

SANTA MONICA MOUNTAINS CONSERVANCY

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June 27, 2011

Ms. Julie Lowry, Principal Planner
General Plan Development Section
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Supplemental Comments on Los Angeles County Draft 2035 General Plan

Dear Ms. Lowry:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the opportunity to comment on the Draft 2035 General Plan. In addition to our previous comments, dated May 23, 2011, the Conservancy offers the following comments. It is our hope that the proposed changes contained herein can be made to the draft plan prior to the issuance of the Notice of Preparation such that they are included in the environmental review process.

Requested Revisions to Significant Ecological Area Boundaries

Since our May 23, 2011 letter, the Conservancy has identified specific requested additions to the County's proposed Significant Ecological Areas (SEAs). The attached additions are refined versions of previous Conservancy requests. All of these requested additions are substantially similar to and contiguous with the habitat contained within the County's proposed SEAs. The Conservancy sees no justification for exclusion of these habitat areas from SEA designation when they are ecologically interrelated and biologically similar to the County's designations. Each requested addition is discussed in detail below.

Proposed Newhall Wedge Addition to Santa Susana Mountains/Simi Hills SEA

The Conservancy requests a northerly expansion of the proposed SEA designation north of the I-5 in the "Newhall Wedge". The requested addition would extend northerly along I-5 to Calgrove Boulevard, then easterly along the edge of current development to Pine Street, as depicted in the attachment. An additional portion would extend easterly from Pine Street along the Eternal Valley Fire Road, then southerly along the ridgeline to the County's proposed SEA boundary. The expansion would include the area between I-5 and The Old Road, which contains a rich California Walnut Woodland community and Mountains Recreation and Conservation Authority (MRCA) parkland.

This expanded area includes two blue line streams home to Southern Coast Live Oak Riparian Forest and known occurrences of California orcutt grass (*Orcuttia californica*), a state- and federal-listed species. Additional rare or threatened species occurrences in the expanded area include slender mariposa lily (*Calochortus clavatus* var. *gracilis*) and Palmer's grapplinghook (*Harpagonella palmeri*). The California Walnut Woodland in the southwestern portion of the expanded area is part of the known range for western mastiff bat (*Eumops perotis californicus*).¹

Most importantly, the expanded area forms part of the Newhall Wedge habitat block and facilitates critical regional wildlife movement. Due to existing constrained conditions, the Newhall Wedge habitat block must be of sufficient size to support a viable home range for medium-sized mammals in order to continue its present role in regional connectivity. The expanded area would ensure that existing conditions do not deteriorate further.

The County's proposed SEA is deficient for not including approaches to two freeway undercrossings within the designated area. Both The Old Road and Calgrove Boulevard undercrossings are essential for maintaining regional habitat connectivity—the primary purpose of designating this SEA. The Old Road undercrossing is rated the highest quality of all I-5 crossing points in the Newhall Wedge. The crossing is open, with ample tree cover on both east and west approaches. To effectively protect wildlife movement, the SEA must include all approaches to this undercrossing. Topographical constraints require protection of the entire ridge to ensure access from the north. The woodland area on both sides of The Old Road must likewise be included.

The area's known rare resources and critical importance in regional wildlife connectivity warrant its inclusion in the Santa Susana Mountains/Simi Hills SEA.

Proposed Mormon Canyon Addition to Santa Susana Mountains/Simi Hills SEA

The Conservancy also requests an addition to the Santa Susana Mountains/Simi Hills SEA that includes Mormon Canyon on the southern flank of Oat Mountain. The proposed expansion is ecologically unified with the adjacent Browns Canyon, much of which is protected by the MRCA. Like Browns Canyon most of Mormon Canyon consists of Southern Mixed Riparian Forest, providing a critical water source and cover on an

¹Department of Fish and Game. *California Natural Diversity Database*.

otherwise arid south-facing slope. As a tributary of Browns Canyon, any disturbance in the upper Mormon Canyon watershed will affect downstream resources within the County's proposed SEA. The Conservancy used watershed boundaries as the basis for the proposed SEA expansion, which is shown in the attachment.

Mormon Canyon is a critical piece of the Oat Mountain habitat block. The woodland habitat in upper Mormon Canyon is actually superior to Browns Canyon and in closer proximity to California Walnut Woodland and Valley Oak Woodland on the other side of the ridge. The lushness of the vegetation in upper Mormon Canyon suggests the presence of a spring and provides ample cover for southwest-northeast wildlife movement. Due to its ecological similarity with Browns Canyon, a biological survey would likely identify occurrences of the same rare or threatened species, including two-striped garter snake (*Thamnophis hammondi*), coast horned lizard (*Phrynosoma blainvillii*), and Plummer's mariposa lily (*Calochortus plummerae*).

Proposed Valley Oaks Savannah-Santa Susana Mountains/Simi Hills SEA Connection

The current extent of the proposed Valley Oaks Savannah SEA does not follow the County's own imperatives for SEA selection and design. The County's previous experience shows that small, isolated SEAs do not adequately protect significant resources. As explained in the County's Conservation and Open Space Element Resources, the design of the current 1980 SEAs is deficient due to the creation of habitat "islands" surrounded by soon-to-be-urbanized land:

Because some of the "island" habitats were isolated from each other by development within the intervening areas, the opportunity for species movement and genetic dissemination was dramatically reduced. Therefore, the identification of island habitats, independent of the entire ecosystem, was ultimately deemed to be unsustainable.²

Despite this previous experience, the County's proposed Valley Oaks Savannah SEA is precisely that: a habitat "island". To address this deficiency, the Conservancy proposes an expansion of the Santa Susana Mountains/Simi Hills SEA that connects directly with the Valley Oaks Savannah SEA. As shown in the attachment, the requested addition would

²Appendix E: Conservation and Open Space Element Resources. *Draft 2035 General Plan* 56

extend from public parkland in Pico and Potrero Canyons around built-out Stevenson Ranch to reach the Valley Oaks. Without this habitat connection, terrestrial mammals would be unable to access the isolated block. As a result, the Valley Oaks would not support a healthy predator population and the ecosystem would be unsustainable in the long term. Furthermore, adaptation to climate change would be precluded by the genetic barrier and physical constraint on species home range evolution.

Requested Amendments to County Highway Plan

During the One Valley One Vision planning effort in the Santa Clarita Valley, the Conservancy requested specific amendments to the highway plan to reduce impacts to biological resources. Should it be impossible to make these changes through that planning vehicle, the Conservancy requests that the following proposed rural widenings or extensions be removed from the General Plan Mobility Element:

- 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
- Pico Canyon Road

The Conservancy contends that each of the above projects would have a significant avoidable impact on wildlife movement by increasing wildlife mortality, discouraging crossings, and decreasing genetic exchange. In their comments on the One Valley One Vision Plan, the California Department of Fish and Game independently arrived at the same conclusion.

The science is quite clear in this respect: vehicle collisions are the leading direct human-caused sources of bobcat and mountain lion mortality in Southern California. Wider roads increase mortality and decrease the frequency of successful crossings until a threshold width is reached where crossings are no longer attempted (i.e. across freeways). A study in New

Mexico directly documented these effects on mountain lion populations.³ Widening roads leads to faster vehicle speeds and larger traffic volumes, both of which are factors in vehicle-wildlife collision rates. Even the width of the pavement has a negative effect on mountain lion dispersal. Local research by the National Parks Service and others have observed frustrated dispersals among tracked carnivores and documented the resulting significant genetic differences across movement barriers.

The Conservancy believes that widening these roads is bad policy. The only possible justification for doubling road capacity within these rural areas is to promote further residential development in remote areas—in direct opposition to the stated goals of the current planning effort. The circulation models appear to assume traffic volume increases only possible if housing continues to sprawl into rural-zoned areas, leading to the misguided recommendation to increase capacity. Even worse, the extension of Shadow Pines Boulevard/Tick Canyon Road all the way to Davenport Road would divide a Significant Ecological Area and provide access to otherwise remote parcels, thereby inducing growth. The County and others are actively promoting protection of these resources through the Angeles Linkage Conceptual Area Protection Plan, so it is unclear why the general plan would then propose fragmenting the same habitat area.

Due to the cumulative nature of the impacts, these issues are best addressed at the plan level. While any one widening could feasibly be mitigated, a succession of mitigated road widenings would still decrease overall landscape-level permeability. The Conservancy therefore requests that these impacts be avoided entirely or comprehensively mitigated at the plan level with appropriate policies and programs, including construction of crossing structures and acquisition of adjacent habitat.

Requested Inclusion of Transfer of Development Rights Program

In discussion with County staff, the Conservancy raised the idea of implementing a countywide Transfer of Development Rights (TDR) program. Such a program would relieve development pressure on sensitive rural areas and facilitate smart growth in urban centers, particularly in connection with transit-oriented developments. It is our understanding that such a program has been included in the Draft 2035 General Plan. The Conservancy is in

³Sweanor, L. L., K. A. Logan, and M. G. Hornocker. 2000. Cougar dispersal patterns, metapopulation dynamics, and conservation. *Conservation Biology* 14:798-808.)

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full support of the proposed TDR program and looks forward to collaborating with County staff on its design and implementation. For your reference, we have attached the outlines of the proposed program as described by County staff. Specifically, we recommend explicitly including the City of Santa Clarita in the General Plan language to facilitate the program's implementation in the northern portion of the County.

Thank you for your consideration of these comments. The Conservancy appreciates the ongoing collaboration with your staff as this process moves forward. We hope that these requested revisions, additions, and deletions can be accomplished prior to commencement of the Draft Environmental Impact Report such that they can be fully vetted during environmental review. If you have any questions, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson

Attachments