

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,

A handwritten signature in black ink that reads "Linda Parks". The signature is written in a cursive, flowing style.

LINDA PARKS
Chairperson

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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
Los Angeles, California 90012

**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

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September 24, 2018

Hon. Board of Supervisors
Los Angeles County
800 W. Temple Street
Los Angeles, California 90012

**Request to Grant Santa Monica Mountains Conservancy Appeal
North Lake Project (SCH No. 2015031080)**

Honorable Supervisors:

The Santa Monica Mountains Conservancy joins a united front with two other State agencies (California Department of Fish and Wildlife) (State Parks) with deep concerns about the proposed suburban sprawl of the North Lake project adjacent to State parkland. The project would be a significant and permanent detriment to the residents of the Santa Clarita Valley, to users of Castaic Lake State Recreation Area, to Interstate 5 commuters in both directions, to an iconic regional I5 viewshed abutting the Angeles National Forest, to the National Forest ecosystem, to the *South Coast Missing Linkages - Sierra Madre - Castaic Connection*, and to the Santa Clara River watershed.

As laid out, the project is one hundred percent dependent on the provision of 36 acres of County fee simple land (now in open space) (APN 3247-017-900) for project infrastructure and even a private commercial pad to be built on top of a filled blueline streambed. The County has no obligation to provide land to this or any developer and should not do so until the project has no unmitigated significant impacts and does include public benefits for all County residents, as opposed to just benefitting future residents of the new development. As proposed, the scant undisturbed natural open space would be owned and managed by homeowners associations – a set up that is not a good prescription to welcome non-tract-residents.

The County badly needs additional housing, but the wholly unnecessary mass grading of streams and mountains that are part of the Public Domain to create mostly low density, high-cost single-family residences is entirely antithetical to modern planning thought, the public good, and to science. Instead, the project's outer perimeter footprint should be reduced in half while still providing the same number of living units in a more dense layout. Only then would there be a meaningful open space contribution and a quantitatively

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significant direct contribution to the affordable housing crisis. The Phase 1 Development alternative in the Final Supplemental Environmental Impact Report (FSEIR) analyzes this exact project footprint. By definition, EIR alternatives must be feasible so the County could limit its approval to this FSEIR alternative project. In addition, page 6-27 of the FSEIR confirms that the Phase 1 Development alternative meets all of the Project Objectives. The County must approve this FSEIR designated environmentally superior alternative that limits all development to Phase 1 before the proposed project because it so demonstrably reduces significant impacts. The blind rush to create more housing is not at all supported by any alternative that includes Phase 2. A Phase 2 tentative tract map is not even part of the subject approval. Any housing from Phase 2 cannot be available in less than five to six years at best even under the current favorable economic conditions. Litigation may push any housing in any project phase out even further and approval of a project that includes Phase 2 most likely would lengthen any litigation process and further delay the construction of any housing.

Remember, this project is impossible to build without the provision of 36 acres of current County-owned open space property. The County can thus demand the project footprint and housing mix it desires. The FSEIR fails to adequately address either the County's compensation and rationale for providing land vital to a huge development fraught with unmitigable adverse environmental impacts. Is this sprawling, traffic clogging project really the project that Santa Clarita Valley residents want? Only a few residents and a handful of local businesses have expressed any support. A smaller footprint - high density development will dramatically reduce environmental impacts while providing the housing and both the local and broader economic engines desired by project proponents.

The Conservancy's April 2018 letter asserts that the 1992 North Lake Specific Plan does not guarantee the applicant any substantial immutable property rights. Our assertion is clearly not refuted in the Board Letters' response to the Conservancy's project appeal. The staff report just states the Specific Plan is "an appropriate baseline for comparison." The model for comparison should not be an antiquated document. The model should be a project that maximizes the avoidance and reduction of adverse impacts and follows the science and recommendations made by California Department of Fish and Wildlife scientists. The two County biologists are not on record concluding that project will not result in multiple unavoidable significant adverse biological impacts.

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The Board of Supervisor's should not be – and legally need not be-- beholden to the 1992 Specific Plan that is a prescription for the wholesale alteration of an entire watershed – that sends polluted runoff from up to 3,150 residential units, schools, businesses, and associated streets into Castaic Lagoon a public water body. The operative document is now the Final Supplemental Environmental Impact Report (FSEIR) and that document concludes that the Phase 1 Development Alternative is environmentally superior, meets all of the Project Objectives, and is feasible.

The County is not bound to approve a project consistent with the Specific Plan if it is immensely detrimental to the environment, and not to mention again, relies on the corporate welfare provision of 36 acres of County property to get off the ground. The somewhat recent buyer of the property had to be aware that the provision of County-owned property for private purposes is essential to construct the proposed project.

The Conservancy urges the Board of Supervisors to grant the Conservancy's appeal and not certify the Final Supplemental Environmental Impact Report. If the Board wants to maximize new housing units and substantially reduce environmental impacts, the project could be sent back to the Regional Planning Commission to develop such a more progressive, science-based project alternative based in the Phase 1 footprint.

If the Board does certify the Final Supplemental Environmental Impact Report (FSEIR), the Conservancy urges it to grant our appeal, in part, and limit any project approval to the Phase 1 Development Alternative– which is the environmentally superior alternative in the FSEIR and which meets all of the Project Objectives (page 6-27). In such case Phase 2 would become permanent open space via an FSEIR mitigation measure.

The County has no legal obligation to approve a project that extends suburban sprawl three miles into the Angeles National Forest and forever ruins one of the most widely viewed green belts in the State (I5 corridor). Some of the project may be tucked away from public views, but the new expanded, street lit Ridge Route and the lighting of up to 3,150 residential units will stick out like a sore thumb in the middle of a regionally significant confluence of State and Federal open space parklands. Essentially the protections against dark sky and other adverse light impacts rest wholly on lighting design guidelines set forth in the 1992 Specific Plan. Without any meaningful analysis, the FSEIR (page 7-3) thus concludes the potential lighting impacts would be less than significant.

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The Board can do a far better job ensuring a project footprint that does not give away public County property, a gift that indisputably facilitates a project that diminishes the visual, ecological, and watershed values of thousands of acres of existing public parkland and viewshed. The proposed project would also unavoidably expand the boundary of the wildland urban fire interface - an action that the fires of 2017-2018 have shown to be permanently detrimental to public resources and government budgets.

County residents deserve a smaller project footprint without the need to sacrifice the number of residential units via an increase in density. The Specific Plan can be amended as necessary. If the developer does not want to accept an environmentally superior project, then as long as the FSEIR concludes there are unmitigated significant adverse environmental impacts, and the project relies on the use of County property, the County has full rights not to adopt a statement of overriding considerations and to withdraw its public property from private beneficial use.

One additional concern is the actual physical availability of sage scrub habitats for the developer to acquire for FSEIR required off site mitigation. The Conservancy in partnership with the Mountains Recreation and Conservation Authority (MRCA) has been a long time integral player in both the land preservation part of compensatory mitigation and the provision of third party conservation easements over said mitigation lands.

Discussions with private partners in the mitigation provision business reveal that the Hathaway Ranch (often called Temescal Ranch) in the Piru Creek watershed is the only location where approximately 1,250 acres of eligible sage scrub plant communities can be acquired. Those sources have stated that the amount of sage scrub community-covered land that would be required for the North Lake developer to acquire offsite cannot physically be assembled elsewhere based on overall habitat scarcity in the watershed. Said sources have also said that different development and mitigation bank entities are competing to acquire Hathaway Ranch. If Hathaway Ranch is acquired for mitigation purposes not associated with the North Lake project, the North Lake project could well not be able to provide the County- required off site habitat preservation mitigation in FSEIR.

The FSEIR is deficient for not addressing this reasonable potential for the applicant to be unable to perform on clearly specified acreage of off site habitat preservation. If the project is delayed for even five to six years, the availability of other key offsite habitat types may also be compromised. This habitat scarcity issue in the watershed, calls into question the

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adequacy of the deferred habitat replacement mitigation. Unless the required off site habitat is permanently protected prior to any onsite grading activities occurring, then that particular habitat must not be allowed to be disturbed.

Please direct all questions and correspondence Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by email at edelman@smmc.ca.gov.

Sincerely,

Original signed by

CRAIG SAP
Chairperson

SANTA MONICA MOUNTAINS CONSERVANCY

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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