

BIOLOGICAL RESOURCES DESCRIPTION AND RECOMMENDATIONS

Meeting Date: June 15, 2026

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| PROJECT NAME: | Single-Family Residence at 555 Sadie Road |
| PROJECT NUMBER: | PRJ2024-000883-(3) |
| PERMIT NUMBER: | Minor Coastal Development Permit No. RPPL2024001287, Variance No. RPPL2024001290 |
| APN: | 4438-037-018 |
| ADDRESS: | 555 Sadie Road, Topanga CA |
| LOCATION: | Topanga Canyon watershed to the north (via Hondo and Old Topanga Canyons); Las Flores Canyon watershed to the south |
| USGS QUAD: | Malibu Beach |
| PROJECT APPLICANT: | Alexandra Logan |
| PROJECT BIOLOGIST: | Marcus C. England, England Ecology LLC |
| STAFF PLANNER: | Shawn Skeries |
| STAFF BIOLOGIST: | Karla Moreno |

GENERAL PROJECT DESCRIPTION

The Applicant proposes the construction of an 18-foot-tall single-family residence within the protected zone of a significant ridgeline, as well as a new onsite wastewater treatment system (OWTS) with seepage pits, swimming pool, retaining walls, and hardscaping on an approximately 2.46-acre property consisting of one legal parcel. The proposed single-family residence would have a floor area of 3,563 square feet with a 1,450-square-foot attached garage on a building site of 9,906 square feet. A total of 2,900 cubic yards (“CY”) of grading is proposed—2,300 CY cut, 600 CY fill, 1700 CY export. The lot would be accessed from Sadie Road a private road via Saddle Peak Road, a 60-foot-wide limited secondary highway and designated scenic route to the east. A new paved 20-foot-wide driveway with a length of 256 feet would access the property from Sadie Road. The subject parcel is surrounded by State Park and California Mountains and Recreation and Conversation land to the north, and single-family

residences to the west, south, and east. ERB review is required, as area proposed for development is less than 200 feet from H2 Habitat.

SITE BIOLOGICAL RESOURCES & HABITAT MAPPING

Biological Resources

The project parcel is undeveloped and is bound by developed residential use parcels along the west and south, with Sadie Road cutting through the panhandle portion of the parcel to the east. The entire north side of the parcel is abutting open space Mountains Recreation and Conservation Authority (MRCA) parcels. Much of the surrounding area to the west, and the northwest corner of the project parcel, was burned by the Palisades Fire in 2025.

The project parcel is mapped in the Santa Monica Mountains Local Coastal Program (LCP) as H2 and H3 habitat. These designations correspond to National Park Service (NPS) vegetation mapping vegetation polygons comprising of the following:

- LCP mapped H3 predominantly includes Urban/Disturbed or Built-Up undifferentiated mapping unit. It also includes areas not appearing to be cleared for fire protection; however, these areas are relatively close to neighboring developments and that may have driven their designation as H3. These associations include limited areas of scrub oak-greenbark ceanothus shrubland association, and chamise-Eastwood manzanita shrubland association.
- LCP mapped H2 includes scrub oak-greenbark ceanothus shrubland association, chamise-Eastwood manzanita shrubland association, and scrub oak shrubland association.

The project development footprint is mostly within the “Urban/Disturbed or Built-up mapping unit” which is largely a transitional area between relatively disturbed native and non-native shrubs and is recovering from the 2025 Palisades Fire, with additional encroachment into scrub oak-greenbark ceanothus and chamise-Eastwood manzanita shrubland stands.

The remainder of the parcel, including areas along the north-abutting open space areas and the panhandle of the parcel located to the east and crossing over Sadie Road, correspond to “Scrub oak-greenbark ceanothus shrubland association”, “chamise-Eastwood manzanita shrubland association”, and “scrub oak shrubland association” mapping units¹.

Survey Findings

Based on the England Ecology survey, the site was mapped as Eastwood manzanita chaparral, chaparral pea, holy leaf cherry-toyon-greenbark ceanothus chaparral, upland mustard and star thistle, wild oats and annual brome grasslands, and disturbed; and

¹ Aerial Information Systems, Inc. 2007. Final USGS-NPS Vegetation Mapping Program, Santa Monica Mountains National Recreation Area Photo Interpretation Report. Prepared for Santa Monica Mountains National Recreation Area.

vegetation in the panhandle part of the parcel as scrub oak chaparral, holy leaf cherry-toyon-greenbark ceanothus chaparral, chamise chaparral, and disturbed.

An intact stand of chaparral pea (*Pickeringia montana*) was identified along the center and northern portion of the parcel, within the proposed development footprint and irrigated fuel modification zones. Chaparral pea is not a CNPS-ranked rare species, but within the Santa Monica Mountains it is restricted to high elevation sandstone-derived substrates and is largely sterile, with persistence generally dependent on vegetative resprouting from rootstocks. Considering the limited range and infertility of chaparral pea, it is considered sensitive by Los Angeles County and was categorized as H2 high scrutiny (H2HS) in the report.

A protected Holm oak (*Quercus ilex*) located on the neighboring property to the west, is located behind a fence with the canopy overhanging the location of the proposed project's driveway.

Proposed changes to habitat categories:

England Ecology generally agreed with the County mapping of the habitat designations within the project parcel, however the areas along the northern part of the parcel were found to be more intact than mapped in the LUP, and are proposed for recategorization from H3 habitat to H2 and H2HS habitat. These revisions would result in 1.17 acres of H2, 0.07 acres of H2HS, and 1.11 acres of H3 on site.

PROJECT IMPACTS TO BIOLOGICAL RESOURCES

Nearly all of the chaparral pea community will be impacted. Roughly 0.01 acres will be permanently impacted by the construction of the development footprint, and the remaining 0.06 acres will be impacted by associated irrigated fuel modification zone requirements.

The neighboring parcel to the west has one protected Holm oak with a canopy that overhangs over the project's proposed driveway. The oak will be impacted since it will be encroached by construction of the driveway within its protected zone and will require pruning to provide Fire Department clearance. Per LIP Section 22.44.1920.K, if the encroachment for driveway construction is greater than 10% and less than 30%, 5 replacement oaks will be required; if greater than 30%, 10 replacement trees will be required. Additionally, if pruning to achieve required vertical clearance involves the removal of limbs larger than 11 inches, 5 replacement trees will be required. Therefore, up to 15 replacement trees may be required, along with 10 years of monitoring.

Landscape, Fuel Modification, and Off-Site Brush Thinning:

According to the Biological Assessment, the proposed construction and fuel modification for the project will impact 0.63 acres of H2, 0.07 acres of H2HS, and 1.11 acres of H3 habitat. New fuel modification will impact H2 habitat abutting the open space parcel to the north. Roughly 0.9 acres of off-site brush thinning may be required on the MRCA open space parcel to the north mapped in the LCP as H2 and H3, with the H3 areas being existing brush thinning area for the neighboring property.

ERB BIOLOGICAL RESOURCES DESCRIPTION AND RECOMMENDATIONS

| Habitat category | On-site impacts ⁱ [acres or sf ⁱⁱ] | | | | | Off-site impacts ⁱⁱⁱ [acres or sf] | | |
|------------------|---|-------------------------|------|------|-------|---|--------------------|-------|
| | Construction | Fuel-modification zones | | | Total | Construction | New brush thinning | Total |
| | | 1 | 2 | 3 | | | | |
| H1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| H2 | 0.01 | 0.05 | 0.3 | 0.27 | 0.63 | 0 | 0.72 | 0.72 |
| H2HS | 0.01 | 0.05 | 0.01 | 0 | 0.07 | 0 | 0 | 0 |
| H3 | 0.49 | 0.2 | 0.2 | 0.22 | 1.11 | 0 | 0.18 | 0.18 |
| Total | 0.51 | 0.3 | 0.51 | 0.49 | 1.81 | 0 | 0.9 | 0.9 |

ⁱ Assess using the ground-truthed habitat mapping as determined in the biological assessment.

ⁱⁱ Calculate area to the nearest 0.01 acre or to square feet if area is too small to be resolved to that degree (i.e., less than 218 sf).

ⁱⁱⁱ Assess using the adopted LCP mapping as presented on County Planning's GIS-NET.

A Landscape Plan was not proposed but landscaping shall be consistent with the LIP section 22.44.1240.B and Fire Department requirements. Native plants are encouraged to be planted in Fuel Modification Zone 1 and Zone 2; and if proposed, plantings in Fuel Modification Zone 3 shall be limited exclusively to locally native species. In addition, the landscape plan shall show the location of any relocated chaparral pea, if relocation is determined to be feasible.

MITIGATION & MINIMIZATION MEASURES

The Biological Assessment includes minimization measures to reduce light impacts to adjacent open space, propose bird friendly infrastructure to reduce bird strikes, and conduct a nesting bird pre-construction survey one week prior to construction activities. County Staff recommends that impacts to chaparral pea be mitigated through propagation of cuttings and planting in an appropriate area within the project parcel, subject to review and approval by Planning Department. The mitigation program shall be developed under the guidance of a restoration specialist qualified to work with native plants. In addition, chaparral pea plants outside of the construction footprint shall be depicted on the landscape plan and site plan to document their location and preservation.

LOCAL COASTAL PROGRAM CONSISTENCY

The following discussion lists the required Burden of Proof, followed by Staff's assessment of the proposed Project's consistency with that burden of proof requirements. Pursuant to 22.44.1850.I.3, the applicant shall substantiate the following facts:

- 1. That the requested development is sited and designed to avoid H1 Habitat and areas within 100 feet of H1 Habitat except as permitted by Sections 22.44.1800 through 22.44.1950; and**

The proposed development is sited and designed to avoid H1 Habitat and areas within 100 feet of H1 Habitat. Areas mapped as H1 and H1 Habitat 100-foot buffer are proximately 450 feet to the east across Saddle Peak Road from the development area.

2. That the requested development is sited and designed to avoid the 100-foot Quiet Zone except as set forth herein; and

The proposed development is sited and designed to avoid the 100-foot Quiet Zone. Areas mapped as 100-foot Quiet Zone are proximately 345 feet to the east from the development area.

3. That the requested development is sited and designed to avoid H2 "High Scrutiny" and H2 Habitat to the maximum extent feasible. Where avoidance is not feasible and it is necessary to allow the owner a reasonable economic use of the property, the requested development is sited and designed to minimize and mitigate significant adverse impacts in conformance with the policies and provisions of the LCP; and

The proposed development location indicated .07 acres of H2 "High Scrutiny" impacts, H2 areas are .63 acres of on-site impacts with and .72 acres of off-site impacts due to new brush thinning. These impacts will be mitigated through the Resource Conservation Program. The development is sited in the least impactful location due to avoid excessive grading and location of the protected significant ridgeline feature on site. The proposed Project will not have significant direct, indirect, or cumulative effects on candidate, sensitive, or special status species.

4. That the requested development is sited and designed to avoid wildlife movement corridors (migratory paths) to the maximum extent feasible to ensure these areas are left in an undisturbed and natural state. Where avoidance is not feasible and it is necessary to allow the owner a reasonable economic use of the property, the requested development is sited and designed to minimize significant adverse impacts in conformance with the policies and provisions of the LCP; and

Project Site likely has limited value for wildlife movement due to development on either side. As such, the proposed Project will not have significant direct, indirect, or cumulative effects on wildlife movement. To avoid significant adverse effects on nesting birds, the applicant will implement the Nesting Birds measure provided in the Avoiding Significant Adverse Project Effects section of the Biological Assessment submitted.

5. That roads and utilities serving the proposed development are located and designed so as to avoid H1 Habitat, H1 buffer, and to avoid or minimize significant adverse impacts to H2 "High Scrutiny," and H2 Habitat, and migratory paths.

There are no impacts to H1 or H1 buffer with the proposed development. Minimal impacts to H2 "High Scrutiny", and H2 Habitat are shown. The Project Site likely has limited value for wildlife movement due to development on either side. As such, the proposed Project will not have significant direct, indirect, or cumulative effects on wildlife movement. To avoid significant adverse effects on nesting birds, the applicant will implement the Nesting

(Attachment 1)
ERB General Recommendations

1. **Landscaping**—In addition to the requirements of §22.44.1240.B.3 (emphasize the use of native plant palettes in fuel-modification Zones 1 and 2; use exclusively native plant palettes in Zone 3; prohibit invasive non-natives species in all zones), the plant palette shall avoid the use of ornamental cultivars and selections, including those of California native species, that have potential to hybridize with local wild plant populations or escape into adjacent natural habitat areas.
2. **Fuel Modification**
 - a. Retain as many non-sprouting species as possible. These usually have a single trunk. Do not cut off the trunk in pruning, as this kills the plant.
 - b. Choose multiple-trunked, resprouting species for removal over non-sprouters. The remaining multi-trunked shrubs should be pruned in a staggered, clumped pattern on an alternating schedule, allowing 2 – 3 years between prunings for any one clump. Re-sprouting species can be pruned to near ground level.
 - c. It is recommended that locally-indigenous plants thinned for fuel modification be chipped and used as native plant mulch. SMM native plant mulch is not widely available in stores, but is an excellent addition to the landscape to retain soil moisture and reduce growth of invasive weeds.
 - d. Disking and indiscriminate clearing is not allowed in any Fuel Modification Zone.
 - e. For trees to have fuel ladders removed: prune lower branches up to 1/3 of tree height or up to 6 ft. maximum for trees 18 ft. and taller, per County fire requirements. Consult with LA County Planning (County Planning) or Forestry before pruning protected oaks or native trees.
 - f. Include provisions for irrigation, both permanent for Zones 1 and 2, and temporary for establishment of native plants in Zone 3 and outside of Fuel Modification Zones.
3. **Permanent Runoff Control/Drainage Plan**—The Applicant shall provide a grading plan and drainage report, including proposed site design and source control best management practices to minimize post-construction runoff and infiltrate at minimum the first 0.75-inches of stormwater. This plan should show all proposed drainage improvements, such as locations of infiltration basins, measures to convey runoff from impervious surfaces into permeable areas of the property (e.g., raingardens or bioswales) in a non-erosive manner, measures to maximize the ability of native substrates to retain and infiltrate runoff, and placement of cisterns or rain barrels for stormwater capture.
4. **Glass** should be least reflective or have frit patterns that will promote energy conservation and prevent bird strikes caused by the bird mistaking a reflection of habitat for available flight space, per §22.44.1320.
5. **Lighting** should carefully follow provisions of §22.44.1270 for exterior lighting. Avoid trespass of light into the night sky and onto natural areas both on and off the project parcels.
6. **Biological Monitor**—Prior to the issuance of a grading permit, a qualified biologist shall be retained by the Applicant as the lead biological monitor subject

to the approval of County Planning. That person shall ensure that impacts to all biological resources are minimized or avoided, and shall conduct (or supervise) pre-grading field surveys for species that may be avoided, affected, or eliminated as a result of grading or any other site preparation activities. The lead biological monitor shall ensure that all surveys are conducted by qualified personnel (e.g., avian biologists for bird surveys, herpetologists for reptile surveys, etc.) and that they possess all necessary permits and memoranda of understanding with the appropriate agencies for the handling of potentially-occurring special-status species. The lead biological monitor shall also ensure that daily monitoring reports (e.g., survey results, protective actions, results of protective actions, adaptive measures, etc.) are prepared, and shall make these monitoring reports available to County Planning and CDFW at their request.

7. **Staking of Grading Limits**—The Applicant’s contractor shall delineate the proposed grading limits of the building site or the extents of the proposed development area, whichever is greater, the driveway, and the extents of the fuel modification zones before any of the measures outlined below are implemented. The contractor shall not remove any native vegetation during staking and shall set the stakes so that they are clearly visible. The locations of the stakes within the fuel modification zones shall be recorded using GPS and provided to the project biologist.
8. **Nesting Bird Survey & Protection Plan**—Initial staging, grubbing, grading, and construction shall be scheduled to occur outside the nesting season of birds as defined by the CDFW, if feasible. Regardless of timing, breeding bird surveys shall be conducted before any activities are scheduled to occur and before installation of any protective fencing (see below), as follows:
 - a. If initial grubbing, grading, and construction activities are scheduled to occur outside CDFW defined nesting season (generally February 1 – August 31), a qualified biologist with experience in conducting breeding bird surveys in the Santa Monica Mountains shall conduct a survey within 7 days prior to and again within 3 days of the date that activities are scheduled to begin. The biologist should focus efforts within the grading area, development area, the fuel modification zones, the driveway area, and areas within 50 ft. of them. The biologist should also survey 300 ft. beyond these areas, as access allows.
 - b. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys in the Santa Monica Mountains shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 ft. of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found in suitable nesting habitat, all project activities within 300 ft. of on- and off-site suitable nesting habitat (within 500 ft. for suitable raptor nesting habitat) may be delayed until August 31. Alternatively, the qualified biologist may continue the surveys in order to locate any active nests. If the biologist determines that there are

active nests within or adjacent these areas, they should establish appropriate buffer zones, as defined in “c” below.

- c. If an active nest is found, regardless of time of year, project activities within 300 ft. of the nest (within 500 ft. for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 ft. (or 500 ft.) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area.
 - d. The qualified biologist shall provide County Planning with a brief report summarizing the results of the surveys, as well as a description and assessment of implemented protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.
 - e. If the qualified biologist determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds’ habituation to them; and the terrain, vegetation, and birds’ lines of sight between the project activities and the nest and foraging areas) to County Planning and CDFW. Based on the submitted information, County Planning (in consultation with CDFW) will determine whether to allow a narrower buffer.
 - i. In circumstances when activities are scheduled to occur between an original buffer and a reduced buffer, a qualified biologist should monitor the nest before, during, and after the activities, to determine if it is being affected.
 - ii. The only activities that shall be allowed between the original buffer and the reduced buffer are those that generate noise levels less than 60 dBA as measured at the resource. The biologist shall record noise levels every hour and must have the authority to stop any activities that exceed 60 dBA if they determine that it is affecting, or has the potential to affect the outcome of a nest.
 - iii. The biologist shall send weekly monitoring reports to County Planning and, upon request, to CDFW, documenting the status of monitored nests, and shall notify County Planning immediately if project activities damage active avian nests.
9. **Temporary wildlife fencing** shall be utilized to reduce the potential for wildlife being harmed by or moving into the work site. The project proponent’s contractor shall delineate the grading limits/approved development area and shall fence the area in its entirety with green screen before beginning removal of any vegetation, as follows:
- a. To install the screen, laborers will remove a 5-foot strip of vegetation at the limits of the grading limits/development area using hand-held tools to allow wildlife, including special status species, a chance to escape and reduce the potential of them being crushed by heavy machinery.

- b. The green screen shall be partially buried, or fitted with silt fence that is partially buried, in a manner that reduces the potential for wildlife moving back in.
 - c. Laborers installing the fence shall remain within the cut areas and any paths leading to it.
 - d. A biologist shall monitor fence installation so that they can capture and relocate wildlife as necessary, and to ensure that no protected trees or special status plants are impacted during installation.
 - e. The biologist must hold a CDFW Scientific Collectors Permit authorizing handling of invertebrates, reptiles, amphibians, and mammals.
 - f. A gated entrance shall allow ingress and egress. The gates shall remain open until after the project biologist conducts a pre-construction survey and shall be closed only after vegetation is cleared from within the fenced area (see below).
- 10. Pre-Construction Biological Resources Survey & Site Clearance**—A pre-construction biological resources survey shall be conducted within the area that is screened and within areas adjacent the driveway the day after screening.
- a. The project proponent's contractor shall plan to remove vegetation from within the screened area no more than 1 day after completion of the Pre-Construction Biological Resources Survey.
 - b. Laborers shall use hand-held tools to remove the vegetation. Using hand-held tools will allow wildlife, including special-status species, a chance to escape and reduce the potential of them being crushed by heavy machinery.
 - c. A biologist shall monitor vegetation removal so that they can capture and relocate wildlife as necessary.
 - d. The biologist must hold a CDFW Scientific Collectors Permit authorizing handling of invertebrates, reptiles, amphibians, and mammals.
- 11. Initial Grubbing & Grading**—Initial grubbing and grading shall occur 3 to 7 days after vegetation has been cleared from the proposed development area/grading limits. The delay between vegetation clearance and the grubbing and grading activities will allow wildlife, including special-status species, a chance to escape and reduce the potential of them being crushed by heavy machinery.
- a. A biologist shall monitor initial grading and grubbing so that they can capture and relocate wildlife as necessary.
 - b. The biologist must hold a CDFW Scientific Collectors Permit authorizing handling of invertebrates, reptiles, amphibians, and mammals.
- 12. Initial Fuel Modification**—The site shall only be fuel-modified after the construction phase of the proposed project has been completed or as otherwise directed by the Fire Department.
- a. A qualified biologist shall implement the Nesting Bird Survey & Protection Plan before fuel modification occurs.
 - b. A qualified biologist shall be present during initial fuel modification activities and shall stake the limits of fuel modification and flag any areas or plants to be excluded from fuel modifications.
 - c. The stakes shall remain in place until after fuel modification activities have been completed.

- d. A qualified biologist shall be present during initial fuel modification activities to ensure that no protected trees or special-status species are damaged by the fuel modification activities.