



June 12, 2017

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
Los Angeles, CA 90012

RE: Draft Supplemental Environmental Impact Report
NorthLake Specific Plan Project – SCH No. 2015031080
Vesting Tentative Tract Map No. TR 073336

Dear Mr. Sackett:

California State Parks, Angeles District (DPR), has reviewed the Draft Supplemental Environmental Impact Report for the NorthLake Specific Plan Project and would like to provide the following comments:

Pipeline Relocation

DPR does not intend to grant permission to relocate the Pacific Oil pipeline on State Parks owned land. When previously approached by the applicant, DPR very clearly denied permission to relocate the pipeline on State Parks property. The DSEIR statement that agreements between the applicant and DPR, which are a condition of approval for initiation of development, are pending, is incorrect.

The relocation of the pipeline would violate the Declaration of Purpose in the General Plan for Castaic Lake SRA (1985): "The purpose of Castaic Lake SRA is to provide opportunities for outdoor recreation experience for the people, by assuring optimum use and enjoyment of the natural, cultural, recreational, and scenic resources of the lake, its shoreline, and surrounding lands within the SRA... and to provide for the protection, enhancement, and interpretation of the wildlife, natural, and historic resources of the area."

The proposed pipeline relocation would impact California sagebrush, a special status vegetation type that provides habitat for the federally listed coastal California gnatcatcher. The degradation and fragmentation of this habitat would impact the only species occurrence in Los Angeles County north of Montebello Hills. It would also increase the likelihood of invasive plant species movement into the area. Relocating the pipeline closer to Castaic Lake, a drinking water source, is not prudent. There are

concerns about the integrity of the pipeline currently located on DPR land, and Pacific Pipeline has needed to install equipment to monitor slope stability.

Biological Resources

The DSEIR is deficient because the data and analyses are insufficient to accurately assess project impacts. The proposed project would impact the entire watershed. The large scale and scope of this proposed project requires a thorough impact analysis, mitigation measures, and success criteria.

There has been no assessment of the impact of filling in the blue line stream in Grasshopper Canyon on the downstream riparian vegetation on State Parks property that supports the Least Bell's vireo (federally endangered, state endangered).

The DSEIR is deficient because it does not contain a detailed relocation plan for the western spadefoot toad, burrowing owl and sensitive plant species within the proposed project area. This plan should be part of the DSEIR, and should include protocols, mitigation measures, and success criteria.

The DSEIR should also address the impact of increased density, noise, and night lighting on wildlife in the adjacent Castaic SRA. Noise and light sources can disorient nocturnal wildlife and act as a barrier to movement.

Wildlife Corridors

The DSEIR is deficient because it claims that the proposed project would not impact wildlife connectivity along the Sierra Madre-Castaic inter-mountain range. The biological report contradicts the technical expertise provided in the *South Coast Missing Linkages* (2005) and *South Coast Missing Linkages Project: A Linkage Design for the Sierra Madre-Castaic Connection* (2005) reports, and minimizes the value of the habitat that connects the two Interstate 5 tunnels directly west of the project.

Cultural Resources

The DSEIR is deficient because the data on archaeological sites are incomplete.

Two additional archaeological sites (CA-LAN-4478H and CA-LAN-4475) identified during 2014 surveys of the Castaic Lake Drawdown Project by DWR, which would fall within the ½ mile record search boundary, are not described in this report. It seems that

the two projects were going on concurrently, so those records would not yet have been available at the Information Center, but it does show the general sensitivity of the area for cultural resources, and that due to limited previous surveys, additional previously unrecorded archaeological resources in the area could be likely, especially along creek channels, where sites are generally found along adjacent (and former) Castaic Creek.

In the cultural resources technical report, the prehistoric context uses an older chronology and could benefit from using more recent and project-area specific references to demonstrate the potential for the presence of archaeological sites within the project area. For example, numerous studies have been conducted in the Upper Santa Clara River Valley area related to developments by the Newhall Land and Farming Company, as well as studies of the Elderberry Canyon site nearby in adjacent Castaic Canyon. In contrast, the historical background provides a good, region-specific context for the project area.

The ethnographic section suggests that a Tataviam community is no longer present, which is incorrect. King's (2004) ethnographic study prepared for the Angeles National Forest provides a good, relatively recent description of ethnographic-period Tataviam settlements, including those near the project area.

The site number is written incorrectly for the Old Ridge Route throughout the DSEIR and the cultural resources technical study – it should be noted as CA-LAN-990H (the number zero, not the letter "O").

The project area totals 1,330 acres straddling Grasshopper Canyon, an intermittent blue line stream. The low number of sites found during surveys of the project area are surprising given the nature and density of sites in adjacent Castaic Canyon, although the report does note that the ground surface visibility was poor in several areas. The DSEIR also states that much of the project area is underlain by landslide deposits which could indicate a high potential for deeply buried archaeological sites. Given the poor prehistoric and ethnographic contextual information, as well as the geological context and potential for immense grading (33 million cubic yards) of the project area, it does not appear from the given documentation that sufficient effort has been made in the identification of cultural resources given the scope and scale of the proposed project.

On page 5.3-14 of the DSEIR, the document describes four previously recorded archaeological sites, three newly recorded archaeological sites and five archaeological isolates. The document then goes on to say, and repeats in Section 5.3.8, that no archaeological resources are located within the project site boundaries. But reading of the cultural resources technical report suggests that the newly recorded sites were identified during surveys of the project area. I am unclear why consultants would be surveying and recording sites outside of the proposed project area.

The cultural resources document recommends that an archaeologist be present to "observe grading activities in the uppermost layers of sediment," but the DSEIR only states that an archaeologist be called in if artifacts are found during grading (MM 5.3-2). Since some sites may be small, they could go unnoticed by construction personnel untrained in archaeological material identification, and because surface visibility was poor during archaeological field surveys and the archaeological context and tribal consultation indicates a high cultural sensitivity in at least some portions of the project area, the original recommendations to have archaeologists present during all grading should be followed. This appears to be covered by MM 5.3-7 for project specific mitigation measures, but the meaning of the term "archaeological sensitive sediments" is unclear.

Sincerely,



Craig Sap
Angeles District Superintendent

Cc
Los Angeles County Department of Regional Planning
NorthLake Associates, LLC
Public Utilities Commission
LADWP