

**SANTA MONICA MOUNTAINS CONSERVANCY**

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April 27, 2015

Mr. Kim K. Szalay  
County of Los Angeles  
Department of Regional Planning  
Special Projects Section  
320 West Temple Street, Room 1362  
Los Angeles, California 90012

**Notice of Preparation Comments  
Northlake Specific Plan - Phase One Implementation  
Vesting Tentative Tract Map No. TR073336**

Dear Mr. Szalay:

The subject property in the Santa Clara River watershed contains regionally significant viewshed (including night skies) from Interstate 5 and comprises regionally significant inter-mountain range habitat linkage potential between the Angeles and Los Padres National forests. The ecological integration of these two national forests has a direct affect on the long-term ecological viability of all the habitat located in the Santa Monica Mountains Conservancy's jurisdiction. The project's proposed adverse impacts to the Santa Clara River watershed will also have a direct effect on the ecological vitality of numerous sections of the Santa Clara River within the Rim of the Valley Trail Corridor.

**Interstate 5 - Inter-mountain Range Habitat Linkage Onsite**

The focus on inter-mountain range habitat linkages across Interstate 5 (I5) has sharpened greatly since the Northlake Specific Plan was adopted in 1992. The Draft Environmental Impact Report (DEIR) must address the regional ecological value of this cross-freeway wildlife habitat connection. The South Coast Wildlands project identifies this linkage in its landmark "*Missing Linkages*" report as the Western and Eastern Sierra Madre Mountains Linkage. The linkage is further studied in the follow-up report "*South Coast Missing Linkages Project - A Linkage Design for the Sierra Madre - Castaic Connection*," completed in March 2005.

In any case the ecological interface between the Los Padres and Angeles National Forest

ecosystems is of statewide importance. The quality and quantity of connectivity across I5 must be maximized to guarantee maintenance of existing ecological conditions both within these two national forests and within the hundreds of thousands of other public and privately owned natural lands that depend on them for wildlife population stability. The proposed growth between the subject project area and Highway 138, area where the first phase of the Tejon Ranch project has been proposed, leaves no existing, or potential, crossing safe unless all the component land is publically owned. In addition, those public agencies must have put in place permanent safeguards to insure that linkage function cannot diminish on their lands. Those public agencies include Caltrans and the Los Angeles County Department of Public Works because they control the transportation corridor rights-of-ways and their ubiquitous fencing.

The DEIR may show that better cross-I5 habitat linkages exist north of the project site between Violin Summit and Highway 138. However, regardless of the presence of such linkages, two factors make potential cross-I5 habitat linkages just east of the proposed project area regionally important. Habitat linkage redundancy and spatial separation is critical to maintain species diversity. In addition, linkage redundancy is critical insurance to compensation for adverse impacts from future transportation and other infrastructure projects through the I5 corridor.

The DEIR must provide a thorough examination of the opportunities and constraints for wildlife movement across I5 between the southern boundary of the project area and Violin Summit. Property ownership and rights-of-way analyses are critical to such a study.

Two underpasses beneath the southbound lanes of I5 provide excellent opportunity for wildlife to cross into the multi-hundred acre habitat area between the two south and north bound lane crossovers. One such underpass is located approximately parallel to the intersection of the northern boundary of Phase One and Old Ridge Route. The other undercrossing is located more northward, approximately in the center of the southwest quarter of Section 3. That is essentially the north-south mid-point of Phase Two. There may be additional undercrossings not uncovered by our analysis. These underpasses probably represent the southernmost, large animal routes under I5 until Castaic Creek crosses under by Highway 126. We do not know if undercrossings, or good sites for potential undercrossings, exist beneath the northbound lanes. The DEIR must examine the opportunities for crossing under the northbound lanes.

The DEIR must also analyze how the proposed project would extend the urban and suburban land use miles up I5 into some of the most ecologically valuable core habitat in

southern California. The DEIR should address how the ecological integrity of the proposed protected onsite natural open space would be maintained and protected by a permanently funded management entity. Natural land set aside next to dense residential subdivisions requires maintenance funding to ensure long-term biological mitigation values.

### **Incompatibility of the Project with the Site**

Few professional planners, and even fewer biologists, would attest to the fact that either the original project, or the proposed revisions to Phase I, represent an acceptable project for the site. Without the early 1990s Program FEIR and Development Agreement approval in the books, all versions of this project would be DOA upon submission to the Planning Department. The subsequent removal of the golf course then makes a poor project much poorer by creating an additional unavoidable significant adverse ecological impact, specifically to wildlife movement. The applicants attempt to paint a rosy picture by saying that the project (at least Phase I) will be laced with various recreational amenities on manufactured pads and slopes. Those dispersed green spaces on manufactured slopes internal to the development obviously do not mitigate for regional wildlife movement. Pretty much the rest of the project remains the same with a mix of commercial and residential uses. There is no public policy justification to approve an amended project that will result in an otherwise avoidable significant adverse impact to regional wildlife movement.

### **Project Phases One and Two must be Included in a Single EIR**

All cumulative impacts and wildlife habitat linkage analyses of the subject area must include all of the subject Northlake project. For example, a Phase One project footprint that provides marginal wildlife access to existing 15 undercrossings, could have that access eliminated by multiple Phase Two alternative project footprints. For this reason, and given the 23-year gap since the Specific Plan EIR, adequate California Environmental Quality Act (CEQA) review of the subject project must lump Phases One and Two as a single project in the DEIR. If that action is not taken by the County, the DEIR must include a comprehensive answer why the two phases do not have to be considered in a single DEIR.

The proposed Phase One project includes a minimum of three arterial streets that come to the border of Phase Two. The future contemplated development of Phase Two mandates analysis of its potential impacts with Phase One. Our position is that project piecemealing will occur under all circumstances unless a DEIR is prepared for all potential development on the property.

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In 1992, the golf course approved in the Program Specific Plan EIR was the critical project feature that allowed wildlife to move through the project between large open space areas to the north and Castaic Creek to the south. The current project omits the golf course in exchange for scattered pocket recreation sites. Essentially, under the current proposal a decision maker can only safely assume that regional wildlife movement would be as adversely impacted in Phase II as in Phase I because the golf course has been omitted from the Phase I. Therefore, an analysis of regional wildlife movement that does not address both Phases I and II together cannot provide decision makers with complete information regarding potential project impacts.

The DEIR analysis must address the influence of the approved Development Agreement on the issue of requiring a combined Phase One and Two EIR. When did, or does, the Development Agreement expire? How would proposed project changes affect the Development Agreement? More specifically, the significant removal of the golf course must require changes to the Development Agreement. If those changes exist they should be disclosed in the DEIR.

What is the effect of proposed offsite grading on prior Specific Plan and CEQA approval?

It is not clear if the 1992 Specific Plan and EIR encompassed the approximately 284 acres of off-site grading on adjacent private land and within the Castaic Lake State Recreation Area. If the 1992 EIR did not include any offsite grading, then the project description has changed substantially. If the County disagrees with this conclusion, the DEIR must include a definitive, comprehensive answer why the project description has not changed substantially.

Please address any questions and future correspondence to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

LINDA PARKS  
Chairperson