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May 22, 2017

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Hall of Records, 13th Floor, Room 1348
320 West Temple Street
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**Draft Supplemental Environmental Impact Report Comments
Northlake Specific Plan Project - SCH No. 2015031080
Vesting Tentative Tract Map No. TR 073336**

Dear Mr. Sackett:

The subject property in the Santa Clara River watershed contains regionally significant day and night time viewsheds from Interstate 5 and comprises the eastern half of a regionally significant inter-mountain range habitat linkage across Interstate 5 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 proposed 3.5 mile long development that requires 33 million cubic yards of initial grading would severely interfere with the integration of the two national forest ecosystems.

The Draft Supplemental Environmental Impact Report (DSEIR) concludes the counter opposite that the subject 1,330-acre property as is has inconsequential wildlife corridor value and if developed would not significantly impact public viewsheds because the subject natural segment of Interstate 5 viewshed is not a designated scenic highway. The DSEIR contains no actual viewshed analysis for potential impacts to public lands. The DSEIR is inadequate on both issues.

The proposed project would fill the entire length of 3.5-mile-long Grasshopper Canyon essentially converting an entire blueline stream watershed of the Santa Clara River into a massive impervious fill site directly bordering 2.5 miles of Castaic Lake State Recreation Area. The large fill would significantly reduce groundwater recharge into Castaic Lagoon and on intervening riparian habitat on State property.

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The DSEIR concludes that the direct total elimination of 1,070 acres of core habitat can be mitigated below a level significance via both the future acquisition of totally unidentified land and the post-approval preparation and multi-year implementation of plant transplantation, rare amphibian relocation, and habitat restoration plans. In regards to western spadefoot toad relocation and burrowing owl nest site reestablishment, the DSEIR concludes there will be no significant impact just because some undefined number of animals are going to be moved at an undefined time to an undefined place with an undefined methodology or final resting place. Every single substantive DSEIR biological mitigation measure constitutes deferred mitigation. The feasibility of these biological mitigation measures and the timely availability of adequate mitigation lands is not at all demonstrated. The DSEIR provides no specific justification or analysis of how nebulous deferred mitigation would offset the loss of an entire remote watershed that is significantly enhanced ecologically by its 2.5-mile-long adjacency to the year-round, development-free water source of Castaic Lake.

The DSEIR is deficient for its total absence of recognition of how the subject property's adjacency to the protected public land around a year-round water lake significantly increases its per-acre habitat value. The DSEIR is further deficient for not addressing how the proposed preservation of offsite lands for multiple mitigation measures does not factor in the increased per-acre ecological value of Grasshopper Canyon lands because of their adjacency to protected land next to a 2.5-mile-long perennial water source. The County could factor that in but it must be disclosed in the DSEIR.

The proposed project would only result in 167 acres of open space that was not graded. The DSEIR is deficient for not disclosing that those 167 acres would be fragmented into approximately a dozen remnant pieces and that one third of the 167 acres would have to be cleared annually for mandatory brush clearance. The DSEIR does not address permanent onsite land protection measures, ownership, or stewardship. The DSEIR alternative project to only build Phase One on 720 acres makes no mention of permanent protection of the Phase Two area.

Where is the public benefit in this proposed project or any of its DSEIR alternative projects? They all eliminate a watershed, ruin an Interstate viewshed, degrade a State Recreation Area, require relocating a major oil pipeline onto State Park property, emit greenhouse gases from tens of millions of cubic yards of grading, and eliminate wildlife access to one of only two wildlife crossings under southbound I5 for a distance of 10 miles between

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Castaic Creek and Templin Highway. How can Los Angeles County consider a statement of overriding considerations for a project so injurious to regionally significant public resources? Why would the Los Angeles County Sanitation District or Consolidated Sewer Maintenance District approve annexation of any large scale subdivision of this property? Why would Los Angeles County permit a major project access road, extensive grading in the I5 viewshed, and new utilities through its land adjacent to the Ridge Route? Such allowances may constitute a gift of public funds.

The DSEIR contains an inadequate range of alternative projects to avoid significant biological and visual impacts. Even the loss of a minimum of 720 acres of any habitat types from the Phase One project alternative would result in unavoidable significant adverse biological impacts. The DSEIR is deficient in stating that the project would not require a statement of overriding considerations for biological impact, including for the DSEIR's environmentally superior alternative which is just the Phase One project.

The Draft Supplemental Environmental Impact Report makes extensive reference back to both the 1992 Specific Plan Environmental Impact Report and the NorthLake Specific Plan. Any reliance on 1992 impact analyses and guidelines derived from such analyses cannot be valid anymore. For example the DSEIR just passes over any potential significant adverse ecological or night sky impacts from lighting up a 3.5-mile-long canyon and a 2.5-mile-long section of the Ridge Route based on the fact that all lighting would conform to lighting design guidelines set forth in the NorthLake Specific Plan. That reliance on the 1992 analysis for a poorly defined 2017 project makes the DSEIR further deficient. Because the proposed open space is fragmented into so many pieces, virtually no land in the project boundary would not be partially illuminated.

The DSEIR is totally deficient in multiple ways because it does not define the footprint for the proposed relocation of the major oil pipeline onto State Park and Department of Water and Power land. The relocation of the pipeline is an essential part of both the proposed project and every development alternative. Not only do the public and decision makers need to see where that pipeline would go, they need to know what its construction and lifetime maintenance impacts would be. The project description is thus also deficient. Most likely the State would also have to do a CEQA review for permanent damage and threat to State parkland and the water supply of southern California from potential oil spills.

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The range of project alternatives is deficient because it lacks a project that does not require less than 15 million cubic yards of grading. Any project requiring 15 million cubic yards of grading and the loss of ten acres of wetlands in the wildlands of California next to State Park land and BLM land and located within one of the fifteen most imperiled habitat linkages in southern California defined in the 2000 South Coast Wildlands Missing Linkages Study cannot avoid regionally significant biological impacts. Just because a specific plan was approved in 1992 does not exempt the current land owner from 2017 conditions and information. The DSEIR shall remain deficient until it includes a feasible development alternative with less than 7 million cubic yards of grading and less than five acres of wetland habitat impact. The DSEIR is deficient for skirting this issue by determining that its dismissed Creek Avoidance Alternative was not feasible. The DSEIR states that that alternative is not feasible only because it would eliminate over half of the residential units and other uses. The DSEIR makes no mention of what entitles the project to more than half of the proposed residential uses. The DSEIR could have included an alternative with much more than half of the proposed residential units that partially filled the primary Grasshopper Canyon stream. That alternative would have greatly avoided biological impacts while also provide far more than half of the proposed residential units. Furthermore, the Project Objectives are so broad that this Conservancy-recommend DSEIR alternative for analysis could easily meet all of the project objectives.

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 Conservancy's 2015 Notice of Preparation letter contains more extensive detail on this subject that was wholly dismissed from consideration in the DSEIR. 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.

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The DSEIR mentions that there is a tunnel under the southbound I5 lanes just across Ridge Road from the project. The DSEIR is deficient for not showing the relationship of this underpass to the project. The DSEIR is further deficient for not showing the relationship of both a second underpass under I5 to the north and the potential cross-I5 connectivity of the Violin Canyon flood control channel that enters the property and leads into a natural section of Castaic Creek. The attached figure shows the locations of these underpasses and related underpasses that go under the more westerly I5 lanes and the potential animal travel paths between existing protected public lands.

All of the subject underpasses are included within the linkage boundary shown in the South Coast Wildlands' "*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. The DSEIR is deficient for not addressing the importance of this study. The DSEIR is deficient for concluding that the habitat that connects to the two I5 tunnels directly west of the project is not important for cross-I5 connectivity because traveling around the north end Castaic Lake is too tough and out of the way for animals.

In 2016 the Mountains Recreation and Conservation Authority (MRCA) acquired the land between the Ridge Road and one of the subject tunnels. The property coordinates are 34°31'59.20"N and 118°38'40.33"W. The current APN is 3247-017-902 for the 7.2-acre parcel. The parcel was specifically acquired to protect wildlife connectivity to the tunnel. The proposed project would severely block habitat connectivity to both tunnels and severely degraded conditions for animals to reach the tunnels via proposed improvements to the Ridge Road and primary access road to the proposed development alternatives.

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,

IRMA MUÑOZ
Chairperson