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December 16, 2010

Mr. Mitch Glaser  
Department of Regional Planning  
Los Angeles County  
320 West Temple Street  
Los Angeles, California 90012

DEC 20 2010

**One Valley One Vision  
Revised Draft Program Environmental Impact Report**

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency for the Rim of the Valley Trail Corridor zone which includes major portions of the One Valley One Vision planning area. During the One Valley One Vision (OVOV) planning process, the Conservancy has repeatedly commented about the preservation of natural resources in the plan, or the lack thereof. Our understanding is that the City and County are issuing separate decisions based on one common Environmental Impact Report (EIR). The County is recirculating a revised Draft EIR and has requested that all previous comments be resubmitted for inclusion and response in the Final EIR. We have therefore attached our previous comments to the County, dated October 5, 2009, for staff response in addition to the issues raised in this letter. The plan contains numerous well-intentioned policies and objectives to protect open space, habitat, and scenic ridgelines, but lacks mechanisms for any assured programmatic implementation of the proposed greenbelt surrounding the Santa Clarita Valley. Without stronger land-use controls on the periphery, growth will not be effectively directed to already urbanized areas as intended.

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**Plan Lacks Adequate Protection of Open Space**

As stated in the Biological Resources section of the EIR, “The proposed General Plan goals, objectives, and policies do not provide a mechanism for the compensation of lost habitats when avoidance or minimization of impacts is considered to be infeasible.” Despite its “smart growth” intentions, the proposed plan still calls for the wholesale conversion of prime habitat to development. And yet, when these impacts occur, the programmatic EIR is designed in such a way to write off future impacts as “significant and unavoidable” rather than making an honest attempt to partially avoid or mitigate them.

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Without a mechanism or incentive for habitat protection, the greenbelt exists only on paper. The land use map is the core of the plan, yet it shows a continuous expanse of land-use designations that would in fact sever the two halves of the Angeles National Forest and impede wildlife movement through the Newhall Wedge (area between SR-14 and I-5). The Conservancy urges the City and County to use their zoning authority to strongly protect habitat connectivity on all scales.

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The Conservancy will continue to partner with the City and County to achieve common open space objectives. Through our joint efforts, we have successfully protected key habitat blocks, including the Whitney Canyon Open Space Preserve and the Santa Clarita Woodlands. However, this partnership is limited in what it can accomplish in comparison to the Valley's overall preservation needs and objectives. Acquisition is but one tool for directing growth away from prime habitat areas. Only the City and County can go farther by reducing zoned densities and creating land use regulations for rural areas that emphasize permanent deed-restricted habitat preservation. The OVOV plan is deficient for relying too heavily on acquisition to the exclusion of other land protection methods.

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The land use map is the defining feature of any general plan, yet the OVOV map provides no direction for habitat conservation efforts. Instead, unincorporated land is zoned continuously for one dwelling unit per two acres, even when lot sizes are larger than this. Zoned density should reflect the lot size in undeveloped areas to discourage subdivision in areas intended to remain rural. The only by-right development in rural areas should be one house per lot unless part of a deliberate growth management strategy or clustered existing community. The proposed zoning change from agricultural to residential makes this land use control critical for managing development in non-urban areas in a manner where habitat resources and connectivity can be permanently maintained.

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As we commented previously, the greenbelt is meaningless without any definition or teeth. Where is the map showing its extent? What policies will apply to projects in the greenbelt, but not the rest of the plan area? How will permanent protection be achieved? Planned open space preservation must be seamlessly integrated with the land use plan. Known wildlife movement corridors and "missing links" should be overlaid on this map to evaluate the extent to which the plan adequately protects them. [The plan should raise the bar for regional growth management by focusing on defined goals and measurable results. Other jurisdictions have attempted this, but fallen far short, such as the Tierra Rejada Valley greenbelt effort consisting of the Cities of Thousand Oaks, Simi Valley, and Moorpark and Ventura County. We believe the County of Los Angeles and City of Santa Clarita can do far better.

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**Inconsistent Plan Elements Create Conflicting Growth Patterns**

Furthermore, the Circulation Element is thoroughly inconsistent with the Conservation and Open Space Element by proposing to double road capacity within rural areas that are presumably part of the greenbelt. However, it is difficult to make this assessment because the extent of the greenbelt is so ill-defined. Widening these roads would irreparably damage wildlife movement by more than doubling vehicle-caused mortality and providing a barrier to genetic exchange:

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- Agua Dulce Canyon Road
- Davenport Road
- Escondido Canyon Road
- Bouquet Canyon Road north of Copper Hill Drive
- The Old Road south of Calgrove Boulevard
- Placerita Canyon Road
- Shadow Pines Boulevard/Tick Canyon Road (proposed extension)
- Sierra Highway north of Vasquez Canyon Road

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All of the above road projects must be removed from the OVOV plan to avoid decimating regional wildlife mobility. Completion of these extensions and widenings would induce residential growth in outlying areas and forever alter the character of the valley's rural communities. Groundwater recharge rates and water quality will also suffer commensurately with increased road capacity and associated induced development. Transportation drives development and misguided transportation investments would attract residential development to the periphery, to the detriment of fiscal and environmental sustainability.

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**Edge Effects Inadequately Addressed**

The Conservation and Open Space Element is well-intentioned, but does not specifically address edge effects on Southern California ecosystems. In a setting like Santa Clarita, creating on-site habitat may be a much lower priority than avoiding natural habitat destruction in the first place. While open space in urban areas does have habitat value for birds, insects, and some urban-adapted small mammals, requiring or incentivizing too much open space on urban parcels will lower effective densities and result in greater expansion into truly natural areas. The plan must strike a balance between maximizing the habitat value of urban open space and encouraging compact development that reduces

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development pressure on natural land. The plan should allow and encourage off-site habitat acquisition as a mitigation measure whenever natural land is proposed to be urbanized.

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The element recommends buffers of 50 to 100 feet to protect wetlands and wildlife movement corridors. These values are much too low to substantially reduce edge effects on these sensitive areas if corridor widths are just a few hundred feet wide or less. Movement corridors must be designed for target species, such as mountain lions, which require much greater buffers to not impact habitat connectivity. Under no circumstances should the buffer area for sensitive habitat features be less than the required brush clearance radius.

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**Plan Lacks Adequate Protection of Significant Resources**

The County's proposed expansion of Significant Ecological Areas (SEA) is an important step for considering biological resources within potential development areas. Biological resources don't end at municipal boundaries and, indeed, several areas extend into City jurisdiction. To adequately protect these resources, which include a complete array of valley ecosystems, the City must adopt the boundaries of the County SEAs and hold development to a higher standard in these areas. To reflect the best available biological science, the plan must fold in future acceptance of the pending County SEA boundary adjustments. The SEAs encompass numerous parcels slated for development within the City that deserve maximum impact avoidance. These properties should be dramatically down-zoned to reduce development in sensitive areas. As part of the joint planning process, the County should exemplify and encourage these best practices.

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The plan also lacks adequate protection of riparian resources. Ridgelines are properly identified as valuable aesthetic and biological resources, but it is the riparian corridors that are home to the plurality of sensitive species and provide for linear wildlife movement. Policies should place a higher priority on preserving streams in their natural condition, particularly in areas where the urban footprint will expand. To truly protect riparian resources, the plan must prohibit all future hard-bottom channels. Armored channel walls should also be prohibited unless hydrological studies determine that no alternative designs are feasible. Proposed flood control improvements in Mint Canyon must maximize riparian habitat values. In addition, clear span bridges should be required for all public roads crossing riparian habitat. Reinforced concrete box culverts should be required at a minimum for private road crossings rather than narrow culverts.

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Lastly, the plan calls for multiple new six or eight-lane bridges over the Santa Clara River. In the spirit of impact avoidance, alternatives to bridge construction must be analyzed, including transportation demand management solutions to reduce the need for new capacity. Alignment alternatives, such as terminating the proposed Santa Clarita Parkway at Soledad Canyon Road must also be evaluated.

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If you have any questions, please contact me at (310) 589-3200 ext. 128.

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Sincerely,



PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning

**SANTA MONICA MOUNTAINS CONSERVANCY**

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October 5, 2009

Mitch Glaser  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Santa Clarita Valley Area Plan Update One Valley One Vision  
Project No. R2007-01226-(5) SCH No. 2008071119**

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor zone which includes major portions of the One Valley One Vision planning area. The Conservancy is also concerned with land use issues in virtually all remaining portions of the project planning area because adjacent actions can and do affect public resources within the Rim of the Valley Trail Corridor zone.

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Between December 16, 1999 and December 23, 2008, the Conservancy submitted a minimum of six comment letter on County General Plan updates. Every letter included specific comments about natural resources located within the unincorporated portions of the Santa Clarita Valley. The Final Environmental Impact Report (FEIR) or the re-circulated DEIR should clarify how those comments on the overarching General Plan would integrate with the proposed Area Plan and whether or not they have been addressed.

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**Significant Ecological Area (SEA) Boundaries not Determined**

The area that requires the most clarification is that of the proposed new Significant Ecological Area (SEA) boundaries. One can only assume that the Planning Commission and the Board of Supervisors will not have approved the new boundaries by the time the subject FEIR is presented for certification. The DEIR's reference to and impact analysis foundation on the draft SEA boundaries shall remain deficient until those boundaries become an approved part of the General Plan.

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**Inadequate Attempt to Avoid or Reduce Biological Impacts**

The entire DEIR analysis of biological impacts is so oversimplified and generalized such that decision makers cannot possibly understand the ecological ramifications of certifying the environmental document. We do not believe that Programmatic DEIRs can slip into that level of generality.

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The DEIR categorically concludes that the proposed project, and every alternative project, would result in unavoidable significant adverse ecological impacts. (The one exception in the alternatives section is addressed in the paragraph following the next paragraph.) The only component of the DEIR that briefly contemplates the reduction of significant adverse biological impacts is Alternative 2 - Preservation Corridor Alternative. However, that alternative is rejected because it does not adequately meet project objective numbers 14, 17 and 27.

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Those three project objectives deal with a mix of land uses to support basic residential needs, a commitment to affordable work force housing, and an integrated transit system, respectively. No analysis is provided on how Alternative 2 would not sufficiently meet these three project objectives just because Alternative 2 would result in slightly less population and houses in 5,225 acres of designated regional wildlife corridor in Soledad Canyon. The Conservancy sees no connection on how Alternative 2 could impede these project objectives such that the DEIR rejects it.

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We also question the DEIR conclusion in the Environmentally Superior Project analysis that Alternative 2 would reduce ecological impacts to a level less than significant. How can a plan that cannot mathematically result in less than 15,000 acres of permanently lost habitat not result in unavoidable significant adverse biological impacts?

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**Inadequate Range of DEIR Alternatives**

Alternative 2 - Preservation Corridor Alternative only reduces allowable density in a 5,225-acre area identified as a regional wildlife corridor by the South Coast Wildlands project. It includes no changes to reduce biological impacts anywhere else in the plan area. One DEIR alternative that modestly reduces potential impacts in a single section of the ecologically rich plan area does not represent an adequate range of alternatives.

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For the record Alternative 2 is also fundamentally flawed for not including all areas in the Angeles Linkage (Soledad) Conceptual Protection Plan (CAPP) that implements the subject South Coast Wildlands core linkage elements. Regional Planning representatives were one of a dozen agencies that produced this CAPP for connecting the two lobes of the Angeles National Forest across State Route 14.

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Any environmental document for the subject planning area that does not include implementation of the CAPP is deficient for excluding a multi-agency regional ecological land use priority and plan adopted by the California Department of Fish and Game.

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Any environmental document for the subject planning area that also does not include an alternative that recognizes all scientifically described inter-mountain range wildlife corridors in the plan area shall remain deficient.

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Any environmental document for the subject planning area that does not include an alternative that significantly reduces development density along the edge of most core or large habitat areas shall remain deficient. Random reduction of density in such areas where terrain makes such development nearly infeasible does not constitute a fully analyzed effort to reduce impacts. The DEIR or FEIR must include an explanation of how the proposed density reductions will specifically reduce biological impacts in each affected watershed. We understand that a project specific analysis is not feasible but a watershed, or equivalent, level analysis for this type of alternatives analysis is warranted.

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**Promised Open Space and Green Belt but No Teeth to Produce Either**

The DEIR states that it will result in more protected open space than under the existing Area Plan. Changing land use designations can help bring about such results, but it can in no way come close to assuring them. The DEIR clearly states that it is nothing more than a policy document that has no affect on underlying zoning.

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How can the proposed project create 4,098 additional acres of open space without a single penny of acquisition money or a single new filed project to identify and analyze? That DEIR assertion is completely unsupported.

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The only DEIR mitigation measure (3.7-3) for the loss of habitat is to allow habitat acquisition for compensation. The measure refers to amorphous policies (10.1.3, 10.1.11, and 10.1.12) for implementation. These policies have zero teeth, zero specifics and are basically totally pie in the sky-non-specific statements. They are not mitigation measures

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that can be verified. The DEIR is flawed without more substantive and enforceable mitigation measures for substantial habitat loss, including bulk loss of ordinary chaparral.

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How can the proposed project incorporate the provision of a green belt that provides more protected open space than currently exists today? The project description is flawed for not including enough precision on this issue. There is no Land Use Green Belt map in the DEIR as is referenced to within the document. It is basically a concept with no definition.

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The green belt expansion assertions in the DEIR are also not consistent with the proposed reduction of 10,224 acres of rural land with the proposed project.

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What kind of green belt along the edge of existing development would for example be provided for on the Stevenson Ranch Phase V property?

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The DEIR states, "The Land Use Element is designed to ensure that the irreplaceable natural resources and open spaces are preserved and protected from encroachment by future development." All lost open space is irreplaceable. The DEIR is deficient for being based on numerous sweeping assertions with no implementation or factual back up.

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Drainage and slope easements are counted as "protected open space" under the OS-C-Conservation designation. This is misleading and those types of land uses should be identified as permanently disturbed open space.

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**Basic Essence of Project and DEIR**

The proposed project and DEIR essentially are a vehicle to change development density over hundreds of square miles. The vision of One Valley One Vision is to increase density in all but a few isolated pockets where terrain is prohibitive. Policies are important but the permanent land use designations are more important for the long term ecological state of the upper Santa Clara River watershed.

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The end result of the proposed project could well be the significant increased diminution of biological resources both within and around the edges of all existing development. The Conservancy asserts that much more can be done with the new Area Plan to pro-actively reduce potential impacts to ecological resources both within and around the edges of all existing development.

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**Recommendations for Adequate DEIR Alternatives**

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We make the following recommendations of elements to include in project alternatives that would increase the probability of significantly adding to the greenbelt around developed plan areas and also within developed areas - particularly along the Santa Clara River and its tributaries.

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For example the River Setback Policy LU 6.1.2 should include a greater mandatory setback of 75 feet as opposed to 50 feet. Neither passes agency or scientific muster but every additional foot increases habitat quality and availability and improves the public experience. The Conservancy supports riparian systems with some natural upland buffer as opposed to contrived buried bank stabilization. Each of these tributaries is important for wildlife movement (in many cases regional wildlife movement) and the Area Plan must make provision for continued movement capability in a world where no new open space will be created from already developed areas. The opposite trend will occur where there will only be less and less open space remaining. Designing long riparian corridors as wildlife movement corridors must compensate for future development encroachment.

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The only meaningful mechanism we see to increase green belt area and habitat quality around the existing development in the plan area is to make the wholesale change of RL 2 and RL 5 designated areas to RL 10. The area where high concentrations of RL 10 most definitely make ecological sense is the Soledad Canyon watershed.

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The DEIR must include more specifics about both capturing and infiltrating storm water.

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Currently, upstream from State Route 14 municipal wells are progressively lowering the watertable below the Santa Clara River year after year. The direct and indirect adverse ecological impacts to the river vegetation are evident. Until such groundwater pumping is eliminated, and the river water levels are restored, it is difficult not to question the DEIR conclusion that the proposed increase in population and development density beyond the current plan would not result in unavoidable, potentially irreversible, significant impacts to water supply.

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The DEIR must address critical habitat for California gnatcatcher and the soon to be revised critical habitat for red-legged frog.

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Lastly the North Lake Specific Plan should be eliminated because it is obsolete under all sound planning principles.

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**Letter No. B1 Paul Edelman, Santa Monica Mountains Conservancy, December 16, 2010**

**Response 1**

The comment describes the role of the Santa Monica Mountains Conservancy (SMMC) in planning for the Rim of the Valley Trail Corridor zone. The comment does not raise an environmental issue within the meaning of California Environmental Quality Act (CEQA). Therefore, no further response is required.

**Response 2**

This comment states that the SMMC has commented on the preservation of natural resources during the “One Valley One Vision” (OVOV) planning process. The comment does not raise an environmental issue within the meaning of CEQA. Therefore, no further response is required.

**Response 3**

This comment states that the City of Santa Clarita (City) and the County of Los Angeles (County) are issuing separate decisions on the City’s proposed General Plan and the County’s proposed Area Plan, both of which were developed through the joint OVOV planning effort, based on a common Environmental Impact Report (EIR). This is not correct. Two EIRs have been prepared, one by each jurisdiction. The City Council adopted the City’s proposed General Plan and certified the City’s Final EIR on June 14, 2011, prior to the release of the County’s Revised Final EIR.

**Response 4**

The comment states that the Revised Draft EIR has been circulated for public comment and that SMMC’s previous comments on the earlier 2009 Draft EIR are attached. The comment also attaches and incorporates by reference its November 20, 2009 comment letter. Revised Draft EIR, Section 1.0, Introduction page 1.0-10 discusses the previously released EIR and comments received to said EIR: “In September 2009, the County released a Draft Area Plan and Draft Environmental Impact Report (Draft EIR). Comments received on the Draft EIR, concerning Air Quality, Traffic and Circulation, Global Climate Change, and Water Supply required a reexamination of the Draft EIR data. As a result of this examination, the County determined that a recirculation of the Draft EIR would be required. While substantive changes have only been made to the Air Quality, Traffic and Circulation Global Climate Change, and Water sections, the County has determined that the entire Draft EIR will be recirculated for review and comment. Since the County is recirculating the entire Draft EIR, the County will require reviewers to submit new comments and will not respond to previous comments received during the first circulation period, even if those comments pertain to a portion of the EIR that has not been substantively changed. Although previous comments are part of the administrative record, the previous comments do not require a written response in the Revised Final EIR. The County need only respond to those

comments submitted in response to the recirculated Draft EIR, except that the County cannot fail to respond to pertinent comments on significant environmental issues.”

**Response 5**

The comment acknowledges that the proposed Area Plan contains numerous policies to protect open space, habitat, and scenic ridgelines. However, the comment also states that the proposed Area Plan lacks a mechanism for the implementation of the proposed “greenbelt” surrounding the Santa Clarita Valley. Accordingly, the comment states that stronger land use policies are needed to concentrate future development near existing urbanized areas. Please see **Responses 6** through **29** below for information responsive to this comment. No further response is required.

**Response 6**

The comment restates information contained in Section 3.7, Biological Resources, of the Revised Draft EIR. The comment will be made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an issue relating to the content or adequacy of the Revised Draft EIR, no further response is required.

**Response 7**

The comment expresses the opinion that the proposed Area Plan calls for “wholesale conversion of prime habitat to development.” The comment will be made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an issue relating to the content or adequacy of the Revised Draft EIR, no further response is required. That being said, the County disagrees that the commenter’s language accurately reflects the County’s approach to development and protection of prime habitat throughout the entire unincorporated Santa Clarita Valley. The proposed Area Plan’s Land Use Policy Map concentrates development into previously developed or urban areas to promote infill development and prevent sprawl and habitat loss (refer to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the Area Plan’s proposed land use designations). However, it is not feasible to prohibit all development outside of previously developed or urban areas or to prevent any habitat loss, as many of the properties within the unincorporated Santa Clarita Valley are privately owned and must have some level of development potential. Although the proposed Area Plan’s Land Use Policy Map reduces allowable residential densities in many outlying, rural portions of the unincorporated Santa Clarita Valley, the proposed Area Plan’s Land Use Policy Map allows some level of development potential, as it is not feasible to prohibit development in these areas.

**Response 8**

The comment states that the Revised Draft EIR, rather than making an honest attempt to avoid or mitigate impacts, simply identifies impacts as “significant and unavoidable.”

The County does not agree with this statement. The Revised Draft EIR includes mitigation measures designed to avoid or reduce potentially significant impacts. Only when an impact cannot be feasibly mitigated is it deemed “significant and unavoidable.” However, even those impacts will be subject to all feasible mitigation measures. Note also that Mitigation Measure 3.7-3 would require habitat loss compensation through the acquisition of lands as described in proposed Area Plan Policies CO 10.1.3, CO 10.1.11 and CO 10.1.12. These policies will ensure that open space needed to preserve and protect wildlife corridors and habitat is acquired, and such open space may include land within Significant Ecological Areas (SEAs), wetlands, woodlands, water bodies, and areas with threatened or endangered flora and fauna. The policies also encourage the County to partner with conservation agencies and other entities to acquire and maintain open space, combining funding and other resources for joint-use projects, where appropriate. Additionally, substantive mitigation measures to reduce air quality, climate change, water service, and noise impacts are clearly articulated in the Revised Draft EIR. Lastly, the commenter is directed to **Response 8**, above.

**Response 9**

The comment states that the “greenbelt” exists only on paper because there are no incentives in the proposed Area Plan for habitat protection. The comment also states that the proposed land use designations shown on the proposed Area Plan’s Land Use Policy Map will divide the Angeles National Forest and impede wildlife movement through the “Newhall Wedge” (the area between State Route 14 (SR-14) and Interstate 5 (I-5)).

The County does not agree with these comments. The proposed Area Plan uses the term “greenbelt” to describe the existing and proposed open space areas that would surround the urbanized portions of Santa Clarita Valley. Much of this greenbelt is provided by the Angeles National Forest. The “greenbelt” concept is codified in proposed Area Plan Policy CO-10.1.1: “Provide and protect a natural greenbelt buffer area surrounding the entire Santa Clarita Valley, which includes the Angeles National Forest, Santa Susana, San Gabriel, and Sierra Pelona Mountains, as a regional recreational, ecological, and aesthetic resource.” In terms of planning for future development, the National Forest is an important part of the envisioned greenbelt surrounding the Santa Clarita Valley.

The land uses proposed under the proposed Area Plan do not divide the Angeles National Forest boundaries, as those boundaries have been divided by SR-14 and existing development for decades. The proposed Area Plan proposes to extend the Santa Susana Mountains/Simi Hills SEA northeastward into the “Newhall Wedge” precisely to protect this important wildlife movement corridor. The proposed land use designations in this area are primarily Rural Land designations with very low densities, and the proposed land use designations would generally reduce allowable residential densities significantly

(refer to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the Area Plan's proposed land use designations). Although the proposed Area Plan's Land Use Policy Map reduces allowable residential densities in this area, the proposed Area Plan's Land Use Policy Map allows some level of development potential, as it is not feasible to prohibit development in this area, given that the properties are privately owned.

**Response 10**

The comment acknowledges the long-standing cooperation among SMMC, the City of Santa Clarita, and the County to protect open space. The comment also states that the City and County have the responsibility to permanently preserve habitat and must do so by reducing zoned densities in the rural land use categories. Finally, the comment states that the proposed Area Plan relies too strongly on land acquisition to protect lands from development.

The County agrees that there has been excellent cooperation among SMMC, the City and the County on matters relating to open space protection, and anticipates that this cooperation will continue in the future. The County does not agree, however, that the City and County, by virtue of their authority to zone property, have sole responsibility for habitat preservation in the Santa Clarita Valley planning area. SMMC itself routinely acquires property for purposes of preserving open space and wildlife habitat, and it has done an excellent job in this role. The County assumes that SMMC's efforts in this regard will continue with assistance from the City and the County. Finally, the County does not concur that protecting open space through land acquisition is a limited method of conserving habitat. Property ownership is among the best ways to control land uses and, through such control, protect open space for the public good. Again, SMMC exemplifies this concept in its pursuit of land preservation through acquisition.

The County also agrees that reducing allowable residential densities in outlying, rural areas is appropriate from a long-range planning perspective and is an appropriate use of the "police powers" granted to local governments (*Village of Euclid v. Ambler Realty Co.*, 272 U. S. 365 (1926)). Accordingly, the proposed Area Plan's Land Use Policy Map concentrates development into previously developed or urban areas to promote infill development and prevent sprawl and habitat loss, and reduces allowable residential densities in outlying, rural areas (refer to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the Area Plan's proposed land use designations). However, it is not feasible to prohibit all development outside of previously developed or urban areas or to prevent any habitat loss, as many of the properties within the unincorporated Santa Clarita Valley are privately owned and must have some level of development potential. Furthermore, the County Zoning Ordinance provides for the

preservation of open space when development is proposed in Hillside Management Areas and Significant Ecological Areas (see Section 22.56.215 of the County Code).

**Response 11**

The comment recommends that the proposed Area Plan's Land Use Policy Map be redrawn to provide guidance on habitat conservation. The comment also states that the proposed zoning density for many of the properties in the County's unincorporated area is one dwelling unit per 2 acres, even though many of the parcels in question are much larger than 2 acres. The comment recommends that the zoning density reflect the lot size to discourage land division. According to the comment, under such a regime, the only "by-right" development in rural areas would be one dwelling unit per parcel, "unless part of a deliberate growth management strategy or clustered existing community." The comment also recommends that the zone change from agricultural to residential include a mechanism to maintain connectivity and habitat resources.

As the comments address components of the proposed Area Plan and not the content or adequacy of the Revised Draft EIR, no further response is required, but additional information is offered as follows.

The proposed Area Plan does have provisions for habitat conservation through the proposed SEA boundaries, which recognize areas within the unincorporated Santa Clarita Valley planning area that contain important biological resources requiring careful consideration during any land use entitlement application processing. Where special-status biological resources are documented to occur, a project will be required to incorporate design features to avoid significant impacts to those resources (see Section 22.56.215 of the County Code). The proposed SEA boundaries represent a significant expansion of SEA's within the unincorporated Santa Clarita Valley planning area.

With regard to the comment that the majority of zoning designations on the proposed zoning map equate to 1 dwelling unit per 2 acres, this is not accurate, as the maximum allowable residential density is determined by the Area Plan's land use designation, not by the zoning designation. Instead, the zoning designation specifies minimum lot size. In the rural portions of the unincorporated Santa Clarita Valley, the predominate zoning designations are A-1-2 (Light Agricultural Zone, 2 acre minimum lot size) and A-2-2 (Heavy Agricultural Zone, 2 acre minimum lot size), and the proposed zoning map carries over these designations in most areas and therefore, does not reflect a change. The commenter is referred to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the Area Plan's proposed land use designations, which determine maximum allowable residential density. Although some outlying, rural areas are designated as Rural Land 2 (RL2), with a maximum allowable residential density of 1 dwelling unit per 2 acres, many other areas are designated as Rural Land 10 (RL10), with a maximum allowable residential density of 1 unit per 10 acres, or as Rural Land 20 (RL20), with a

## *2.0 Topical Responses, Comment Letters, and Responses to Comment Letters*

maximum allowable residential density of 1 unit per 20 acres. The proposed RL10 and RL20 land use designations represent a significant decrease in maximum allowable residential density from the existing Area Plan in many rural, outlying portions of the unincorporated Santa Clarita Valley planning area. Also, the Land Use Element of the proposed Area Plan states “a comprehensive assessment of existing land uses and their distribution was conducted using aerial photo analysis, field surveys, and a geographic information system. Land was evaluated for suitability of development type and intensity based on topography, access, proximity to infrastructure, environmental constraints, character of surrounding development, economic viability, and other criteria.” The commenter’s request that existing lot sizes be considered was fulfilled by County staff’s inclusion of “character of surrounding development” in the criteria used to develop the Area Plan’s proposed Land Use Policy Map. The retention of A-1-2 and A-2-2 zoning designations within the proposed RL10 and RL20 land use designations allows for flexibility in the design of a development project, especially in Hillside Management Areas and Significant Ecological Areas where the preservation of open space is desirable and may be required pursuant to Section 22.56.215 of the County Code. For example, a 100-acre parcel located in a proposed RL20 land use designation and A-2-2 zoning designation would be allowed a maximum of five dwelling units. Since the A-2-2 zoning designation requires a 2-acre minimum lot size, a development project on this parcel could cluster those five dwelling units on five parcels containing 2 acres each, with the remaining 90 acres (or portion thereof after streets, easements, and other dedications are made) dedicated as permanent open space. The 2-acre minimum lot size would ensure that the clustered development is consistent with the rural character of the area and would allow for animal-keeping and other agricultural uses. The proposed Area Plan’s Land Use Element further provides that smaller lots could be allowed in the proposed Rural Land designations, in accordance with the density-controlled development provisions of the County Code (see Section 22.56.205), provided that smaller lots are not precluded by a Community Standards District (CSD), such as the adopted CSD’s for the communities of Agua Dulce, Castaic, and San Francisquito Canyon.

Lastly, the comment regarding zone changes from agricultural to residential is not clear because there is a limited association between a zone change action and the protection of biological resources. In addition, the zoning in most of the unincorporated Santa Clarita Valley are not proposed for a change from agricultural to residential and thus would remain agricultural if the proposed Area Plan is adopted by the Board of Supervisors.

### **Response 12**

The comment states that the greenbelt is meaningless because there is no definition for the term and no map depicting such areas. The comment asks how permanent protection of the greenbelt would be

achieved. Finally, the comment recommends that movement corridors and habitat linkages be overlaid on a map to provide protection of these resources.

The OVOV proposed Area Plan covers the unincorporated portions of the Santa Clarita Valley in the County of Los Angeles. Therefore, it is not possible for the proposed Area Plan to specify an infill housing target within a city limit or downtown border, as was specified done in the City of Stockton settlement agreement with the Attorney General. Nonetheless, the residential land use designations in the OVOV proposed Area Plan would increase multi-family housing by 170 percent over existing 2004 conditions compared to the increase for single-family housing of 69 percent. The OVOV proposed Area Plan proposes high-density residential land use designations that would allow up to 30 dwelling units per acre specifies high-density residential zones with up to 40 dwelling units per acre. These zones proposed land use designations would generally be located near the City of Santa Clarita, near commercial land uses, and along major transit corridors. Refer to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the proposed Area Plan land use designations. While the proposed Area Plan excludes the City of Santa Clarita and the City's downtown area (to the extent that any portion of the City could be considered a downtown area), it does contain proposed high-density residential land uses use designations that are generally located on the Valley floor close to existing higher density areas and along transit corridors. Therefore, the OVOV proposed Area Plan; through its land use plan proposed Land Use Policy Map, is consistent with the recommendations from the Attorney General to promotes higher density infill development, and discourages greenfield development in non-urbanized areas.

The proposed Area Plan would also ensure that and development on properties adjacent to, but outside of the defined primary river corridor, shall will be located and designed to protect the river's water quality, plants, and animal habitats. Protection of sensitive wetland and woodland habitats, state and federal-listed species habitats, and habitats within SEAs and along the Santa Clara River and its tributaries will also help to protect wetland habitats within the unincorporated Santa Clarita Valley (Please refer to Policies CO 3.2.1, 3.2.2, 3.2.3, and 3.2.4, 3.3.1 in the proposed Area Plan) will also help to protect wetlands. It should be noted that the proposed Area Plan's Land Use Policy Map concentrates development into previously developed or urban areas to promote infill development and prevent sprawl and habitat loss (refer to Section 3.1, Land Use, of the Revised Draft EIR for a map showing the locations of the Area Plan's proposed land use designations). However, as acknowledged in Policy CO 3.1.1, it is not feasible to prohibit all development outside of previously developed or urban areas or to prevent any habitat loss, as many of the properties within the unincorporated Santa Clarita Valley are privately owned and must have some level of development potential. The discussion of habitat connectivity begins on page 3.7-44 in Section 3.7, Biological Resources of the Revised Draft EIR begins on

page 3.7-44 and includes discussion of the South Coast Wildlands San Gabriel-Castaic Connection. Discussion of potential impacts to wildlife movement corridors begins on page 3.7-62 in Section 3.7, Biological Resources of the Revised Draft EIR and concludes that the proposed Area Plan would potentially impact habitat linkages. This impact would be potentially significant in the event that avoidance of impacts to habitat linkages arising from future development is considered infeasible, as these linkages provide viable opportunities for the exchange of individuals and genetic information among populations in the core habitat areas of the unincorporated Santa Clarita Valley.

The comments address aspects of the proposed Area Plan and not the content or adequacy of the Revised Draft EIR. Therefore, no further response is required. However, the comments will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan. That being said, the commenter is referred to **Response 9**, above, concerning the greenbelt, **Response 11**, above, concerning the expansion of SEA's and the reduction of allowable residential densities, and **Response 7**, above, concerning the infeasibility of prohibiting any and all development of privately owned properties.

#### **Response 13**

The comment states that the Plan should "raise the bar for regional growth management by focusing on defined goals and measurable results." The comment identifies other cities and counties whose efforts in this regard have, in the opinion of SMMC, "fallen short." The commenter believes that the County can succeed where these other jurisdictions have failed. The comment expresses an opinion, but does not raise any issue relating to the content or adequacy of the Revised Draft EIR. Therefore, no further response is required. That being said, the County is of the opinion that the joint OVOV planning effort with the City has been a positive and tangible step in regional growth management for the entire Santa Clarita Valley, and that the proposed Area Plan, which was developed as part of the joint OVOV planning effort, represents a positive and tangible step in growth management within the unincorporated Santa Clarita Valley, as evidenced by the other responses herein, and especially when compared to the currently adopted Area Plan, which has smaller SEA's and allows for higher residential densities in many rural, outlying areas.

#### **Response 14**

The comment claims that the Circulation Element of the proposed Area Plan proposes to double current road capacity and is therefore inconsistent with the proposed Area Plan's Conservation and Open Space Element.

The County does not agree that the Circulation Element is inconsistent with the Conservation and Open Space Element of the proposed Area Plan. The majority of Highway Plan improvements in the proposed

Area Plan relate to existing roadways, as discussed in **Response 16**, below. However, SMMC's comments will be provided to the decision-makers for their consideration. As the comment does not address the content or adequacy of the Revised Draft EIR, no further response is required.

**Response 15**

The comment states that the term greenbelt is ill defined. The proposed Area Plan uses the term "greenbelt" to generally describe the largely undeveloped areas surrounding urban uses. This comment does not relate to the content or adequacy of the Revised Draft EIR. Therefore, no further response is required, although the commenter is referred to **Response 9**, above. However, the comment will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan.

**Response 16**

The comment states that road widening in rural areas would irreparably damage wildlife movement, impede genetic exchange, and would double vehicle-caused mortality of wildlife.

The County does not agree with the comment. The comment is also not supported by data or other specific documentation (see Pub. Resources Code, section 21153, subd. (c)). Each of the eight specified roadways currently exist and to some extent, each of the roadways impedes wildlife movement, though none presents such a barrier as to make movement impossible. Further, there is no evidence that increased traffic on the roadways would significantly increase animal mortality or create an impenetrable barrier to wildlife movement. Section 3.7 Biological Resources of the Revised Draft EIR analyzes the proposed Area Plan's impacts on habitat connectivity and concludes that that the conversion of rural lands to urban uses – not the widening of existing roadways – would have the predominant impact on habitat connectivity.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required.

**Response 17**

The comment recommends that all road projects be removed from the proposed Area Plan to "avoid decimating wildlife movement." The comment also states that the proposed road extension and road widening projects would encourage residential development in the outlying portions of the unincorporated Santa Clarita Valley planning area, forever altering the character of these rural communities.

The opinions expressed in the comment are those of the SMMC and not shared by the County. That said, the majority of roadway improvements proposed east of I-5 relate to existing roadway and connectivity within previously developed and/or developing areas. As the comment does not address any issue relating to the content or adequacy of the Revised Draft EIR, no further response is required.

**Response 18**

The comment claims that groundwater recharge and water quality will suffer as a consequence of buildout of the proposed Area Plan Circulation Element.

The County does not agree with this claim, which is not supported by data or other specific documentation (see Pub. Resources Code, section 21153, subd. (c)). Section 3.12, Hydrology and Water Quality, of the Revised Draft EIR analyzed the impacts to groundwater recharge and water quality and concluded that impacts can be reduced to less than significant, with roadway improvements comprising a minor contribution to overall impacts. For example, the Revised Draft EIR found that “[n]ew development projects within the County’s Planning Area can take such measures as utilizing building materials that allow infiltration, which in turn would reduce surface water runoff, recharge aquifers, and reduce impacts on water quality.” (Revised Draft EIR, p. 3.12-21; see also Revised Draft EIR, p. 3.12-12 to 3.12-13 [discussing (i) the use of low impact development (LID) techniques, as required by various proposed Area Plan policies, to manage stormwater, enhance surface water quality, reduce runoff volumes, and economize on infrastructure costs; and, (ii) the County’s adoption of a LID ordinance in 2008]; p. 3.12-22 [Policy S 2.1.2 - promoting LID standards]; p. 3.12-23 [Policy CO 4.3.3 - providing flexibility in roadway design standards in order to facilitate stormwater retention and groundwater infiltration]; p. 3.12-24 [Policy CO 4.3.4 - encouraging use of pervious pavement].)

**Response 19**

The comment states that transportation drives development and that “misguided transportation investments would attract residential development to the periphery.” The County does not agree with this statement, which is not supported by data or other specific documentation (see Pub. Resources Code, section 21153, subd. (c)). Although transportation facilities provide the necessary access to newly developed areas, those facilities do not control where development will be proposed or eventually implemented. The County also disagrees with the suggestion that the proposed Area Plan Circulation Element’s capacity improvements are “misguided.” The proposed Area Plan presents an opportunity for the orderly and logical extension of existing urban and suburban communities, for the preservation of existing rural communities (see **Response 11**, above), and for the provision of adequate area-wide circulation.

The comment expresses opinions, but does not raise issues pertaining to the content or adequacy of the Revised Draft EIR, so no further response is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 20**

The comment states that the proposed Area Plan's Conservation and Open Space Element does not address edge effects on Southern California ecosystems. The comment also states that, in a setting such as the Santa Clarita Valley, creating on-site habitat is less important than preserving existing habitat in the first instance. In addition, the comment questions the long-term benefits of urban open space areas, as they tend to lower urban densities and thereby encourage expansion into rural areas. The comment recommends that off-site habitat acquisition be required when urban uses are allowed to develop in existing natural areas.

The County does not agree that the proposed Area Plan's Conservation and Open Space Element fails to address edge effects. Objective CO-3.6 and associated Policies 3.6.1 through 3.6.5 are designed to minimize impacts of human activity and the built environment on natural plant and wildlife communities. Objective CO-3.1 encourages conservation of existing natural areas and restoration of damaged natural vegetation to provide for habitat and biodiversity. Objective CO-3.2 strives to protect areas which, due to a specific type of vegetation, habitat, ecosystem, or location, possess exceptional biological resource value. See also **Response 8**, above, in regard to land acquisition, and also **Response 11**, above, in regard to the expansion of SEA's and the reduction of allowable residential densities in outlying, rural areas. Furthermore, the commenter is directed to Section 22.56.215 of the County Code in regard to current requirements related to open space dedication within non-urban (rural) Hillside Management Areas.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. However, the County also points out that the Revised Draft EIR discusses the proposed Area Plan's edge effects, as well as measures and policies to reduce those effects. (See pages 3.7-53 to 3.7-57; 3.7-60 to 3.7-62; and 3.7-64). The comment will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan.

**Response 21**

The comment contends that the proposed Area Plan's Conservation and Open Space Element recommends buffer widths of only 50 to 100 feet for wetlands and wildlife corridors, which the commenter believes is too narrow. The comment states that movement corridors should be designed to accommodate mountain lions, which require buffers wider than 100 feet. Finally, the comment

recommends that buffers for wetlands and movement corridors be no less than the distance required for fuel modification.

The commenter misreads the 50 to 100 feet buffer reference in the proposed Area Plan's Conservation and Open Space Element, as it states that this is a LEED recommendation only. The Conservation and Open Space Element itself does not recommend a specific width for the buffers. Instead, Policy CO-3.1.2 requires that *adequate* buffers be established to avoid adverse impacts on wetlands (emphasis added). Adequacy of buffer width would be determined upon a project-by-project basis. If a proposed development project requiring discretionary approval is located within a Hillside Management Area or a Significant Ecological Area, the requirements of County Code Section 22.56.215 may also apply, and those requirements relate, in part, to open space dedication and buffering. With respect to the suggestion that the width of habitat buffers be greater than or equal to the width of fuel modification zones, the County does not believe this is a sound policy. The size and location of fuel modification zones are dictated by public safety concerns, and sometimes the desire to preserve biological resources must yield to the need to protect human life. The County, however, strives to minimize these conflicts wherever possible. In addition, the width of a fuel modification buffer has no bearing on the required width of a wetland or wildlife movement buffer, as the two kinds of buffer serve different purposes. There is no need to arbitrarily make them equal in size.

The proposed Area Plan recognizes the need to link open space areas to facilitate wildlife movement and would preserve as open space the Santa Clara River Corridor and its major tributaries to protect critical plant and animal species.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

#### **Response 22**

The comment acknowledges the importance of the SEA for biological resources considerations and recommends that the City adopt the County-proposed SEA boundaries.

This comment does not apply to the County because the County is recommending adoption of the updated SEA boundaries as part of the proposed Area Plan. However, Task 6.2 in the City's General Plan is to recognize the Significant Ecological Area designations of Los Angeles County, and ensure adherence to SEA standards as a minimum condition of development approval in these areas.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 23**

The comment states that the proposed Area Plan lacks adequate protection for riparian resources and recommends that drainages be preserved in their natural condition.

The County disagrees with this comment, but will provide it to the decision makers for their consideration. Nonetheless, the Conservation and Open Space Element contains policies to protect the Santa Clara River and its tributaries, as well as other riparian areas, from the adverse impacts of development. Development proposals that affect jurisdictional waters may also require permits from the U.S. Army Corps of Engineers, the California Department of Fish and Game, and the Regional Water Quality Control Board.”

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 24**

The comment recommends that hard-bottomed channels be prohibited.

The County disagrees with this comment, but will provide it to the decision-makers for their consideration. Design specificity will occur at the time the flood control improvements are needed and will balance the need to maximize riparian values while proving a cost efficient design to meet flood control demands. Additional environmental review will be conducted as required by CEQA. The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required.

**Response 25**

The comment recommends that armored channel walls be prohibited unless there is no feasible alternative. Please see **Response 24**, above, for flood control design considerations.

The County disagrees with this comment, but will provide it to the decision makers for their consideration. Design specificity will occur at the time the flood control improvements are needed and will balance the need to maximize riparian values while proving a cost efficient design to meet flood

control demands. Additional environmental review will be conducted as required by CEQA. The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 26**

The comment recommends that flood control improvements in Mint Canyon maximize riparian values.

Specific designs for flood control improvements in Mint Canyon are not part of the proposed Area Plan. Design specificity will occur at the time the flood control improvements are needed and will balance the need to maximize riparian values while proving a cost efficient design to meet flood control demands. Additional environmental review will be conducted as required by CEQA.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. However, the comment will be provided to the decision makers for their consideration. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 27**

The comment recommends that bridges be free spanning of drainage channels and that concrete box culverts be used for private road crossings of drainages.

Specific designs for bridge construction and private road crossings are not part of the proposed Area Plan. Design specificity will occur at the time the drainage crossings are needed and will balance the needs to protect natural resources while providing a cost efficient design to meet the circulation demands. Additional environmental review will be conducted as required by CEQA.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 28**

The comment states that the proposed Area Plan calls for multiple six or eight-lane bridges over the Santa Clara River.

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required. That being said, although the proposed Area Plan calls for multiple bridges over the Santa Clara River (some of which would be located within the City of Santa Clarita, not the unincorporated Santa Clarita Valley), specific designs for bridge construction are not part of the proposed Area Plan. Design specificity will occur at the time the bridges are needed and additional environmental review will be conducted as required by CEQA.

**Response 29**

The comment states that alternatives to bridge crossing and road alignments, such as transportation demand management solutions, must be evaluated.

To preface, Section 3.2, Transportation and Circulation, of the Revised Draft EIR evaluated the proposed Area Plan's traffic impacts. Section 3.2 concluded that, with implementation of the recommended mitigation measures, traffic-related impacts would be reduced to a level below significant. Therefore, CEQA does not require that alternatives to the Circulation Element and/or contemplated infrastructure improvements be considered. (See Cal. Code Regs., tit. 14, Section 15126.6(a) [requiring EIRs to describe a range of reasonable alternatives that "avoid or substantially lessen any of the significant effects of the project"].)

In any event, roadway systems are designed to balance mobility and access needs in an efficient manner. The proposed Area Plan's Circulation Element has been developed to provide mobility and access while minimizing congestion and is based on an analysis of existing conditions in the Santa Clarita Valley (Valley), future development in both City and County areas, and anticipated growth. Projects such as completion of the Cross-Valley Connector, the Via Princessa gap closure, and plans to create a new north-south connection through the center of the Valley (Santa Clarita Parkway), are examples of projects intended to increase connectivity. The Highway Plan contains the major and secondary highways, expressways, and parkways needed to meet the projected growth demands of the Valley. Alternatives to bridges and road alignments were considered in the development of the Highway Plan. Policies C 3.1.1 to C 3.1.8 are listed under Objective C 3.1., which states: "Promote the use of travel demand management strategies to reduce vehicle trips." Given that the relevant Objective promotes the use of travel demand management strategies, the County is of the opinion that it is appropriate that the Policies listed under that Objective also promote and encourage the use of various travel demand management strategies,

especially in light of the fact that the County is not able to mandate the use of some travel demand management strategies in all instances.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 30**

The comment is noted. No further response is required given that the comment does not address or question the content of the Revised Draft EIR.



DEPARTMENT OF PARKS AND RECREATION • P.O. Box 942896 • Sacramento, CA 94296-0001  
Angeles District  
1925 Las Virgenes Road  
Calabasas, California, 91302

Ruth Coleman, Director

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January 6, 2011

JAN 12 2011

Los Angeles County Department of Regional Planning  
320 West Temple Street, Room 1362  
Los Angeles CA 90012

**RE: One Valley One Vision-County Project No. R2007-01226  
Draft Environmental Impact Report (DEIR), SCH#2008071119**

Dear Los Angeles County Planning Commissioners:

California Department of Parks and Recreation ("California State Parks"), Angeles District, staff has reviewed the above referenced project, and provides the following comments.

The project includes areas within the City of Santa Clarita and adjacent unincorporated areas of Los Angeles County. This area provides several important linkages for wildlife and biological gene flow between expansive areas of open space associated with Castaic Junction, the San Gabriel Mountains, Sierra Madre, and ultimately, the Santa Monica Mountains to the south. State Parks, Angeles District has several park units that are affected by the ability of biological resources to utilize these corridors. The closest include Santa Susana Pass State Historic Park ~ 10 miles to the southwest, Verdugo Mountains Park Property located ~15 miles to the southeast, and numerous parks in the Santa Monica Mountains ~ 20 miles to southwest.

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We offer the following recommendations to improve the project by reducing its impacts on habitat linkages and associated biological resources.

**Alternatives Analysis**

The DEIR states on page 6.0-21 that *Alternative 2, Preservation Corridor Alternative* would "support the South Coast Missing Linkages wildlife corridor and the proposed SEAs by proposing a density reduction." In fact, only one of three key linkage areas has been identified under this alternative (see Figure 6.0-1 in the DEIR), and that is the linkage between the San Gabriel-Castaic Connection. Missing are important connections between the Santa Susana and San Gabriel Mountains near the juncture of I-5 and SR-14 (Figure 46 in South Coast Wildlands 2006<sup>1</sup>) and between the Sierra Madre and Castaic Junction at Castaic Lake and Devils Canyon (Figure 37 in South Coast Wildlands 2005<sup>2</sup>) (see attached Figures 1,2). **These two missing linkages are vital for wildlife movement and genetic gene flow between these large open space areas, and the State Parks associated with them, and should be included in this alternative** (see attached Figure 3).

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1 South Coast Wildlands. June 2006. South Coast Missing Linkages: A Linkage Design for the Santa Monica-Sierra Madre Connection, 2 South Coast Wildlands. March 2005. South Coast Missing Linkages: A Linkage Design for the Sierra Madre-Castaic Connection

Los Angeles County Planning Commissioners

The DEIR acknowledges that the loss of wildlife movement areas is significant and unavoidable under the proposed project alternative *and that the connectivity once lost, would not be recoverable.*

*"Although the loss of sensitive habitats may be compensated for through land acquisition, the loss of special-status species and wildlife movement opportunities would remain significant."*

*"Impacts on wildlife movement opportunities would also be significant and unmitigable because of the loss of connectivity for wildlife movement through the Planning Area; this connectivity would not be recoverable once the area has been developed."*

*"... portions of the Santa Monica-Sierra Madre Connection, the Sierra Madre-Castaic Connection, and the San Gabriel-Castaic Connection would be potentially impacted by development allowed under the proposed Area Plan. This impact would be potentially significant, as these linkages are all that remain in terms of viable linkages providing for the exchange of individuals and genetic information among populations in the core habitat areas of the of the Santa Monica, Sierra Madre, Castaic, and the San Gabriel Mountains that may otherwise become isolated if the linkages are severed. Implementation of the plan may therefore interfere substantially with the movement of native resident or migratory fish and wildlife species and with established native resident or migratory wildlife corridors, and may impede the use of native wildlife nursery sites. This impact is significant at the plan level."*

**State Parks therefore strongly recommends selection of *Alternative 2, the Preservation Corridor/Environmentally Superior Alternative* with inclusion and protection of the two additional linkage areas listed above. This will not only help ensure the greater health and survival of ecosystems associated with California State Parks, but the associated open space areas as a whole.**

#### **Minimizing Impacts to Wildlife Corridors/Habitat Linkages**

**Regardless of the project alternative ultimately selected, direct and indirect impacts to wildlife corridors/habitat linkages should be minimized to the maximum extent feasible. We recommend the modification of the following items within the DEIR for this purpose:**

- *Guiding Principles, Environmental Resources, #6:* This principle is currently limited to the Santa Clarita River corridor and should be modified to include avoidance and minimization of direct/indirect effects on *all* key regional habitat linkages/wildlife corridors.
- *Noise Section:* There appears to be no consideration in this section of noise impacts or standards on identified open space areas or wildlife corridors/habitat linkages.

Los Angeles County Planning Commissioners

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• *Biological Resources Section:*

- *Proposed SEAs:* The retention/expansion of SEA 20/27-Santa Susana Mts/Simi Hills and 23-Santa Clara River will help protect some existing habitat linkages. SEA 15-Piru, should be extended to the east to connect with Lake Castaic to facilitate the protection of habitat linkages in this area as shown in attached Figure 4. 7
- *Habitat Linkages:* The importance and location of wildlife corridors/habitat connectivity is discussed on pages 3.7-44 though -46, yet no graphic is provided to show the location of these areas. One is required to enable reviewers to understand which linkages have or have not been included in the proposed alternatives. 8
- *Mitigation Measure 3.7-2:* This measure does not discuss indirect or cumulative impacts on special-status species via long-term affects of landscaping palette choice, impacts noise, and artificial lighting/glare. 9
- *Policy CO 3.3.1:* This policy provides protection for the banks and adjacent riparian habitat associated with the Santa Clara River and its tributaries. Other important waterways used as wildlife corridors should be included to receive similar protections. 10
- *Policy CO 3.1.2:* This policy would avoid designating or approving new development that would adversely impact wetlands, floodplains, threatened or endangered species and habitat, and water bodies supporting fish or recreational uses, and would establish an adequate buffer area as deemed appropriate through site specific review. Habitat linkages/wildlife corridor areas should be included in this list of protected resources. 11

- *Water Service Section:* Mitigation Measure 3.13-6 (policy LU 7.4.1): Modify language to ensure that drought tolerant *and non-invasive* landscaping material is used. The California Invasive Plant Council Invasive Weed Database is an excellent resource for this and is located at: <http://www.cal-ipc.org/ip/inventory/weedlist.php>. 12

We thank you for the opportunity to comment on this project. Please contact Jamie King, Environmental Scientist at [jking@parks.ca.gov](mailto:jking@parks.ca.gov) or 818.880.0373, if clarifications are required. 13

Sincerely,



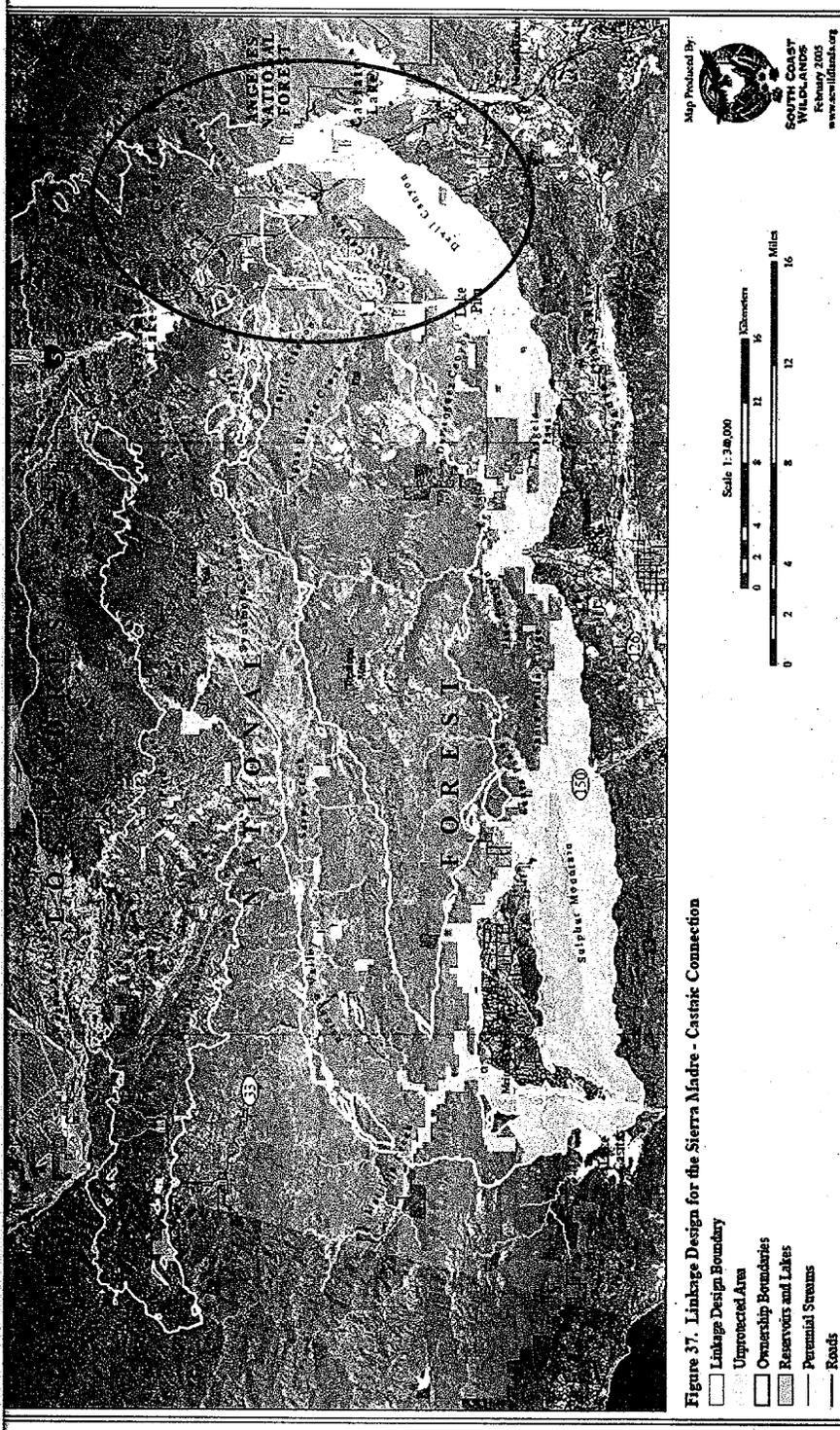
Craig Sap  
Acting District Superintendent

cc: DPLA Environmental Review Unit, California Department of Water Resources  
CDPR, Natural Resources Division, Attn: Clarissa Samaga  
State Clearinghouse/OPR  
Woody Smeck, National Park Service, Santa Monica Mountains National Recreation Area  
Joe Edmiston, SMMC-MRCA

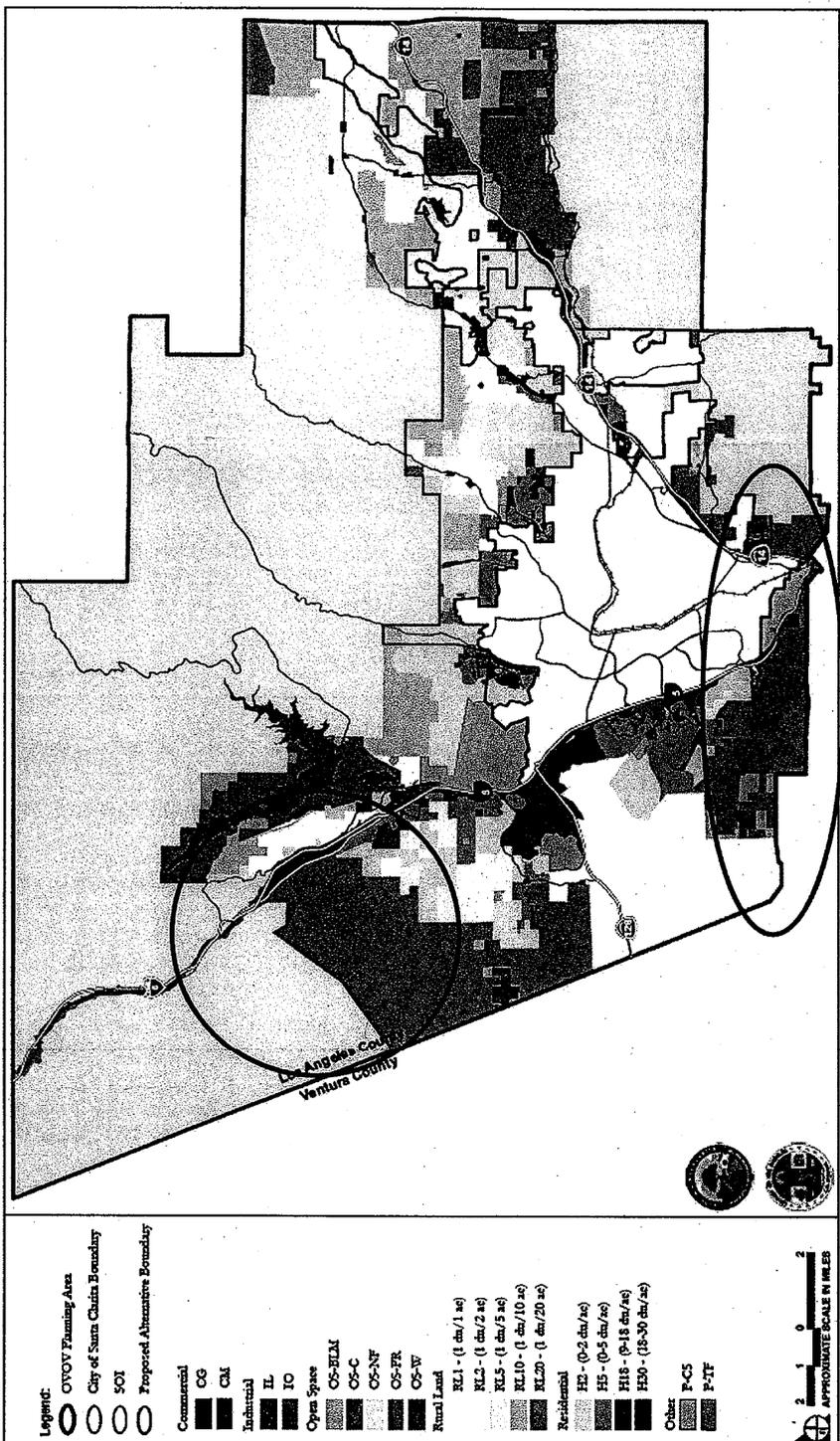
Attachments: Figure 1 - Castaic Junction-Sierra Madre Linkage Recommended for Inclusion.  
Figure 2 - Monica Mountains-Sierra Madre Linkage Recommended for Inclusion  
Figure 3 - Recommended Additional Corridor Preservation Areas  
Figure 4 - Recommended SEA Expansion Area-#15, Piru



**Figure 1. Santa Monica Mountains-Sierra Madre Linkage Recommended for Inclusion under Alternative 2, Preservation Corridor Alternative is circled in red. The area outlined in yellow is the recommended habitat linkage boundaries and areas shaded yellow are currently not protected. Source: South Coast Wildlands. June 2006. South Coast Missing Linkages Project: A Linkage design for the Santa Monica-Sierra Madre Connection, Figure 46.**



**Figure 2. Castaic Junction-Sierra Madre Linkage Recommended for Inclusion under Alternative 2, Preservation Corridor Alternative is circled in red. Source: South Coast Wildlands, March 2005. South Coast Missing Linkages Project: A Linkage design for the Sierra Madre Castaic Connection, Figure 37.**



Preservation Corridor Alternative 2, Preservation Corridor

**Figure 3. Recommended Additional Corridor Preservation Areas recommended for inclusion under Alternative 2, Preservation Corridor Alternative are circled in red. See Figures 1 and 2 for refined boundaries. Source: DEIR 2010.**

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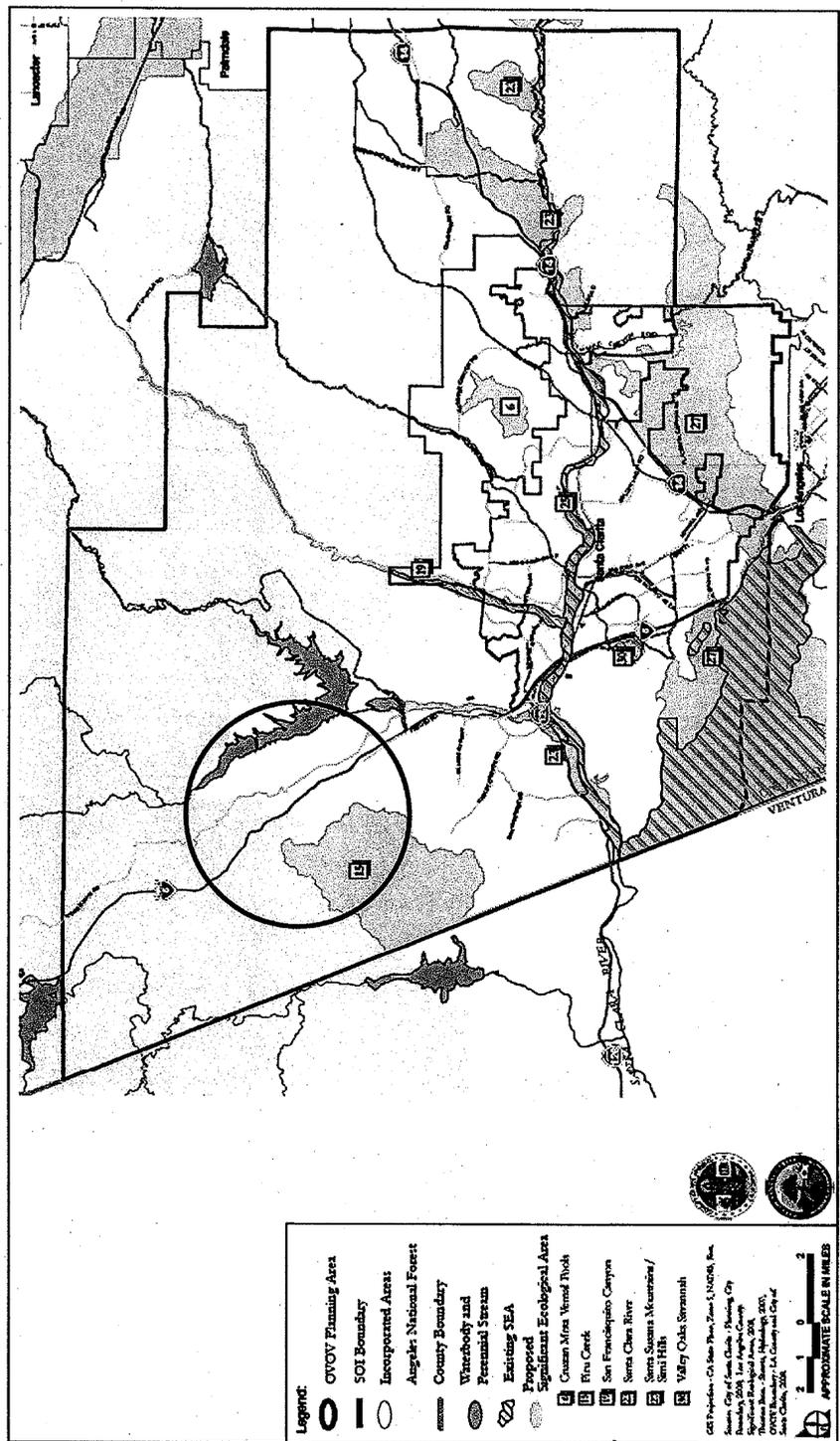


Figure 4. Recommended SEA Expansion Area-#15, Piru is circled in red. See Figure 2 for refined boundaries. Source: DEIR, 2010.

**Letter No. B2**

**Letter from State of California, Department of Parks and Recreation, January 6, 2011**

**Response 1**

This comment from the Department of Parks and Recreation (State Parks) is an introduction to comments that follow, provides factual background information only, and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

**Response 2**

The comment from State Parks states that only one of the three key linkage areas has been identified under Alternative 2 – Preservation Corridor. As stated on page 6.0-21, “This alternative would create more open space for wildlife movement (see Figure 6.0-1, Preservation Corridor Alternative). Policies would be developed to create minimal obstructions on these properties to allow for wildlife movement. This alternative would also support the SEAs proposed within this region.” As the comment acknowledges, Figure 6.0-1 specifically identifies the San Gabriel – Castaic Connection. The two wildlife links identified by State Parks as missing from the Alternative 2 discussion are the Sierra Madre – Castaic Junction and the Santa Susana – San Gabriel Mountains. As discussed below, protections for those corridors via density limitations are included in the proposed Area Plan and analyzed by the Revised Draft EIR.

In the area of the Sierra Madre – Castaic Junction, the National Forest lies to the north, providing a connection to a large expanse of existing wildlife habitat. Within the corridor, the approved North Lake Specific Plan is located between Interstate 5 (I-5) and the western shores of Castaic Lake, which disrupts possible west-east linkage, although movement in this area would primarily be north south in alignment with Grasshopper Canyon. Additionally, I-5 presents a formidable barrier to east-west wildlife movement in the vicinity of Castaic Lake, exacerbated by the division of the highway in this area. In the area of the Santa Susana – San Gabriel Mountains wildlife corridor, I-5 and State Route 14 (SR-14) are the largest formidable barriers for wildlife.

The Revised Draft EIR concluded that the potential loss of habitat linkages would remain significant in the event that avoidance of impacts to habitat linkages arising from future development allowed by the proposed Area Plan is considered infeasible. I-5 and SR-14 are the largest dividing factors for the proposed wildlife connections for the Sierra Madre – Castaic Junction and Santa Susana – San Gabriel Mountains, factors which were already analyzed by the Revised Draft EIR. The Sierra Madre – Castaic Junction and Santa Susana – San Gabriel Mountains areas have been designated on Figure 2.0-4 (Proposed Land Use Policy Map) and Figure 6.0-1 as Rural Land 20 (RL20, maximum density of 1

dwelling unit per 20 acres), Rural Land 10 (RL10, maximum density of 1 dwelling unit per 10 acres) and Open Space – Parks & Recreation (OS-PR) land uses, similar to the land use designations (primarily RL10) described in Alternative 2 for the San Gabriel – Castaic connection. As a result, they were not included in the analysis of Alternative 2.

The County acknowledges State Parks' input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

### **Response 3**

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

### **Response 4**

The comment by the State Parks strongly recommends selection of Alternative 2 – Preservation Corridor with inclusion and protection of two additional linkage areas between Santa Susana Mountains/San Gabriel Mountains near the I-5/SR-14 junction and between Sierra Madre/Castaic Junction at Castaic Lake. The comment expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

### **Response 5**

The comment by the State Parks recommends modification to the Revised Draft EIR to minimize direct and indirect impacts to wildlife corridors/habitat linkages to the maximum extent feasible. The Guiding Principles, Environmental Resources No. 5 states the following, "The natural buffer area surrounding the entire Valley, which includes the Angeles National Forest, Santa Susana, San Gabriel, Sierra Pelona, and Del Sur mountains, shall be preserved as a regional recreational, ecological, and aesthetic resource." The three wildlife corridors identified in the *South Coast Missing Linkages* document are primarily located along the buffer area. The requested modification to Section 2.0 Project Description, page 2.0-9 and Section 3.7 Biological Resources, page 3.7-57 of the Revised Draft EIR have been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

### **Response 6**

The comment refers to the Noise Section of the Revised Draft EIR and the lack of specific reference to potential noise impacts on open space areas or wildlife linkages. This comment is correct in that the Noise Section of the Revised Draft EIR does not include an analysis of impacts on wildlife and open space areas.

There are no established noise impact thresholds for wildlife and consequently an analysis of noise impacts on wildlife is not included in the Noise Section of the Revised Draft EIR. However, Policy CO 10.1.14 states “Protect open space from human activity that may harm or degrade natural areas, including but not limited to off road motorized vehicles, vandalism, campfires, overuse, pets, noise, excessive lighting, dumping, or other similar activities” and the policy is discussed in Section 3.7, Biological Resources, of the Revised Draft EIR. Noise impacts are typically treated as indirect impacts associated with development construction activities. The County Noise standards for construction are designed to avoid impacts to humans but would equally apply to wildlife species, for which no noise impact thresholds are established. Mitigation Measure 3.7-2 has been revised to include potential indirect impacts associated with construction activities and will reduce noise impacts on wildlife to less than significant. The revision to Mitigation Measure 3.7-2 has been made in Section 3.7, Biological Resources, page 3.7-67 of the Revised Draft EIR. Please see the portion of the Revised Final EIR entitled, “Revised Draft EIR pages,” for the actual text revision.

**Response 7**

The comment states that the proposed expansion of County-designated SEA boundaries, developed through the County’s SEA Update Program, will help in protecting some existing habitat linkages but also recommends that the boundary of the proposed Santa Felicia (formerly known as Piru Creek) SEA boundary be extended to the east to connect with Castaic Lake to “facilitate the protection of habitat linkages in this area.” This recommendation is based on the analysis contained in the South Coast Wildlands “South Coast Missing Linkages Project: A Linkage Design for the Sierra Madre-Castaic Connection” (Penrod, K., C. Cabañero, P. Beier, C. Luke, W. Spencer and E. Rubin. 2005. South Coast Wildlands, Idyllwild, California. [www.scwildlands.org](http://www.scwildlands.org)).

The County supports the idea of connectivity between open space and wildlife habitat areas. The SEA Update Program incorporated the concept of connectivity in designing the proposed SEA boundaries, primarily linking habitats between existing SEAs or between open space areas in private ownership to emphasize the importance of linkage when the County processes development applications that may hinder or otherwise impact connectivity. In the area of the proposed Santa Felicia SEA, the National Forest lies to the north, which provides a connection to a large expanse of existing wildlife habitat. The approved North Lake Specific Plan is located between I-5 and the western shores of Castaic Lake, which disrupts possible west-east linkage, although movement in this area would primarily be north south in alignment with Grasshopper Canyon. Additionally, I-5 presents a formidable barrier to east-west wildlife movement in the vicinity of Castaic Lake, exacerbated by the bifurcation of the highway in this area. While a laudable recommendation, the County does not believe that the recommended eastward

expansion of the proposed Santa Felicia SEA boundary is consistent with the criteria established in the SEA Update Program.

The County acknowledges State Parks' input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. The comment provides factual background information only and does not raise an environmental issue within the meaning of CEQA. No further response is required because the comment does not raise an environmental issue.

**Response 8**

The comment states that the biological discussion in the Revised Draft EIR mentions the importance of wildlife corridors and habitat linkages and the commenter suggests that a figure depicting the habitat linkages in the planning area would assist the reader of the Revised Draft EIR in understanding which linkages are included in the proposed alternatives.

The County concurs that figures in environmental documents are helpful to readers to understand some concepts contained in the discussion. In the case of habitat connectivity, the Revised Draft EIR specifically mentions three linkages identified by the South Coast Missing Linkages project, a well-established program coordinated by the South Coast Wildlands organization ([www.scwildlands.org](http://www.scwildlands.org)), as occurring in the unincorporated Santa Clarita Valley planning area (see pg. 3.7-45 of the Revised Draft EIR). These three linkages are the Santa Monica-Sierra Madre, the Sierra Madre-Castaic, and the San Gabriel-Castaic Connections, all of which are well illustrated in the respective reports hosted on the South Coast Wildlands website, referenced in a footnote in the habitat connectivity discussion. Figure 3.16-1, Parks, Recreation and Open Space Resources of the Revised Draft EIR depicts the San Gabriel-Castaic Connection Linkage Design within the unincorporated Santa Clarita Valley planning area. Therefore, the County does not concur that a graphic depicting all habitat linkages is required.

**Response 9**

The comment states that Mitigation Measure 3.7-2 does not include indirect or cumulative impacts on special-status species from noise, artificial light, or invasive plant species. This comment is correct that Mitigation Measure 3.7-2 was originally designed to address potential direct impacts to special-status species. The mitigation measure has been modified to include indirect impacts.

In addition to the revised Mitigation Measure 3.7-2, a number of policies in the proposed Area Plan address the indirect or "edge effects" mentioned in this comment. These include Policy CO 3.1.5 that would prohibit the use of invasive or noxious plant species in landscape designs; Policy CO 3.4.2 that encourages the limitation of use on invasive species adjacent to open space areas such as the National

Forest; Policy CO 3.6.1 that would limit exterior lighting to minimize light trespass; and Policy CO 3.6.4 that would provide public information to help reduce the potential spread on invasive species.

The Revised Draft EIR states, “Minimization of edge effects such as light trespass, urban runoff, un-controlled off-road vehicle use, invasive species (**Policies CO 3.6.1, 3.6.2, 3.6.3, 3.6.5**) will encourage the viability of open space directly adjacent to the developed environment, which often may abut special-status species habitats such as the Santa Clara River” (pg. 3.7-64 of the Revised Draft EIR).

In regard to cumulative impacts to special-status species, the proposed Area Plan is a long-term planning document that will be applicable to all new development projects within the unincorporated Santa Clarita Valley planning area and, therefore, the policies of the proposed Area Plan collectively address the cumulative impacts that may occur over the life of the proposed Area Plan.

**Response 10**

The comment states that Policy CO 3.3.1 provides protection for the banks and adjacent riparian habitat associated with the Santa Clara River and its tributaries as wildlife corridors. The comment recommends that other “important waterways used as wildlife corridors” should be provided with comparable protection as the Santa Clara River would receive.

It is not clear what the commenter means by “important waterways” since the Santa Clara River and its tributaries are the most important waterways in the Santa Clarita Valley planning area. Because the Santa Clara River is the major waterway in the Santa Clarita Valley planning area, the inclusion of its tributaries would appear by definition to incorporate all important waterways and the policy to protect these drainages as wildlife corridors (Policy CO 3.3.1) would indeed apply to all important waterways of the Santa Clarita Valley planning area.

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

**Response 11**

The comment states that Policy CO 3.1.2 would avoid approval of new development that would adversely impact wetlands, floodplains, threatened and endangered species (and their habitat), and water bodies supporting fish and would establish adequate buffer area through site specific review. The comment recommends that habitat linkages and wildlife corridor areas be included in the Policy CO 3.1.2 list of protected resources.

The County agrees that habitat linkages and wildlife corridors deserve protection. Policy CO 10.1.3 is designed to protect wildlife corridors and provides stronger language through dedication and acquisitions of open space to preserve and protect wildlife corridors. The Revised Draft EIR states, "... acquisition of natural open space for the preservation of habitat linkages, fostering of partnerships with conservation groups and regulatory agencies, securing funding for open-space management and protection (**Policies CO 10.1.1, 10.1.2, 10.1.3, 10.1.11, 10.1.12, 10.1.14**), will encourage the preservation of core habitats within larger expanses of natural open space and riparian networks at the periphery of development," (pg. 3.7-59 of the Revised Draft EIR). Therefore, the County does not believe it is necessary to amend Policy CO 3.1.2 to include wildlife corridors since protection of these areas would be provided through other policies.

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

**Response 12**

The comment by State Parks requests that the language in Mitigation Measure 3.13-6 (Policy LU 7.4.1) be modified to ensure that non-invasive landscaping material is used. The requested correction to Section 3.13 Water Service, pages 3.13-126 and 3.13-146 of the Revised Draft EIR have been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

**Response 13**

The comment is noted. No further response is required because the comment does not address or question the content of the Revised Draft EIR.

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-9140  
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*Flex your power!  
Be energy efficient!*

January 21, 2011

IGR/CEQA No. 101150AL-RDEIR  
Referenced to IGR/CEQA No. 090903AL,  
DEIR and 080733AL, NOP  
One Valley One Vision  
Vic. LA-05/126/14  
SCH # 2008071119

Mr. Mitch Glaser  
Department of Regional Planning  
Los Angeles County  
320 West Temple Street  
Los Angeles, CA 90012

Dear Mr. Glaser:

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above referenced project. The One Valley One Vision, (OVOV), project is a comprehensive update to the Santa Clarita Valley Area Plan to establish common guidelines for new development that will lead to greater cooperation and an enhanced quality of life for residents of Santa Clarita Valley. The document received is a Recirculated Draft Environmental Impact Report (RDEIR) since substantial changes have been made to the Air Quality, Traffic and Circulation, Global Climate Change, and Water Supply Sections.

1

According to Table 2-3: Valley-wide Land Use and Trip Generation (page 2-16) of the Valley-Wide Traffic Study (Appendix 3.2) dated June 2010, the existing land use (2004) is generating 1,487,994 vehicle trips, however, the OVOV Buildout condition will generate 3,288,386 vehicle trips. There is an approximate 1.8 million increase of vehicle trips projected as a result of buildout of the proposed plan. Therefore, the proposed denser and transit-oriented development "One Valley One Vision" of the County of Los Angeles, City of Santa Clarita will have impacts on the I-5, SR-14 and SR-126 Freeways in the Santa Clarita Valley.

2

In order to fully analyze the State facility under One Valley One Vision, we recommend the County provide the traffic analysis using the most recent data and Caltrans Guidelines for the Preparation of Traffic Impact Studies on SR-126, SR-14, and I-5 and all related on/off ramps. For instance, Golden Valley and SR-14 interchange has the worse operational conditions and traffic improvements are needed at this location.

3

We understand that those impacts would be reduced by implementing the planned improvements to segments of I-5 and SR-14 through the Santa Clarita Valley. However whether the improvements will mitigate the impact or how much of the traffic impact will be mitigated needs to be clarified in the traffic report.

4

*"Caltrans improves mobility across California"*

Mr. Mitch Glaser  
January 21, 2011  
Page 2 of 2

The funding for the planned improvements on I-5 or SR-14 indicated in the traffic report is not finalized nor validated at this time. We request that both the City and County coordinate with Caltrans to establish an equitable mechanism by which cumulative transportation impacts to State highway system be addressed.

5

In the spirit of mutual cooperation, we would like to invite the lead agency, County of Los Angeles, to the Caltrans office to discuss traffic impact and fair share contributions towards planned freeway improvements. Please contact this office at your earliest convenience to schedule a meeting in the near future.

6

If you have any questions, please feel free to contact me at (213) 897-9140 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 101150AL.

7

Sincerely,

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Caltrans improves mobility across California"*

**Letter No. B3                      Letter from State of California Department of Transportation, January 21, 2011**

**Response 1**

This comment is an introduction to comments that follow. No further response is required.

**Response 2**

The comment restated portions of the Traffic Study in the Revised Draft EIR. The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

**Response 3**

The comment recommends that the County provide the traffic analysis using the most recent data and California Department of Transportation (Caltrans) Guidelines for the Preparation of Traffic Impact Studies on SR-126, SR-14 and I-5 and all related on/off ramps. The Revised Draft EIR analyzes impacts to representative mainline segments of I-5, SR-126 and SR-14 as part of the analysis of Congestion Management Program (CMP) facilities, which is sufficient to determine the overall operation of both of these freeways through the Santa Clarita Valley. Analysis of specific mainline segments and freeway ramps can be included as part of site-specific traffic studies and project-level EIRs for specific development projects, where appropriate. Any analysis of Caltrans facilities in site-specific traffic studies will be completed in accordance with the Caltrans Guide for the Preparation of Traffic Impact Studies.

**Response 4**

The comment requests that the traffic study be clarified to show how the planned improvements to segments of I-5 and SR-14 will mitigate the traffic impact or how much of the traffic impact will be mitigated. Please see **Response 3**. Any site-specific traffic study that analyzes Caltrans facilities, and determines that one or more of these facilities are significantly impacted by project-related traffic, will contain an evaluation of potential mitigation measures. All analyses will be prepared in accordance with the Caltrans Guide for the Preparation of Traffic Impact Studies.

**Response 5**

The comment suggested that the City of Santa Clarita (City) and the County of Los Angeles (County) coordinate with Caltrans to establish an equitable mechanism to address cumulative transportation impacts. As requested, the City and the County met with Caltrans on March 24, 2011. During this meeting, the City and the County expressed willingness to work with and support Caltrans and other agencies, such as the Los Angeles County Metropolitan Transportation Authority (MTA or Metro), the

Southern California Association of Governments (SCAG), and the Golden State Gateway Coalition, in their efforts to respond to and mitigate regional traffic impacts. Subsequently, to reflect this willingness, County staff revised the policies under Objective C 1.3 in the proposed Area Plan's Circulation Element as follows:

**Policy C-1.3.1:** Continue coordinating with the Metropolitan Transportation Authority (MTA or Metro) to implement the County's Congestion Management Program (CMP) for designated CMP roadways.

**Policy C-1.3.2:** Participate in updates to the CMP and collaborate with Caltrans and Metro to revise CMP impact thresholds, ensuring that they are adequate and appropriate.

**Policy C-1.3.2-3:** Through trip reduction strategies and emphasis on multi-modal transportation options, contribute to achieving the air quality goals of the South Coast Air Quality Management District Air Quality Management Plan.

**Policy C-1.3.3-4:** Coordinate circulation planning with the Regional Transportation Plan prepared by the Southern California Association of Governments (SCAG), to ensure consistency of planned improvements with regional needs.

**Policy C-1.3.4-5:** Continue ~~coordination~~ coordinating with Caltrans on circulation and land use decisions that may affect Interstate 5, State Route 14, and State Route 126, and support programs to increase capacity and improve operations on these highways.

**Policy C-1.3.6:** Collaborate with Caltrans and Metro to implement the recommendations of the North County Combined Highways Corridor Study and support efforts by Metro to update this Study after SCAG adopts a Sustainable Communities Strategy.

**Policy C-1.3.7:** Support the Golden State Gateway Coalition in its advocacy efforts to improve the Interstate 5 corridor, recognizing that the corridor facilitates regional and international travel that impacts the Santa Clarita Valley.

**Policy C-1.3.5-8:** Ensure consistency with the County's adopted Airport Land Use Plan as it pertains to the Agua Dulce Airport, in order to mitigate aviation-related hazards and protect airport operations from encroachment by incompatible uses.

**Policy C-1.3.6-9:** Support the expansion of Palmdale Regional Airport and the extension of multi-modal travel choices between the airport and the Santa Clarita Valley, in conformance with regional planning efforts.

**Policy C-1.3.7-10:** Apply for regional, state, and federal grants for bicycle and pedestrian infrastructure projects.

#### Response 6

The comment suggested that the City and the County meet to discuss traffic impacts and fair share contributions towards planned freeway improvements. As requested, the City and the County met with Caltrans on March 24, 2011. During this meeting, the City and the County expressed willingness to work with and support Caltrans and other agencies, such as the MTA, the SCAG, and the Golden State Gateway Coalition, in their efforts to respond to and mitigate regional traffic impacts. Subsequently, to reflect this willingness, County staff revised the policies under Objective C 1.3 in the proposed Area Plan's Circulation Element as follows:

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Metro to update this Study after SCAG adopts a Sustainable Communities Strategy.

**Policy C-1.3.7:** Support the Golden State Gateway Coalition in its advocacy efforts to improve the Interstate 5 corridor, recognizing that the corridor facilitates regional and international travel that impacts the Santa Clarita Valley.

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**Policy C-1.3.7-10:** Apply for regional, State, and Federal grants for bicycle and pedestrian infrastructure projects.

**Response 7**

The comment is noted. No further response is required given that the comment does not address or question the content of the Revised Draft EIR.

1/6



State of California - The Natural Resources Agency

Edmund G. Brown, Jr., Governor

DEPARTMENT OF FISH AND GAME

John McCamman, Director

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January 24, 2011

Mr. Mitch Glaser  
Los Angeles County  
320 West Temple Street, Room 1354  
Los Angeles, California 90012

**Subject: Draft Environmental Impact Report for the One Valley, One Vision General Plan EIR, SCH 2008071119, Los Angeles County**

Dear Mr. Glaser:

The Department of Fish and Game (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the One Valley, One Vision (OVOV) General Plan relative to impacts to biological resources. The Department understands the OVOV is a joint effort between the County of Los Angeles (County), City of Santa Clarita (City), and Santa Clarita Valley (Valley) residents and businesses to create a single vision and set of guidelines for the future growth of the Valley and the preservation of natural resources. The project will be a comprehensive update of its Area Plan document for the build-out of the entire Santa Clarita Valley Planning Area. The Planning Area includes the City of Santa Clarita and its four communities Canyon Country, Newhall, Saugus, and Valencia and the County communities of Stevenson Ranch, Castaic, Val Verde, Agua Dulce, and the future Newhall Ranch. The Department supports the goal of the County and City working together to develop one seamless plan in order to address current and future needs for the public and for the conservation of the valuable natural resources within the planning area. The Department also understands that the process will require the adoption of two separate documents. The City will adopt a new General Plan, while the County will adopt a new Area Wide Plan to replace the Santa Clarita Valley Area Wide Plan.

1

The Department prepared the following statements and comments pursuant to authority as Trustee Agency with jurisdiction over natural resources affected by the project under the California Environmental Quality Act (CEQA Section 15386) and Responsible Agency (Section 15381) over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq. regarding impacts to streams and lakes.

2

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the County of Los Angeles to minimize impacts to fish and wildlife resources with a focus on these stressors. Please let Department staff know if you would like a copy of the plan to review.

3

The Department appreciates the thorough analysis of potential biological impacts contained in the DEIR. The Department supports the numerous policies and objectives to protect and conserve open space and habitat within the OVOV Planning Area. The Department agrees with

4

*Conserving California's Wildlife Since 1870*

the concept of focused development in core areas and the conservation of natural resources around and within the planning area via parks and greenbelt policies, objectives, and implementation. The Department staff will continue to work with County and City staff on open space conservation through acquisition of high priority parcels from willing sellers and through the use of conservation easements when appropriate. One key to the greenbelt concept is to conserve large contiguous tracks of extant native habitat when feasible within the Angeles Linkage area and the San Gabriel and Santa Susana Mountains linkage area to facilitate wildlife movement. The Department supports the concepts to reduce vehicular travel and support mass transit opportunities to reduce greenhouse gas impacts. The Department supports the Significant Ecological Area (SEA) concepts and will continue to work with the County and City to evaluate projects within SEAs to minimize impacts to these high value ecological areas.

4

The Department's general concerns regarding potential impacts to biological resources from project implementation are direct and indirect impacts to the Santa Clara River watershed and the associated vegetation communities and wildlife. Special attention should be given to the South Coast Missing Linkages Project, specifically the San Gabriel Mountains to Castaic Range is critical for preserving ecosystem processes in the South Coast Ecoregion. This and other linkages are critical in establishing a protected area network for the South Coast Ecoregion. The Department recommends the County adopt Alternative 2, Preservation Corridor Alternative, because it is the Environmentally Superior Alternative and would support the South Coast Missing Linkages wildlife corridor and the proposed Sensitive Ecological Areas (SEAs) by proposing a density reduction. The number of dwelling units (du) within the Preservation Corridor would potentially decrease from 2,761 du under the proposed Area Plan to 597 du on 5,967.50 acres under Alternative 2. Impacts on land use would be less than that of the proposed Area Plan.

5

6

The linkage is extremely diverse, supporting 20 distinct natural communities. Habitat types in the linkage include Coastal sage scrub, chaparral, coast live oak woodlands in canyons, and high quality riparian scrub and woodlands at lower elevations. In the eastern portion of the linkage there is a shift to a xeric landscape characterized by desert scrub, with scattered juniper and Joshua tree woodlands. Among the sensitive natural communities that occur are alluvial fan sage scrub, southern cottonwood willow riparian forest, southern riparian scrub, southern sycamore alder riparian, freshwater marsh, coast live oak riparian forest, vernal pool, mainland holly-leaved cherry woodland, valley needlegrass grassland, and coastal sage scrub. These habitats are among the rarest and most sensitive ecosystem types in the United States. Conservation of parcels within the linkage will contribute to the preservation of these communities. The Department recommends that the areas within the linkage be considered as high priority open space within this planning document for the City and County.

7

While each of the vegetation communities is important in their own right, it is also important that the natural hydrology of the linkage remain intact. The Santa Clara River is a prominent feature, draining 3,108 km<sup>2</sup> (1,200 mi<sup>2</sup>) of the San Gabriel, Castaic, Santa Susana, and Sierra Madre mountains and cutting transversely through the linkage along Soledad Canyon. As one of the last free flowing natural riparian systems left in southern California, the Santa Clara River supports a diversity of aquatic, semi-aquatic, and terrestrial organisms. The essential habitats in the upper watershed and headwater streams in the planning area are largely intact, providing breeding sites, traveling routes, and other resources for wildlife; natural flood control; recharge of groundwater basins; nutrient cycling; and helping to sustain the river to its estuary in Ventura County. Many species that depend on low-elevation habitats are now federally and or state-listed as endangered, threatened, or sensitive.

8

Riparian zones and associated buffers within the Santa Clara River are of high quality and many of the tributary drainages are in an undisturbed state. However, some parcels within the flood plain of the Santa Clara River have been impacted by disturbance and would therefore benefit from conservation and restoration. This restoration would have an added benefit of expanding habitat for several special status species, including the unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), a federal and state endangered species and state Fully Protected species. Two other native fish are also present in the planning area, the federally threatened and state species of special concern Santa Ana sucker (*Catostomus santaanae*) and the state species of special concern arroyo chub (*Gila orcutti*).

9

The Department supports the conservation sensitive policies proposed in this DEIR, but has concern with allowing an increase of 9,417 acres of urban residential area proposed in the new plan compared to the existing County Area Plan, while reducing rural land by 10,224 acres. The direct and indirect impacts on surface water resources within the Santa Clara River and its tributaries and the loss of habitat, as well as degradation of habitat due to edge effects from this proposed increased level of development will have significant negative environmental impacts on the upper Santa Clara River watershed.

10

To further aid in open space planning and reduce biological impacts within the planning area the Department recommends:

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- Continued coordination with Resource Agencies and Land Conservation Organizations to identify key conservation parcels within the Angeles Linkage and linkage between the San Gabriel's and Santa Susana Mountains and work with willing sellers to acquire the lands in fee or place conservation easements on the parcels.
- Coordination with Resource Agencies and Land Conservation Organizations to develop long term management plans and resource assessment strategies for the open space conservation areas to insure long term ecological services are maintained while providing public recreational uses. Once biological resources are assessed and mapped, public use can be planned for specific areas and avoid areas with sensitive biological resources.
- Increasing the area of low density development where feasible (10 acre minimum rural lot size per dwelling) in the land use plan, to facilitate wildlife uses within the Angeles Linkage area and on parcels adjacent to Forest Service lands.
- Re-evaluating the Circulation Element that proposes to increase the road capacity within rural areas that are part of the greenbelt and consider not increasing the capacity when feasible. Widening rural area roads would impact wildlife by increasing vehicle caused mortality and would reduce wildlife movement. Construction of road extensions and widening would also induce residential growth in the rural areas.
- Fully recognizing climate change factors in planning for water and fire suppression needs. Based on National Aeronautical and Space Agency data, the most recent meteorological year, which ran from December 2009 through November 2010 was the warmest in 131 years of record keeping. Nine out of the 10 hottest meteorological years on record have occurred since 2001. As stated in the PDEIR Global Climate Change section: "California must change its water management and uses because climate change will likely create greater competition for limited water supplies needed by the environment, agriculture, and cities. As directed by the recently signed water legislation (Senate Bill X71), state agencies must implement strategies to achieve a statewide 20 percent reduction in per capita water use by 2020." Conservative development planning in the near term would be prudent as statewide water management strategies are refined. Strategic long term riparian habitat assessment along the Santa Clara River and its tributaries within the Planning Area will need to continue to insure habitat conservation through adaptive management.

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As stated in the DEIR, "Under CEQA, a public agency, other than a lead agency, that has discretionary approval power over the proposed project is considered a "responsible agency" (State CEQA Guidelines Section 15381). No public agency, other than the County of Los Angeles, has discretionary approval power over the proposed project; however, if the County approves this project, subsequent implementation of various project components could require discretionary approval authority from responsible agencies. Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out projects (e.g., California Department of Fish and Game)." Projects proposed under the new Area Wide Plan that will be adopted by the County will need to consider the following information during the project specific CEQA process.

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1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats (See Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities at: <http://www.dfg.ca.gov/habcon/plant/>).

- a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.
- b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.
- c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380).
- d. The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 ([www.dfg.ca.gov/biogeodata](http://www.dfg.ca.gov/biogeodata)) to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEA) or Environmentally Sensitive Habitats (ESH) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.

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2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.

- a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
- b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided.

The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.

- c. A cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to remove/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
  - e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
  - f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1- September 1) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends a minimum 500-foot buffer for all active raptor nests).
3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
- a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with off-site mitigation locations clearly identified.
  - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts.
  - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A California Endangered Species Act (CESA) incidental take permit is required to ensure compliance under the CESA, if the project has the potential to result in "take" of species of

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plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. If the DMND determines that the proposed project would result in take of a listed plant or animal, the following information would be required:

- a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
  - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses (including concrete channels) and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of drainage.
- a. The Department requires a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a SAA may be a project that is subject to CEQA. To facilitate our issuance of the Agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (Lead Agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

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Thank you for this opportunity to provide comments. Please contact Mr. Dan Blankenship, Staff Environmental Scientist, at (661) 259-3750 if you have any questions.

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Sincerely,



Edmund J. Pert  
Regional Manager  
South Coast Region

cc: Helen Birss, Los Alamitos  
Terri Dickerson, Laguna Niguel  
Betty Courtney, Newhall  
Scott Harris, Pasadena  
State Clearinghouse

**Letter No. B4**                      **Edmund J. Pert, California Department of Fish and Game, January 24, 2011**

**Response 1**

The comment is introductory and provides background of the One Valley One Vision (OVOV) planning effort and supports the City of Santa Clarita (City) and County of Los Angeles (County) effort to develop collaborative planning documents.

Because the comment does not question the content or adequacy of the Revised Draft EIR, no further response is required or provided. However, the comment will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan.

**Response 2**

The comment describes the role of the California Department of Fish and Game (CDFG) under CEQA as a trustee agency.

Because the comment does not question the content or adequacy of the Revised Draft EIR, no further response is required or provided. However, the comment will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan.

**Response 3**

The comment mentions the California Wildlife Action Plan and states that CDFG is willing to work with the City and County to reduce impacts to fish and wildlife.

The comment provides important factual background information, but does not raise issues regarding the content or adequacy of the Revised Draft EIR. Therefore, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 4**

In this comment, CDFG states that it appreciates the Revised Draft EIR's thorough analysis of the proposed Area Plan's potential biological impacts and agrees with the proposed Area Plan's commitment to the conservation of natural resources. The comment also supports the Significant Ecological Area (SEA) program, the use of mass transit, and the reduction of vehicular traffic.

The comment provides important background information, but does not raise issues relating to the content or adequacy of the Revised Draft EIR. Therefore, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 5**

The comment states that CDFG is concerned about the direct and indirect impacts to biological resources, especially those within the Upper Santa Clara River watershed. The comment also stresses the importance of wildlife habitat linkages, especially the linkage between the San Gabriel Mountains and the Castaic Range.

The Revised Draft EIR's discussion of potential impacts to the Santa Clara River is set forth in Section 3.7, Biological Resources, beginning on page 3.7-45. The proposed Area Plan would preserve the Santa Clara River corridor and its major tributaries as open space to accommodate storm water flows and protect sensitive vegetation and special-status plant and animal species. Development on properties adjacent to, but outside of the defined primary River Corridor, must be located and designed to protect the river's water quality, plants, and animal habitats. In addition, proposed Area Plan Policies CO 3.2.1, 3.2.2, 3.2.3, and 3.2.4, 3.3.1 will protect sensitive wetland and woodland habitats, state and federal-listed species habitats, and habitats within SEAs and along the Santa Clara River and its tributaries.

The Revised Draft EIR, Section 3.7, Biological Resources, page 3.7-31, discusses habitat connectivity, including the South Coast Wildlands San Gabriel-Castaic Connection. The analysis of potential impacts to wildlife movement corridors begins on page 3.7-50, and concludes that the proposed Area Plan would potentially impact habitat linkages. This impact would be potentially significant, as these linkages provide viable opportunities for the exchange of individuals and genetic information among populations in the core habitat areas of the unincorporated Santa Clarita Valley planning area. However, mitigation measures proposed in the Revised Draft EIR, if adopted and implemented, would reduce this impact to less than significant.

The Revised Draft EIR concluded that the potential loss of habitat linkages would remain significant in the event that avoidance of impacts to habitat linkages arising from future development allowed by the proposed Area Plan is considered infeasible. SR-14 and existing development are the largest dividing factors for the proposed San Gabriel-Castaic Connection, factors which were already analyzed by the Revised Draft EIR.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR. Therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 6**

The comment states that CDFG recommends that Alternative 2, the Environmentally Superior Alternative, be adopted by the County as this alternative would support the South Coast Wildlands San Gabriel-Castaic Connection and the proposed SEA boundaries.

CDFG's recommendation will be provided to the decision-makers as they deliberate on the proposed Area Plan. However, as the comment does not raise issues relating to the content or adequacy of the Revised Draft EIR, no further response is required.

**Response 7**

The comment states that the San Gabriel-Castaic linkage is biologically diverse and lists the sensitive natural communities that occur in the linkage area. The comment also recommends that the City and the County reflect this biological diversity by designating properties in the linkage area as high priority open space.

The County agrees that the San Gabriel-Castaic Connection supports a wide variety of diverse biological resources, including sensitive natural communities. CDFG's recommendation regarding land use designations in the linkage area will be provided to the decision-makers for their consideration. However, as the comment does not raise issues relating to the content or adequacy of the Revised Draft EIR, no further response is required.

**Response 8**

The comment emphasizes the importance of the Santa Clara River as a linkage area between several mountain ranges, and also indicates that the river supports a diverse range of aquatic, semi-aquatic and terrestrial organisms.

The County agrees that the Santa Clara River is a prominent ecological feature that supports a diversity of organisms and natural communities, many of which are defined as sensitive as a result of their increase scarcity.

The comment provides important factual background information, but does not raise issues relating to the content or adequacy of the Revised Draft EIR; therefore, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 9**

The comment states that riparian zones of the Santa Clara River are relatively undisturbed, but that some areas within the floodplain have sustained disturbance and would benefit from conservation and

restoration, which would expand habitat for the endangered unarmored threespine stickleback and other special-status fish species.

The County agrees that areas of the Santa Clara River floodplain would benefit from conservation and restoration, which could expand the habitat for unarmored threespine stickleback and other special-status aquatic species. The proposed Area Plan supports conservation and restoration efforts in the Santa Clara River corridor and floodplain, as evidenced by the following policies:

**Policy LU-6.1.2:** On the Land Use Map, designate publicly owned portions of the Santa Clara River corridor and its major tributaries as Open Space.

**Policy CO-1.5.6:** Through the development review process, consider the impacts of development on the entire watershed of the Santa Clara River and its tributaries, including hydromodification.

**Policy CO-3.3.1:** Protect the banks and adjacent riparian habitat along the Santa Clara River and its tributaries, to provide wildlife corridors.

**Policy CO-4.3.7:** Reduce the amount of pollutants entering the Santa Clara River and its tributaries by capturing and treating stormwater runoff at the source, to the extent possible.

**Policy CO-6.3.2:** Protect the banks of the Santa Clara River and its major tributaries through open space designations and property acquisitions, where feasible, to protect and enhance the scenic character of the river valley.

**Policy CO-10.1.2:** The Santa Clara River corridor and its major tributaries shall be preserved as open space to accommodate storm water flows and protect critical plant and animal species, as follows: (Guiding Principle #6)

- Uses and improvements within the corridor shall be limited to those that benefit the community's use of the river in its natural state.
- Development on properties adjacent to, but outside of the defined primary river corridor shall be:
- Located and designed to protect the river's water quality, plants, and animal habitats by controlling the type and density of uses, drainage runoff (water treatment) and other relevant elements; and

## *2.0 Topical Responses, Comment Letters, and Responses to Comment Letters*

- Designed to maximize the full range of river amenities, including views and recreational access, while minimizing adverse impacts to the river.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

### **Response 10**

The comment states that CDFG supports the conservation policies proposed in the Revised Draft EIR, but is concerned that the proposed Area Plan's proposal to convert more than 9,000 acres to urban residential land uses while reducing rural land areas by more than 10,000 acres will have significant negative impact on the Santa Clara River watershed.

The land use designations in the proposed Area Plan reflect the changing demography and development considerations of the unincorporated Santa Clarita Valley planning area, which recognizes the need for growth within the area. The Land Use Element of the proposed Area Plan states, "a comprehensive assessment of existing land uses and their distribution was conducted using aerial photo analysis, field surveys, and a geographic information system. Land was evaluated for suitability of development type and intensity based on topography, access, proximity to infrastructure, environmental constraints, character of surrounding development, economic viability, and other criteria." This comprehensive assessment evaluated land for suitability of development type and intensity to ensure that the proposed Land Use Policy Map was consistent with the Goals, Objectives, and Policies of the proposed Area Plan's Land Use Element. The biological impacts of the proposed land use changes have been analyzed in the Revised Draft EIR and, where feasible, have been mitigated to less than significant levels.

As the comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR, no further response is required. Because the comment does not question the content or adequacy of the Revised Draft EIR, no further response is required or provided. However, the comment will be included as part of the record and made available for consideration by the decision makers prior to a final decision on the proposed Area Plan. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

### **Response 11**

The comment recommends the continued coordination between the resource agencies and the City and County in identifying key parcels for public ownership or conservation easements in the Angeles Linkage Conceptual Protection Plan (CAPP) area and in the habitat linkage between the San Gabriel and Santa Susana Mountains.

Both the City and the County participated in discussions regarding the CAPP and will continue to work cooperatively with resource agencies for the preservation of open space areas that preserve biological resources.

The proposed Area Plan includes a proposed northeast extension of the Santa Susana Mountains/Simi Hills SEA into the habitat linkage between the San Gabriel and Santa Susana Mountains precisely to emphasize the importance of this area as a wildlife movement corridor. The primary land use designations in this area are Rural Land designations with a range of low maximum allowable residential densities, which would limit intense residential development in this area in order to minimize potential impacts.

The County acknowledges this input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 12**

The comment recommends the coordination between the resources agencies and the City and County to develop long-term management plans for open space maintenance and recreational uses while avoiding areas with sensitive biological resources.

The County concurs that long-term management of open space would be beneficial to both biological resources and recreational opportunities. The County has no formal open space management agency but works cooperatively with organizations such as the Santa Monica Mountains Conservancy to provide this service.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 13**

The comment recommends an increase in low-density land use designations (a 10-acre parcel minimum) in the proposed Area Plan's Land Use Policy Map to facilitate wildlife uses of the Angeles Linkage area.

The Angeles Linkage area is essentially an area contained within the slightly larger San Gabriel-Castaic Linkage identified by South Coast Wildlands, discussed in **Response 5**, above, and would therefore be considered under the Alternative 2 Preservation Corridor and the corresponding low density Rural Land 10 (RL10) land use designation.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 14**

The comment recommends that the County re-evaluate the portion of the Circulation Element in the proposed Area Plan that proposes to increase road capacity in rural areas that are part of the greenbelt. According to the commenter, road capacity should remain static in such areas, if feasible, as road widening tends to increase vehicle collisions with wildlife, resulting in higher animal mortality rates and diminished wildlife movement. The comment also indicates that road extensions and widening would induce residential growth in rural areas.

In Section 3.2, Transportation and Circulation, the Revised Draft EIR analyzes road capacity in relation to the development of circulation infrastructure. Roadway systems are designed to balance the needs of mobility against those of access, which are distinct (if not mutually exclusive) circulation concerns. Congestion problems occur when a street designed to provide *mobility* is expected to provide for *access* as well. The Circulation Element in the proposed Area Plan was developed to provide both mobility and access while minimizing congestion, and was based on an analysis of existing conditions in the Santa Clarita Valley, future development in both City and County jurisdictions, and anticipated growth.

That said, however, the County is committed to reducing the impacts of the circulation network on sensitive biological resources. For this reason, circulation infrastructure has been designed so as to reduce such impacts to the greatest extent feasible, especially in greenbelt areas where the potential for collisions between vehicles and wildlife may be high. Furthermore, it should be noted that most road and highway improvements are related to connectivity between previously developed areas and developing areas. The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 15**

The comment recommends that the proposed Area Plan recognize the role climate change plays in water and fire suppression planning. The comment also recommends that the proposed Area Plan develop methods for conserving water.

The Revised Draft EIR discusses climate change in Section 3.4, Global Climate Change, and discusses water resources and conservation in Section 3.13, Water Service. The comment does not raise any specific issue regarding the discussion and analysis presented in these sections of the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. It should be noted that the proposed Area Plan includes several policies regarding water conservation, which are listed in Section 3.13, Water Service.

The County acknowledges this input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

**Response 16**

The comment acknowledges that the County is the lead agency for purposes of adopting the proposed Area Plan, but that other public entities function as responsible agencies under CEQA could be required to provide discretionary approval for subsequent projects.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan. Applications for subsequent projects requiring discretionary approval will be processed in accordance with CEQA.

**Response 17**

The comment states that CDFG is a trustee agency under CEQA and would need to review the CEQA documents for future projects proposed under an adopted Area Plan. The comment states that information that may be required within subsequent CEQA documents may include biological assessment of flora and fauna, discussion of direct and indirect impacts to biological resources, a range of alternatives proposed to minimize significant impacts to sensitive biological resources and assessment of impacts to watercourses and wetlands.

The comment does not raise any specific issue regarding the analysis presented in the Revised Draft EIR and, therefore, no more detailed response can be provided or is required. Los Angeles County appreciates the comments and they will be made available to the decision makers prior to a final decision on the proposed Area Plan. Applications for subsequent projects requiring discretionary approval will be processed in accordance with CEQA.

**Response 18**

The comment is noted. No further response is required given that the comment does not address or question the content or adequacy of the Revised Draft EIR.



JERRY BROWN  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



January 25, 2011

JAN 27 2011

Mitch Glaser  
Los Angeles County  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Subject: One Valley One Vision - County Project No. R2007-01226  
SCH#: 2008071119

Dear Mitch Glaser:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 24, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

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These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov



**Document Details Report  
State Clearinghouse Data Base**

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**Date Received** 11/23/2010    **Start of Review** 11/23/2010    **End of Review** 01/24/2011

**Note:** Blanks in data fields result from insufficient information provided by lead agency.

**Letter No. B5**

**Letter from State of California, Governor's Office of Planning and Research,  
January 25, 2011**

**Response 1**

The comment provides factual background information regarding the state agencies that received a copy of the Revised Draft EIR from the State Clearinghouse and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.