

SANTA MONICA MOUNTAINS CONSERVANCY

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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

RAMIREZ CANYON PARK
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MALIBU, CALIFORNIA 90265
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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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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

1/7

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.

1

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 2006¹) and between the Sierra Madre and Castaic Junction at Castaic Lake and Devils Canyon (Figure 37 in South Coast Wildlands 2005²) (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."

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"... 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.

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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:

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- *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.

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Los Angeles County Planning Commissioners

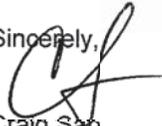
317

• *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 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

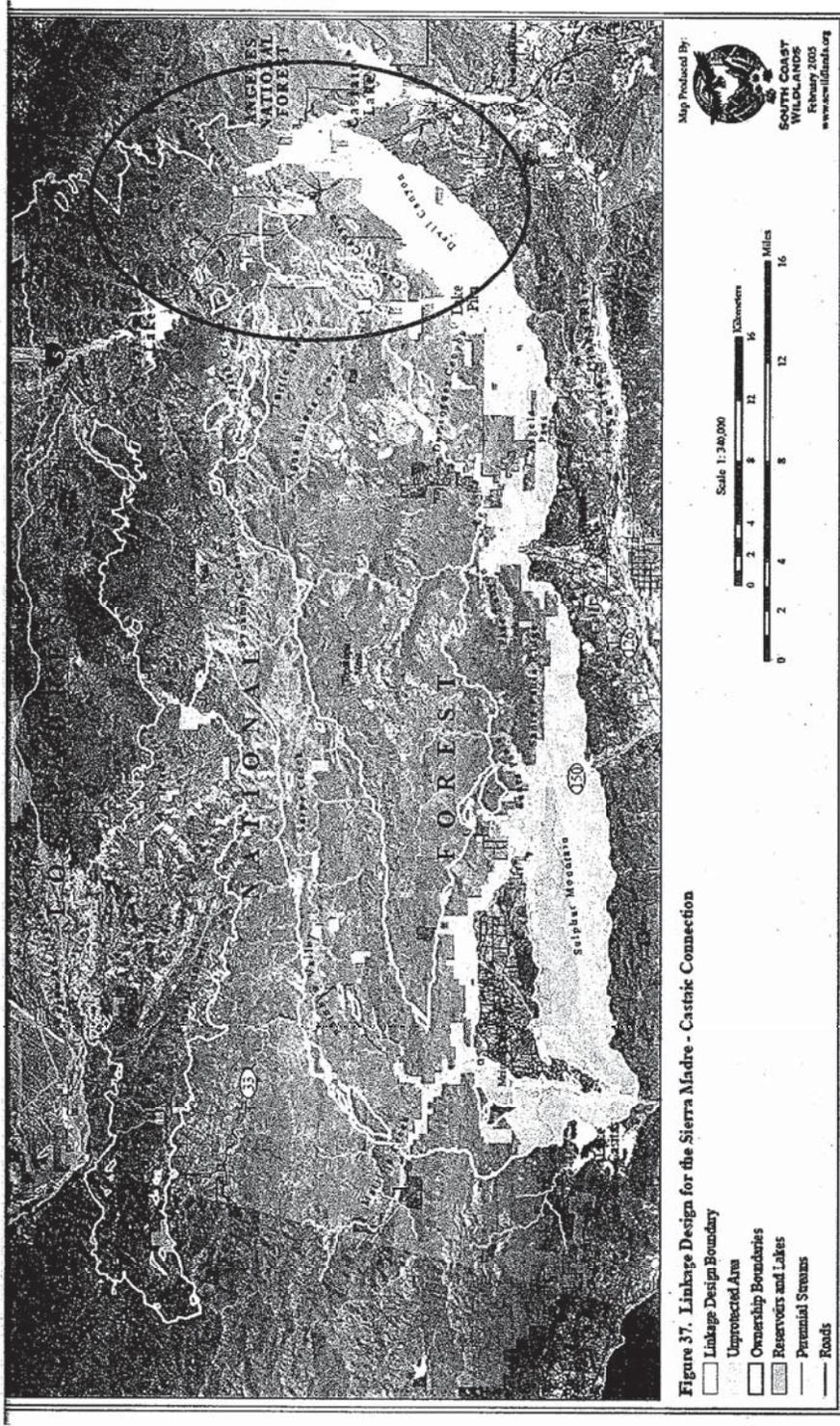


Figure 37. Linkage Design for the Sierra Madre - Castaic Connection

- Linkage Design Boundary
- Unpromoted Area
- Ownership Boundaries
- ▨ Reservoirs and Lakes
- Potential Streams
- Roads

Scale 1:30,000



Map Produced By:

SOUTH COAST WILDLANDS
 February 2005
www.southcoastwildlands.org

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.

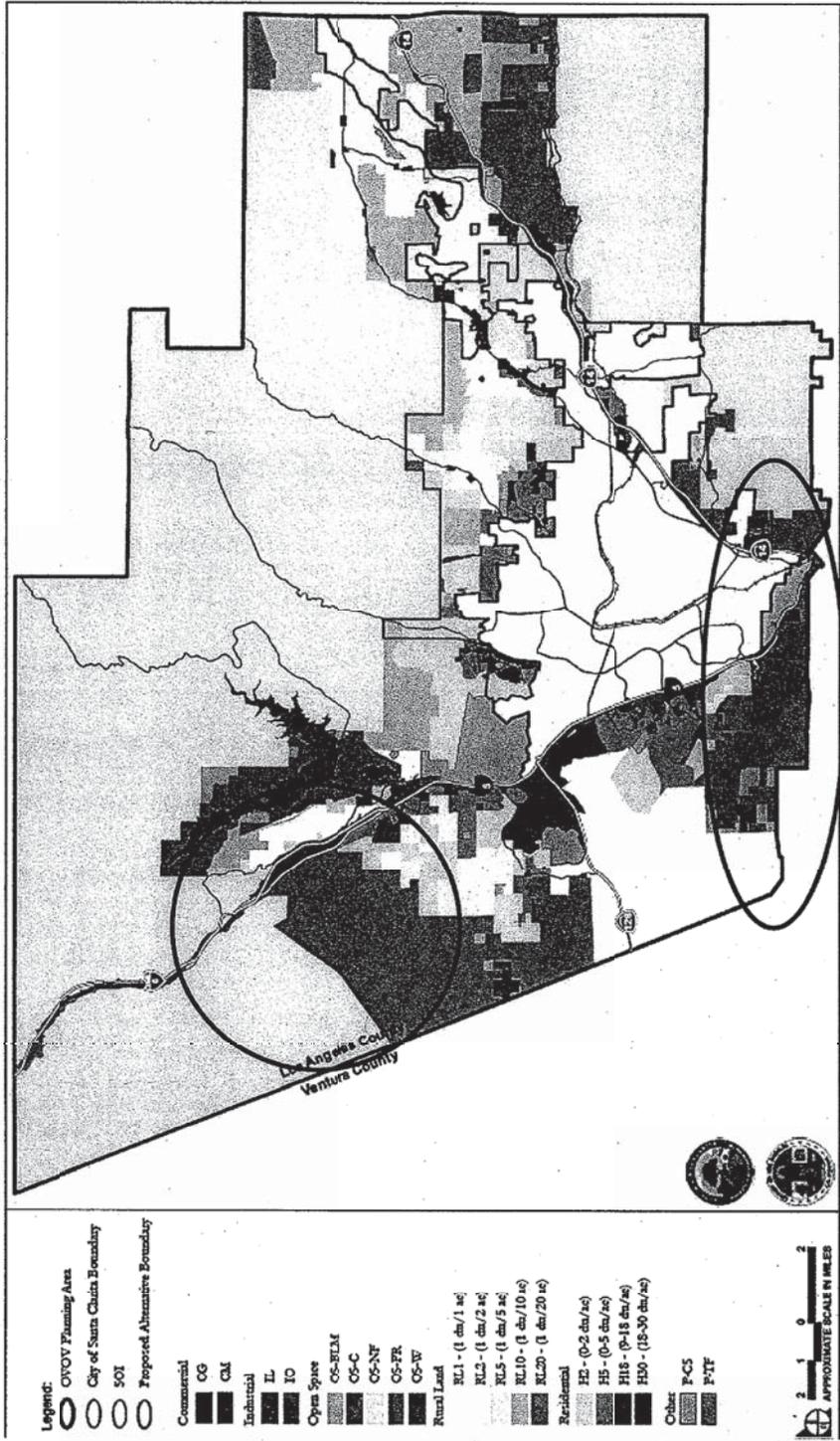


Figure 3. Recommended Additional Corridor Preservation Areas recommended for inclusion under Alternative 2, Preservation Corridor Alternative are circled in red. See Figures 1 and 2 for refined boundaries. Source: DEIR 2010.

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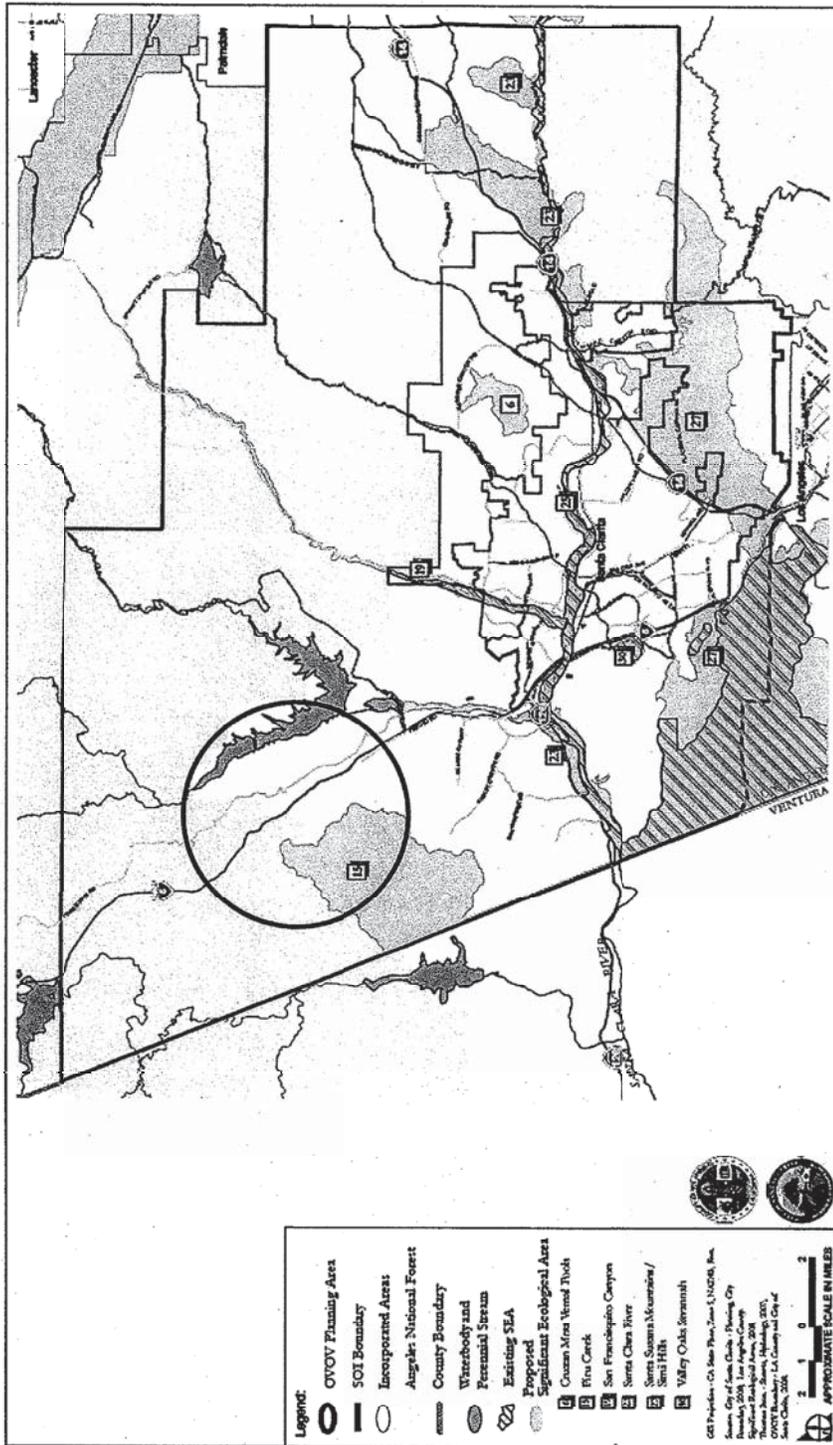


Figure 3.7-2
Current and Proposed Significant Ecological Areas
Figure 4. Recommended SEA Expansion Area-#15, Piru is circled in red. See Figure 2 for refined boundaries. Source: DEIR 2010.

DEPARTMENT OF TRANSPORTATION
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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.

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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.

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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.

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"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.

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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.

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Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

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.

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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.

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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.

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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

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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.

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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.

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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.

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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 km² (1,200 mi²) 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.

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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*).

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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.

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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.

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- 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.

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- 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.

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- 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) 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

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



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

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Document Details Report
State Clearinghouse Data Base

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.