

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

SMMC

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April 17, 2018

Regional Planning Commission
Department of Regional Planning
Los Angeles County Hall of Records, Room 1348
320 w. Temple Stree
Los Angeles, California 90012

Via Electronic Mail

North Lake Project
Final Supplemental Environmental Impact Report Comments
R2015-00408-(5) - SCH No. 2015031080 - VTT No. TR 073336

Dear Planning Commissioners:

The Santa Monica Mountains Conservancy (Conservancy) urges the Regional Planning Commission at a minimum to not certify the Final Supplemental Environmental Impact Report and require a re-circulation to address major deficiencies in the record including an inadequate range of alternatives. More decisively we urge the Commission to deny the North Lake project for the following ubiquitous and compelling reasons.

The huge myth and erroneous smoke screen that staff and the developer are putting before your Commission is that the 1992 North Lake Specific Plan guarantees the developer substantial immutable development rights. That Plan is a devastating early 1990's dinosaur document that does not have the foundation of a Environmental Impact Report representing either current physical conditions and standards beneath it. For all intents and purposes, this project is starting at close to square one in regards to environmental review. There is an attempt to lure the Commission into myopically believing differently and thus force perhaps the most ill suited land use in the County's history -- a land use that provides no general public benefit (except for tract residents) and heaps of permanent public detriment for the whole County. The Commission must, and legally can, look at this property as a fresh slate in regards to environmental review and thus project design. The developer common cry that, "We made it better than the prior project" does nothing to substantively solve huge unmitigable environmental issues with the project.

The FSEIR was intentionally crafted to exclude any Alternative projects for your consideration that provide even a slightly better public outcome on everything from traffic to degradation of public lands to regional wildlife habitat connectivity. That is an insult and

slight to the Commission and the people of Los Angeles County. The project grading footprint of every FSEIR alternative is the same with tens of millions of cubic yards of earth filling Grasshopper Canyon and scraping its walls bare. What fallacy that the project would not be blatantly visible with a fully improved miles of street-lit Ridge Route, a ridgeline commercial complex, and over a thousand dwelling units and street lights glowing above the Santa Clarita Valley surrounded by natural darkness.

Only a misguided decision-making body would approve a project that unnecessarily extends suburban residential development over three miles into an area jacketed by public National Forest lands, Bureau of Land Management property, and high public visitation-State-owned-Castaic Lake Recreation Area. Through what mechanism is the County providing its now public land to facilitate this development? Is the developer paying the County?

Nobody would benefit from this project in either the short or long run other than the developer and maybe the few vocal small businesses at the base of the grade. Do you destroy a whole remote canyon next to a cherished recreation area and exacerbate an existing traffic nightmare just to benefit future totally unknown homeowners in area that has a glut of approved unbuilt development? Luxury housing available at best three years from now at the maximum possible distance from the City of Los Angeles does not address address home afford ability.

Only a poorly informed decision-making body would fall into the trap of burying 3.5 miles of blueline stream that flow into Castaic Lagoon used for swimming to create expensive housing in the Santa Clarita Valley where there are tens of thousands of unbuilt approved housing units.

There is no combined set of needs for this project that outweigh the massive amount of unmitigated adverse environmental impacts. The benefits in the Statement of Overriding Considerations (SOC) are all unsupported with data or common sense. However, the regionally significant project detriments are patently clear in every arena of environmental impact.

The County published a April 5, 2018 Supplemental Memo that disclosed that revisions to the Project were made which removed virtually all of the proposed commercial and industrial uses in favor of more dwelling units. Such revisions effect various EIR technical analyses that now do not reflect this project revision. In addition, a project description cannot be changed after a DSEIR has be circulated. The SOC claims that the project will provide for (now non-existent) industrial uses. Those claimed economic benefits no longer exist even on paper.

The applicant made an attempt to show east-west wildlife connectivity through the project connected to the two adjacent vehicle tunnels under southbound Interstate 5. Tunnel 2 in the FSEIR appendices is flanked on both sides by parkland owned by the Mountains Recreation and Conservation Authority and paid for by the owner of over one hundred acres between the south and north bound I5 lanes. Given the paucity of undercrossings for animals under the I5 from Violin Canyon to Templin Highway, no under-crossing can be dismissed as valuable to cross-freeway wildlife movement. The FSEIR fails to include a viable habitat linkage option from Tunnel 2 to protected public lands without a minimum 6,000 foot journey around either end of the proposed project. Animals can navigate 60 percent slopes for considerable lengths. The applicant dismisses the ability of animals to enter the North Lake property approximately east of Tunnel 2 because of steep terrain. The FSEIR shall remain deficient until a detailed slope study shows the terrain viability for animals to move from Tunnel 2 over the Grasshopper Canyon watershed divide to the bottom of Grasshopper Canyon. The FSEIR shall remain deficient until includes an Alternative that provides a protected direct east-west habitat linkage between Tunnel 2 and Castaic Lake Recreation Area public lands. No non-North Lake private lands can break this linkage.

The applicant will tout the value of Tunnel 3 as a superior habitat linkage. However, both sides of Tunnel 3 have multiple non-North Lake private parcels that could easily be blocked by fencing and diminish the efficacy of the tunnel. A paint ball facility is also in the way.

The FSEIR is deficient for not addressing how improvements to Ridge Route and added traffic would diminish wildlife potential to safely cross Ridge Route. The FSEIR is deficient for not addressing how a 3.5-mile-long development next to Castaic Lake Recreation Area could adversely affect human intolerant wildlife species on the land between the lake and the development.

Letters in record from the Center for Biological Diversity and the California Department of Fish and Wildlife address a plethora of FSEIR deficiencies that are herein incorporated by reference.

The FSEIR totally fails to make the case that a much less damaging project is infeasible. The project design does not avoid any environmental resources. The project does not cluster any development to create ecologically viable blocks of open space. The minimum basic unwritten standard for open space dedications of County projects is a minimum 50 percent open space dedication. This project does not even come close to that standard.

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The FSEIR is deficient for not addressing why the Creek Avoidance Alternative would require exporting a minimum 10 million cubic yards of earth. Where is the demonstrated proof? The FSEIR partially rules out a creek avoidance alternative because it will require three bridges. Since when does the need for three bridges rule out the viability of a project with over 1,000 housing units? These stark omissions show the weakness of the FSEIR Alternatives selection.

The entire proposed development project footprint collects pollutants, concentrates them in artificial ponds, and then releases them into the Castaic Lagoon swimming area. How is this a public benefit? It is a huge permanent public safety threat.

The FSEIR is deficient for not addressing new standards for debris flow generated by the recent catastrophic debris flows in Montecito. The Tract Map cannot be approved because of this public safety issue. The County will develop new standards for silt and debris flow from offsite upstream properties perhaps ridgeline to ridgeline. The FSEIR does not taken into account potential additional debris flow from the "Montecito Effect."

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN
Deputy Director
Natural Resources and Planning