaches in the region. Hence, there should be no sand retention measures included in the project. See Section 2.3 Master Response - Hydrologic Modeling ENGEO
Kelli Frye		
IND 81-1	Hello, I am a volunteer for the Sierra Club Santa Monica Mountains Task Force. We fight all development in the Santa Monica Mountains to protect the flora and fauna. I am 100% in favor of Alternative 2: Maximum Lagoon Habitat. Wetland preservation is crucial. Thank you, Kelli	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Jay Shields		
PUB 1-1	My names Jay Shields, I'm here with friends of Topanga Point. We are a coalition of surfers and beachgoers and just wanted to comment on a few things that we've been involved in the process. The beach morphology and beach studies were contracted for the agencies in response to FOTP's advocacy for expert analysis of the potential impacts the restoration project alternatives could have on the beach and surfing. We are pleased to the agencies contracted with reputable consultants to do the work and moreover, these consultants met with us to understand our concerns and sought out knowledge from the local surf and beach community and incorporated our input into their computer modeling of the wave and coastal morphology.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 1-2	These final studies were released just last week and we are still reviewing them, but they appear to have seriously examined the issues we raised and are clearly the product of substantial analysis and the results are encouraging. They conclude that their project alternatives would not have significant adverse impacts to the beach or the surf break.	The Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on

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		page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.
PUB 1-3	We would like to thank the RCD and the agencies involved for including these studies in the DEIR, which has not happened before and we look forward to continued collaboration with them. And with that, I'm going to turn it over to Aaron who is also part of our group.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Aaron Clark		
PUB 2-1	My name is Aaron Clark, I am part of Friends of Topanga Point. We all entered this process somewhat suspiciously. We weren't sure we'd be heard, we weren't sure we'd be taken seriously but I can ensure the surfers in this room and the people listening online we were indeed taken very seriously.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 2-2	So the two primary reports that Jay mentioned were to the surf morphology and the beach protection. So we wanted to understand what the impacts to the beach would be, not just for surfers, but for their families, for people that never been on a surfboard. More importantly and selfishly, we wanted to make sure there was no harm done to the break because it's an historic, iconic right-hand point break; there's not many of them around.	The Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.
PUB 2-3	You have to go up to Rincon and it's probably the second best one to that in this area, at least north of Orange County. And so, with that, I just want to thank the staff and this is nascent times, we're going to be putting comments in as we read the report. But Integral group did a fantastic job, Dave Revell, and Moffat & Nichol did as well and so we invite everyone to review the reports. I think you're going to put a zoom of a presentation that they gave to our group last Tuesday, which sealed it for me. Which basically, and I'm a land use practitioner, I work for a law firm that does projects up and down the coast of California and this one of the best collaborations I've had with public agencies, and I just want to thank them very much.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 3-1	So, are there plans for additional pedestrian tunnels under the highway or is that going to be part of the enlarged extended bridge? Right now I know of only one tunnel under the highway. Will there be improved pedestrian access? Anybody know?	As noted in Section 2.6.1 of the Draft EIR, coastal access improvements are part of all Project Build Alternatives and include the creation of a trail system through the Project area and provision of pedestrian access under PCH. The existing pedestrian undercrossing stairs located on the eastern end of the existing bridge would be removed and replaced with a new pedestrian access constructed under the proposed bridge structure on both the east and west sides of the lagoon. The Draft EIR identifies increased safety and coastal access for pedestrians and cyclists as a project objective. To accomplish this, the Draft EIR notes on page 2-16 that coastal access improvements would incorporate safety measures to improve safety compared with existing conditions. This includes incorporation of a pedestrian path under PCH and placing parking in areas more directly linked with recreational locations. The Draft EIR notes on page 2-18 "A pedestrian path would lead from the parking area south to the intersection of PCH and TCB, where a safe crossing of PCH to the beach would be available. Stairs providing beach access from PCH are proposed near the intersection as well.
Anonymous Speaker		
PUB 4-1	So it looked like a 10-year long project. Hi, I'm a Topanga resident. I use the beach a lot with my family and our friends. Looked like a long project, about 10 years, obviously a lot of work. Is it phased in such a way that the resources that are there now can still be used by people over that time or is it like a 10 along construction site. So is that a real five years or like a best case scenario of five years?	Construction of Hybrid Alternative 3A, which includes the wastewater Option 2, Seepage Pits, is estimated to take five years, not ten. Alternative 3A is described in detail in Section 1.3 of the Final EIR. The additional five years mentioned are a maintenance period that is standard for weeding and watering planted habitat areas to ensure their successful establishment. The Draft EIR concludes in Section 2.61 that coastal access would be maintained during construction and improved under all Project Build Alternatives. Construction would close portions of the beach for five to seven months, but a temporary accessway out to the surf break would be maintained at all times. As noted in Section 2.7.2 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible. As noted in Section 2.5 of the Draft EIR, protecting and enhancing coastal access and visitor services is one of the purposes of the Proposed Project. The California Coastal Act establishes coastal land use, access, and management policy in California that strives to balance public trust asset management with sound development and habitat conservation policy. As stated in Section 30001.5 of the California Coastal Act, one of the goals of the state for the coastal zone is to “Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.” Both State Parks and the County have developed coastal land use plans that identify beneficial uses, goals, and development policies to manage the Project Area

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		consistent with the California Coastal Act. The Proposed Project has been developed to facilitate implementation of recreation and coastal access policies outlined in the Topanga State Park General Plan and the Santa Monica Mountains Local Coastal Program that are currently underdeveloped on the Project site. Once constructed, all Build Alternatives, including the preferred Alternative 3A would improve recreational opportunities and facilities by improving or retaining coastal access and visitor services within Topanga State Park compared to existing conditions. As noted in Section 2.7, Project Construction, and Section 2.7.1, Schedule, construction activities would be conducted in phases, beginning with the Gateway Corner to provide continued coastal access parking. Construction and demolition in the Project area is anticipated to begin in 2027 with a total construction duration of 60 months. If an off-site sewer is chosen for wastewater management, it is anticipated that it would take an additional two to three years to obtain required permits and funds for this effort, with construction expected to take approximately one year.
Anonymous Speaker		
PUB 5-1	Hi, I'm a Topanga resident and a heavy user of the beach. I'm in the water a lot when it's not so cold. I really have a question that's not centered around human beings.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 5-2	I wonder about the size of a lagoon, the largest lagoon size, whether or not you've done any correlations with how that buffers against sea level rise in that particular stretch of the coastline. To me that would be a big game changer for supporting the largest lagoon size if it indeed provided sea level rise buffering as well, but I didn't pick that up from your presentation.	The Draft EIR describes each Alternative's resiliency to sea level rise in section 2.6. Each Alternative would be affected slightly differently with Alternative 2 providing the greatest resilience due to the widened lagoon. Alternative 2 provides the lowest flood elevation in the lagoon during peak storms. The proposed project has been designed in coordination with the County of Los Angeles Department of Beaches and Harbors and is consistent with applicable County policies and development regulations. As preferred Alternative 3A was selected and includes seepage pits as the wastewater management option, sewer is not involved, and construction would last 60 months. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 5-3	And thank you very much for all your collaborations by the way and the land acknowledgement; it's long overdue.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 6-1	What would be the advantage of restoring the hotel's historic landmark? it's a dilapidated rundown structure. What would be,would it be work used as a functional motel?	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Restoring portions of the Topanga Ranch Motel under Alternatives 3 and 4 would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. This is also true for the Hybrid Alternative 3A that was selected as the preferred Alternative. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations. Comments on visitor facilities will be considered in the future during the design phase when ultimate uses of project facilities are identified. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 6-2	And the second part of the question is about the current trail head. I'm an avid hiker and currently, the trail extends back about half a mile; it's really nothing. A nice 3 to 4 mile hiking look would be optimal. Thank you.	Each Alternative, including Hybrid Alternative 3A that was selected as the preferred Alternative, includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR. The proposed trail network has the potential to connect with regional systems such as the California Coastal Trail and Coastal Access Trail, which would facilitate connectivity between upper Topanga State Park and areas along the coast. The Backbone Trail is located to the north of the project area within a different portion of Topanga State Park and is not included as part of the proposed project. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 7-1	Hi, I'm from Malibu and when our lagoon was restored, I don't think they did an adequate study of the hydrology as far as how the bridge supports ended up shuttling the water over to where it's trying to take the Adamson House out now.	The Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The reference to Malibu Creek restoration is noted, but the two systems are very different. The potential impact to the surf break and recreational surf quality at Topanga Beach was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.
PUB 7-2	I'm hoping that the study includes research about the new bridge supports so that they will keep the break in the same place.	Each Alternative would include the widening of the PCH bridge as described on page 2-15 of the Draft EIR. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.

Comment Number	Comment	Response
Christine Lee Griffiths		
PUB 8-1	Along those lines, about why in all three alternates that they have the bridge going from 79 feet to 460 and if there is a study that talks about the steelhead and the freshwater goby needing that size.	Each Alternative would include the widening of the PCH bridge from 79 feet to as much as 460 feet as described on page 2-15 of the Draft EIR. The expanded bridge span provides the opportunity for an expanded and improved lagoon area that will provide habitat and reduce flood flows. As described in **Appendix M** (Topanga Lagoon Ecohydrology Report (ESA 2022)), these benefits will provide important refugia for tidewater gobies and juvenile steelhead trout. The expanded riparian buffers will allow the creek and lagoon to adapt to sea level rise All of the proposed restoration avoids changing the beach and the wetted areas.
PUB 8-2	Along those same lines, I stared at this for hours and I don't understand how if you put that much water on the beach side that you now don't have issues with, you know, there's not a lifeguard that's going to be west, so how is that water going to be managed and it does seem to be taking the berm down and basically occupying all of the sand that exists there now. So I'm not quite sure how this plays out. Along those lines, you would need a sand replenishment, I guess permit from the coastal commission, which I understand are really hard to get. So has that already been sought after and in place?	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions. Discussions regarding sea level rise and the value of nearshore nourishment will be considered for inclusion in future public outreach and the interpretive planning identified in Section 2.0 of the Draft EIR.

Comment Number	Comment	Response
PUB 8-3	I also wondered too, why has a cultural center not been already created already, why has that not happened? Why have the trails that are behind the Topanga motel not been created already? It just seems like this project is massive and asking for PCH to be disrupted and the beach to be disrupted but yet not really you know giving some things that should have been addressed a long time ago that could be addressed in an area that you know really has no impact as far as you know people or concessions that are going to be destroyed. The first thing I read at the construction site was that you're going to take down all six, no I'm sorry, five of the six you know restaurants, and Oasis and the Feedman. So it's very ambitious but I also feel like it's incredibly, you know, kind of taking some things out that the people you know are enjoying and especially just to take it.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. All Project Build Alternatives would include one concession and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan.
PUB 8-4	When I read the impact report, it felt like there was this absence of awareness that there is an entire community to the north, to the west, there's an entire community to the east of this existing project and so I find that a bit disheartening.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. The documents are also sent to the State Clearinghouse to be available for other agencies to assess. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community. The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focus on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more 200 feet away from the proposed west bridge abutment. Over time, the channel breach may migrate within the lagoon depression toward the west. However, the modeling conducted for the project estimates that the thalweg of the Creek will remain in the proposed main channel which is more than 300 feet away from the westerly properties. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of

Comment Number	Comment	Response
		the increased lagoon acreage since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the abutments will be protected with rocks to prevent scour from occurring toward the west and prevent any westerly migration. The west bridge abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. No impacts to neighboring beaches and properties is expected from the proposed project. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative "upcoast" or western position relative to sand movement alongshore. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.
PUB 8-5	The other thing about the surf, when I watched the surf video, it showed that they're going to be put the breach of the runoff to the west, which happens to be where there are a lot of homes that are already in flood zone. So if you're putting 460 feet of a width of water and breaching it to the west to support the surfers, which I totally support, I mean I don't surf, but my son does. But you're putting that water now toward homes that are actually in a flood zone and below, for example some of them are under PCH. So how is that mitigated and how is that not even mentioned in an EIR? And along those same lines, my understanding of the video that I watched about the surf was that it the study was actually not done with the specific sand um barge out there are they is that correct? So the wave was really determined before they actually put that barge out there, not the barge, but the box. They didn't take the box into consideration before they did the study.	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1-foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and

Comment Number	Comment	Response
		36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities.
Will Alfred		
PUB 9-1	Hi, Will Alfred, I'm with, I represent Topanga Association for a Scenic Community. I work on the trash warriors on the boulevard, and I take part in the arson watch. I have a couple of things. First of all, I'd just like to say thank you for preserving our nature that we have left here in Los Angeles. There's not a lot of it left and I think this project is ambitious and definitely warranted. I agree with the managed parking that you have up Topanga Canyon Boulevard.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 9-2	I appreciate that because as a trash warrior, that's a pretty rough beat. We get the most garbage right there. I do have a concern with bringing the lagoon up into the back that we make sure that there's a trash management portion of this because people that park there do leave a lot of garbage. I think managing it with a parking lot is going to create a much better environmental spot though.	The Draft EIR concludes that new visitor serving amenities would improve conditions at the site. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and facility management. The Operations and Maintenance Plan is provided in **Appendix S** of the Final EIR.
PUB 9-3	I agree with keeping the motel, I have a concern with making it an overnight spot because people, again, leave trash. They walk into areas they shouldn't be in. I like it better using a visitor center, so I would have a concern if that was a motel. And then finally, I agree and salute with keeping out native American heritage intact, it's extremely important.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Restoring portions of the Topanga Ranch Motel under Alternatives 3 and 4 or the selected preferred Hybrid Alternative 3Awould create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. Alternative 3A is described in detail in Section 1.3 of the Final EIR. As discussed on page ES-21 of the Draft EIR, all Project Build Alternatives, including Alternative 3A, would provide new visitor amenities via the Gateway Corner would retain an onsite concession. Alternatives 3 and 4 would provide additional visitor amenities associated with restoration and use of the Topanga Ranch Motel site for some visitor serving purposes. Day use is anticipated to be the primary access period for most facilities, although evening access would occur if the motel were developed as low cost overnight accommodations.

Comment Number	Comment	Response
PUB 9-4	But also agree with this lady over here that we need to keep some of those businesses intact. I speak specifically about the Reel Inn. It's a place that we gather, it's a place where we have heritage. Whether it's graduation or bringing visitors, it's a place that we enjoy the beach and we have a lot of memories and there's not a lot of privately owned places left in Los Angeles that we can call ours, and that's one of them. So I would have concerns if that's removed, I would appreciate it if you could keep at least that restaurant intact.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. All Project Build Alternatives, including preferred Hybrid Alternative 3A would include one concession located in the structure currently used by the Reel Inn and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan.
Anonymous Speaker		
PUB 10-1	Yeah, I'm a surfer. I've been surfing at Topanga Beach for 45 years. I've surfed professionally around the world, I've also lived in Topanga Canyon. Expansion does not coincide with preservation. This is our land. These are our beaches. These are our reefs. Those are our kelp beds. We need to find ways to preserve these things, not just put up parking lots and expand the bridge. There's a lot that needs to be discussed. Thank you.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Anonymous Speaker		
PUB 11-1	I have a concern with that square box and that fill. You know, it was kind of mentioned as fill and on the website, it was like organic fill and then you know, I got concerns with that, that's all I can say. I mean the other night, it was like hey we're not trucking it cause it's not in the budget, well then what's the budget?	The material to be placed in the nearshore ocean off of Topanga Beach is sandy native material originally sourced from adjacent hillsides during development of the area in the 1930s. The placement of the material in the nearshore for beneficial reuse has been assessed via a thorough investigation required by the government. The material will not be placed as a “land mass, impedimentary structure or natural groin.” Rather, the material is proposed to be placed as a layer of sediment on the seabed over a relatively large area during the construction period. The sediment deposit will not cause any downcoast effects to downdrift beaches. The project will actually provide a downcoast benefit of supplying sand to the downcoast beaches. The beaches west of the project site will not be affected because that direction is located “upcoast” of the project and is outside of the window of project influence along this coast. Multiple site reconnaissance dives by marine biologists and a nearshore morphology analysis were conducted to: 1) determine the most suitable placement site based on proximity and accessibility from the project site; 2) balance the temporary marine environmental impact and beach nourishment benefits, and 3) determine and quantify the fate of the material after dispersion in the ocean. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates.

Comment Number	Comment	Response
		The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered “clean” from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. The placement of sediments southeast of the lagoon is downcoast which avoids impact to surfing and sensitive marine habitats. The prevailing currents move sand northeastward. As a result, Topanga State Beach may not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by the information in **Appendix G**.

Comment Number	Comment	Response
PUB 11-2	What's the budget? If you already know what the budget is, how do you know it's not in the budget? So, what's the budget? That's a question. I'm not a student, you know, break it down, simplify it. This is a public meeting. I'm assuming I'm not the only guy that might want to know. So, what is it?	Detailed cost estimates for each Alternative have not been determined at this time. Funding for the grading, site contouring, lagoon expansion, bridge expansion, and visitor services amenities would be raised by State Parks largely through state and federal grants in coordination with the other landowners, Caltrans and DBH. The actual costs of implementing the project and funding opportunities will be developed as further designs are completed. Project costs are not considered to environmental impacts to be considered under CEQA.
PUB 11-3	But if you guys respond saying hey it's not in the budget and then go hey man, we don't want to contribute to global warming by trucking, to me that's like ehh. When we were talking about that fill dirt, that 200,000 cubic yards of fill dirt because you know it's too much gas, like yeah, I don't like that answer.	As explained in the DEIR, the reasons nearshore placement has been selected instead upland disposal are that it provides an environmental benefit to downcoast beaches; avoids impacts to traffic, air quality, and noise associated with hauling material offsite; and is more cost effective. The material to be placed in the nearshore ocean off of Topanga Beach is sandy native material originally sourced from adjacent hillsides during development of the area in the 1930s. The placement of the material in the nearshore for beneficial reuse has been assessed via a thorough investigation required by the government. The material will not be placed as a "land mass, impedimentary structure or natural groin." Rather, the material is proposed to be placed as a layer of sediment on the seabed over a relatively large area during the construction period. The sediment deposit will not cause any downcoast effects to downdrift beaches. The project will actually provide a downcoast benefit of supplying sand to the downcoast beaches. The beaches west of the project site will not be affected because that direction is located "upcoast" of the project and is outside of the window of project influence along this coast. Multiple site reconnaissance dives by marine biologists and a nearshore morphology analysis were conducted to: 1) determine the most suitable placement site based on proximity and accessibility from the project site; 2) balance the temporary marine environmental impact and beach nourishment benefits, and 3) determine and quantify the fate of the material after dispersion in the ocean. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study

Comment Number	Comment	Response
		(Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022), and the Sampling and Analysis Plan (M&N 2023) process required by the U.S. Environmental Protection Agency (USEPA) and the US Army Corps of Engineers (USACE) Dredged Materials Management Team (DMMT). The analyses characterize the grain size range from soil samples taken on site and reports on chemical analyses conducted to determine suitability for beach nourishment. This process has led to agency conclusions that the material is considered "clean" from contaminants and is sufficiently similar in grain size to be deemed compatible with placement in the ocean. As a result, the Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for nearshore placement to provide future beach nourishment. The placement of sediments southeast of the lagoon is downcoast which avoids impact to surfing and sensitive marine habitats. The prevailing currents move sand northeastward. As a result, Topanga State Beach may not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The lengthening of the bridge would broaden the area of sediment deposition on the beach but would not change sediment loads delivered to the ocean compared to existing conditions. The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by the information in **Appendix G**.
Anonymous Speaker		
PUB 12-1	I could not find in the report, perhaps it's in there someplace, an assessment of the sediment supply that's needed to maintain the beach. I know you showed a picture of the beach today. The high tideline was up against the lifeguard headquarters and one of the things you want to accomplish is to protect that lifeguard headquarters, I understand that. But if you go out there today you see the beach is now 50 feet in front of that from the last couple of storms we've had because a lot of sediment washed down through the creek and deposited on the beach. Obviously, you're going to be disturbing that current balance because you're going to change the sediment flow in the creek by changing the shape and size of the the lagoon and the size of bridge and so on. And you showed a number of pictures from you know, the late 19th century showing the beach and the size of it and we all know that with the last several years, decades, we've had a number of droughts. We're in drought conditions now that's reduced the amount of sediment transport from the creek to the beach to sustain it. Obviously once you start digging a lagoon behind the creek, behind the road, behind the bridge, you're going to do something additional to the sediment transport and discharge of that creek. The discharge of the creek and the sediment load in it is what maintains the beach and I think you need to do a thorough assessment of that before you move forward with excavating the lagoon, changing the bridge, and modifying the sediment transport to the beach. This will	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on pages 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot

Comment Number	Comment	Response
	obviously impact the beach sustainability, it will also impact the goals of having a lagoon which can sustain the goby and the steelhead trout. And so, the sediment transport, the stream discharge, and the predictions of what will be in the future need to be assessed and considered in this report. Otherwise, your report will be inconsistent with I think the needs for assessing this project. Thank you.	difference in bed elevation change during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on pages 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 13-1	Going back to the sediment fill, I was just curious if there was some sort of environmental impact report on that.	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or nearshore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.
Michael Bedner		
PUB 14-1	I have a question and a comment. I've lived on that beach since 1964 when all the houses were there so I know that beach intimately. I know the lagoon intimately because there was a whole series of homes that was built around that lagoon. I worked there and I had friends that lived there, so this is not a new thing to many of us. I think many people in the room really are conversant with how that has transformed itself over the years.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 14-2	My biggest concern now is that the people that are living there, we are adjacent to where you're doing the construction, haven't been considered at all, not once. We live on Topanga Beach Drive. There are seven houses. I have the first three.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Topanga Beach Drive residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. The documents are also sent to the State Clearinghouse to be available for other agencies to assess. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
PUB 14-3	We have a building there that had the surf shop, which is now leaving; today's a day that they're, they have their things. I'm concerned that all of this disruption will kill small business industry up and down.	The proposed Project would reduce the number of businesses on State Parks property. No other small businesses would be affected. Other nearby restaurants may experience increased patronage. The Gateway Corner will be developed to invite visitorship to the State Park consistent with the General Plan
PUB 14-4	You're going to have a bottleneck going into Malibu. You're forgetting about Malibu, Malibu is a tourist destination. You don't need a bottleneck to get there. There's something like 11 million cars that go on PCH into Malibu.	The proposed Project would not increase traffic to Malibu and would not create a traffic bottleneck since four lanes of traffic would be maintained. The proposed Project would be consistent with the General Plan adopted in 2012.
PUB 14-5	There's a whole series of things that haven't been considered, not just the environment. You have to consider the people as part of the environment; the shop keepers, the small business owners, all of that. And that's not just the adjacencies that's in Malibu that you can see all the shops. We have to understand that people are part of the environment.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 14-6	Don't discount the people that you're causing problems to, with, not considering at all, not considering Malibu. I mean that's the reason people come here is because the name Malibu. They don't come for Topanga Beach.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 14-7	I came for Topanga Beach. I have six grandchildren that surf Topanga Beach, I haven't done it in 20 years but the point is so many of us know it intimately and I love what you're doing but there has to be a way of saying, hey maybe the bridge is not the option.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 14-8	How much is that son of a gun cost? How much does everything cost on this? Because I'm paying for it, my taxes are paying for this and hopefully some of yours.	Detailed cost estimates for each Alternative have not been determined at this time. Funding for the grading, site contouring, lagoon expansion, bridge expansion, and visitor services amenities would be raised by State Parks largely through state and federal grants in coordination with the other landowners Caltrans and DBH. The actual costs of implementing the project and funding opportunities will be developed as final designs are completed. Project costs are not considered to environmental impacts to be considered under CEQA.
PUB 14-9	But I know the residents on Topanga Beach have not been considered. We haven't been asked a question. No one came to our homes.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Topanga Beach residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
PUB 14-10	I'd love to have groins put out into the ocean again that really created Topanga Beach when we had all the groins that brough the sand in that stopped the sand from migrating you know, south. Why aren't we looking at more groins?	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 14-11	Why aren't we looking at protecting the beach? Why aren't we adding sand to the beach? Why are we saying, oh it's going to be overflown, you know the sea rises, well all those houses will be gone. Yeah if our houses are gone, so is the PCH, so think of that.	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon, but would modify flood flow dynamics that would lead to

Comment Number	Comment	Response
		morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4-foot difference during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1,

Comment Number	Comment	Response
		MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach but would not increase sediment loads delivered to the ocean compared to existing conditions.
PUB 14-12	So I think it would be good to consider your immediate neighbors. I mean, I walk that beach three times a day with this dog. I know that beach intimately, I know from surfing it all the way back to '74. And I do want to protect the fish. I'm a a great environmentalist. I spent a ton of money on the environment, in contributions. But this seems to be going in a weird direction. It's not about a bridge, it's not about widening that. How come I have never seen a problem with the rainwater? We don't get that much rainwater - twice a year. I see what happens. We have a bridge, you know, which would be countless amount of money. I don't think it'll ever be approved. But let's, why don't we start doing the things that we can do as Chris was saying.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 14-13	Why don't we put the hiking trails in?	Each Build Alternative, including the preferred Hybrid Alternative 3 includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 14-14	Why don't we get rid of the utility poles and put them underground?	As noted in Section 3.17.3 of the Draft EIR, the Proposed Project would require the relocation of existing utilities along with the construction of new utilities or service systems connections. Under all Project Build Alternatives, the existing overhead power/telecommunication lines along PCH between the western boundary of the project and Topanga Canyon Boulevard would be undergrounded and relocated within the proposed bridge or on an adjacent utility bridge.
PUB 14-15	Why don't we get the bus situation brought it?	As noted in Section 2.6.1 of the Draft EIR, an improved bus stop area would be constructed under all Project Build Alternatives. The areas around the existing bus stops would be improved to be more visible and welcoming to public transportation users by providing shaded seating and closer access to restrooms.
PUB 14-16	Why don't we improve the parking, why don't we do all those things?	As noted in Section 2.6.1, all Project Build Alternatives would improve parking. The project would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. These benefits would also occur with implementation of the preferred Hybrid Alternative 3A. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
		As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.
PUB 14-17	We can do them now. We're talking about all of this for sometime in the future. Let's do the things that are immediately available and you know I really wish you would talk to the people that live there. Ron lives next to me, Chris lives up the beach, Cammy lives on that same street. You know, talk to the people that are truly affected. I had offered at the last meeting, we could have a meeting like this above Board Gliders. My wife has a non-profit organization, I offered that space the last time we were all together I believe, which was the old Topanga Motel. And I think it'd be a great spot because you can see the entire beach, you could see our concerns. It's called Creative Visions Foundation and it's yeah 450 feet, we could look at it all.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required. Significant outreach to the Topanga Beach homeowners has occurred. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Topanga Beach residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon.

Comment Number	Comment	Response
PUB 14-18	But we're very much involved, we really know how much work you guys have to go through, but we would like to be considered a little bit because this affects us more than anyone. We live there, we're on that beach several times a day, every day as I said earlier. I have grandchildren that are surfing there, so we're very much involved and we're not just casual visitors.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Topanga Beach residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
PUB 14-19	I really would like to put in there maybe at looking at the groins yet again. That's how that beach was created, you keep forgetting how those beaches were created. There was the addition of groins all the way up and down Topanga Beach and everywhere.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Ron Kurstin		
PUB 15-1	As a Malibu resident, I'm really concerned about the traffic problems that this is going to cause. I realize you said they're going to put some alternative routes around where the bridge is going to be constructed but it's going to take time. And the wastewater project where we're going to have a year with a reduced lane, that's crazy, I mean I'm sorry I go to town every day, I come back it's a nightmare already. There's just no way you can possibly do that, I'm sorry.	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. Traffic lanes are anticipated to be open at all times, except for short durations when construction equipment needs mobilization, and other short-term construction activities. Only construction of a sewer line as a wastewater management option has the potential to involve lane closures. The selected preferred Hybrid Alternative 3A involves development of seepage pits, not sewer, and would therefore not result in substantive lane closures. Alternative 3A is described in detail in Section 1.3 of the Final EIR. All traffic impacts in the DEIR were concluded to be either less than significant or less than significant with mitigation. This is also true for the preferred Alternative 3A. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include TRA-1: Construction and Emergency Traffic Management Plan and TRA-2: Construction Parking Plan. The Transportation Management Plan would address potential traffic flow disruptions and shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
Dennis Washburn		
PUB 16-1	I have a question, but I want to make a comment first if I can. Now the question, what can we do to accelerate the project?	As noted in DEIR Section 2.7, Project Construction, and DEIR Section 2.7.1, Schedule, construction activities would be conducted in phases, beginning with the Gateway Corner to provide continued coastal access parking. Construction and demolition in the Project area is anticipated to begin in 2027 with a total construction duration of 60 months. If an off-site sewer is chosen for wastewater management, it is anticipated that it would take an additional two to three years to obtain required permits and funds for this effort, with construction expected to take approximately one year. As preferred Alternative 3A was selected and includes seepage pits as the wastewater management option, sewer is not involved, and construction would last 60 months. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 16-2	And I know you can't, meaning that all the voices in this room including Mr. Bedner's and Mr. Kurstin's and everybody else, they matter and that's why we're here and we are talking to you. I'm Dennis Washburn and I'm actually one of the the ancient members of the Resource Conservation District that started the Malibu Lagoon restoration project but mostly dealing with the Malibu Creek Watershed restoration and we got money from the federal government to actually undertake that we're doing it with all of us in this room and all of your agencies now. Ultimately there's no disagreement that something has to be done and we do need to take a global view and it's not just about saving this steelhead species or the tidewater goby, it's really saving us.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 16-3	So one of the things I think would be helpful is to recognize what this process does, which is tap into the resources of all of us locals, all of us government involved people, all of us citizens that live on the beach or use it or hope to see it continue for the next 50 or 100 years even though we won't see it, you have to make those decisions.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Public meetings were held on 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24, in addition to additional outreach to adjacent homeowners, surfers and area jurisdictions. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
PUB 16-4	So what do we do to accelerate the process? Because this process is, from what I can see on the screens and the displays, it's actually doing a really great job of saying, hey we're pretty far along. And now you're asking what other obstacles are we going to face? Let's not face them at the end of the process when we lose all the work we've done, let's do it now and duke it out, make it happen.	The Project is anticipated to begin construction as early as 2027. Prior to construction, several permits and approvals are required from the California Coastal Commission, Caltrans, and the US Army Corps of Engineers among others listed in Table 2-6. The Project construction schedule is discussed in Section 2.7.1.
PUB 16-5	How do we get the resources? I will just explain that I got involved with the wildlife crossing at the 101 freeway and we got $25 million pledged by Mrs. Annenberg to undertake that. That accelerated the process of getting our wildlife crossing that actually might help save you know the wildlife and also our quality of life out here as well, that's the really critical part.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 16-6	So I'm not sure how we answer that question today because this is a DEIR process, that's the way it works, and if anybody in the room doesn't understand that, that's a good follow up for yourselves and how you get engaged. Because the draft EIR issues are really looking for obstacles more than opportunities and many of the opportunities that have been identified can be enhanced, so let's do that.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 16-7	So my question simply is, how do we accelerate the process that we're going through now so that we can get everybody in the room and elsewhere connected to the importance of not just Topanga Lagoon, which is critical.	The Project is anticipated to begin construction as early as 2027. Prior to construction, several permits and approvals are required from the California Coastal Commission, Caltrans, and the US Army Corps of Engineers among others listed in Table 2-6. The Project construction schedule is discussed in Section 2.7.1.

Comment Number	Comment	Response
PUB 16-8	We have the same problem in Ballona Wetlands and Ballona Creekwater shed, and every watershed on the California, well, the Pacific coast of America. So let's get busy. We can actually do something that is a great model for our community.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 16-9	Just a quick question, are the agencies using generative AI to deal with speeding up the answers that we're looking for? And are we aware of the Xprize for removing one of the major greenhouse gases, carbon in CO2? And if you're not aware, if you go to the Xprize website and look up the Xprize for reducing or removing carbon, this project could be a classic case study in dealing with contributing to the assistance of reducing the carbon load that in actually with GHGs, greenhouse gases, are causing a lot of the problems that we're facing, whether it's climate change or global warming and all that other stuff. But generative AI does accelerate the process from my experience, just to let you know.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Eugenia Ermacora		
PUB 17-1	Hi everybody, my name is Eugenia Ermacora and the Los Angeles chapter manager for the Surfrider Foundation and I just want to say a couple of words that we are extremely thankful to California State Parks and RDC for the incredible job that they have been doing to actually listen to the voices. It's the first time in record that the voices of the people that use recreationally like the beach of Topanga and the surfers have been listened to and we were able to meet up before with several meetings with Rosie and have the morphology study done and the surf break study done, which is incredible and added to the study. I'm glad that right now with the release of the EIR, like people have the opportunity to put their comments in during this period, so thank you so much.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Alisa Land		
PUB 18-1	Hi, I'm Alisa Land and I'm a resident of Topanga and I'm a part of the Topanga Town Council. I want to thank you for your amazing and thoughtful work.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 18-2	I guess I just wanted to make a plug regarding children and our youth here in this region that this will be disruptive for all the families that want to use the beach and it's a wonderful I think opportunity to really educate our children from elementary to high school about Coastal change, about climate rise, about endangerment, and I really request if there was funding or at least not just signage at the site but really an effort to put some educational material into the Palisades, to Topanga, and to Malibu so that our children are like, okay these are the solutions we are making, this is how we are walking our lives forward in a time of climate change. I think could be really empowering for them. They will see the traffic and the disruption, we want them to feel like we can create solutions to the challenges we're facing. So as a parent as well, please consider that, thanks.	Development of the project under all Build Alterative will create new educational opportunities through creation of the new Gateway Corner with an interpretive pavilion, development of a more extensive trail system to provide opportunities for nature viewing, and development of an interpretive program for the entire project area. Alternatives 3 and 4 would also result in increased interpretive and educational opportunities associated with the restoration of the Topanga Ranch Motel providing more visitor services opportunities to learn about the cultural and biological resources onsite. Selected Hybrid Alternative 3A provides all of these same interpretive/educational opportunities. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
PUB 18-3	This is a separate comment, but as a person that runs, that has small farm animals in my home and represents a lot of people in Topanga in this region, the Feed Bin is a really valuable resource for everybody with chickens or goats or small animals, which is part of the Topanga heritage, the Malibu Heritage. I recognize sacrifices have to be made. I guess I just want to remember that the Feed Bin provides feed and resources, baby chickens, and years of memories for many of our families and if there are places that might be spared that that is a really unique resource for everybody with small animals in this region so to consider, thanks.	All Project Build Alternatives, including preferred Hybrid Alternative 3A would include one concession located in the structure currently used by the Reel Inn. Although the final concession type has yet to be determined, the concession will meet the requirements of the 2012 Topanga State Park General Plan and State Parks mission.
PUB 18-4	This is more of a question really, and maybe too complicating with all the moving parts. As a parent with two teenagers, I guess I'm just wondering a little bit about engaging out youth. Is there any piece of this that they could be involved in, serve in, get their hands dirty? See I guess I'm thinking about how do we empower our kids to feel like they can make solutions, thoughtful solutions to the changes we're facing. I know how busy you are making the project happen but I'm wondering is there any way to do that or engage some of our local science teachers. I would love to see that as a parent because I think it's easy for our children to feel very despairing about the world we're living in and I think giving them agency and solutions and that you can get involved. I mean the beach cleanups are great I will be there but I don't know I'm just asking is there anything more ways that we can get our kids hands into this so that they can take some power and hope for the future? I'd love to see that, thank you.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Development of the project under all Build Alterative will create new educational opportunities through creation of the new Gateway Corner with an interpretive pavilion, development of a more extensive trail system to provide opportunities for nature viewing, and development of an interpretive program for the entire project area. Alternatives 3 and 4 would also result in increased interpretive and educational opportunities associated with the restoration of the Topanga Ranch Motel providing more visitor services opportunities to learn about the cultural and biological resources onsite. Selected Hybrid Alternative 3A provides all of these same interpretive/educational opportunities. Alternative 3A is described in detail in Section 1.3 of the Final EIR. Please see the project website at https://www.topangalagoonrestoration.org/stay-connected to learn about opportunities to engage families and children with this project.
Anonymous Speaker		
PUB 19-1	Is there any thought in picking a plan rather then like focusing on that plan and talking about that plan and splitting the difference on that plan, as opposed to like four plans and doing reports but like I don't know, it seems kind of broad and vague.	The DEIR provides three Build Alternatives that are similar in nature, with many common features. State Parks wanted to receive input from the public, regulatory agencies and involved landowners to help identify a preferred alternative. Alternative 3A was selected based on this input and is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 20-1	How will that selection happen? Who's going to pick it? (In reference to the preferred project alternative) That's not going to be voted on or by anybody? But my follow up question about the decision, how is the decision made, that question I think you answered that there will be a process, but who is the decision making body for selecting the alternatives? Which organization actually makes the selection, based on whatever established criteria, I assume which I will find in the DEIR. Okay, so the Department of Parks decides which of the alternatives are selected?	The Draft EIR describes four alternatives in detail in Section 2.6, including three Build Alternatives and the No Project Alternative as required by the CEQA Guidelines Section 15126.6. Each of these Alternatives is evaluated at a similar level of detail. Section 2.6.1 identifies elements common to each of the Build Alternatives. Section 2.6.3 describes elements of Alternative 2: Maximum Lagoon Habitat, which results in the largest lagoon. Section 2.6.4 describes elements of Alternative 3: Limited Lagoon Habitat Expansion, which would limit expansion of the lagoon in order to retain the Topanga Ranch Motel. Section 2.6.5 describes elements of Alternative 4: Maximum Managed Retreat, which includes moving the Pacific Coast Highway alignment slightly inland. Section 6 of the Draft EIR provides a detailed comparison of each alternative and identifies Alternative 3 as the Environmentally Superior Alternative since it avoids all significant impacts. Based on comments received on the Draft EIR and discussions with the other landowners (Caltrans and DBH), State Parks has developed a hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Anonymous Speaker		
PUB 21-1	Is there public meetings after that or is that like way down the line, like brah we figured it out, we're good.	Comment expresses interest in future public meetings are noted. It is anticipated that public meetings will be held at milestone steps during the design stage (such as an initial design charette and at 60%, 90%, etc.) No additional response is required.
Anonymous Speaker		
PUB 22-1	Thank you so much for all the work and great discussion. I'm just wondering if it might make sense to explore an approach that considers like a more pedestrian friendly kind of situation, like maybe we could keep some of the restaurants and and homes and what not that people love,	The Draft EIR describes the CEQA process in Section 1.3. The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. All Project Build Alternatives would include one concession and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan.

Comment Number	Comment	Response
PUB 22-2	but have it be accessed through more of a Park Trail or something like that	Each Alternative includes the expansion of the trail system within the project area. The proposed trail network is described on page 2-16 and shown in Figures 2-5a, 2-6a, and 2-7a of the Draft EIR.
PUB 22-3	and perhaps this part of the PCH goes underground or you know just just perhaps reimagining it from that perspective as well. I don't know technically how much the autos are a problem versus some other aspects.	As noted in Section 2.6.1 of the Draft EIR, coastal access improvements are part of all Project Build Alternatives and include the creation of a trail system through the Project area and provision of pedestrian access under PCH. The existing pedestrian undercrossing stairs located on the eastern end of the existing bridge would be removed and replaced with a new pedestrian access constructed under the proposed bridge structure on both the east and west sides of the lagoon.
Lloyd Ahern		
PUB 23-1	My name's Lloyd Ahern, I'm the president of the Las Tunas Homeowners Association, which is the beach adjacent to Topanga Beach. Where's Rosie? Hi Rosie, I saw you the other night on the Zoom meeting with the surfers and you said something that was very interesting to me.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 23-2	You said the lagoon was going to breach to the west. You said it twice, maybe three times. I was very confused by that because the berm does go to the east. So, if the berm were to go to the west, it would go, since I'm the homeowners association president, even though I live a thousand yards from this project, I still am affected by everybody calling scared to death. If it breaches to the west, it goes to the homeowners that are very, very close. So where your line is right now with the creek, is the berm. You're proposing to take the berm down, are you taking the palm tree down, and are you moving the mouth of the berm, the lagoon out further to the west.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.

Comment Number	Comment	Response
PUB 23-3	And in a flood, where would the water go, and have you figured that out?	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes.
PUB 23-4	And I'll just sit down after I'm done with this. I'm proposing that your hydrologist, our hydrologist, meet in the next two weeks right down the beach where you say that line of the water is going to be and we can get that settled before this EIR is over on the 12th. Okay Rosi, you wanna think about that one? You think you can do it?	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Chester Griffiths		
PUB 24-1	Good evening, my name is Chester Griffiths. I'm a surgeon and physician in the community for the last 34 years, excuse my voice. But I am, my wife and I, are homeowners on Topanga Beach Drive and I'm representing the five other homeowners on that street tonight.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 24-2	A couple of issues we've had is to this day, none of the impacted residents were individually contacted relating to this project and to the related imminent dangers to their residential properties.	CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. Topanga Beach residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. Two DEIR public meetings were held on February 24, 2024, which was also livestreamed, and on February 28, 2028. Videos of both meetings have been posted on the project website (https://www.topangalagoonrestoration.org/whats-new). As noted in Section 2.3 of the Draft EIR, public meetings have been held since 20001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. Staff from CDPR, LA County Department of Beaches and Harbors, and members of the he Santa Monica Mountains Resource Conservation District of the Santa Monica Mountains have met with individual interest groups throughout the process in an effort to address concerns of the local community
PUB 24-3	None of the impact studies included in this included the Residential Properties and the potential damages to the properties with the westward expansion of Topanga Lagoon. Not limited to flooding, foundation damage, change to the already existent beach erosion, leading to more ocean wave damage and loss of function to the properties. Nor were any studies performed on the impacts on any of the other homes on Las Tunas Beach. I must say that the interested parties must take this into consideration with the westward expansion and I would recommend consideration of a protective bond for any damage or loss to the homeowners related to this restoration project in perpetuity, as no one can predict the ultimate future of the impact of such a project on these residential properties.	The Draft EIR concludes on page 3.9-33 that the morphological changes to the lagoon would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. The hydrological modeling summarized in **Appendix B** focuses on elevation changes to the lagoon and beach area. The neighboring properties to the west of the lagoon are more than 100 feet away from the west bridge abutment and more than 200 feet away from the bridge main span. The modeling results indicate the thalweg of the creek may shift to the west but will still remain in the main span of the bridge even after an extreme wet storm period. The modeling conducted for the project estimates that no impacts will occur to neighboring beaches to the west due to their relative “upcoast” or western position relative to sand movement alongshore. Side scouring and encroachment onto the neighboring residential properties to the west will not occur as a result of the increased lagoon acreage and bridge lengthening since the existing residential development is on the upcoast of the project with ocean currents moving southeast, and the fact that the bridge abutments will be protected with

Comment Number	Comment	Response
		rocks to prevent scour from occurring toward the west. The west abutment will be protected in place and prevent creek migration to the west beyond the position of the west abutment. It will be physically impossible for the creek to meander to the west and threaten the homes. The creek is going to be constrained in position to the west by the bridge structure, and ocean currents move from west to east placing a constant force on the creek mouth to also move in that same direction. There will not be any forces on or conditions within the creek that would cause it to shift against the prevailing ocean current direction and affect the homes. State agencies typically do not post a Property Damage Bond for adjacent properties and CDPR has determined this is not warranted.
PUB 24-4	Additionally, Caltrans and the Coastal Commission must conduct a study to address the erosion of beach, which was highlighted in the initial historic shoreline changes as part of the planning and in compliance with SB 272, which was passed on October 7th, 2023, which addresses the imminent sea level rise with planning and applications.	The Draft EIR concludes in Section 3.9 Hydrology that the proposed modifications to the lagoon acreage would restore a more natural hydrological system that would benefit habitat and native species. The proposed project would not alter the existing wetted lagoon but would modify flood flow dynamics that would lead to morphological changes in the lagoon and beach. The Draft EIR concludes on page 3.9-33 that the morphological changes would not increase flooding hazards on neighboring areas. This conclusion was based on detailed modeling that was conducted to evaluate impacts to beach morphology, breaching dynamics, fish passage, and sea level rise. The modeling efforts are described in detail in the technical Appendices B and E. **Appendix B** (Topanga Lagoon Restoration Technical Report for Shoreline Morphology Analyses, (Moffatt & Nichol 2023)) provides a summary of shoreline morphology with and without the project. As described on page 6, a two-dimensional "Delft3D FM" morphological model was created to estimate the changes to the beach morphology during 10-year and 100-year flood stages. The analysis concludes on page 44-45 (**Appendix B**) that changes to beach morphology would be within seasonal variation, including an approximate 0.4 foot difference during a 10-year flood event and an approximate 1 foot difference during a 100-year flood event. The report states on page 45 that the removal of the knoll and lifeguard and public restroom building would not cause more erosion on adjacent beaches. **Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities.

Comment Number	Comment	Response
PUB 24-5	Furthermore, it's not to our knowledge that representatives of the city of Malibu have been engaged in this process in the Topanga Lagoon restoration, which is concerning as the LCP of the Coastal Commission grants jurisdiction to the City of Malibu up to the western border of the project, and which then includes the westward expansion.	The City of Malibu has been included in the public outreach process and has attended the public meetings. Discussions with City staff regarding CDP concerns and other items occurred on 7/27/2022 and 1/29/24. CDPR has implemented a robust public outreach and participation process throughout the development and analysis of the proposed Alternatives. The Draft EIR Section 2.3 describes this outreach process that included participation by many agencies and members of the public. CDPR has complied with the public noticing requirements of CEQA Guidelines including Section 15082, publishing of the Notice of Preparation initiating the scoping process, and Section 15085 and 15087 noticing the availability of the Draft EIR for public review. Notices of Availability (NOA) of the Draft EIR were sent to over 818 addresses, including all property owners within a half mile radius of the project site. In addition, the NOP was published in the Los Angeles Times on Thursday May 26, 2022 and the NOA was published in the Los Angeles Times on Friday February 16, 2024. The NOA described the process and provided a link to an electronic copy of the document and appendices available for review. As noted in Section 2.3 of the Draft EIR, public meetings have been held since 2001, including the establishment of a Technical Advisory Committee (TAC) involving over 100 representatives of relevant permitting agencies, landowners, and utilities. CDPR and members of the Santa Monica Mountains Resource Conservation District have met with individual groups throughout the process in an effort to address concerns of the local community.
PUB 24-6	The noise disruption from the construction of PCH bridge and evacuation of the landfill was never addressed to the adjacent residents.	Impacts related to Noise and Vibration are analyzed in Section 3.12 of the Draft EIR. As described in Section 3.12, all Noise and Vibration impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include NOISE-1, NOISE-2, and NOISE-3. Mitigation measure NOISE-1 would address noise impacts associated with operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work. Mitigation measure NOISE-2 would monitor construction noise to verify compliance with the applicable noise limits. Mitigation measure NOISE-3 would mitigate vibration and noise impacts related to pile driving. Details of these mitigation measures are discussed in Section 3.12 of the Draft EIR.

Comment Number	Comment	Response
PUB 24-7	We did discuss the wastewater treatment and of course the final disposal of the extracted dirt. What is the Coastal Commissioner going to do, or is it going to allow that extracted dirt to be placed in the ocean or will they remain to be removed?	The Draft EIR describes in Section 2.6.6 the options for on-land sediment disposal or near-shore beneficial reuse. Nearshore sediment placement is described as a means of providing beach nourishment down-coast while also reducing impacts to air quality and traffic caused by the offsite trucking and disposal alternative. The Draft EIR evaluates the impacts of near-shore placement in Section 3.11 Marine Biological Resources. The analysis is supported by **Appendix G**. A detailed assessment of the material to be excavated from the area was conducted and summarized in **Appendix G** Sediment Beneficial Reuse Study (Moffatt & Nichol 2022), and Beneficial Reuse Soil Characterization (GeoPentech 2022). The analysis characterizes the grain size from soil samples taken on site and conducts chemical analysis to determine suitability for beach nourishment. The Draft EIR concludes based on this analysis that the soils to be removed are suitable for beneficial reuse for beach nourishment. An offshore analysis was conducted to determine the most suitable placement site based on proximity and accessibility from the project site and the marine environmental conditions. A suitable location was identified southeast of the lagoon as shown in Figure 2-2. This site exhibits low presence of sensitive marine vegetation and invertebrates. The analysis concludes in Section 3.11-32 of the Draft EIR that the site appears to be suitable, pending approvals from the California Coastal Commission, National Marine Fisheries Service, and the US Army Corps of Engineers. The Draft EIR identifies mitigation measures MAR-1, MAR-2 and MAR-3 that would ensure impacts to the marine environment would be minimized. The placement of sediments southeast of the lagoon is downcoast. The prevailing currents move sand southward. As a result, Topanga State Beach would not benefit from the one-time nourishment action. However, beaches downcoast would benefit from the additional material. Once constructed, normal sediment transport from Topanga Creek would continue. The widening of the bridge would broaden the area of sediment deposition on the beach, but would not increase sediment loads delivered to the ocean compared to existing conditions.
PUB 24-8	Our request is that a formal meeting with all homeowners of Topanga Beach Drive be done and that we have an action plan to investigate the impact together on our properties. We are in favor of the Topanga Lagoon Restoration Project, but of course we have our concerns with our homes and our livelihoods. I would recommend that we engage the City of Malibu in this planning process as well as they are liable by the LCP and I hope we find and define all future issues that we don't know of now so that we could all make this a very successful project together. Thank you.	Topanga Beach residents were present at the 2/29/20, 2/27/21, 6/11/22, 2/24/24, 2/28/24 meetings. Meetings on 6/6/22 (C. Stevens, RCDSMM) and 3/28/24 were also held with adjacent residential landowners with representatives of CDPR, RCD of the Santa Monica Mountains and Moffatt & Nichol hydrologists to specifically address concerns regarding the alternative designs on the west side of the lagoon. Coordination with the City of Malibu has occurred as part of extensive public outreach efforts for the project. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
Anonymous Speaker		
PUB 25-1	I'm a little surprised that we can't ask a question, but the big question I have and it's more, you can take it as a comment or a question.	To facilitate a public input process, CEQA requires a lead agency to solicit comments and then to consider those comments with respect to the adequacy of the analysis in the Draft EIR in order to determine if new information has been provided not already considered that may require revising the Draft EIR. Providing answers from staff in the public meeting context may provide inaccurate information. This Final EIR provides detailed responses that are thoroughly reviewed by State Parks to ensure accurate information is conveyed. The Draft EIR describes the CEQA process in Section 1.3.
PUB 25-2	Has anybody had any familiarity with the Malibu Lagoon Project and what an unmitigated disaster that was for Malibu Beach and how many experts just like yourselves were there and saying this is going to be great, this is this amazing natural habitat, we really need to protect it and it has destroyed the natural habitat. It's actually almost destroyed the Adamson House which is a historical building. It has destroyed the wall. It's required a jetty to be put in at the bottom of the Malibu wall and it was with all the good intentions that everybody thought that this was going to be a great idea.	The Draft EIR describes the CEQA process in Section 1.3. Malibu Creek is a different watershed and has no bearing on the proposed project or the adequacy of the analysis and information contained in the Draft EIR.
PUB 25-3	This is exactly the same thing and maybe even more radical because you've got PCH that you're dealing with, so the comment is, this is psycho. This is, I get it, I love, this is crazy, like what you guys are going to do to this environment and that beach and PCH, and just our lives in general for five years.is just, I cannot believe we're even considering it and I get the good intention behind it but have a look at Malibu and see what that looks like to you.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
John Luker		
PUB 26-1	Hi there, how you guys doing tonight? So, I have a couple of comments and two questions that will probably be answered in some point in time. Oh, my name's John Luker, I'm the vice president of the Santa Susana Mountain Park Association and we keep pretty much close tabs on everything that happens environmentally around here. The two comments I've got:	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 26-2	I really like alternative two, I think you should maximize the lagoon habitat in there, I think it'd be healthy all the way around for everyone.	The comment expresses preference for Alternative 2. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
PUB 26-3	I think it's a shame that the Malibu, or the Topanga Motor Court has to go, but unfortunately, I've been in those buildings and in order to repair them and restore them, you would probably have to replace every stick of wood inside it and it would be prohibitively costly to fix it unfortunately.	As noted in Table 3.4-1 on page 3.4-27 of the Draft EIR, the Topanga Ranch Motel has been identified as eligible for listing on the National Register of Historic Places for its association with the development of early roadside recreational activities and a rare surviving example of a 1930s auto court motel. The Draft EIR identifies mitigation strategies to minimize impacts to the historic resource on page 3.4-32. However, the Draft EIR concludes that the proposed demolition of the resource under Alternative 2 would constitute a significant and unavoidable impact of the project. Restoring portions of the Topanga Ranch Motel under Alternatives 3 and 4, and the selected preferred Hybrid Alternative 3A, would create a destination amenity for visitors seeking to experience unique State Park assets in a manner that is consistent with the Topanga State Park General Plan's objective to enhance recreational access for all Californians. State Parks has previously determined that restoration is technically feasible due to the simple, uncomplicated construction of the structures. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 26-4	Two questions are: is funding in place for this and how much is this going to cost? Especially who's going to pay for that bridge? And that's pretty much all I've got. Thank you very much and thanks for all your hard work, I know you guys have been working on this for decades, thank you.	Detailed cost estimates for each Alternative have not been determined at this time. Funding for the grading, site contouring, lagoon expansion, bridge expansion, and visitor services amenities would be raised by State Parks largely through state and federal grants in coordination with the other landowners Caltrans and DBH. The actual costs of implementing the project and funding opportunities will be developed as final designs are completed. Project costs are not considered to environmental impacts to be considered under CEQA.
Matt		
PUB 27-1	Hi, my name's Matt, long time Topanga resident. Just a couple thoughts on this. I really love the idea that the lagoon could come back and that we could restore this habitat.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 27-2	That's just incredible and so looking at these models, my main concerns maybe overdevelopment, over gentrification. I'd rather that this project stay a bit country if it's going to happen; keep the natural surrounding looking natural.	As described in the *Programmatic Topanga State Park Visitor Services* sections of the DEIR, under all Build Alternatives, the intent of the Gateway Corner is to provide a rural/urban interface into the Santa Monica mountains and Topanga State Park. All buildings would be one-story and blend into the surrounding areas. Restoration of the Topanga Ranch Motel under Alternatives 3 and 4, would retain and restore the charm of the original structures. The selected preferred Hybrid Alternative 3A retains these same elements. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
PUB 27-3	I think there's a couple key issues. I think down here at the beach, I mean we want more beach. Does this lifeguard tower have to be this far out? Can we push this back? And the helipad like right on the beach here. This stretch here to where this bridge is is like one of the most beautiful parts of the beach, can't we more beachify this and get rid of infrastructure? I know you need a lifeguard tower and you need a helipad somewhere, but it seems like they're really sticking out here in the ocean in the prime zone and kind of blocking this spot, so there's issues I have there.	The comment identifies the preference for more beach area and location of beach facilities further inland. As noted on page 3-15 of the Draft EIR, beach stabilization using living shoreline concepts will be considered during final design. The preferred Hybrid Alternative 3A described in detail in Section 1.3 of the Final EIR would include these features where feasible with County approval. These additional areas would provide opportunities for increased recreational space and would incorporate bioengineered stabilization or living shoreline elements to both protect against storm surge and SLR and restore coastal strand and foredune habitats. Bioengineered stabilization and living shorelines typically feature low-impact installation of temporary fencing and native vegetation to encourage deposition of sand and include interpretive signage and pathway guidance. These elements would be installed above the ordinary high-water mark and would be located where they could protect lifeguard facilities. Additional design of these elements would be further developed for the preferred alternative in accordance with best management practices (BMPs) similar to those implemented along Santa Monica, Dockweiler, and Zuma beaches.
PUB 27-4	I just feel, I'm wondering about things like lighting. Is this going to be all blown out with lights and like can we reduce lighting and things?	This comment expresses concern regarding lighting impacts. Impacts related to lighting are analyzed in Section 3.1, Visual/Aesthetics, of the Draft EIR. All impacts were concluded to be less than significant with mitigation. As described in Section 3.1, all lighting impacts were concluded to be less than significant with mitigation. The mitigation measures include AES-1, AES-2, and AES-3. Mitigation measure AES-1 would require lighting used during daytime or nighttime construction to be shielded and pointed away from surrounding light-sensitive land uses. Mitigation measure AES-2 would require that all new permanent exterior lighting associated with proposed Project components to be shielded and directed downward to avoid any light spill onto neighboring lands or into nighttime skies. Mitigation measure AES-3 would require all proposed aboveground facilities to be designed with non-glare exterior materials and coatings to minimize glare or reflection. Details of these mitigation measures are discussed in Section 3.12 of the Draft EIR.
PUB 27-5	Another issue up here, one of my favorite parts about, I live up in Topanga so I'll come up you know off the coast and suddenly you're up into the canyon like right around the first corner, I noticed they're extending a bunch of parking up here and infrastructure or probably just a parking lot, but is that going to be lit up? Is that going to be dark, or are we going to keep it like it feels now? You get right around that first corner and it's like wow, it's wide open. I think that part needs to be considered. I'd hate to have lights going up into there.	This comment expresses concern regarding lighting impacts. Impacts related to lighting are analyzed in Section 3.1, Visual/Aesthetics, of the Draft EIR. All impacts were concluded to be less than significant with mitigation. As described in the DEIR, the intent is to have the Gateway Corner, located at the NW corner of PCH and Topanga Canyon Boulevard) function as the rural urban interface into the Santa Monica Mountains, As described in Section 3.1, all lighting impacts were concluded to be less than significant with mitigation. The mitigation measures include AES-1, AES-2, and AES-3. Mitigation measure AES-1 would require lighting used during daytime or nighttime construction to be shielded and pointed away from surrounding light-sensitive land uses. Mitigation measure AES-2 would require that all new permanent exterior lighting associated with proposed Project components to be shielded and directed downward to avoid any light spill onto neighboring lands or into nighttime skies. Mitigation measure AES-3 would require all proposed aboveground facilities to be designed

Comment Number	Comment	Response
		with non-glare exterior materials and coatings to minimize glare or reflection. Additional measures to limit lighting impacts to fish and wildlife are included in Mitigation Measures MAR-2, BIO-7 and BIO-10. Details of these mitigation measures are discussed in Sections 3.3, 3.11 and 3.12 of the Draft EIR.
PUB 27-6	Also, I understand we need to bring more people, but you know to be honest, in some ways, I don't think we want to make too much parking and keep it natural.	As described in the DEIR, the intent is to have the Gateway Corner and its associated parking lots, located at the NW corner of PCH and Topanga Canyon Boulevard) function as the rural urban interface into the Santa Monica Mountains. As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations.

Comment Number	Comment	Response
PUB 27-7	Another big point is I know there's this talk about depositing all this soil out off the coast here. I know you have studies and morphology things, but this is concerning to me to what that could do to the surf break.	The Draft EIR concludes on page 3.10-13 that the proposed project is consistent with the goals and policies of the 2012 Topanga State Park General Plan prepared by CDPR. A detailed assessment of consistency with the Local Coastal Plan is provided in **Appendix Q**. The Topanga State Beach is a popular surfing area, known for its "right-hand point break" which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a "high-fidelity wave modeling tool" to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that "[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion." Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions. The nearshore nourishment placement site is located on the eastern edge of the project area to avoid impacts to surf areas and sensitive biological resources.
PUB 27-8	We don't really know, I don't think. I mean you have ideas, I would say there's another picture somewhere, they're going to take it straight off the bottom of the boulevard, but maybe you would want to deposit that soil off the end of Chart House point. Because if you follow down the coast from Chart House, that's where the road erosion is occurring. And a couple of points on that erosion, I believe the seawall that was built at the old Ted's Rancho down at coastline, that seawall, they built a vertical wall with a parking lot that has become a major backwash wall. The waves come up, they wash out. If you go there on a medium sized swell or a significant swell, you can watch the waves going off that wall and heading for Catalina. I'm reckoning that that's just taking all the sand with it and along that highway stretch, it's just draining all the sand out and hence now we have road erosion right below Chart House. There's another wall up past Topanga at little Tuna Creek or Tuna Creek. They put a bunch of riprap, big boulders down there. They've created another backwash wall. The surf comes up, washes out and it sends all the sand out to the outer lying area, who knows. I think those are both impacting the erosion on the road around there and the Topanga Point.	A discussed in Section 3.11 of the DEIR, the nearshore nourishment placement site is located on the eastern edge of the project area (near the intersection of PCH and Topanga Canyn Boulevard) to avoid more sensitive biological resources associated with Ratner Beach (east of Charthouse or Mastro's Point). Movement of material to that location also was determined by project engineers to provide more construction and traffic challenges given the distance from the site and erosion of the S shoulder of PCH in that area due to wave damage. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 27-9	So, those are my main concerns. I just feel like we don't want to overdevelop this. Let's take this opportunity to bring back the country and maybe just keep it light. Light footprint would be suggestion.	As described in the *Programmatic Topanga State Park Visitor Services* sections of the DEIR, under all Build Alternatives, the intent of the Gateway Corner is to provide a rural/urban interface into the Santa Monica mountains and Topanga State Park. All buildings would be one-story and blend into the surrounding areas. Restoration of the Topanga Ranch Motel under Alternatives 3 and 4, would retain and restore the charm of the original structures. The selected preferred Hybrid Alternative 3A retains these same elements. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Anonymous Speaker		
PUB 28-1	Hello, thanks for all the work. I guess I have three or four concerns. I second the concern with Malibu Creek. I don't know what measure, what your guys' opinions of the success of that project are, but if you think it was a success, you're not tapped in the same way the people that use that space are because it's a failure. It's a failure ecologically, the recreational areas have been destroyed because they weren't planned property. He listed a few other things, so. I know that this is, I won't say this is the same project, because it can't be.	The Draft EIR concludes on page 3.10-13 that the proposed project is consistent with the goals and policies of the 2012 Topanga State Park General Plan prepared by CDPR. The Malibu Creek project is located in an entirely different watershed and has no bearing on the proposed Project. A detailed assessment of consistency with the Local Coastal Plan is provided in **Appendix Q**.
PUB 28-2	I'm concerned about access to the beach during construction. I go to the beach four times a week five times a week. I would say right now the majority of people that go to the beach are surfers in the morning. Weekends, full of everyone.	The Draft EIR concludes in Section 2.61 that coastal access would be maintained during construction and improved under all Project Build Alternatives. Construction would close portions of the beach for five to seven months, but a temporary accessway out to the surf break would be maintained at all times. As noted in Section 2.7.2 of the Draft EIR, there are an existing 390 vehicle parking spaces currently in the Project area and it is a Project goal to retain the same level of parking availability during construction activities. Temporary parking would move around during the five-year construction period and would utilize areas that are not actively being developed to protect public access to the beach and concessions to the maximum extent feasible. As noted in Section 2.5 of the Draft EIR, protecting and enhancing coastal access and visitor services is one of the purposes of the Proposed Project. The California Coastal Act establishes coastal land use, access, and management policy in California that strives to balance public trust asset management with sound development and habitat conservation policy. As stated in Section 30001.5 of the California Coastal Act, one of the goals of the state for the coastal zone is to "Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners." Both State Parks and the County have developed coastal land use plans that identify beneficial uses, goals, and development policies to manage the Project Area consistent with the California Coastal Act. The Proposed Project has been developed to facilitate implementation of recreation and coastal access policies outlined in the Topanga State Park General Plan and the Santa Monica Mountains Local Coastal Program that are currently underdeveloped on the Project site.

Comment Number	Comment	Response
		Once constructed, all Build Alternatives would improve recreational opportunities and facilities by improving or retaining coastal access and visitor services within Topanga State Park compared to existing conditions. This is also true for the preferred Hybrid Alternative 3A that was selected. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 28-3	I'm concerned with the beachside parking, I'm not really clear how that works.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks leasee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks leasee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks leasee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, including preferred Hybrid Alternative 3A that was selected, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. Alternative 3A is described in detail in Section 1.3 of the Final EIR
PUB 28-4	I'm concerned also with having recreational areas beachside because I, that is like, for a lot of us I'm sure will love to go check out the creek once in a while, but really, it's Topanga State Beach for us, not Topanga State Creek.	Maintaining beach access is a central objective of the Topanga State Park General Plan prepared by CDPR in 2012. All project Build Alternatives, as well as the selected preferred Hybrid Alternative 3A would increase bridge widths 50-90 feet and provide an estimated additional 0.2-0.4 acre of beach areas. Access to the beach would also be bettered by an improved distribution of parking, improved access across/under PCH, and improved bus stop areas and provision of new bicycle parking. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
PUB 28-5	I think that's kind of it, I just really hope that, I would also second I don't really care about the hotel. I'm just going to put it out there, I don't care about and hopefully there's no tribal people leaders here that will be pissed off, but I don't care about their archaeological damage done by moving the PCH. That's me, it's where I'm at. I think those buildings are old meth houses.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Keon Smith		
PUB 29-1	Hi, my name's Keon Smith. I'm a homeowner on Las Tuna Beach and I've been interested in Topanga Ranch Motel for years. I know Pablo who used to live behind and I'm sure people on the project know him as well, very vocal.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 29-2	But, I love alternative three and a comment would be how can we preserve the music and art history of Topanga Canyon and Malibu?	The comment expresses preference for Alternative 3. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 29-3	Can we turn the, instead of making it overnight places, like small businesses, having small artisans come into these already existing infrastructures that are going to be revamped? Can we have an amphitheater where musicians can play and the little space behind Reel Inn where it's flat, can we turn that into like occasional drive-in movie theater which raises funds for the continuing projects and a percentage of that money that is generated from these small shops goes into the beautification of the creek of the beaches and creating a community-like aspect around this. I think that from the younger generation, social media coverage of, for me, a beautiful historical site, a lagoon, creating that surfer beach vibe, continuing that for the surfers, for the people visiting the park, and then visiting the shops and promoting local artisans, local musicians, and maintaing the heritage of the area.	The CDPR prepared the Topanga State Park General Plan in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Improvements to the trail system and management of cultural resources on site were identified in the General Plan. CDPR evaluated the historic character of the existing restaurant amenities on the site as described in Section 3.4.2 and Section 3.4.3. The Draft EIR concludes that the Topanga Ranch Motel is the only resource with the potential for eligibility on the National Register of Historic Places. All Project Build Alternatives would include one concession and identify a plan for determining the future configuration of the historic Topanga Ranch Motel. Although the final type has yet to be determined, the concession will meet the requirements of the General Plan. Ultimate uses for the restored motel units have yet to be determined but will comply with the objectives of the 2012 Topanga State Park General Plan.

Comment Number	Comment	Response
Jay Shields		
PUB 30-1	Yeah hi, my name's Jay Shields, I'm with Friends of Topanga Point. We formed actually, one of the reasons we formed, is because of what happened at Malibu and in response to that and one of the things that, with the help of the agencies involved, we got done was the surf study and the beach morphology study and that's something that hadn't been done before, and something that is included in this DEIR. Has not happened before and we got that done and I want to say we appreciate that; something Malibu didn't get and I encourage everyone here if you're interested in the beach and interested in surfing, that you watch the zoom call that is on the Topanga Lagoon restoration site I think it's also on our website and watches about 45 minutes or an hour and if you don't want to read the whole DEIR that's on that desk, watch that video and you know see for yourself all the work that's been done about this and that's enough for me. I'm going to turn this over to Carolyn Day who's with us as well.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Carolyn Day		
PUB 31-1	Hi, I'm Carolyn Day and I'm with Friends of Topanga Point. I'm also a Topanga resident, I was married in this community club and on the beach at Topanga using the staircase to be walked down. My comment today is twofold. One with the Friends of Topanga Point, where I want to thank the planners who, I want to assure the surfers, I know here that our concerns about how this project was going to affect the surf, the beach, and the sand replenishments were taken seriously and they gathered input from our community they inputted it in their data driven models and that is the Zoom call that Jay is referring to that's on the website it's a lot easier to digest than 3,900 pages of draft DEIR. I want to make a note that Topanga Beach is the closest Point Break to 12.5 million Angelenos. It's our state sport and that many generations of surfers have been gathering there since the 1930s when the Lilone family brought over the first surf boards from Hawaii. We're a community of surfers that has gathered there for generations, marriages, birth, and we've celebrated a lot of our loved ones on the beach.	The DEIR acknowledge the importance of Topanga State Beach as a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required. F113:F120
PUB 31-2	We have a lot of markers and reminders on the beach of the people we love, the Jensen bench, the Scotty tree, and we would hope that with the planners, we can identify those and possibly preserve and move them for us to keep remembering our loved ones.	Future public meetings will be held during key design milestones (initial charette, 50%, 90%, etc.) where community feedback on specific design elements were be considered. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 31-3	With this project, many surfers fear that they are losing a place of gathering. Unless you gather there as Kyle and I do many times a week and a lot of other folks here, you might not know, that there's a community of folks that uses the top of the staircase to have barbecues to celebrate each other's waves, to celebrate a connection with the ocean. We've also begun interacting with state beaches, the fences used to be eight feet tall, so you had to watch the ocean through a frost fence. They've now been lowered to 3 feet and Evie, a local surfer and resident, has been landscaping the hillside.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 31-4	We want to have places in your project, where as Kyle said, we're not Topanga State Creek, we're Topanga State Beach. We have communities that live there, and we want to have places such as tables and benches and places to cook food, sit down, and enjoy each other's company. It would be said if this was just a loss for the beach community and that these needs weren't tended to.	Maintaining beach access is a central objective of the Topanga State Park General Plan prepared by CDPR in 2012. Since the adoption of the General Plan, CDPR has been pursuing funding and convening design workshops to develop the alternatives evaluated in the Draft EIR. This process is described on page 2-8 of the Draft EIR. Future public meetings will be held during key design milestones (initial charette, 50%, 90%, etc.) where community feedback on specific design elements were be considered.
PUB 31-5	What else, please consider this community, my community of surfers, when you make plans for humans to enjoy the ocean and the shoreline together.	The DEIR acknowledges that the Topanga State Beach is a popular surfing area, known for its “right-hand point break” which is the result of coastal morphology, lagoon breaching, and ocean wave and current dynamics. The potential impact to the surf break and recreational surf quality was evaluated in a study included in the Draft EIR as **Appendix H** Surf Quality Impact Assessment for Topanga Lagoon Restoration (Integral 2023). The analysis employs a “high-fidelity wave modeling tool” to resolve the propagation and breaking on a wave-by-wave basis. The surf modeling results indicate that sea level rise poses the greatest risk to the existing surfing conditions. Rainfall and watershed runoff variability also produce greater changes to the wave conditions than the proposed Project Alternatives. The report concludes that “[b]ased on the rigorous modeling analysis, the surf conditions are not expected to be negatively impacted by the Project when compared to natural seasonal variability (flood/drought) and SLR impacts. Overall, the results of the surf study indicate that the Project impacts to surf conditions are comparable to interannual creek flow discharge changes and that any of the short-term impacts of the Project decay within 5 years of project completion.” Based on the analysis in **Appendix H**, the Draft EIR concludes on page 3.14-11 that the proposed modifications for any of the Build Alternatives would not adversely affect surfing conditions.

Comment Number	Comment	Response
PUB 31-6	I have two more points; one is parking near the waves preserves access. By putting parking on Topanga Canyon Boulevard, you're forcing folks to walk an eight of a mile with surfboards that would reduce access for the older surfers, older beachgoers, or the moms with kids.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, as well as selected preferred Hybrid Alternative 3A the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. Alternative 3A is described in detail in Section 1.3 of the Final EIR
PUB 31-7	By putting the parking by Topanga Canyon Boulevard, you increase the risk of people's lives crossing PCH, a really high traffic boulevard. I know that there'll be a path that goes under the bridge, but we know humans like to take shortcuts, which would mean crossing at the light at Topanga Canyon Boulevard, and I don't want us to wait until lives are lost before we address that point. It needs to be addressed now.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.

Comment Number	Comment	Response
PUB 31-8	And please consider not allowing fire pits, should you have short-term or day use usage of the space because we're a high-risk fire area and knowing that there are fire pits of day users or campers at the bottom of the hill would be very stressful for us as the on shores blow those fires and winds up our canyon. Thank you so much.	No firepits are proposed in the DEIR. This comment expresses concern regarding wildfire impacts. Impacts related to wildfire are analyzed in Section 3.18, Wildfire, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As described in Section 3.18, all Wildfire impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include TRA-3 and FIRE-1. Mitigation measure TRA-3 would address potential traffic flow disruptions and would maintain operation of PCH for use as an emergency evacuation route at all times during construction. Mitigation measure FIRE-1 would require State Parks to submit a fuel modification plan to the State Fire Marshal and Los Angeles County Fire Department to identify fuel modification zones around the Project area and the type of landscaping allowed. Details of these mitigation measures are discussed in Section 3.18 of the Draft EIR.
Anonymous Speaker		
PUB 32-1	Hi, I'm a casual observer for 30 years of the parking lot at Topanga Beach because I watched my son, who's now 24, surf there his whole life and my husband who's grown up there, and I guess knows Lloyd.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 32-2	Segueing off with what Carolyn said, was I've watched young boys, young women, young kids, cross PCH with their surfboards nearly get hit by cars.	As noted in Section 2.6.1, parking availability and configuration would be improved under all Project Build Alternatives. The new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. As a result, it is hoped that this could reduce the frequency of unsafe jaywalking across PCH. By expanding the waiting area at the Topanga Canyon Boulevard/PCH intersection and moving parking away from the immediate intersection, more convenient, safer pedestrian access would be provided. The new west DBH lot would provide easy access to the beach west of the lagoon down an unpaved road from the parking lot, while the State Parks lot on the north side of PCH would have an underpass trail leading from the parking area directly to the beach on both sides of the lagoon. Under all Build Alternatives, lifeguard staff and ADA parking spaces at the beach level would be retained and additional spaces would be provided in State Parks lots.

Comment Number	Comment	Response
PUB 32-3	Secondly that parking lot is never full, even on weekends, so I'm not sure why we need more parking.	As noted in Section 2.6.1, all Project Build Alternatives would provide a new configuration for parking that would improve parking opportunities relative to beach and park access points. These improvements include the addition of new spaces at the new DBH lot west of Topanga Creek, the new Gateway Corner lots, and improvements to the existing DBH Topanga Beach and State Parks Topanga Ranch Motel lots to meet current code. As noted in Section 2.6.2 of the Draft EIR and **Appendix F**, Parking Analysis Technical Memo, there are currently 390 parking spaces available, although many are nonconforming with current standards, and includes a mix of State Parks concession exclusive (124), State Parks public fee (50), public fee in DBH lot (97), and public free along PCH (79) and along Topanga Canyon Boulevard (40). Under the No Project/No Build-Managed Decline Alternative (Alternative 1), no additional parking would be added along Topanga Canyon Boulevard or west of Topanga Creek along PCH and no bus station or beach access stairs would be installed. Under Alternative 2, there would be a total of 314 parking spaces, including 20 concession exclusive spaces associated with the one State Parks lessee retained, 201 public fee spaces (DBH = 87 and State Parks = 114), and 93 public free spaces (along PCH and TCB). Under Alternative 3, there would be a total of 332 parking spaces, including 25 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 194 public fee spaces (DBH = 79 and State Parks = 115), and 93 public free spaces (along PCH and TCB). Under Alternative 4, there would be a total of 343 parking spaces, including 15 Topanga Ranch Motel exclusive spaces, 20 concession exclusive spaces associated with the one State Parks lessee retained, 217 public fee spaces (DBH = 110 and State Parks = 107), and 91 public free spaces (along PCH and TCB). Under all Project Build Alternatives, as well as selected preferred Hybrid Alternative 3A, the new distribution of parking would improve public access to all areas of lower Topanga State Park and Topanga Beach by more directly linking parking spaces with preferred recreation locations. Alternative 3A is described in detail in Section 1.3 of the Final EIR
PUB 32-4	And thirdly, you're trying to save fish. I came from Montana where that's all we did was fish, but you can't fish in water, your fish can't survive if you're dumping septic into the creek that runs all the way down. So how do you manage the fish when you can't manage what's happening up here? And we live up here. So I don't understand why these issues haven't been tackled before you tackle something that's very superficial from what we can see.	The project does not propose to dump septic into the creek. The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard,

Comment Number	Comment	Response
		within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless and some open trench methods are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. The selected preferred Hybrid Alternative 3A includes use of seepage pits in an upland area. Alternative 3A is described in detail in Section 1.3 of the Final EIR
Kris Wolfe		
PUB 33-1	My name's Kris Wolfe, I'm from the Pacific Palisades, and I've been surfing at Topanga for 44 years and I know for a fact that expansion doesn't coincide with preservation. I also know that the third cause of extinction of a species is human destruction of a natural habitat. It seems like they a little bit more worried about a lifeguard station getting thrashed than all these beautiful homes on the point. There's a lot to consider here. I'm not against you know, doing good things for that beach park and like Carolyn said, we've had birthday parties, we've lost people. I've lost two dear friends at that beach.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 33-2	The traffic that's going to happen with this construction project is absolutely gonna be insane from Santa Barbara to Pasadena and eastward, mark my words. In a three-year span, there here was 633 injury accidents and 17 of them were fatalities. If there's bunched up traffic and there's a bottleneck, they're going to try to keep that place open when they're building a bridge, it's never going to happen.	This comment expresses concern regarding traffic impacts. Impacts related to traffic and transportation are analyzed in Section 3.16, Transportation and Circulation, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As discussed in Section 3.16, Transportation and Circulation, of the Draft EIR, the analyses of transportation issues required to be addressed under CEQA were evaluated, with supporting data provided in **Appendix J**, Draft Construction Traffic and Emergency Management Plan (LLG 2023), and **Appendix R**, Topanga Lagoon Final Transportation Assessment (LLG 2023). As described in Section 3.16, all Transportation and Circulation impacts were concluded to be less than significant either without or with mitigation. The mitigation measures include TRA-1: Construction and Emergency Traffic Management Plan and TRA-2: Construction Parking Plan. The Transportation Management Plan would address potential traffic flow disruptions and shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police departments, and ambulances that have jurisdiction within the Project area. The Construction Parking Plan would address temporary parking areas during construction and shall be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. Details of these mitigation measures are discussed in Section 3.16 of the Draft EIR. As described in Chapter 2.0 of the Draft EIR, a 180-foot-long temporary bridge would be constructed adjacent to the existing bridge. As noted in Section 1 of the Final EIR, the preferred Alternative 3A may incorporate value engineering recommendations that would construct a wider bridge and not require a temporary bridge. In either case, the new PCH bridge would be constructed sequentially by building first the northbound lanes followed by the southbound lanes. With these plans and final design plans, all four lanes of PCH would be maintained within the bridge area throughout the entire construction period. Furthermore, these plans would be developed in coordination with Caltrans and appropriate agencies requiring input and emergency service responders and would ensure PCH is maintained as an evacuation route during construction.

Comment Number	Comment	Response
PUB 33-3	I mean, and god forbid if there's a fire, the situation with the historical landmark;	This comment expresses concern regarding wildfire impacts. Impacts related to wildfire are analyzed in Section 3.18, Wildfire, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As described in Section 3.18, all Wildfire impacts were concluded to be less than significant with mitigation. The mitigation measures include TRA-3 and FIRE-1. Mitigation measure TRA-3 would address potential traffic flow disruptions and would maintain operation of PCH for use as an emergency evacuation route at all times during construction. Mitigation measure FIRE-1 would require State Parks to submit a fuel modification plan to the State Fire Marshal and Los Angeles County Fire Department to identify fuel modification zones around the Project area and the type of landscaping allowed. Details of these mitigation measures are discussed in Section 3.18 of the Draft EIR.
PUB 33-4	I did contact Ken Bernstein, who's the principal city planner and manager of the LA City Los Angeles office of Historic Resources and I received a message, he's not too stoked either. We're just going to have to see what happens here and I'm glad it's still just in the planning stages because it seems like we've got a lot of planning to do.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Christine Lee Griffiths		
PUB 34-1	Thank you, so this is the point, okay, I just, I don't know if you can see this, but it is the berm. My name is Chris Griffith, sorry. Okay, here we go. That's the point and my perspective of it and I know most people when they come to the beach, the locals, and even I think the Coastal Commission basically says, you know we don't take away places where they can look and have a clear view of the ocean. What comes to mind is that in the design, now all the points, the visitation points are across the street. Very few of them are really where you're standing on a berm and you're looking at the waves or you're looking at the, or you're looking at the beauty, or you're looking at you know the environment that's there.	This comment expresses concern regarding aesthetics impacts. Impacts related to aesthetics are analyzed in Section 3.1, Visual/Aesthetics, of the Draft EIR. All impacts were concluded to be either less than significant or less than significant with mitigation. As described in Section 3.1, visual/aesthetics impacts 3.1-1 and 3.1-3 were concluded to be less than significant. Viewpoint 1 is on Topanga Beach overlooking Topanga Lagoon and the foreground view includes fill material and vegetation with scenic views of the Pacific Ocean experienced in the distant background looking east. Under all Project Alternatives, expansion of Topanga Lagoon would not include any aboveground components that could obstruct views of the Santa Monica Mountains or Pacific Ocean during operation. The large fill area west of Topanga Lagoon that obstructs views along the beach would be removed, improving beach viewsheds for visitors. Under Alternative 2, the existing visual sensitivity for Viewpoint 1 is considered low. The proposed beach facilities would include similar building footprints and materials as the existing facilities and therefore, would have similar visual character and quality. As the existing beach facilities cause temporary obstruction of scenic ocean views for motorists, bicyclists, or pedestrians traveling on PCH, view obstruction would be less than existing conditions due to relocation further back from the ocean.

Comment Number	Comment	Response
PUB 34-2	But the other thing about that point is where the existing helicopter pad is and I do feel like some of this project kind of went full steam ahead without really coming down and seeing what is happening on that beach day to day, and by that I mean that really the helicopter pad that's existing is for the, what you were just talking about Kris, all those emergency vehicles that are coming from Malibu. They're really not the lifeguard, matter of fact, the lifeguard, I've been there when the lifeguards, there was a gentleman who was in the water and the emergency vehicles can get to the lifeguard stand and even get to the other side across the existing creek right now easily. Where the helicopter blows sand all around, you don't want it near people, you don't want it near cars, it doesn't make sense. What makes more sense is to put a lifeguard station next to the existing one, and a bathroom because now when we've got all these visitors coming, there's not one bathroom added.	Under all Project Build Alternatives, the existing lifeguard and public restroom building would be rebuilt closer to the realigned access road and farther from the ocean at a higher elevation to provide additional protection from sea level rise. The helipad would be relocated to the east side of the lagoon for improved access by lifeguards and emergency responders. As noted on page 2-48 of the Draft EIR, removal of fill on the east side would be coordinated with maintenance of the helipad functioning at all times. The size and built elements of the new helipad would conform to all Federal Aviation Administration and County requirements and a new hydrant would provide water for wildland fire response. As noted on page 2-17 of the Draft EIR, an unpaved emergency route from PCH to the beach level would be constructed to allow lifeguard access. The building footprints of the proposed beach facilities would be similar to existing facilities and would therefore be similar in scale and size and would not have the scale to obstruct views of the Pacific Ocean.
PUB 34-3	And the other thing about the reality of Topanga Beach is as you found, it has an F rating because there's not only bird poop, there's dog poop, and there's human poop. Not saying I'm against it, but I'm just saying let's be realistic, you know. You need to put a bathroom there, you need to address dogs.	As discussed on page 3.9-26 of the Draft EIR, the proposed Project's improvements to public access and improved visitor services, which would include more State Parks staff present, may help with achieving greater enforcement of the no-dog and no-camping rules, which could help to reduce dog and human fecal sources. The existing restroom facilities associated with the lifeguard and public restroom building would be retained, and additional restrooms would be provided on State Parks property at the Gateway Corner in the interpretive pavilion and within the restored Topanga Ranch Motel units.
PUB 34-4	When I was just recently at George Wolfberg, it's the Potrero Canyon, it's the next canyon over; it's this beautiful route that goes along and basically shows you where you can bring your dogs. You see the new new riparian, you know I'm not an environmentalist but it was a gorgeous project and it was to save fish as well like and it's you know right in the palisades, it's at Potrero Canyon, is that what it's called? It's 45 acres now, it's gorgeous.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 34-5	People you know, realistically, bring their dogs to this beach constantly and realistically, there are unhoused, there are fire pits on the beach, there is graffiti underneath the bridge. So when I see that you're not going to hire anyone else once this project is finished, that's a huge mistake. Like, you have to have, and these groups have to stay together and be the place that we can call and say there's a problem. Not let they become independent parts, because then we're going to be chasing, you know, who do we call, the beach, you know the Santa Monica, you know, I get nervous talking.	Additional staff would be required with restoration of the Topanga Ranch Motel for visitor services uses and the Gateway Corner. The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. As discussed on page 3-6 of the Draft EIR, it is anticipated that up to three new permanent or seasonal employees would be required for Proposed Project operation.
PUB 34-6	Anyhow, I'm going to let Dennis talk, but it just felt like this has not really had the opportunity to see what really happens to preserve a place like this point and not take it away put it across the street.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

Comment Number	Comment	Response
PUB 34-7	You know, no surfer is going to stand above a building and try to see how the waves are and you know, I just think taking the berm away is ridiculous, honestly.	Under all Project Alternatives, expansion of Topanga Lagoon would not include any aboveground components that could obstruct views of the Pacific Ocean during operation. The large fill area west of Topanga Lagoon that obstructs views along the beach would be removed, improving beach viewsheds for visitors. Under Alternative 2, the existing visual sensitivity for Viewpoint 1 is considered low. The proposed beach facilities would include similar building footprints and materials as the existing facilities and therefore, would have similar visual character and quality. As the existing beach facilities cause temporary obstruction of scenic ocean views for motorists, bicyclists, or pedestrians traveling on PCH, view obstruction would be less than existing conditions due to relocation further back from the ocean.
Dennis Robert Smith		
PUB 35-1	Good evening, my name is Dennis Robert Smith. One of the things that concerns me is that which I've personally dealt with, is the bridge at Tuna, or at Zuma Creek. So with Caltrans, and their infinite wisdom out there, they started the bridge as many of you may know, and it was kind of moving along as per our representative here said, but then it suddenly stopped. The reasons it stopped is because the geologists and the engineers didn't do their homework and they had to come back in and doube drill the bridge. So now you're at, they were at like 64, 65 feet, now you got 130 foot. So now you've stopped the whole process. These are people that paid a lot of money that paid a lot of money to watch what's going on. When you drive by these projects, there's a lot of people there that's supposed to be watching as a contractor myself, if it'd have done that kind of work, you know what would happen. First, you never get paid, they sue you, they charge you for the delay and everything else. So anyways, the bridge is a big thing.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 35-2	One of the other things I was curious about on the biology, is on the material, the plant material that's going to grow. Are you growing that material now? Are you going to hand seed this? Are you going to hand plant? If you're going to grow it now, you'll have different sizes of plant material to go in which would be great. You'll have mateiral in areas if that's what you're looking for, are you going to hydroseed some of the areas. So that just kind of gets covered, but it's got the Topanga brush, you know there are codes believe it ot not in the hydroseed you got to have here.	The Draft EIR notes on page 2-14 that restoration would be conducted on the graded area to promote native habitat and minimize erosion. **Appendix L** includes a conceptual habitat restoration plan that includes plant types and installation methods recommended for the final restoration plan. Final plans will be prepared to determine methods and seed mixes are employed.
PUB 35-3	And if you do that are you bringing the younger people in? Are you bringing people in that can be taught, the younger kids out of the inner city? Are you bringing them, is this part of the CCC deal where those kids and somebody else is being taught all this?	As discussed in Sections 2.4 and 2.5 of the DEIR, an intent of the project is to be a recreational resource for the diverse array of area and regional residents. Public outreach to engage communities in the greater Los Angeles area, including Outward Bound Adventures and tribal partners has been a focus of State Parks and the project partners. These efforts are planned to continue into the design phase of the project to engage a variety of participants. Development of improved coastal access and interpretive features that is proposed for all Build Alternatives, including the preferred Hybrid Alternative 3A, will provide more resources for young people to visit the project area.

Comment Number	Comment	Response
PUB 35-4	There's a chance here for all this to do a lot lot of good. I know it's going to be tough, in fact, I know it's going to be downright awful for a long time, but I think as a community can get through it. The other thing I was thinking, and I know that I'm taking too long, but hang on.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
PUB 35-5	The other thing I was thinking, the sewer line. I know that sucks, that's the extra year, but what I was thinking is if you do that line, you're going up the coastline, you fix that road, you get that water that's on the side of the road on the land side, you capture that water, you get it away, you turn that into another lane.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Option 1, subsurface drip irrigation, would support effluent levels for State Parks facilities under Alternative 2 only and would be installed on State Parks property directly north of the proposed parking area along Topanga Canyon Boulevard, within the Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. The SDI system would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.6 million. Option 2, seepage pits, would support effluent needs under all Project Build Alternatives and would require a pipe and pump system with an alignment between the treatment works and the dispersal site that would be located outside of Caltrans ROW on the west shoulder of Topanga Canyon Boulevard and cross to terminate at the dispersal site on the east side of Topanga Canyon Boulevard. Approximately 1,000 CY of excess fill material would be generated. This option would be constructed concurrently during Project construction over a three- to six-month period at an estimated cost of $1.9 million. Option 3, connection to the public sewer system, would involve construction an extension of the Los Angeles County Sanitation Districts (LACSD) public sewer from existing facilities just south of the intersection of Coastline Drive/PCH, within the Will Rogers State Beach parking lot, to facilities associated with Topanga Beach and the Topanga Ranch Motel/Gateway Corner. Approximately 1,000 CY of excess fill material would be generated. Depending on the sewer type. installation method utilized, and possible geotechnical and Caltrans mitigations, sewer costs are anticipated to range from $12 to 22 million. A combination of trenchless methods and some open trench are likely to be used and periodic closure of the #1 westbound lane during sewer installation could occur. Sewer construction is anticipated to take one year and would likely extend project construction an additional year for a total of six years. Traffic management and communication requirements of Caltrans, the County, State Parks, DBH, and other regulatory agencies would be implemented. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater

Comment Number	Comment	Response
		Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
PUB 35-6	So everybody in this room, if you're coming from town, you can have a right turn lane, you can have a complete five or 600 foot right turn lane to come home right instead of everybody sitting in one spot waiting just, so you can get by the wall to maybe make that right turn to get around to get home. So there's some stuff and as a guy that does this kind of work, I'm kind of thinking about that, so thank you.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Anonymous Speaker		
PUB 36-1	Hi, so I'm a weekly surfer at Topanga, coming all way from Pasadena because the waves are so great. My concerns regarding wastewater just like the gentleman said before me, how we'll be able to capture rain and runoff in a better way. I don't know if you guys have been out there where the water, the smell, and the grossness of the water runoff from I know the creek and everywhere else seems to congregate around that area. If we can address that as a priority as well that would be great.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. Stormwater runoff is currently conveyed to the Topanga Lagoon. The proposed project would improve the storm drain system while installing best management practice features to reduce runoff through on-site retention systems like bioswales.
Anonymous Speaker		
PUB 37-1	I'll keep it short. I didn't read all 3900 pages of the report, but what's the expected lifetime of the lagoon that is under future climate scenarios, storms, typical rainfall? How long will it take for that lagoon to be filled in again after you remove the hundred and something cubic yards of sediment? I think that's important to know because I would hate to see that you do all this work and then it gets filled up a year later in one storm or two years later.	**Appendix E** (Topanga Lagoon Restoration Alternatives Analysis Report (Moffatt & Nichol June 2022) and Hydraulics, Sediment Transport and Sea Level Rise Analyses (Moffatt & Nichol 2022)) provides detailed results of modeling conducted to estimate future conditions of breaching dynamics, fish passage, and sea level rise. As described on page 21 of the Hydraulics, Sediment Transport and Sea Level Rise Analysis study, a "Mike11" model suite from the Danish Hydraulic Institute (DHI) was used to estimate effects to watershed hydrology, hydraulics, and sediment transport. The results are summarized on page 35 and 36 of the report. The report concludes that although the increased acreage of the lagoon would increase sediment deposition in the lagoon, it remains a "pass through" system where sediments are swept out to the ocean during peak floods. The analysis concludes that the proposed grading does not change the sediment delivery appreciably. With respect to fish passage, the report concludes on page 63 that each Alternative would increase fish passage opportunities.

Comment Number	Comment	Response
PUB 37-2	And since others have expressed interest or their opinion about different alternatives, I think mine was alternative one, which was do nothing. I think it isn't broken, so I don't see why it should be fixed at this point.	The comment expresses preference for Alternative 1. The preference was taken into consideration as State Parks developed the hybrid alternative (Alternative 3A) that maximizes the area of lagoon restoration while conserving cultural resources. Alternative 3A combines components of each of the Build Alternatives described in the Draft EIR and has been selected as the Preferred Alternative. Wastewater Management Option 2: Seepage Pits has also been selected as the preferred wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.
Randy Johnson		
PUB 38-1	Hi, I'm Randy Johnson, I live in the canyon for the last 30 some years, and I used to be a surfer so I know the beach well. I'm wondering all these comments and ideas and things that have been raised today, are we going to have another session like this and are these issues going to be addressed? There's a bunch of thing that I'd never thought about before like what these guys are talking about on the point.	The Draft EIR describes the CEQA process in Section 1.3.
PUB 38-2	And my other question was what happens to the wastewater now and maybe we need a session where we get to ask questions and you get to answer, thank you.	The existing Department of Beaches and Harbors (DBH) facilities at Topanga Beach are supported by an advanced on-site wastewater treatment system (AOWTS). The existing wastewater systems for State Parks are outdated as concessions rely on pumping, while the Topanga Ranch Motel is limited to a single closed tank supporting the on-site employee residence. As discussed in Section 2.6.7 of the Draft EIR and **Appendix I**, Wastewater Management Options, a variety of options for upgrading wastewater management to meet current standards were explored. The planning-level feasibility study identified three options, including on-site subsurface drip irrigation (SDI), on-site seepage pits, and connection to off-site sewer, and once a final preferred alternative is selected, only one option would move forward to the final design. The preferred Hybrid Alternative 3A has included seepage pits as the wastewater management option. Alternative 3A is described in detail in Section 1.3 of the Final EIR.

Comment Number	Comment	Response
Carrie B.		
PUB 39-1	Thank you so much, my name is Carrie B. I've lived in Topanga for 20 years. I'm a Santa Monica native. I just want to acknowledge all the hard work that was put into this project all these years. This didn't start two years ago, 5 years ago, 10 years ago, this started 24 years ago and even longer and it's come into people's consciousness and people have worked on this and studied. It hasn't just been thrown out as let's do this. This is years and years of biological, geological, and historical research and I wanted to acknowledge this team. I think we're getting a lot of really strong comments but I'm thinking 20 years ahead, this project's been going 24 years or more. I'm thinking of our children, our grandchildren. And also, Chumash people are not dead, it's not a historical archaeological thing. There's living human beings and this saving this cultural heritage so when people say who cares, I don't feel that, and I think that we do need to save these fish. We destroyed all this area, why not bring it back. It's half an acre, when it was 30 acres, the lagoon. I think that there's room for everyone. I think that the surfers really felt heard, and they had the whole private Zoom meeting with you all and I appreciate that conscientiousness. I think many of the Surfers are happy. I think there's more to talk about of course, but I just want to acknowledge all the hard work and that I think everyone can really benefit from this, especially the future generations and I think it's our responsibility to take care of the environment and to take care of the people living in the area, thank you so much.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Anonymous Speaker		
PUB 40-1	I feel like April 12th isn't enough time. There's tons of info, by the time we you know, like we don't do this full-time. Like by the time we do our due diligence, have conversations with friends, try to group up. It's not enough time to to digest it all and make sense of it all, to digest it all, and make sense of it all, and you know, kind of yeah, straight up.	CEQA Guidelines Section 15105 notes that the public review period for an EIR should not be more than 60 days unless under unusual circumstances. This EIR was provided for a 60-day public review period. In addition, as noted in Section 2.3, the development of the project included a series of public workshops leading to the development of the project alternatives evaluated in the EIR. The public scoping and review exceed CEQA requirements. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Michael		
PUB 41-1	Michael, Topanga resident for a long time and surfer my whole life. I've been cleaning up the beaches by myself for a long time. I walk up and down and grab the garbage and I don't know if it's been addressed. I unfortunately couldn't read the hundreds and hundreds of pages, but from what it sounds like, you're bringing in a lot more people to the beach and you're not really addressing the fact that they're going to be leaving a lot more garbage. Right now, I think there are maybe two or three trash receptacles on the beach and uh they're filled up pretty much all the time. So I'm hoping that you know, somebody's making plans to address that.	The operations and maintenance of the new facilities would be the responsibility of the landowners including CDPR, Caltrans, and Los Angeles County as described on page 2-52 of the Draft EIR. Maintenance would include trash collection and management. A preliminary Operations and Operations and Maintenance Plan has been included in the Final EIR as **Appendix S**. Comments expressing interest in incorporating specific ideas into the design phase are noted. It is anticipated that public meetings will be held at milestone steps (such as an initial design charette and at 60%, 90%, etc. during the design process. No additional response is required.

Comment Number	Comment	Response
PUB 41-2	And the fact that we've got two restrooms that sometimes function and sometimes don't is also a really big concern of mine and I'm sure it is of anyone else that beach, so.	The Proposed Project would replace the existing public restrooms with new facilities at the beach and create new facilities on State Parks property at the Gateway/ Topanga Ranch Motel. The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.
Anonymous Speaker		
PUB 42-1	I'd just like to say that that it's really clear that there's conflict and there's people checking off boxes for things they need to get done and people's concerns aren't being met and that doesn't give them a peace of mind. Additionally, that we want to teach the next generation the culture that was here, but if we teach the next generation about restoration being a human-made project and that humans are going to fix the problems they made in the past, I think there's some concern in there around teaching the future generation that we are the problem fixers. That's not always the case and I think there's not a lot of peace of mind here, and avoidance of conflict is a very common theme here tonight.	The comment does not identify an issue relating to the adequacy of the information or analysis provided in the Draft EIR. No additional response is required.

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CHAPTER 3
Revisions, Clarifications, and Corrections to the Draft Environmental Impact Report

In accordance with CEQA Guidelines Section 15132(a), this chapter of the Final Environmental Impact Report (EIR) provides revisions, clarifications, and corrections to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These revisions, clarifications, and corrections are the result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or recognition of inadvertent errors or omissions.

3.1 Revisions and Corrections

The revisions herein include, but are not limited to, the following minor modifications to the proposed Project.

> **Appendices.** Appendix N includes air emission, energy assumptions and noise modeling results as labeled and referenced. This Appendix had been mislabeled in the Draft EIR. In addition, Appendix P includes the report on restoration water and sediment quality as labeled and referenced. This Appendix had been inadvertently omitted in the initial publication of the Draft EIR.
>
> Two additional Appendices have been prepared to support the analysis including: Appendix S of the Final EIR that provides the Operations & Maintenance Plan and Appendix T of the Final EIR that provides copies of comment letters, emails, and public meeting transcripts.

The revisions, clarifications, and corrections provided in this chapter do not add significant new information or support a conclusion that the Project would result in new or substantially more severe significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

More specifically, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5) but before the EIR is certified. CEQA Guidelines Section 15088.5 specifically states the following:

> *New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to*

mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*
- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that "[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR … A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

As demonstrated in this Final EIR, including any changes to the environmental analysis in Chapter 3 of the Draft EIR, the changes presented in this chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA. Sections 3.1 through 3.2 below reference these revisions to the Draft EIR and are incorporated herein as part of the Final EIR. Revised language or new language is <u>underlined</u>. Deleted language is indicated by ~~strikethrough~~ text.

Draft EIR Executive Summary

Page ES-4 The text under Section ES.3.3., *Alternative 2: Maximum Lagoon Habitat*, is revised to state as follows:

Based on the 30 percent design, the restoration would <u>result</u> in 9.5 wetted acres, with 23 riparian/transitional upland acres restored and beach expansion to 4.39 acres in the area by the lagoon.

Table ES-1 Changes to Table ES-1 reflecting modifications to mitigation measures are not re-printed here, but can be found in the MMRP, Chapter 4 of this Final EIR.

Draft EIR Chapter 2, Project Description

Page 2-2 The text under Section 2.2.1, *Topanga State Park*, is revised to state as follows:

The Proposed Project is designed to meet the objectives established in the general plan. ~~Same capitalization problem as Park.~~

Page 2-6 The text under Section 2.2.3, *Pacific Coast Highway (PCH) Bridge*, is revised to state as follows:

This upgraded an earlier coastal~~?~~ road built in the early 1920s that terminated at the entrance to the Rindge Ranch at approximately Las Flores Canyon.

Page 2-6 The text under Section 2.2.4, *Topanga Beach*, is revised to state as follows:

Topanga Beach is located just south of where TCB meets the Pacific Ocean at PCH (Figure 2-4). Topanga Beach includes an ocean frontage of approximately ~~35~~ 21.5 acres, receives more than 750,000 visitors each year, and is popular with surfers because of the orientation of the beach (DBH 2022). Topanga Beach is accessible via Bus 1~~5~~34 at Stop "PCH and TCB" and provides a metered parking lot (at the upper level) and Americans with Disabilities Act (ADA) parking (at the upper and lower levels), beach wheelchairs, a lifeguard and public restroom building, and a picnic area.

Page 2-12 The text under Section 2.5.3, *Increase Coastal Resilience,* is revised to state as follows:

The Proposed Project would increase coastal resiliency for essential public functions, including emergency services, and would provide climate-change refugia for the Topanga Lagoon ecosystem from the negative effects of SLR, which would include recreational beach and open space habitat areas. ~~Another good paragraph for explaining multi-alternatives.~~

Page 2-15 The text under Section 2.6.1, *Action Common to All Build Alternatives,* is revised to state as follows:

Under all Build Alternatives, the area of Topanga Beach would increase, ranging from up to 50 feet of additional depth on the east cove beach under Alternative 2 or 3 to approximately 90 feet under Alternative 4. On the west side, the beach would expand by 0.65 acre under any of the Build Alternatives. Together, these expansions would add approximately ~~1 to 1.2~~ 0.2 to 0.4 acres of beach area. These additional areas would provide opportunities for increased recreational space and would incorporate bioengineered stabilization or living shoreline elements to both protect against storm surge and SLR and restore coastal strand and foredune habitats. Bioengineered stabilization and living shorelines typically feature low-impact installation of temporary fencing and native vegetation to encourage deposition of sand and include interpretive signage and pathway guidance. These elements would be installed above the ordinary high-water mark~~9~~ and would be located where they could protect lifeguard facilities. Additional design of these elements would be further developed for the preferred

alternative in accordance with best management practices (BMPs) similar to those implemented along Santa Monica, Dockweiler, and Zuma beaches.

Page 2-52 The text under Section 2.8 Project Operations and Maintenance, is revised to state as follows:

A detailed Operations and Maintenance Plan is found in **Appendix S ~~M~~**, which provides roles and responsibilities for each landowner, especially with regard to the restored lagoon area. Each landowner would implement its standard facilities and property management protocols and comply with all regulatory requirements associated with the Proposed Project. It is not anticipated that operations and maintenance activities for facilities would be significantly greater than at present. Management and maintenance of the restored lagoon area and any expanded visitor services could require significantly more operations and maintenance efforts at least for the first five to 10 years post-implementation to comply with all permitting monitoring requirements. If an AOWTS option is selected, an AOWTS operations and maintenance manual would provide details on the requirements for carefully monitoring the AOWTS for water quality compliance.

Page 2-53 Table 2-6 has been modified to include the FEMA Letter of Map revision as well as the County approvals as follows:

Federal Emergency Management Agency (FEMA)	Conditional Letter of Map Revision and Letter of Map Revision	• Floodplain map revision.
Los Angeles County Board of Supervisors	Capital Improvement Approval CEQA adoption	• Project Approval

Draft EIR Section 3.3, Biological Resources

Page 3.3-72 Mitigation Measure BIO-2 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

1. During the overwintering season (October 1~~5~~–March 1~~5~~) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol.

Page 3.3-72 to 3.3-73

Mitigation Measure BIO-2 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

2. To prevent disturbance of monarchs during the overwintering season by construction personnel or work activity, roosting trees will be flagged, and snow fencing or a similar technique shall be used to cordon off monarch roost trees at a reasonable distance of at least 25 feet away from the qualified biologist ~~roosting monitor.~~ The qualified biologist ~~monitor~~ shall determine the placement of the fencing to protect the monarchs while allowing work to continue.

3. While work is occurring in the Project vicinity during the overwintering season, the qualified biologist ~~monitor~~ shall visit the property a minimum of two times per week to verify protection measures remain in place and document that roosting monarchs are not disturbed by work activities. The qualified biologist ~~monitor~~ shall have authority to stop work if monarchs show signs of unnatural disturbance. If monarchs are being disturbed or affected, protection measures shall be relocated by the qualified biologist ~~monitor~~ in consultation with the foreman.

4. Work crew shall be educated on the monarch protection measures and how the measures apply to their work.

5. During the overwintering season when monarchs are present, activities that could result in vibration and thus movement of monarch clusters, shall be avoided within 500 ~~200~~ feet of occupied trees. A qualified biologist can modify the buffer with approval of the regulatory agencies if adjacent activities are determined not be disturbing.

6. Aerial pesticide applications or pesticides that are harmful to butterflies shall not be applied ~~be avoided~~ within 500 ~~200~~ feet of overwintering sites when monarch overwintering is occurring. Small cut and paint efforts or directed spot spraying when it is not windy will be allowed if required to control invasive arundo treatments or other highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines.

7. Monarch nectary plants shall be incorporated into the plant palette of the HRAMP near potential overwintering sites.

Page 3.3-73
to 3.3-74

Mitigation Measure BIO-3 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

1. Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist ~~familiar~~ with the appropriate permits and familiarity with the identification, behavior and life history of the species. The qualified entomologist shall conduct surveys adhering to CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. ~~A minimum of three surveys during peak flying season shall be conducted when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983), non-lethal survey methodology shall be used and photo vouchers for species confirmation will be obtained (CBBA 2023).~~ At minimum, a survey report shall provide the following:

    a. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee.

    b. Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.

    c. Map(s) showing the location of nests/colonies.

2. If Crotch's bumble bee is detected, the following shall be implemented:

    a. a. The qualified entomologist shall:

        i. Identify the location of all nests within and adjacent to the Project site.

        ii. Provide a survey report to the CDFW ~~summary~~ of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

        iii. An Avoidance Plan shall be developed with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate ~~Establish a 15-meter~~ no disturbance buffer zone around any identified nest(s) to reduce the risk of disturbance or accidental take.

The buffer zone will be expanded as necessary to prevent disturbance or take to the extent feasible.

b. If complete avoidance ~~of the buffer zone~~ is not feasible, consultation with CDFW shall occur to ~~identify any additional measures needed to avoid impact on the species, confirm allowable activities within the buffer zone, and~~ determine if take authorization from CDFW is required.

c. Floral resources associated with Crotch's bumble bee that require removal during restoration activities shall be replaced at a 1:1 ratio and with guidance from CDFW. Floral resources will be planted within 200 meters of the original plant location or in the most centrally available location relative to identified Crotch's bumble bee nests and be located no more than 1.5 kilometers from the nest sites.

d. The Habitat Restoration and Adaptive Management Plan will include native and local plant species preferred by Crotch's bumblebee within the plant palette to further support the existence and expansion of the species on-site.

Page 3.3-74 to 3.3-75

Mitigation Measure BIO-4 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

BIO-4: Fish Protection Measures During Work in Wetted Areas. Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project shall comply with all permit requirements. The following measures shall be implemented to protect and minimize impacts on tidewater goby and steelhead trout, their critical habitat, and other special-status aquatic species during construction:

1. Cofferdam, sediment curtain, and/or another method approved by CDFW/NMFS/USFWS shall be used to cordon off the area (approximately 0.33 acre) around the existing bridge abutment to both exclude fish and wildlife and to contain construction debris and runoff within the work area. Final construction design shall meet all permit conditions and be developed by the contractor in coordination with State Parks.

    a. The cofferdam shall not be fully dewatered until the supervising biologist determines that no fish remain within the area. The supervising biologist shall have appropriate handling permits and experience with dewater and fish relocation activities. This includes experience with aquatic species associated with the lagoon, creek, and wetted areas.

i. Dewatering shall be done slowly with supervision to ensure that any fish trapped in the area can be captured and relocated reducing the risk of injury or stress.

ii. Pumps shall be properly screened to prevent fish from entering the intake.

iii. Dewatering and flow diversion shall comply with permit requirements from CDFW, USFWS, and NMFS.

iv. Once the supervising biologist has confirmed that the work area is isolated, all fish are excluded, and there is no risk of entraining fish, then the pump screen may be removed.

v. Water removed from the work area shall be directed to an adjacent holding area according to permit requirements before being infiltrated into the existing fill or release into the lagoon or ocean downstream of the work area.

vi. Water quality testing including turbidity, temperature, salinity, dissolved oxygen, pH, and conductivity, nutrients (and potentially metals if required) shall be monitored and documented at the start, middle and end of each day.

b. Blocking nets providing a buffer area outside the work zone shall remain in place until all work is completed and the coffer dam removed.

i. Blocking nets shall be inspected at least three times a day (start, middle, end) or more if requested by the supervising biologist. If fish are impinged on the net, or weather/flow conditions change significantly, the supervising biologist can increase inspection efforts.

c. Silt curtains may also be installed inside the blocking nets to further reduce potential for water quality impacts.

2. All construction activities within or directly adjacent to the lagoon, creek, and wetted areas will occur preferentially outside of the steelhead migration season (November – June ~~December through March~~). In the event, this time frame cannot be avoided, measures shall be implemented with the approval of NMFS and CDFW to avoid impacts such as allowing passage through a protected portion of the work area and implementation of additional BMPs to buffer fish from adjacent work, such as use of silt curtains within the wetted edge and silt fence along the dry edge, etc.).

3. If fish upstream are observed in distress, a fish kill occurs, or spills occur, the supervising biologist shall immediately contact the contractor to stop work, contact the relevant agencies, and work with the contractor to correct the problem.

4. Upon completion of the removal of the old bridge within the coffer dam area, water quality shall be tested within the work area before removal of the walls. Flow shall be restored slowly, and fish shall remain excluded upstream of the work area pending confirmation that water parameters are suitable for direct release into the lower lagoon.

Page 3.3-76 Mitigation Measure BIO-6 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

BIO-6: Fish Hydroacoustic Buffering Measures. Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project will comply with all permit requirements. The following measures shall be implemented to protect and minimize direct and indirect impacts on special-status fish species

Page 3.3-78 Mitigation Measure BIO-10 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

BIO-10: Bat Roost Measures. The most suitable bat roosting habitats on the Proposed Project are along the PCH bridge, within the motel, leasee or lifeguard and public restroom building, and within oak, palms, and other large, mature trees. Rock crevices could also be used. Bats are their most vulnerable during their maternity roosting period (March 1 to August 31) ~~(May 1 to October 31)~~ and during hibernation periods (November 1 to February 31). ~~(December 1 to March 31).~~

The following measures shall be implemented to protect and minimize impacts on protected and roosting bats:

1. When feasible, disturbance to suitable bat roosting habitat shall be scheduled ~~in November and April, or otherwise~~ outside of sensitive hibernation and roosting periods.

2. Within two weeks prior to disturbance of potential bat roosting sites (large trees, structures, rocky crevices), a qualified bat specialist shall conduct a visual and acoustic pre-construction survey of the Proposed Project and surrounding 200 feet for possible roosting habitat. Surveys shall be conducted during the daytime and nighttime when bat species are detectable. Surveys shall be conducted by a qualified bat specialist with the appropriate handling permits and familiarity in identifying bat species and roosting

habitat. The bat specialist shall document all survey results and prepare a summary report to CDFW.

3. In the event no roosting bats are present within the survey area, one-way exclusion devices shall be installed prior to structure demolition to exclude bat use and avoid their potential harm.

4. If potential roosting sites are identified, an additional survey to pinpoint roosting locations shall ~~should~~ occur within seven days prior to disturbing activities. The bat specialist ~~biologist~~, in coordination with CDFW, shall refine a 200-foot or other agreed-upon buffer to keep in place during construction until the roosting site is confirmed to be no longer in use for hibernation ~~or dependent young~~. Night lighting for construction shall not be directed towards these roost sites.

5. If maternity roosts are identified, roosting locations shall be recorded within seven days prior to Project activities. Maternity roosts shall be demarcated with an appropriate buffer as agreed upon by CDFW and CDPR. Work shall occur outside of the maternity season. Trees and structures that are determined to support maternity roosts shall be left in place until the end of the maternity season and the young are flying and foraging on their own. Work near a maternity roost shall not occur between 30 minutes before sunset and 30 minutes after sunrise.

6. Large tree cutting or removal shall be supervised by a qualified bat specialist ~~biologist~~ to document the presence or absence of bats that might be affected. A local bat rehabilitation facility shall be available in the event tree-felling results in unanticipated injury to any bat.

7. If bat roosts are affected during construction, the Project applicant shall provide replacement roosts within similar habitat and with a gap no greater than 3.8 centimeters and interior surface comparable to that of the original roost. The replacement roost shall be swabbed with bat guano and urine collected from the original roost. For the replacement roost to be considered effective, the same bat species that was affected by construction shall be observed utilizing the replacement roost in numbers that are comparable to the original roost. Replacement roosts that are occupied shall be left in place during and after the Project.

Page 3.3-101 Mitigation Measure BIO-14 under Section 3.3.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

BIO-14: **Protected Native Tree Survey and Mitigation.** A preconstruction survey of protected native trees shall be conducted once an alternative and wastewater treatment option has been selected and prior to construction. The Project is an extensive restoration project that not only restores natural

topography and hydrology followed by extensive planting in a 7.50- to 9.21-acre area, it also provides additional enhancements via weed management and focused planting in a 30.03- to 31.21-acre enhancement area (Table 3.3-9). Due to the significant net benefits of the Project to native trees and habitats, and State Parks/RCDSMM track record of approximately 75 percent survivorship of native tree plantings, protected native trees being removed or affected during construction shall be planted at 5:1 ratio. ~~15:1 ratio.~~ Protected trees that are encroached upon within 3 feet of the trunk or more than 30 percent of the tree protected zone (TPZ) shall be replaced at a 3:1 ratio. Protected trees that are encroached into 10–30 percent of the TPZ shall be replaced at a 1:1 ratio. Volunteer native seedlings within the BSA can be mapped and used as mitigation trees. No mitigation shall be required for protected native trees if they are encroached by less than 10 percent of the TPZ, but these trees shall be monitored. Annual monitoring of all encroached protected trees shall occur for 5 years post impact and shall require annual reporting to document any tree death. If any replacement trees die during the annual monitoring period, the tree shall be mitigated at a 2:1 ratio. Watering of replacement trees shall be scheduled to have fully removed additional watering by year 4–5 to promote natural survival. Trees shall be preferentially incorporated into appropriate open space habitat areas, but also incorporated into the plant palettes of the developed and transitional areas.

Draft EIR Section 3.6, Geology, Soils, Seismicity, Topography, and Paleontology

Page 3.6-5 The text under Section 3.6.1, *Regulatory Setting, Regional and Local,* is revised to include the following:

Santa Monica Mountains Local Coastal Program

The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to geology, soils, seismicity, topography, and paleontology and are relevant to the Proposed Project:

Goal CO-8: Preservation of the area's rich and diverse archaeological, paleontological and historic cultural resources.

CO-204 Protect and preserve archaeological, historical, and paleontological resources from destruction, and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible.

CO-205 Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

CO-206 Regulate landform alteration to ensure minimal disturbance of known archaeological and historic cultural sites. New development on sites identified as archaeologically sensitive shall include onsite monitoring of all grading, excavation, and site preparation that involve earthmoving operations by a qualified archaeologist(s) and appropriate Native American consultant(s).

CO-207 The County should coordinate with appropriate agencies, such as the Southern California Indian Center (SCIC) and the UCLA Archaeological Center, to identify archaeologically sensitive areas. Such information should be kept confidential to protect archaeological resources. [note that Native American Heritage Commission (NAHC), and the California Historical Resources Information System (CHRIS) have retained this role]

CO-208 New development within archaeologically sensitive areas shall implement appropriate mitigation measures, designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

CO-210 Prohibit the unauthorized collection of paleontological and historic cultural artifacts.

Goal SN-1: A built environment designed and engineered to minimize the potential for loss of life, physical injury, environmental disruption, property damage, economic loss and social dislocation due to seismic- and non-seismic induced geologic phenomena.

SN-1 All new development shall be sized, designed and sited to minimize risks to life and property from geologic hazard.

SN-2 On ancient landslides, unstable slopes and other geologic hazard areas, new development shall only be permitted where there is substantial evidence, provided by the applicant and confirmed by the Los

Angeles County Department of Public Works, that the project provides an adequate factor of safety.

SN-3 Prohibit new development in areas where it presents an extraordinary risk to life and property due to an existing or demonstrated potential public health and safety hazard.

SN-4 In the placement of new development, emphasize avoiding areas susceptible to seismic and non-seismic geologic hazards, even when engineering solutions are available

SN-5 Prohibit grading and brushing in areas that have a slope of 50 percent or greater and limit grading in areas with a slope of over 25 percent.

SN-6 Prohibit the construction of new structures for human occupation in unstable geologic areas.

SN-7 Limit the discretion and authority of County inspectors to modify approved grading plans at project sites to that which is necessary to address unanticipated conditions and to protect public health and safety.

SN-8 In-field grading modifications shall be subject to a coastal development permit amendment to ensure that modifications will not create adverse impacts that were not considered during a project's environmental review.

SN-9 Allow the remediation or stabilization of landslides or other slope instability that affect existing structures or that threaten public health or safety. Analyze alternative remediation or stabilization techniques to determine the least-environmentally-damaging alternative. Maximum feasible mitigation shall be incorporated into the project to minimize adverse impacts to natural resources.

SN-10 Prohibit land divisions, including lot line adjustments, unless all proposed parcels can be demonstrated to be safe from flooding, erosion, and geologic hazards and will provide a safe, legal, all-weather access road(s), which can be constructed consistent with all policies of the LCP.

SN-11 New development shall assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Draft EIR Section 3.6 Geology, Soils, Seismicity, and Paleontology

Page 3.6-18 The text of Mitigation Measure GEO-1 has been modified as shown below:

Mitigation Measure GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design.

Draft EIR Section 3.8, Hazards and Hazardous Materials

Page 3.8-7 The text under Section 3.8.1, *Regulatory Setting, Regional and Local,* is revised to include the following:

Santa Monica Mountains Local Coastal Program

The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to hazardous and toxic materials and are relevant to the Proposed Project:

Goal SN-5: The transport, distribution, sale, use, storage, and disposal of hazardous material and hazardous waste in a manner that protects the health and safety of residents, workers, area visitors, and the natural environment.

> **SN-38** Monitor through conditional approvals businesses handling, using, or storing more than threshold amounts of hazardous or toxic materials. Hazardous or toxic wastes may only be stored on a commercial site temporarily and must be disposed of as soon as possible.
>
> **SN-39** Prohibit hazardous waste disposal facilities within the Santa Monica Mountains, due to the area's sensitive seismic and geologic characteristics.

Goal SN-6: A land, air, and water environment with minimal cumulative impacts from the use of toxic and hazardous materials.

SN-40 Protect the area's residents, workers, and visitors from the risks inherent in the transport, distribution, use, and storage of hazardous materials and hazardous wastes, recognizing that the use of these materials is necessary in many parts of society.

Draft EIR Section 3.11, Marine Biological Resources

Page 3.11-20 The text under Section 3.11.2, *Affected Environment, Fish,* is revised to state as follows:

The grunion is a member of the New World S~~i~~lversides family, Atherinopsidae ~~Atherinidae~~, along with the jacksmelt and topsmelt.

Page 3.11-30 The text under Section 3.11.2, *Affected Environment, Fish,* is revised to state as follows:

California grunion is known to spawn along Topanga Beach. California grunion could be directly affected during sediment placement activities, through direct mortality of egg masses and potential temporary loss of suitable spawning habitat. The temporary loss of spawning habitat could potentially be a significant impact if the placement activities were to occur during California grunion spawning season (usually late February through July) and if the sediment placement equipment were located below the Highest High Tide ~~mean high tide line~~. **Mitigation Measure MAR-2** would be implemented to avoid potential significant impacts on California grunion during Proposed Project construction. This measure requires the Proposed Project to avoid sediment placement activities during the spawning season and ensure that sediment placement equipment and activities remain above the Highest High Tide line ~~mean high tide line~~, or that the equipment be installed and not need to be maintained until after the spawning season. With implementation of this mitigation measure, impacts of Proposed Project construction on California grunion would be less than significant.

Page 3.11-31 to 3.11-32 Mitigation Measure MAR-2 under Section 3.11.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

3. Grunion monitoring will be conducted by a qualified biologist for 30 minutes before and two hours after the predicted start of each nightly spawning event. Sufficient qualified biologists shall be employed to ensure that the entire construction site is monitored during the predicted grunion run. The magnitude and extent of a spawning event shall be defined in 300-foot segments of beach using the Walker Scale (Martin et al. 2021). ~~Every individual fish shall be counted~~. The number of fish will be estimated to determine the Walker Scale value (e.g., 0, 1, 2, 3, 4, or 5) of each 300-foot segment within the proposed work area.

Page 3.11-32 Mitigation Measure MAR-2 under Section 3.11.3, *Environmental Consequences, Mitigation Measures,* is revised to state as follows:

5. The following management measures shall be implemented after construction:

    i. To retain the natural deposition of wrack along the beach, mechanical beach grooming will not occur ~~on-site~~ below the highest high tide line consistent with existing beach Best Management Practices. ~~. Trash and debris should be removed by hand as necessary.~~

    ii. Vehicle use on the beach shall be limited to that required for emergency response and occasional required maintenance. All vehicles must drive above the higher high-tide line during March ~~September~~ August unless no grunion spawning occurred in the task location during the last full or new moon.

Draft EIR Section 3.12, Noise and Vibration

Page 3.12-12 The text under Section 3.12.1, *Regulatory Setting, Regional and Local,* is revised to include the following:

Santa Monica Mountains Local Coastal Program

The Project area is located within the California Coastal Zone, and all developments are subject to the regulations of the Santa Monica Mountains Local Coastal Program (LCP). The LCP was certified by the California Coastal Commission (CCC) in 2014 and grants the County authority to review and approve coastal development permits at the local level. The County's LCP includes a Land Use Plan (LUP) to regulate land use and a Local Implementation Plan for zoning (County of Los Angeles 2018). Development within a coastal zone may not commence until a coastal development permit has been issued by the CCC or a local government that has a CCC-certified LCP. The LUP identifies the following goals and policies that pertain to noise hazards and are relevant to the Proposed Project:

Goal SN-7: Noise sensitive lands and land uses, wildlife habitats, and public lands that are shielded from excessive mobile and stationary noise.

> **SN-42** Require development projects to demonstrate that: 1) no adverse noise effects on adjacent uses will occur from the project, 2) no adverse effects on the project will occur from adjacent influences, and 3) that provisions of the County Noise Ordinance can be met by the project.
>
> **SN-44** Prohibit, wherever feasible, new development or land uses within any natural area or sensitive land use from increasing the ambient noise

levels by more than 3 dBA CNEL. If infeasible, noise impacts shall be mitigated.

SN-45 Consider noise impacts in transportation system design, and require that roadway extensions and capacity enhancement projects mitigate related noise impacts to acceptable levels.

SN-48 Locate noise-tolerant uses within developed areas. Encourage sensitive building orientation, placing the most noise-tolerant portions of a project between sensitive portions and the noise source, and architectural design as the noise management strategies preferred over constructing noise barriers.

SN-49 Private helicopter pads are prohibited. Publicly owned and operated helicopter pads and stops may be allowed on public or private land where needed for emergency services, and consistent with all applicable policies of the LCP. Locate new public helicopter pads to limit noise impacts on residential areas and public parklands.

Draft EIR Section 3.16, Transportation

Page 3.16-8 to 3.16-9

The text under Section 3.16.2, *Affected Environment*, *Transit,* is revised to state as follows:

The Metro Express Line 134 ~~534~~ provides service along PCH. The first stop of the 134 ~~534~~ bus route is Trancas Canyon/PCH, and the last stop is Olympic/7th. Route 134 ~~534~~ is operational every day and has 39 stops with a total trip duration of approximately 62 minutes from end to end.

3.2 Lead Agency-Initiated Changes

In response to comments received on the Caltrans-required Transportation Management Plan (TMP), Mitigation Measures TRA-1 and TRA-2 have been modified to clarify responsibilities of local jurisdictions, moving elements not required in a TMP to TRA-2. In addition, a new mitigation measure TRA-3 has been added to capture the Emergency Evacuation Route Plan as a separate plan rather than as part of the TMP, but still required as mitigation for the project. Mitigation measure TRA-4 has been added to capture the public outreach campaign and has been separated from TRA-1 as a separate mitigation measure, but still required as mitigation for the project. To reflect this change, **Table 3.16-1** has been revised as shown below. Each impact that relies on implementation of Mitigation Measure TRA-1 will also rely on implementation of Mitigation Measures TRA-2, TRA-3 and TRA-4. This modification clarifies Transportation and Circulation mitigation requirements.

TABLE 3.16-1
SUMMARY OF POTENTIAL PROJECT IMPACTS RELATED TO TRANSPORTATION AND CIRCULATION

Impact	Alternative	Mitigation Measure	Significance After Mitigation
TRA 3.16-1: Circulation System	Alternatives 2, 3, and 4 (Build Alternatives)	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
	Programmatic Topanga State Park Visitor Services	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
TRA 3.16-2: VMT	Alternatives 2, 3, and 4 (Build Alternatives)	None Required	LTS
	Programmatic Topanga State Park Visitor Services	None Required	LTS
TRA 3.16-3: Traffic Hazards	Alternatives 2, 3, and 4 (Build Alternatives)	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
	Programmatic Topanga State Park Visitor Services	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
TRA 3.16-4: Emergency Access	Alternatives 2, 3, and 4 (Build Alternatives)	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
	Programmatic Topanga State Park Visitor Services	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM
TRA 3.16-5: Cumulative Impacts	Alternatives 2, 3, and 4 (Build Alternatives) and Programmatic Topanga State Park Visitor Services	Implement Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-4	LTSM

NOTES:
NI = No Impact, no mitigation proposed
LTS = Less than Significant, no mitigation proposed
LTSM = Less-than-Significant Impact with Mitigation Incorporated
SU = Significant and Unavoidable

The revised mitigation measures are included below as part of lead agency-initiated changes:

Mitigation Measures

TRA-1 ~~Stage Construction & Traffic Handling Plan and~~ Transportation Management Plan (TMP). During final design and prior to the issuance of demolition, grading or any construction permits, a qualified ~~traffic~~ engineer shall prepare a TMP that would address potential traffic flow disruptions on local roadways prior to construction. A TMP is required by Caltrans to address the following as applicable: 1) Public Information 2) Motorists Information Strategies 3) Incident Management 4) Construction Strategies 5) Demand Management 6) Alternative Route Strategies 7) Other Strategies.

~~The Plan shall incorporate and build upon requirements from the City of Malibu Emergency Evacuation Plan and the Los Angeles County Evacuation Plan and would be developed in coordination with Caltrans, City of Malibu, Los Angeles County, State Parks, DBH, and emergency service responders, which include fire departments, police~~

~~departments, and ambulances that have jurisdiction within the Project area.~~ The ~~Plan~~ TMP shall be included in the final design plans and prepared in accordance with the California Manual on Uniform Traffic Control Devices, Caltrans Standard Plans (2023), and current standards and best practices of the reviewing and approving agencies. The ~~Plan~~ TMP shall be coordinated with applicable agencies regarding construction and maintenance schedules and worksite Traffic Control Plans including, but not limited to, Caltrans, the California Highway Patrol (CHP), and local fire and police departments. The ~~Plan~~ TMP shall include, but is not limited to the following measures:

- Maintain four lanes, two lanes in each direction, of circulation on PCH within the bridge area, at least one lane in each direction on all other public roadways, and access to neighboring commercial establishments during construction of all Proposed Project components other than the sewer extension within PCH if selected
- ~~Prepare an Emergency Evacuation Route Plan approved by Caltrans and other emergency agencies for installation of the sewer extension within PCH requiring closure of one lane of traffic. The Plan shall ensure the following at a minimum:~~
  - ~~No more than one lane of traffic will be closed at any time~~
  - ~~Nighttime work shall be used to minimize lane closures during daytime hours~~
  - ~~Four lanes of traffic shall be maintained during peak traffic hours. Lane closures shall not be allowed during weekend days or holiday days~~
  - ~~Emergency service providers shall be provided expedited through passage at all times~~
- Minimize traffic delays and effectively maintain a ~~an acceptable~~ level of traffic flow acceptable to Caltrans throughout the transportation system during construction
- Minimize detours and impacts to pedestrians and bicyclists
- Maintain operation of PCH for use as an emergency evacuation route at all times during construction, especially during "red-flag" (high fire hazard) days declared by the National Weather Service.
- Establish line of communications ~~plan~~ between State Parks, DBH, Caltrans, City of Malibu, Los Angeles County Fire, construction contractors, and emergency service providers
- Ensure that temporary speed limit reduction for the traffic detour approaches and exits conforms to safe highway design speeds as acceptable to Caltrans.
- Have a flagger present to coordinate north-south traffic during those limited times that only a single lane is open
- ~~Prepare of a public outreach campaign and signage plans for public notification prior to and during the construction period~~

TRA-2: Construction Parking Plan. Prior to the issuance of demolition, grading, or any other construction permits, a Construction ~~Management~~ Parking Plan will be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. The Construction ~~Management~~ Parking Plan shall include, at a minimum, the following parking measures, which shall be followed until construction activities are completed. ~~be implemented during all construction activities as overseen by the Construction Contractor~~:

- All temporary public ~~construction~~ parking areas shall be located within previously disturbed or developed areas within the Project area
- Temporary parking areas shall provide a minimum replacement parking ratio of 1:1 for standard parking spaces to the greatest extent feasible, as well as ADA spaces
- ~~Temporary parking areas shall be identified on the final design plans and signage shall be provided prior to the start of construction activities to notify travelers of the location and duration of the temporary parking provisions~~
- Temporary parking shall be in place for use prior to removal of existing parking ~~developed and available for use prior to start of construction~~

TRA-3: Emergency Evacuation Route Plan. Contractor shall implement the Emergency Evacuation Route Plan approved by Caltrans in coordination with other emergency agencies. The Plan shall ensure the following at a minimum:

- Nighttime work shall be used to minimize lane closures during daytime hours
- Four lanes of traffic shall be maintained during construction
- Lane closures shall not be allowed during weekend days or holiday days
- Emergency service providers shall be provided expedited through-passage at all times

TRA-4: Public Outreach Campaign. Landowners shall prepare a public outreach campaign and signage plans for public notification prior to and during the construction period.

CHAPTER 4
Mitigation Monitoring and Reporting Program

4.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The California Department of Parks and Recreation (State Parks) is the CEQA Lead Agency for the Topanga Lagoon Restoration Project (proposed Project) and, therefore, is responsible for administering and implementing the MMRP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the CEQA Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the MMRP.

4.2 Purpose

The purpose of the MMRP is to do the following:

- Coordinate all mitigation monitoring activities
- Manage the preparation, approval, and filing of monitoring or permit compliance records
- Maintain records concerning the status of all approved mitigation measures and project design features (PDF)
- Provide quality control assurance of field monitoring personnel
- Coordinate with other agencies regarding compliance with mitigation or permit requirements
- Review and recommend acceptance and certification of implementation documentation
- Act as a contact for interested parties or surrounding property owners who wish to register concerns regarding environmental issues; verifying any such circumstances; and developing any necessary corrective actions

4.3 Organization

As shown in the following pages, each identified mitigation measure and PDF for the proposed Project is listed and categorized by environmental issue area, with accompanying discussion of:

- Time Frame for Implementation: When the measure will be implemented
- Monitoring Period: Indicates when monitoring for compliance with the measure will occur
- Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation, and development are made
- Verification of Compliance: The entity responsible for reporting that monitoring is complete to ensure compliance with the measure

4.4 Monitoring Procedures

This MMRP shall be enforced throughout all phases of the proposed Project. State Parks shall be responsible for implementing each PDF and mitigation measure and shall be obligated to provide verification, as identified below, to the appropriate monitoring and enforcement agencies that each project design feature and mitigation measure has been implemented. State Parks shall maintain records demonstrating compliance with each project design feature and mitigation measure listed below.

All applicable construction-related mitigation measures and best management practices (BMP) will be included in any bid specification released for construction of the proposed Project. Unless otherwise specified herein, State Parks will be responsible for taking all actions necessary to implement the mitigation measures according to the provided specifications and demonstrating that each action has been successfully completed. State Parks, at its discretion, may delegate implementation responsibility or portions thereof to a licensed contractor. This MMRP for the proposed Project will be in place through design, construction, and operation.

4.5 Changes to Mitigation Measures

Under CEQA, mitigation measures may be modified or deleted if the relevant decision-maker approves such action, gives a legitimate reason for making the change, and supports those reasons with substantial evidence, including an appropriate subsequent CEQA document. Any substantive change to the MMRP shall be documented in writing. Modifications to the mitigation measures may be made by State Parks subject to one of the following findings and documented by evidence included in the record:

1. The measure included in the EIR and the MMRP is no longer required because the significant environmental impact identified in the EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the Project, changes in conditions of the environment, or other factors.

   OR

2. The modified or substitute mitigation measure to be included in the MMRP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the EIR and the MMP.

   AND

3. The modified or substitute mitigation measure/BMP does not have significant adverse effect on the environment in addition to or greater than those which were considered by State Parks in its decisions regarding the EIR and the Proposed Project.

   AND

4. The modified or substitute mitigation measure is feasible, and State Parks, through measures included in the MMRP or other established procedures, can assure its implementation.

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the MMRP and shall be made available to the public upon request.

4.6 Mitigation Monitoring and Reporting Program

The following tables outline the proposed Project's Mitigation Monitoring and Reporting Program. Table 4-1 includes mitigation measures required for the proposed Project, and Table 4-2 includes the PDFs associated with the proposed Project.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM – MITIGATION MEASURES

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Mitigation Measures			
Aesthetic Resources			
AES-1: Lighting used during daytime or nighttime construction shall be shielded and pointed away from surrounding light-sensitive land uses and shall use Los Angeles County LIP Section 22.44.1270 as guidance and incorporate light spectrums that are wildlife friendly.	During Construction	Landowner	Contractor or Landowner Construction Inspectors Construction Manager
AES-2: All new permanent exterior lighting associated with Proposed Project components shall be shielded and directed downward to avoid any light spill onto neighboring lands or into nighttime skies when feasible and shall use Los Angeles County LIP Section 22.44.1270 as guidance and incorporate light spectrums that are wildlife friendly.	During construction Operations	Landowner	Contractor or Landowner Construction Inspectors Construction Manager
AES-3: All proposed aboveground facilities shall be designed to include non-glare exterior materials and coatings to minimize glare or reflection when feasible shall use Los Angeles County LIP standard 22.44.1320. as guidance and incorporate light spectrums that are wildlife friendly.	Prior to Construction	Landowner	Contractor or Landowner Engineer Construction Manager
Air Quality			
AIR-1: Construction Equipment. The Applicant shall implement the following requirement for construction equipment operating at each Project site. This requirement shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. • The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency Tier 4 Final off-road emissions standards or equivalent for equipment rated at 100 horsepower or greater, where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT), which means a CARB-certified Level 3 diesel particulate filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or South Coast Air Quality Management District operating permit at the time of mobilization of each applicable unit of equipment shall be provided.	During Construction	Landowner	Contractor or Landowner Construction Inspectors, Construction Manager
Biological Resources			
BIO-1: Special-Status Plant Protections. The following measures shall be implemented to avoid and minimize impacts on special-status plants: • Preconstruction plant surveys shall occur in the appropriate blooming period preceding construction, and again within two weeks prior to construction activities affecting vegetation.	Prior to construction During construction Post construction	Landowner	Contractor or Landowner Biologist

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
• In the event a special-status plant is identified, steps shall be taken to avoid, or if infeasible, collect propagules for propagation and installation on-site. CDFW, USFWS, and CCC shall be coordinated with to discuss findings and actions. • Special-status plants shall be incorporated into the Habitat Restoration and Adaptive Management Plan (HRAMP) plant palette and sourced from genetically appropriate stock. Species shall be chosen that are well matched to on-site soils, exposure, and water regime: o Southern California black walnut shall be included. o The following species shall be considered for inclusion as they are special status species that could occur historically on-site: Coulter's saltbush (Atriplex coulteri), Malibu baccharis (Baccharis malibuensis), Lewis' evening-primrose (Camissoniopsis lewisii), Santa Monica dudleya (Dudleya cymosa ssp. ovatifolia), white-veined monardella (Monardella hypoleuca ssp. hypoleuca), and south coast branching phacelia (Phacelia ramosissima var. austrolitoralis). o Additional special-status wetland species shall be incorporated that would be expected in similar wetland systems in the Santa Monica Bay. o Native species from the region identified by the Gabrielino/Tongva tribe as traditionally important will be included.			Construction Manager
BIO-2: Monarch Butterfly Measures. The following measures shall be implemented to protect and minimize impacts on overwintering monarchs: 1. During the overwintering season (October 1–March 1) prior to the start of restoration activities, a qualified biologist shall conduct a roosting monarch survey every two weeks to monitor the size of the population and map the locations of roosting monarchs. Roosting monarch surveys shall follow the Xerces Society monarch count protocol. 2. To prevent disturbance of monarchs during the overwintering season by construction personnel or work activity, roosting trees will be flagged, and snow fencing or a similar technique shall be used to cordon off monarch roost trees at a reasonable distance of at least 25 feet away from the qualified biologist. The qualified biologist shall determine the placement of the fencing to protect the monarchs while allowing work to continue. 3. While work is occurring in the Project vicinity during the overwintering season, the qualified biologist shall visit the property a minimum of two times per week to verify protection measures remain in place and document that roosting monarchs are not disturbed by work activities. The qualified biologist shall have authority to stop work if monarchs show signs of unnatural disturbance. If monarchs are being disturbed or affected, protection measures shall be relocated by the qualified biologist in consultation with the foreman. 4. Work crew shall be educated on the monarch protection measures and how the measures apply to their work. 5. During the overwintering season when monarchs are present, activities that could result in vibration and thus movement of monarch clusters, shall be avoided within 500 feet of occupied trees. A qualified biologist can modify the buffer with approval of the regulatory agencies if adjacent activities are determined not to be disturbing. 6. Aerial pesticide applications or pesticides that are harmful to butterflies shall not be applied within 500 feet of overwintering sites when monarch overwintering is occurring. Small cut and paint efforts or	Prior to construction During construction Post construction	State Parks	State Parks or Contractor Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
directed spot spraying when it is not windy will be allowed if required to control invasive arundo treatments or other highly invasive species to avoid invasive regrowth in the Project area. All weed treatments shall be under the supervision of a qualified biologist to ensure no impacts on monarchs occur. Any weed treatments shall be under the supervision of a Qualified Applicator Certificate and conducted per State Parks and California Department of Pesticide Regulation guidelines. 7. Monarch nectary plants shall be incorporated into the plant palette of the HRAMP near potential overwintering sites.			
BIO-3: Crotch's Bumble Bee Measures. The following measures shall be implemented to protect and minimize impacts on Crotch's bumble bees: 1. Surveys for Crotch's bumblebee shall be conducted within one year of vegetation removal/ground disturbance by a qualified entomologist with the appropriate permits and familiarity with the identification, behavior and life history of the species. At minimum, a survey report shall provide the following: a. A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. b. Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c. Map(s) showing the location of nests/colonies. 2. If Crotch's bumble bee is detected, the following shall be implemented: a. The qualified entomologist shall: i. Identify the location of all nests within and adjacent to the Project site. ii. Provide a survey report to the CDFW of the physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. This shall include native plant composition (e.g., density, cover, and abundance) within affected habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). iii. An Avoidance Plan shall be developed with specific avoidance measures that will be implemented prior to and during Project activities. The Avoidance Plan shall be submitted to CDFW prior to Project activities for review. Upon CDFW approval of an Avoidance Plan, the qualified entomologist shall demarcate an appropriate no disturbance buffer zone around any identified nest(s) to reduce the risk of disturbance or accidental take. The buffer zone will be expanded as necessary to prevent disturbance or take to the extent feasible. b. If complete avoidance is not feasible, consultation with CDFW shall determine if take authorization from CDFW is required. c. Floral resources associated with Crotch's bumble bee that require removal during restoration activities shall be replaced at a 1:1 ratio and with guidance from CDFW. Floral resources will be planted within 200 meters of the original plant location or in the most centrally available location relative to identified Crotch's bumble bee nests, and be located no more than 1.5 kilometers from the nest sites.	Prior to construction During construction Post construction	Landowner	Landowner or Contractor Biologist,/ Entomologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
d. The Habitat Restoration and Adaptive Management Plan will include native and local plant species preferred by Crotch's bumblebee within the plant palette to further support the existence and expansion of the species on-site.			
BIO-4: Fish Protection Measures During Work in Wetted Areas. Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project shall comply with all permit requirements. The following measures shall be implemented to protect and minimize impacts on tidewater goby and steelhead trout, their critical habitat, and other special-status aquatic species during construction: 1. Cofferdam, sediment curtain, and/or another method approved by CDFW/NMFS/USFWS shall be used to cordon off the area (approximately 0.33 acre) around the existing bridge abutment to both exclude fish and wildlife and to contain construction debris and runoff within the work area. Final construction design shall meet all permit conditions and be developed by the contractor in coordination with State Parks. a. The cofferdam shall not be fully dewatered until the supervising biologist determines that no fish remain within the area. The supervising biologist shall have appropriate handling permits and experience with dewater and fish relocation activities. This includes experience with aquatic species associated with the lagoon, creek, and wetted areas. i. Dewatering shall be done slowly with supervision to ensure that any fish trapped in the area can be captured and relocated reducing the risk of injury or stress. ii. Pumps shall be properly screened to prevent fish from entering the intake. iii. Dewatering and flow diversion shall comply with permit requirements from CDFW, USFWS, and NMFS. iv. Once the supervising biologist has confirmed that the work area is isolated, all fish are excluded, and there is no risk of entraining fish, then the pump screen may be removed. v. Water removed from the work area shall be directed to an adjacent holding area according to permit requirements before being infiltrated into the existing fill or release into the lagoon or ocean downstream of the work area. vi. Water quality testing including turbidity, temperature, salinity, dissolved oxygen, pH, and conductivity, nutrients (and potentially metals if required) shall be monitored and documented at the start, middle and end of each day. b. Blocking nets providing a buffer area outside the work zone shall remain in place until all work is completed and the coffer dam removed. i. Blocking nets shall be inspected at least three times a day (start, middle, end) or more if requested by the supervising biologist. If fish are impinged on the net, or weather/flow conditions change significantly, the supervising biologist can increase inspection efforts. c. Silt curtains may also be installed inside the blocking nets to further reduce potential for water quality impacts. 2. All construction activities within or directly adjacent to the lagoon, creek, and wetted areas will occur preferentially outside of the steelhead migration season (November – June) In the	Prior to construction During construction Post construction	Landowner	Landowner or Contractor Fish Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
event, this time frame cannot be avoided, measures shall be implemented with the approval of NMFS and CDFW to avoid impacts such as allowing passage through a protected portion of the work area and implementation of additional BMPs to buffer fish from adjacent work, such as use of silt curtains within the wetted edge and silt fence along the dry edge, etc.). 3. If fish upstream are observed in distress, a fish kill occurs, or spills occur, the supervising biologist shall immediately contact the contractor to stop work, contact the relevant agencies, and work with the contractor to correct the problem. 4. Upon completion of the removal of the old bridge within the coffer dam area, water quality shall be tested within the work area before removal of the walls. Flow shall be restored slowly, and fish shall remain excluded upstream of the work area pending confirmation that water parameters are suitable for direct release into the lower lagoon.			
BIO-5: Fish Relocation Measures. Formal consultation with USFWS will further refine these measures and the Project will comply with all permit requirements. The following measures shall be implemented to protect and minimize direct impacts on special-status fish species: 1. All fish shall be relocated out of the BSA by a permitted biologist prior to work within the lagoon, creek, and wetted areas. The fish shall be relocated in an approved location upstream (or downstream if conditions are suitable). Assessment of carrying capacity and crowding shall be made at the time of relocation in conjunction with USFWS to ensure that there is sufficient area to support any fish that are moved. 2. Downstream blocking nets (having no greater than 1/8-inch mesh) shall be secured to both banks and the bottom to prevent movement downstream or upstream of the work area in the main lagoon. 3. Fish shall be herded upstream above the limit of the proposed work area and then seining will continue until all fish are captured. The upstream blocking net shall be installed and secured so that no fish can move back into the work area. 4. Fish that are not herded but captured in the seine nets shall be placed in buckets of cool, clean water collected from an undisturbed area of the lagoon with bubblers attached at the sides and then immediately hand carried upstream above the upstream blocking net or downstream into the main lagoon if conditions are suitable. 5. Fish shall not be crowded or held in buckets for more than 10 minutes. 6. Fish handling shall be minimized while the supervising biologist documents the species, number, size class, and condition of release. 7. Individuals handling fish shall ensure that their hands are clean and free of potentially harmful substances such as sunscreen, insect repellent, etc. 8. Should there be any mortality, the fish incidentally killed shall be preserved whole on ice then frozen, data on species, size and cause of mortality will be documented, and the remains delivered to the appropriate agencies. 9. If the limits of incidental take are approached, the supervising biologist shall postpone work until the appropriate agency is notified and a plan developed to further reduce potential for further stress or injury.	Prior to construction During construction Post construction	Landowner	Landowner or Contractor Fish Biologist Construction Manager
BIO-6: Fish Hydroacoustic Buffering Measures. Formal consultation with CDFW/USFWS/NMFS will further refine these measures and the Project will comply with all permit requirements. The following measures shall be implemented to protect and minimize direct and indirect impacts on special-status fish species from hydroacoustics:	Prior to construction During construction	Landowner	Landowner or Contractor Fish Biologist

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
1. Construction of the bridge foundation and footings shall be completed within the existing fill material. 2. Construction of the temporary bridge shall avoid placement of any foundations within or immediately adjacent to the wetted area and any construction shall be completed within existing fill material. Construction of the coffer dam or other devices within or immediately adjacent to the wetted area associated with removal of the existing bridge shall comply with all Caltrans requirements as outlined in the Technical Guidance for Assessment and Mitigation of Hydroacoustic Effects of Pile Driving on Fish (Caltrans 2020).			Construction Manager
BIO-7: General BMPs for Biological Resources. To minimize temporary and limited turbidity or water pollution impacts from adjacent ground disturbing activities, the following BMPs shall be implemented at a minimum. If more stringent measures are identified in the Project permits and Storm Water Pollution Prevention Plan (SWPPP), they will also be implemented. 1. Siltation fences, or other suitable material, shall be installed at the edge of the work areas to be graded to avoid movement of soil into wetted areas. 2. Vegetation removal shall be conducted so that materials are not permitted to fall into wetted areas. 3. Stockpiles shall be located away from the lagoon and creek corridor and will be contained by standard BMPs such as wattles, tarps, or burlap to ensure materials are not moved into the creek due to wind, rain, gravity, or flooding. 4. No equipment maintenance or refueling shall be permitted within 100-feet to avoid accidental spills from entering the lagoon and/or creek. 5. Soil shall be stabilized in bare areas with mulch, straw matting, hydroseeding or other approved methods as described in the Habitat Restoration and Adaptive Management Plan to avoid movement of soils into wetted areas. 6. Ground disturbing activities shall not occur during rain events. Within 24 hours of a projected likely rain event, the site will be "buttoned up" with appropriate BMPs such as covers over stockpiles and wattle installation at graded area boundaries and along slopes so that soil and Project materials will not wash into adjacent areas. 7. Access roadways shall be periodically swept (paved) or wetted down (unpaved) to minimize soil movement into adjacent areas due to wind. Construction lighting shall be directed away from non-work areas and directed downward to avoid adversely affecting adjacent species and their movement corridors.	Prior to construction During construction	Landowner	Landowner or Construction Inspector Construction Manager
BIO-8: Herpetofauna Measures. The following measures shall be implemented to protect and minimize impacts on protected herpetofauna: 1. Thirty days prior to ground disturbance or grading activities, a qualified biologist shall conduct pre-construction surveys to detect the presence of special-status herpetofauna. A minimum of three preconstruction surveys shall conducted during periods when the target species are most likely to be active. Periods of lower temperatures, generally December through February, should be avoided. 2. In the event special-status herpetofauna are identified during preconstruction surveys, a capture and relocation plan shall be developed for review and approval of CDFW. The plan shall, at a minimum, include the timing and location of the surveys, trapping and relocation	Prior to construction During construction	Landowner	Landowner or Contractor Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
methods and locations, species exclusions methods from active work areas, and required documentation/recordation data. Species specific guidance shall be included. 3. Exclusion fencing (e.g. 4- to 6-foot-high silt fence keyed in) shall be installed around the active work area to limit the potential for re-colonization of the site prior to construction activities. Fence stability shall be surveyed daily and repaired within 24 hours. 4. A qualified biologist will be present during vegetation removal or initial ground-disturbing activities immediately adjacent to or within habitat that supports populations of these species. Special attention shall be given to burrows and allowing animals to escape during earth work. Earthwork and vegetation removal should be sequenced where feasible to facilitate animal movement towards open space areas.			
BIO-9: Nesting Bird Measures. If the nesting bird season cannot be avoided and construction or vegetation removal occurs between February 1 through August 1 (February 1–September 15 for large tree removal), the Project shall do the following to avoid and minimize impacts on nesting birds and raptors: 1. A qualified biologist shall conduct a nesting bird study within two weeks of the anticipated start date, and again within two days prior to ground disturbance, to identify any active nests within 500 feet of the development footprint. 2. If an active nest is found, the nest shall be avoided and a suitable avoidance buffer shall be delineated in the field where no impacts may occur until the chicks have fledged the nest as determined by a qualified biologist. Construction buffers shall be 300 feet for passerines or up to 500 feet for raptors or as identified by a qualified biologist. Avoidance buffers may be modified at the discretion of the qualified biologist in coordination with CDFW, depending on the species, location of the nest, species tolerance to human presence, and the type of construction-related noises and vibrations that would occur. In the event a communal nesting site becomes established before completion of restoration activities, coordination with CDFW and USFWS shall occur to determine avoidance and minimization measures. In the event it is determined that the communal nesting site needs relocation, a relocation plan shall be prepared for CDFW and USFWS. The plan shall identify methods and locations for construction of new sites making use of recently used nest materials.	Prior to construction During construction	Landowner	Landowner or Contractor Biologist, Construction Manager
BIO-10: Bat Roost Measures. The most suitable bat roosting habitats on the Proposed Project are along the PCH bridge, within the motel, leasee or lifeguard and public restroom building, and within oak, palms, and other large, mature trees. Rock crevices could also be used. Bats are their most vulnerable during their maternity roosting period (March 1 to August 31) and during hibernation periods (November 1 to February 31). The following measures shall be implemented to protect and minimize impacts on protected and roosting bats: 1. When feasible, disturbance to suitable bat roosting habitat shall be scheduled outside of sensitive hibernation and roosting periods. 2. Within two weeks prior to disturbance of potential bat roosting sites (large trees, structures, rocky crevices), a qualified bat specialist shall conduct a visual and acoustic pre-construction survey of the Proposed Project and surrounding 200 feet for possible roosting habitat. Surveys shall be conducted during the daytime and nighttime when bat species are detectable. Surveys shall be conducted by a qualified bat specialist with the appropriate	Prior to construction During construction	Landowner	Landowner or Contractor Biologist/Bat Specialist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
handling permits and familiarity in identifying bat species and roosting habitat. The bat specialist shall document all survey results and prepare a summary report to CDFW. 3. In the event no roosting bats are present within the survey area, one-way exclusion devices shall be installed prior to structure demolition to exclude bat use and avoid their potential harm. 4. If potential roosting sites are identified, an additional survey to pinpoint roosting locations shall occur within seven days prior to disturbing activities. The bat specialist ~~biologist,~~ in coordination with CDFW, shall refine a 200-foot or other agreed-upon buffer to keep in place during construction until the roosting site is confirmed to be no longer in use for hibernation. Night lighting for construction shall not be directed towards these roost sites. 5. If maternity roosts are identified, roosting locations shall be recorded within seven days prior to Project activities. Maternity roosts shall be demarcated with an appropriate buffer as agreed upon by CDFW and CDPR. Work shall occur outside of the maternity season. Trees and structures that are determined to support maternity roosts shall be left in place until the end of the maternity season and the young are flying and foraging on their own. Work near a maternity roost shall not occur between 30 minutes before sunset and 30 minutes after sunrise. 6. Large tree cutting or removal shall be supervised by a qualified bat specialist to document the presence or absence of bats that might be affected. A local bat rehabilitation facility shall be available in the event tree-felling results in unanticipated injury to any bat. 7. If bat roosts are affected during construction, the Project applicant shall provide replacement roosts within similar habitat and with a gap no greater than 3.8 centimeters and interior surface comparable to that of the original roost. The replacement roost shall be swabbed with bat guano and urine collected from the original roost. For the replacement roost to be considered effective, the same bat species that was affected by construction shall be observed utilizing the replacement roost in numbers that are comparable to the original roost. Replacement roosts that are occupied shall be left in placed during and after the Project.			
BIO-11: San Diego Woodrat Measures. The following measures shall be implemented to protect and minimize impacts on protected woodrats: 1. Exclusion fencing (e.g., 4- to 6-foot-high silt fence keyed in) shall be installed around the active work area to limit the potential for re-colonization of the site prior to construction activities. Fence stability shall be surveyed daily and repaired within 24 hours. 2. Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego desert woodrat. 3. If inactive woodrat nests are found, they shall be disassembled and relocated out of the active work area under the supervision of the qualified biologist. 4. If active San Diego desert woodrat nests (stick houses) are identified within the disturbance zone, a construction fence shall be erected around the nest site adequate to provide the woodrat sufficient foraging habitat at the discretion of the qualified biologist. Clearing and construction within the fenced area shall be postponed or halted until young have left the nest. The biologist shall be present during those periods when disturbance activities will occur near active nest areas to avoid inadvertent impacts on these nests. 5. If San Diego desert woodrat nest avoidance is not possible, the Project biologist shall clear vegetation from areas immediately surrounding the active nests, followed by a night without further disturbance to allow woodrats to vacate the nest. Preference will be given to non-	Prior to construction During construction	Landowner	Landowner or Contractor Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
breeding-season destruction of the nests (May through October) and relocation of adults shall target undeveloped areas of the Project, including salvage of nest-building material—rocks, sticks, etc. Each occupied nest shall subsequently be gently disturbed by a qualified wildlife biologist to entice any remaining woodrats to leave the nest and seek refuge outside the Project construction area. The stick nests shall be carefully removed from the Project construction area and be placed near a suitable vegetation or rocky substrate like original nest location. The Project biologist shall document all woodrat nests moved and provide a written report to CDFW. Results of the surveys and relocation efforts shall be provided to CDFW.			
BIO-12: Habitat Restoration and Adaptive Management Plan: Impacts on sensitive plant communities shall be mitigated with implementation of the following measures: 1. The Project shall complete on-site restoration and enhancement of sensitive plant communities (e.g., removal of invasive species; transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio of no less than 1:1 for temporary impacts and not less than 2:1 for permanent impacts. 2. A HRAMP shall be prepared and reviewed by CCC and CDFW for compliance prior to ground disturbance. The HRAMP shall be consistent with and include the monitoring and adaptive management provisions detailed in the Topanga Lagoon CHRAMP. The plan shall focus on the creation of equivalent sensitive plant habitats within disturbed habitat areas within the Proposed Project or directly off-site within Topanga State Park and Topanga Beach. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components: • Description of existing sensitive habitats on the Proposed Project. • Summary of permanent impacts on sensitive communities based on approved Project design. • Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation. • Detailed description of restoration or enhancement goals. • Inclusion of sensitive communities and plant species with the goal to provide a net increase in the quantity and quality of them on-site. • Description of implementation schedule, site preparation, erosion control measures, planting plans, and seed collection or plant propagation of genetically appropriate plant materials. • Provisions for mitigation site maintenance and control on non-native invasive plants. • Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to CDFW. 3. The HRAMP shall include the following measures to minimize the spread of invasive species: • Stockpiled soil, and grubbed vegetation when blooms or seeds are present, shall be covered to avoid spread of weed seed. • If any soil is slated to be used off-site outside of being disposed in a landfill, it shall be inspected by a qualified biological monitor prior to removal to avoid inclusion of invasive propagules (e.g., sections of Arundo, ivy) that reproduce vegetatively and could spread from the receiver site. • Haul trucks shall be covered to avoid seed dissemination during soil and vegetation treatment.	Prior to construction During construction Post construction	Landowner	Landowner or Contractor Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
• Areas slated for planting shall be pretreated for emergent weeds prior to planting. Typical measures include irrigating and then spot treating germinating weeds three times prior to planting to reduce the invasive seed base. This is usually initiated three to four months prior to planting. Any herbicide use shall be approved by State Parks and a Pest Control Advisor and shall be conducted by trained staff overseen by a supervisor with a Qualified Applicator License or Certification from the Department of Pesticide Regulation. All herbicide application shall be in accordance with state and federal requirements. • Any weed removal work shall take an Integrated Pest Management approach where manual, mechanized, cultural and chemical methods are all considered to determine the most environmentally friendly and functional methods. State Parks policies and Department of Pesticide Regulation guidelines shall be followed when limited pesticide use is determined to be needed. • Use of jute netting, landscape cloth, or mulch, as appropriate, shall be used to cover bare soil reduce the area available for weed intrusion. • Irrigation design shall consider weed control. Drip systems are preferred if feasible, as water is directed solely at the target plant species. • Biodegradable materials shall be used when available for erosion control and soil management. All plant-derived materials (mulch, straw) shall be certified weed free. • Monthly weeding shall be required for the first-year post planting, Quarterly weeding will be required thereafter for the five-year mitigation and monitoring period. • Success criteria shall include the following for five-years post restoration: i. Native vegetation shall reach 85 percent cover except for areas such as mudflats, rocky slopes, beach areas and other habitats that are not naturally or highly vegetated. No highly invasive plants shall be present on-site.			
BIO-13: Jurisdictional Waters/Wetlands Habitat Restoration and Adaptive Management Plan. Prior to any permanent or temporary impacts on wetlands or waters, State Parks shall obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, Streambed Alteration Agreement pursuant to under Section 1602 of the CFGC from CDFW, and a CDP from the CCC. In addition, prior to impacts on wetlands or waters, a Habitat Restoration and Adaptive Management Plan (HRAMP) shall be prepared by State Parks and submitted to the USACE, RWQCB, CDFW, and CCC in support of wetland/waters permit applications. The Jurisdictional Waters/Wetlands HRAMP shall be consistent with and include the monitoring and adaptive management provisions detailed in the Topanga Lagoon CHRAMP. Impacts on wetlands and other waters will be restored/enhanced on-site or within adjacent and equivalent habitat areas within Topanga State Park and Beach at no less than a 2:1 ratio for permanent impacts, with no net loss of wetlands. Areas affected temporarily will be restored to a pre-Project condition or better via removal of invasive species, revegetation with native species, or other appropriate measures. The HRAMP required in **Mitigation Measure BIO-12** may also satisfy this mitigation measure if wetlands and waters impacts and restored wetlands/waters are incorporated into that plan.	Prior to construction During construction Post construction	Landowner	Landowner or Contractor Biologist Construction Manager
BIO-14: Protected Native Tree Survey and Mitigation. A preconstruction survey of protected native trees shall be conducted once an alternative and wastewater treatment option has been selected and prior to construction. The Project is an extensive restoration project that not only restores natural	Prior to construction During construction	Landowner	Landowner or Contractor Certified Arborist

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
topography and hydrology followed by extensive planting in a 7.50- to 9.21-acre area, it also provides additional enhancements via weed management and focused planting in a 30.03- to 31.21-acre enhancement area (Table 3.3- 9). Due to the significant net benefits of the Project to native trees and habitats, and State Parks/RCDSMM track record of approximately 75 percent survivorship of native tree plantings, protected native trees being removed or affected during construction shall be planted at 5:1 ratio. Protected trees that are encroached upon within 3 feet of the trunk or more than 30 percent of the tree protected zone (TPZ) shall be replaced at a 3:1 ratio. Protected trees that are encroached into 10–30 percent of the TPZ shall be replaced at a 1:1 ratio. Volunteer native seedlings within the BSA can be mapped and used as mitigation trees. No mitigation shall be required for protected native trees if they are encroached by less than 10 percent of the TPZ, but these trees shall be monitored. Annual monitoring of all encroached protected trees shall occur for 5 years post impact and shall require annual reporting to document any tree death. If any replacement trees die during the annual monitoring period, the tree shall be mitigated at a 2:1 ratio. Watering of replacement trees shall be scheduled to have fully removed additional watering by year 4–5 to promote natural survival. Trees shall be preferentially incorporated into appropriate open space habitat areas, but also incorporated into the plant palettes of the developed and transitional areas.	Post construction		Construction Manager
BIO-15: Tree Management and Preservation Program. Prior to the removal of any protected native tree, a Tree Management and Preservation Program shall be prepared by a certified arborist or qualified biologist for review by CDFW, CCC, and the County. The plan shall include details for protective fencing to be placed at the limits of the tree protected zone (TPZ) of all oak and native trees within or extending into the Biological Study Area that may be affected by or are in close proximity (50 feet) with construction activities. In addition, the plan shall describe the protection and maintenance provisions for all native trees and the replacement trees for those native trees removed and annual reporting requirements.	Prior to construction During construction	Landowner	Landowner or Contractor Biologist Construction Manager
Cultural Resources			
CUL-1: Historical Resources Monitoring and Treatment Plan. After State Parks approval of the Proposed Project and before the start of Project construction activities, a historical resource monitoring and treatment plan (HRMTP) shall be prepared documenting the actions and procedures to be followed to ensure the avoidance or minimization of impacts on archaeological and historic architectural resources that qualify as historical resources under CEQA. Archaeological resources and historic architectural resources may be addressed in one or separate HRMTPs at the discretion of State Parks. General information and procedures to be addressed in the HRMTP shall include but not be limited to the following: • A listing of Project personnel and contact information, description of roles and responsibilities, reporting relationships, activities requiring notification, and notification procedures and time frames. • Construction worker cultural resources sensitivity training to be implemented before the start of Project construction activities, consistent with Mitigation Measure CUL2 (Cultural Resources Sensitivity Training). Specific archaeological resources procedures to be addressed in the HRMTP shall include but not be limited to the following: • Avoidance and preservation in place of three archaeological resources—P-19-000133 (ethnohistoric site), P-19-003756 (historic-period site), and the non-historic component of P-19-003759 (multicomponent site)—to the extent feasible, consistent with Mitigation Measure CUL-3 (Avoidance and Preservation in Place). • If avoidance is not feasible, development of treatment options that reduce or minimize impacts on P-19-000133 (ethnohistoric site), P-19-003756 (historic-period site), and the non-historic component of P-19-	Prior to construction	State Parks	State Parks Cultural Resource Program Supervisor

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
003759 (multicomponent site). Such options include implementation of Environmentally Sensitive Areas for portions of resources that can be avoided, archaeological testing and/or data recovery, capping of archaeological deposits, and/or the development of interpretation/educational materials and/or exhibits. • An archaeological and Native American monitoring plan to be implemented during Project ground-disturbing activities, consistent with Mitigation Measure CUL-4 (Archaeological and Native American Monitoring). The monitoring component of the HRMTP shall include the detailed locations of monitoring activities and types of construction work requiring monitoring; protocols to be followed during monitoring activities and during discovery situations; roles of archaeological and Native American monitors; communication and notification procedures between the construction contractor, monitors, and State Parks; and archaeological monitor reporting requirements. • Actions to be taken if archaeological resources are inadvertently discovered during ground-disturbing activities or previously recorded archaeological resources are affected in an unanticipated manner. Such actions include: o Redirection of work to avoid the area. o Establishment of a temporary exclusion zone. o Inspection of the resource by a qualified archaeologist. o Development of a research design that provides context for significance evaluation. o Evaluation of the resource for listing in the National Register and California Register under Criteria A/1 through D/4. o Development of avoidance and/or treatment protocols such as establishment of an Environmentally Sensitive Area, data recovery, and interpretive/educational or other creative treatment solutions. o Preparation of a technical report documenting the methods and results of the treatment following Archaeological Resources Management Report guidelines. o Appropriate curation of all recovered materials. Specific historic architectural resources procedures to be addressed in the HRMTP shall include but not be limited to the following: • Avoidance and preservation in place of historic architectural resource (P-19-192464 [Topanga Ranch Motel]) to the extent feasible. If avoidance is not feasible, development of treatment options that reduce or minimize impacts on P-19-192464 (Topanga Ranch Motel) such as implementation of Environmentally Sensitive Areas for portions of the resource that can be avoided; Historic Architectural Building Survey documentation before demolition; relocation and restoration of buildings for reuse or interpretive purposes as feasible; and/or the development of interpretation/educational materials and/or exhibits.			
CUL-2: Cultural Resources Sensitivity Training. Cultural resources sensitivity training for all construction personnel shall be conducted before the start of Project construction. The sensitivity training shall be led by a qualified archaeologist and shall include restrictions around Environmentally Sensitive Areas; information on how to identify archaeological resources; approved access routes and equipment/foot traffic restrictions for workers; specific procedures to be followed in the event of an inadvertent discovery consistent with the HRMTP (see **Mitigation Measure CUL-1**); safety procedures when working with monitors; and consequences in the event of noncompliance.	Prior to construction During construction	Landowner	Landowner or Contractor Archaeologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
CUL-3: Avoidance and Preservation in Place. Project implementation shall be carried out in a way that avoids or minimizes impacts on significant cultural resources to the extent feasible. Avoidance and preservation in place shall be the preferred manner of mitigating impacts on significant historic architectural resources and archaeological resources. Where State Parks has determined that avoidance will be implemented, the construction area shall be narrowed or otherwise altered to avoid resources. An Environmentally Sensitive Area shall be delineated with protective fencing and/or flagging by a qualified archaeologist, including an adequate buffer to be determined in coordination with State Parks. Protective fencing shall remain in place during construction activity until State Parks authorizes its removal.	Prior to construction During construction	Landowner	Construction Inspector State Parks Cultural Resource Program Supervisor
CUL-4: Archaeological and Native American Monitoring. Full-time archaeological and Native American monitoring shall be conducted during Project-related ground disturbing activities consistent with the HRMTP (see Mitigation Measure CUL-1) to identify and avoid impacts on archaeological resources. Ground-disturbing activities include but are not limited to demolition, brush clearance, grubbing, excavation, trenching, and grading. The qualified archaeologist shall have the authority to modify monitoring locations and frequencies based on soil observations in coordination with State Parks. Each archaeological monitor shall have a degree in anthropology, archaeology, or a related field, and experience with the archaeology of the Southern California coastal region. Archaeological monitors shall work under the direct supervision of a qualified archaeologist and shall complete daily monitoring logs. The monitoring logs shall document dates of monitoring and monitoring participants, activities observed, soil types observed, and any archaeological resources encountered.	Prior to construction During construction	Landowner	Landowner or Contractor Archaeologist Native American Monitor Construction Manager
CUL-5: Inadvertent-Discovery Procedures. In the event that previously unrecorded archaeological resources are inadvertently discovered, or previously recorded archaeological resources are inadvertently affected during ground-disturbing activities, work shall be halted immediately within a 100-foot radius of the resource and temporary protective measures shall be implemented pursuant to provisions of the HRMTP. No work shall occur within 100 feet of the resource until it has been evaluated by a qualified archaeologist and any identified treatment implemented. Consistent with **Mitigation Measure CUL-3** (Avoidance and Preservation in Place), avoidance and preservation in place shall be the preferred manner of mitigating impacts on archaeological resources to maintain the important relationship between artifacts and their archaeological context, to preserve each resource's scientific value, and to preserve the cultural values ascribed to resources by local Native American Tribes. All resources unearthed by the Project that cannot be avoided shall be evaluated by a qualified archaeologist for listing in the National Register and California Register. If the qualified archaeologist determines the find to constitute a "historical resource" or a "unique archaeological resource" under CEQA, State Parks shall coordinate with the qualified archaeologist and Native American Tribes to develop treatment to reduce or minimize impacts on the resource consistent with **Mitigation Measure CUL-1** (Historical Resources Monitoring and Treatment Plan).	Prior to construction During construction	Landowner	Landowner or Contractor Archaeologist Native American Monitor Construction Manager
CUL-6: Human Remains. In the event human remains are encountered, pursuant to California Health and Safety Code Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to PRC Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision about the treatment and disposition has been made. If the County Coroner determines the remains to be Native American, the NAHC must be contacted within 24 hours. The NAHC must then immediately identify the Most Likely Descendant (MLD) upon receiving notification of the discovery. The MLD shall then make recommendations within 48 hours and engage in consultation concerning the treatment of	Prior to construction During construction	Landowner	Landowner or Contractor Archaeologist Landowner Tribal Liaison Native American Monitor

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
the remains as provided in PRC Section 5097.98 and consistent with Mitigation Measure CUL-1 (Historical Resources Monitoring and Treatment Plan).			Construction Manager
Geology, Soils, and Mineral Resources			
GEO-1: A soils report and geotechnical investigation report shall be prepared by a California licensed geotechnical engineer for the Project area including Topanga State Park, Topanga Lagoon, the PCH bridge area, the wastewater alignments, and Topanga Beach. These reports shall evaluate various geotechnical characteristics including existing liquefaction risk and soil stability. The reports shall provide recommendations for facility design per these findings. These recommendations shall be incorporated into facility design.	Prior to construction During construction	Landowner	Landowner or Contractor Geologist
GEO-2: During final design, State Parks/DBH will prepare a quality assurance/quality control plan that will be maintained during construction. The plan will include observation, monitoring, and testing by a geotechnical engineer and/or engineering geologist during construction to confirm that geotechnical/geologic recommendations are fulfilled, or if different site conditions are encountered, appropriate changes are made to accommodate such issues. The geotechnical engineer will periodically prepare reports while grading excavation and construction activities are underway.	Prior to construction During construction	Landowner	Landowner or Contractor Geologist
GEO-3: State Parks shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for Qualified Professional Paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Before the start of ground-disturbing activities that would affect the Tuna Canyon Formation and the Marine Terrace Deposits (Qtm), the Qualified Paleontologist or their designee shall provide paleontological resources sensitivity training to all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. State Parks and the relevant land managers shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Prior to construction	Landowner	Landowner Cultural Resource Supervisor or Paleontologist Construction Manager
GEO-4: Paleontological monitoring shall be conducted during ground-disturbing activities in the Cretaceous Tuna Canyon Formation and the Marine Terrace Deposits. The formation crops out along the valley walls in the southeast Project area. Monitoring shall be conducted by a qualified paleontological monitor (SVP 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.	Prior to construction During construction	Landowner	Landowner Cultural Resource Supervisor or Landowner/Contractor Paleontologist Construction Manager
GEO-5: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at an accredited repository.	Prior to construction During construction	Landowner	Landowner Cultural Resource Supervisor or Landowner/ Contractor Paleontologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described in this measure.			
GEO-6: At the conclusion of paleontological monitoring, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring, any salvage efforts, and the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to State Parks, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the proposed project and required mitigation measures.	During construction	Landowner	Landowner Cultural Resource Supervisor or Landowner/Contractor Paleontologist Construction Manager
Hazards and Hazardous Materials			
HAZ-1: Before initiating ground disturbance and construction activities, Project landowners/managers (State Parks, Caltrans, the County of Los Angeles Department of Beaches and Harbors) shall collect representative samples of soils and fill material to be analyzed for lead, asbestos, and chromium and any other substances required by the regulatory agencies. Landowners/managers shall avoid if feasible, or otherwise remove from the Project area, soils and fill material identified as containing hazardous quantities of contaminants and shall dispose of such soils and fill material in accordance with applicable hazardous waste regulations. No contaminated soils or fill materials will be eligible for nearshore placement.	Prior to construction	Landowner	Landowner or Contractor Engineer Construction Manager
HAZ-2: Before construction, a geophysical survey shall be conducted to evaluate the Project area for the potential presence of USTs. In the event that USTs are detected, the USTs shall be removed in accordance with all applicable federal, state, and local regulations.	Prior to construction	Landowner	Landowner or Contractor Engineer Construction Manager
HAZ-3: State Parks shall coordinate with the County of Los Angeles Department of Public Health and the Greater Los Angeles County Vector Control District before Project operations to develop, and if necessary to implement, appropriate insect abatement methods. Such methods shall not utilize any substances that may contaminate water or harm wildlife.	Prior to construction	Landowner	Landowner or Contractor Engineer Construction Manager
Marine Biological Resources			
MAR-1: Marine Resources Protection Measures. The following measures will be implemented to protect and minimize impacts on special-status marine species or managed fish species and their habitats during construction. Additional measures required by regulatory agencies as part of Project approvals will also be incorporated. When a conflict exists between specific measures, the most protective measure will be implemented. 1. Before the initiation of Project construction, focused surveys will be conducted for marine biological habitats and communities within a suitable buffer of the shoreline and the nearshore nourishment area (including the proposed pipeline corridor) to identify marine resources and potential Project impacts. Consultation with the resource agencies will occur to implement the best methods for avoiding and minimizing resource impacts.	Prior to construction During construction	Landowner CSLC	Landowner or Contractor Marine Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
2. Placement of pipeline will avoid rocky intertidal boulder fields, subtidal rocky reefs, surfgrass beds, kelp beds, gorgonian and sandcastle tubeworm beds, and sand dollar beds, if present, to the maximum extent feasible. If possible, risers will be used to avoid impacts on these areas or pipelines will be rerouted into sand channels. 3. Support vessels will avoid anchoring over hard-bottom habitat to minimize damage to sensitive habitat and surfgrass beds. 4. Only clean sediment will be used to enrich nearshore environments. Sediment will be sampled and disposed offsite if deemed unclean. 5. Sediment placement methods will include controlling the flow of sediment into different parts of the nearshore nourishment area to allow natural movement of material and minimize direct burial and mortality of sensitive marine resources. Sediment placement should be conducted farther from shore to reduce the depth of sediment deposition down the coast. A qualified monitor will monitor the placement of marine equipment and structures, including support vessels, to ensure that sensitive marine resources are avoided to the extent practicable and are in compliance with all resource agency permits. If marine resources are threatened by Project activities, the qualified monitor will have the authority to stop work until resource agency consultation occurs and the threat has been resolved,			
MAR-2: Avoidance of California Grunion Spawning Season. The following measures will be implemented to protect and minimize impacts on California grunion spawning season (March through August) during construction. 1. Bright lights at night will not be permitted. To avoid spawning impacts, night lighting on the beach face would be avoided during spawning season. 2. Construction will avoid work within 10 feet of the higher high-tide line (as represented by the highest limit of dry wrack), as this area can be used for grunion spawning. If avoidance of this area during construction is infeasible, a qualified biologist will permit work within the avoidance zone only if it can be confirmed that spawning has not occurred in that area since the last full or new moon. Spawning runs can be forecast within four nights after a full or new moon, at the highest tides and for two hours beyond. If significant spawning is documented, the areas should be marked and protected from disturbance until the next full or new moon. 3. Grunion monitoring will be conducted by a qualified biologist for 30 minutes before and two hours after the predicted start of each nightly spawning event. Sufficient qualified biologists shall be employed to ensure that the entire construction site is monitored during the predicted grunion run. The magnitude and extent of a spawning event shall be defined in 300-foot segments of beach using the Walker Scale (Martin et al. 2021). The number of fish will be estimated to determine the Walker Scale value (e.g., 0, 1, 2, 3, 4, or 5) of each 300-foot segment within the proposed work area. 4. Education programs developed for the Project shall incorporate grunion to both minimize and mitigate impacts on grunion associated with the anticipated increase in beach use and provide regional educational resources about the grunion that addresses a gap in statewide programs. Recommended elements include: i. Post interpretive signage that provides information about grunion, rules and regulations for recreational fishing, and ways to protect the species. ii. Develop and implement grunion run education programs similar to those in place at Cabrillo Beach in San Pedro with the Cabrillo Marine Aquarium, and at La Jolla Shores with the Birch Aquarium at Scripps. 5. The following management measures shall be implemented after construction:	Prior to construction During construction Post Construction	Landowner	Landowner or Contractor Biologist Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
i. To retain the natural deposition of wrack along the beach, mechanical beach grooming will not occur on-site below the highest high tide line consistent with existing beach Best Management Practices. ii. Vehicle use on the beach shall be limited to that required for emergency response and occasional required maintenance. All vehicles must drive above the higher high-tide line during March–August unless no grunion spawning occurred in the task location during the last full or new moon.			
MAR-3: Invasive Aquatic Species Control Measure. All Project support vessels will have underwater surfaces cleaned before entering Southern California waters and immediately before transiting to the offshore construction area. Additionally, and regardless of vessel size, ballast water for all Project vessels will be managed consistent with the California State Lands Commission's ballast management regulations, and Biofouling Removal and Hull Husbandry Reporting Forms will be submitted to State Lands Commission staff.	During construction	Landowner	Landowner
Noise			
NOISE-1: Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 6:00 p.m. and 6:00 a.m., or at any time on Sundays or holidays, such that the sound there from creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited. For construction activities occurring outside of the 6:00 a.m. to 6:00 p.m., Monday through Friday time period, the Proposed Project would be required to obtain a variance in accordance with County Code, Section 12.08.440 and comply with applicable specifications as issued by the health officer. The Project would comply with Caltrans requirements 14-8.02 NOISE CONTROL. Control and monitor noise resulting from work activities. Do not exceed 86 dBA Lmax at 50 feet from the job site from 9:00 p.m. to 6:00 a.m.	During construction	Landowner	Construction Monitor Construction Manager
NOISE-2: Monitor construction noise to verify compliance with the limits. Provide the contractor the flexibility to meet the applicable construction noise limits in the most efficient and cost-effective manner. The contractor would have the flexibility of either prohibiting certain noise-generating activities during daytime and/or nighttime hours or providing additional noise control measures to meet the applicable noise limits. To meet required noise limits, the following noise control mitigation measures will be implemented as necessary, for daytime and/or nighttime only as needed to meet the applicable noise limits: • Monitor and maintain equipment to meet noise limits. • Install a temporary construction site sound barrier near a noise source. • Use acoustic enclosures, shields, or shrouds for equipment and facilities. • Use moveable sound barriers at the source of the construction activity. • Use low-noise emission equipment. • Minimize the use of generators to power equipment. • Limit conducting noisy nighttime construction activities in or within 100 feet of residential neighborhoods. • Prohibit aboveground jackhammering and impact pile driving during nighttime hours. • Limit the use of public address systems and loudspeakers. • During nighttime work, use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with spotters. • Locate stationary construction equipment as far as possible from noise-sensitive sites. • Implement noise-deadening measures for truck loading and operations.	During construction	Landowner	Construction Monitor Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
• Line or cover storage bins, conveyors, and chutes with sound-deadening material. • Use high-grade engine exhaust silencers and engine-casing sound insulation. To mitigate noise related to pile driving, cast-in-drilled-hole (CIDH) piles will be used instead of pile driving to reduce noise levels substantially. CIDH piles will meets applicable U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and National Marine Fisheries Service standards and conditions.			
NOISE-3: To mitigate vibration related to pile driving, cast-in-drilled-hole (CIDH) piles will be used instead of pile driving to reduce vibration levels substantially. CIDH piles will meets applicable U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and National Marine Fisheries Service standards and conditions.	During construction	Landowner	Construction Monitor Construction Manager
Parks and Recreation			
PR-1: Temporary Access Restrictions. During final design, the Project Engineer in coordination with the officials with jurisdiction (i.e., State Parks or DBH) shall evaluate all proposed temporary impact areas to identify opportunities to further reduce their size and the duration of temporary access restrictions. All temporary impact areas shall be shown on the Project plans and specifications and shall include notes that the Construction Contractor shall not increase the size of those areas without consultation with the Project Engineer and subsequent environmental review. The Construction Contractor shall also be responsible for the following: 1. Ensure all temporary impact areas within parks and recreational facilities are appropriately signed and gated to restrict access. 2. Maintain the fencing throughout the time period each temporary impact area is used and to remove the fencing only after all construction activity in an area is completed, the temporary impact area is no longer needed, and the land is ready to be returned to the property owner. Provide signage at each temporary impact area explaining why the area is fenced and why access is restricted, the anticipated completion date of the use of the land, and contact information for the public to solicit further information regarding temporary impact areas and the Proposed Project.	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Contractor Construction Manager
PR-2: Temporary Surf Break Access. During construction, a temporary access way to the surf break shall be constructed, to provide continued access for surfers, beach goers, and other offshore recreational uses at Topanga Beach. Prior to any beach closures, the Project Engineer in coordination with the County, shall develop detour signs notifying surfers and beach goers of the upcoming temporary closures and directing uses to the temporary accessway with estimated timeframes.	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Contractor Construction Manager
Transportation			
TRA-1 Transportation Management Plan (TMP). During final design and prior to the issuance of demolition, grading or any construction permits, a qualified engineer shall prepare a TMP that would address potential traffic flow disruptions on local roadways prior to construction. A TMP is required by Caltrans to address the following, as applicable: 1) Public Information 2) Motorists Information Strategies 3) Incident Management 4) Construction Strategies 5) Demand Management 6) Alternative Route Strategies 7) Other Strategies.	Prior to construction During construction	Caltrans Landowner	Landowner or Contractor Engineer Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
The TMP shall be included in the final design plans and prepared in accordance with the California Manual on Uniform Traffic Control Devices, Caltrans Standard Plans and current standards and best practices of the reviewing and approving agencies. The TMP shall be coordinated with applicable agencies regarding construction schedules and worksite Traffic Control Plans including, but not limited to, Caltrans, the California Highway Patrol (CHP), and local fire and police departments. The TMP Plan shall include, but is not limited to the following measures: • Maintain four lanes, two lanes in each direction, of circulation on PCH within the bridge area, at least one lane in each direction on all other public roadways, and access to neighboring commercial establishments during construction of all Proposed Project components other than the sewer extension within PCH if selected • Minimize traffic delays and effectively maintain a level of traffic flow acceptable to Caltrans throughout the transportation system during construction • Minimize detours and impacts to pedestrians and bicyclists • Maintain operation of PCH for use as an emergency evacuation route at all times during construction, especially during "red-flag" (high fire hazard) days declared by the National Weather Service. • Establish line of communications between State Parks, DBH, Caltrans, City of Malibu, Los Angeles County Fire, construction contractors, and emergency service providers • Ensure that temporary speed limit reduction for the traffic detour approaches and exits conforms to safe highway design speeds as acceptable by Caltrans • Have a flagger present to coordinate north-south traffic during those limited times that only a single lane is open			
TRA-2: Construction Parking Plan. Prior to the issuance of demolition, grading, or any other construction permits, a Construction Parking Plan will be prepared and submitted for review and approval by Caltrans, State Parks, and the County of Los Angeles. The Construction Parking Plan shall include, at a minimum, the following parking measures, which shall be followed until construction activities are completed. • All temporary public parking areas shall be located within previously disturbed or developed areas within the Project area • Temporary parking areas shall provide a minimum replacement parking ratio of 1:1 for standard parking spaces to the greatest extent feasible, as well as ADA spaces • Temporary parking shall be in place for use prior to removal of existing parking	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Manager
TRA-3: Emergency Evacuation Route Plan. Contractor shall implement the Emergency Evacuation Route Plan approved by Caltrans in coordination with other emergency agencies. The Plan shall ensure the following at a minimum: • Nighttime work shall be used to minimize lane closures during daytime hours • Four lanes of traffic shall be maintained during construction • Lane closures shall not be allowed during weekend days or holiday days • Emergency service providers shall be provided expedited through-passage at all times	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Manager

Measures	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
TRA-4: Public Outreach Campaign. Landowners shall prepare a public outreach campaign and signage plans for public notification prior to and during the construction period.	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Manager
Utilities and Service Systems			
UTS-1: Utility Relocation/Protection Plan. During Final Design, a Utility Relocation/Protection Plan shall be prepared in consultation with the affected utility providers/owners for those utility facilities anticipated to be relocated, removed, and protected in place. The Resident Engineer shall develop the plan with a focus on avoiding utility relocations. If relocation is necessary, final design shall focus on relocating utilities within the State right-of-way or within other existing public rights-of-way and/or easements. If relocation outside of existing or the additional public rights-of-way and/or easements required for the Proposed Project is necessary, final design shall focus on relocating those facilities in such a manner as to minimize environmental impacts as a result of project construction and ongoing maintenance and repair activities. The Utility Relocation/Protection Plan shall be included in the project specifications and subject to review and approval by CDPR and the affected utility providers. During construction, the Utility Relocation/Protection Plan specifications shall be implemented by the construction contractor.	Prior to construction During construction	Landowner	Landowner or Contractor Engineer Construction Manager
Wildfire			
FIRE-1: Before the issuance of a grading or building permit, State Parks shall submit a fuel modification plan to the State Fire Marshal and Los Angeles County Fire Department for review and approval. The plan shall identify fuel modification zones around the Project area and the type of landscaping allowed within these zones. The plan shall also ensure that the height and density of restoration planting and vegetation around the Project area is designed to reduce the risk of wildfire.	Prior to construction	Landowner State Fire Marshal Los Angeles County Fire Department	Landowner or Contractor Environmental Scientist/Biologist

TABLE 4-2
MITIGATION MONITORING AND REPORTING PROGRAM – PROJECT DESIGN FEATURES (PDFS)

PDF	Time Frame for Implementation	Monitoring Agency	Verification of Compliance
Biological Resources			
PDF-BIO-3.3-1: Avoid the use of pesticides within the lagoon and creek (including the wetted channel) and immediately adjacent areas to the lagoon and creek, unless deemed appropriate for aquatic habitats, consistent with State Parks policies. Any use of pesticides and herbicides shall comply with California Department of Pesticide Regulation requirements.	During construction Post construction	Landowner	Landowner or Contractor Biologist Construction Manager
PDF-BIO-3.3-2: In the event grading boundaries are modified, all required tree protection measures including fencing and avoiding encroachment into the protected zone (15 feet from trunk or 5 feet from edge of dripline) will be implemented. In the event grading boundaries are modified, all required tree protection measures including fencing and avoiding encroachment into the protected zone (15 feet from trunk or 5 feet from edge of dripline) will be implemented.	During construction	Landowner	Landowner or Contractor Biologist Construction Manager