STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, *Governor*

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SMMC
ATTACHMENT 4
12/02/08
ITEM 17

December 23, 2002

OLD SMMC LETTER

County of Los Angeles
Department of Regional Planning
Attn: Mark Herwick,
320 West Temple Street
Los Angeles, California 90012

Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

Dear Mr. Herwick:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). The majority of the comments in this letter focus on the Significant Ecological Area (SEA) boundaries proposed in the document. (Because no additional information was provided in the NOP regarding management practices for these SEAs, we do not provide additional comments at this time regarding these.) This letter reiterates many of the comments provided by the Conservancy to Los Angeles County (County) on the Los Angeles County Significant Ecological Area Update Study 2000 documents (PCR *et al.* 2000a, 2000b) in a letter dated April 30, 2001 (enclosed).

The General Plan update effort includes the following (IS, pp. 1-2):

- Revisions to growth policies by updating population and housing projections for a new plan horizon year of 2025;
- Revisions to SEA boundaries and related policies, standards, and procedures;
- Technical conversion of land use policy maps to a digital format and realignment of boundaries to reflect assessor parcel boundaries;
- Revisions to transportation policy maps and highway plan;
- Revisions to Conservation and Open Space Element to reflect major changes in laws and current planning practices related to watershed planning and abatement of pollution from storm water runoff; and
- Revisions to boundaries of area and community plans to reflect recent city incorporations.

Full Support for Specific SEA expansions and Some General Plan Objectives

The Conservancy continues to commend the County and the consultant team on the excellent work done for the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy continues to support the proposal to expand several existing SEAs, and to create the proposed Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara, and the East San Gabriel Valley SEAs. We support the additional expansion of the proposed SEAs since the SEA Update Study 2000, including a portion of the San Andreas Rift Zone SEA (in the northwest part of the County), and an area in the Castaic area near the Santa Clara River SEA (contiguous and south of the Angeles National Forest, bordered on the west by the Ventura-Los Angeles County line, and on the east by Interstate-5 [I-5]). (Please note that we look forward to providing additional comments when maps with a better scale are provided for public comments.)

The Conservancy also supports several project objectives identified in the IS, including "[p]reserve critical lands, including....strategic open lands" (IS, p. 3), and

> "[p]rotect the National Forests and Santa Monica Mountains National Recreation Area for their significant natural communities, wildlife corridors, water recharge areas, and recreational opportunities..." (IS, p. 4).

Maximum Inclusion of SEAs in Incorporated Areas

The Conservancy's April 30, 2001 letter recommends that the County analyze areas of existing SEAs in within City jurisdictions in the geographic limits of the County because some cities recognize the importance of SEAs in their General Plans, Zoning Ordinances, and special protective guidelines. To this end, the Conservancy supports the inclusion of the Verdugo Mountains and Tujunga Valley/Hansen Dam existing SEAs, as well as Griffith Park SEA, in the proposed SEAs (as shown on Figure 4 of the IS). These SEAs were not included in the SEA Update Study 2000. The Conservancy continues to recommend that because Ballona Creek will be studied later by a team comprised of County and City of Los Angeles appointees, a mechanism should be in place to include it later as an SEA.

Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy appreciates the County's efforts to partially incorporate the recommendations from the Conservancy's April 30, 2001 letter to expand the Santa Susana

Mountains/Simi Hills SEA proposed in the November 2000 Update Study to include two additional areas (identified as Area A and Area B in our April 30, 2001 letter), and portions of the triangle of land north of the State Route (SR) 14 and I-5 intersection. However, we offer four main comments to fine-tune the boundaries of this SEA.

First, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area A (see April 30, 2001 letter), effectively including Browns and Mormon Canyon. Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. Although the exact location of the proposed SEA boundary in this area is difficult to determine based on the scale of Figure 4, it appears that only part, or only the west side, of Mormon Canyon is proposed to be included in this SEA. All but a short section of Mormon Canyon is undeveloped, contributing to the ecological value of this canyon. Mormon Canyon is part of the Santa Susana Mountains ecosystem, and there appears to be no justification why half of the canyon would be cut out of this SEA. The entire canyon, including both sides of the canyon, and appropriate buffer (as shown in our proposed Area A) must be included in this SEA.

Second, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area B (see April 30, 2001 letter). The SEA should include all of the undeveloped area south of Pico Canyon, to the Old Road, up to the SEA boundary proposed in the IS. This area is ecologically important due to the presence of core wildlife habitat and high quality oak woodlands.

Third, we recommend that Santa Susana Mountains/Simi Hills SEA (or the expanded adjacent Santa Clara River SEA) be further expanded to include a critical area of the triangular habitat area north of the intersection of the north of the SR 14 and I-5 intersection (see Area C on the enclosed figures). This area is identified as a "Missing Linkage"[1] and preservation of the biological function of this area is essential to maintain connectivity between San Gabriel Mountains and Santa Susana Mountains. This triangle of land also contains high quality oak woodland and big-cone douglas fir.

Fourth, Santa Susana Mountains/Simi Hills SEA boundary should reflect a connection between existing SEA 64 (west of, and adjacent to I5, including the Westridge Open Space), and the remainder of the Santa Susana Mountains/Simi Hills proposed SEA (see Area D on

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[1] "Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

the enclosed figures). These areas are currently ecologically connected, and there appears to be no biological justification to representing them as isolated areas. (In the November 2000 Update Study, the SEA boundaries reflected these areas as connected.) The Conservancy prefers to depict the connection partially through the existing private open space on the developed Stevenson Ranch property, and partially through the Stevenson Ranch Phase V property (not yet built).

Deletion of Pico Canyon Road from the Master Plan of Highways

The Conservancy and its Joint Powers Authority, the Mountains Recreation and Conservation Authority (MRCA), cooperatively own and manage the 4,000-acre Santa Clarita Woodlands Park. Pico Canyon Road terminates within the northern portion of this park at the historic oil town of Mentryville. The ultimate alignment and width of Pico Canyon Road will be the principal determinant of whether the canyon's remaining scenic qualities are preserved.

The Conservancy recommends that Pico Canyon Road be deleted from the County's Master Plan of Highways. This recommendation is consistent with the Newhall Ranch Specific Plan Environmental Impact Report (EIR), which recommended deleting Pico Canyon south of the Specific Plan Area from the County's Master Plan of Highways. In addition, the NOP for the Stevenson Ranch Phase V project anticipates Pico Canyon Road to be a two-lane road with only minor contributions to any future project circulation needs. The owners of Stevenson Ranch Phase V property and the Southern Oaks project (Tract No. 43896) are not in favor of any further extension of Pico Canyon Road at highway design standards. This well-defined lack of future need to build Pico Canyon Road at highway standards, in combination with the regionally significant scenic, recreational, hydrological, and ecological resources of the concerned portion of Pico Canyon, dictates the protection of these public resources. Pico Canyon Road should be downgraded from a highway to a collector street on the County's Master Plan of Highways.

Need for Policies to Protect Wildlife and Wildlife Movement With Respect to Roadways and Development

The General Plan should discuss the issue of compatibility of roadways with wildlife in the Circulation Element and the Conservation and Open Space Element. Some impacts to wildlife from roadways include impeding wildlife movement and increasing road kill. Policies to avoid, minimize, and mitigate impacts to wildlife during continued operation of existing roadways and construction of new and expanded roadways should be included in the General Plan.

The General Plan must show in detail where potential habitat linkages remain to connect large regional open space areas. They should receive a special wildlife corridor designation. The General Plan would be deficient without recognizing these connections.

Specifically the General Plan should address wildlife movement across SR-14, in the stretch of SR-14 between Santa Clarita and Palmdale, in light of any proposed infrastructure improvements or development projects along SR-14. This area has been identified as a "Missing Linkage"[1] because it affords the potential habitat connection between the two portions of the Angeles National Forest, or between the San Gabriel Mountains and the Sierra Pelona Range.

The above-described potential habitat connection across SR-14 connects to another potential habitat connection across I-5, also identified as a "Missing Linkage"[1]. The General Plan should address wildlife movement across this area of I-5, north of Castaic to the Los Angeles County/Kern County line. This area provides for a potential habitat connection between the Angeles National Forest and Los Padres National Forest. The General Plan should include the following information for this potential habitat connection along I-5: the extent of open space remaining along this linkage, the presence and condition of existing underpasses, strategic potential locations for new underpasses to maximize wildlife movement, and where existing publicly-owned open space lands could complement those existing and potential new underpasses. This information is necessary to adequately analyze the impacts from any proposed infrastructure improvements or development projects along I-5, which may result from the General Plan guidelines.

Scenic Highway Element

Per p. 15 of the document, the Scenic Highway Element will be rescinded and in its place, a scenic highway element will be added to the Circulation Element. This revision will eliminate most urban routes depicted in the adopted Scenic Highway Element, and will in turn focus on the scenic qualities present in rural routes (IS, p. 15). We look forward to reviewing which of these scenic highway designations will be eliminated.

Other Comments from Conservancy's April 30, 2001 Letter

The Conservancy continues to make the following comments consistent with its April 30, 2001 letter:

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[1] "Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

- Expand the Santa Monica Mountains SEA to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon;
- Expand the proposed San Gabriel Canyon SEA westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon, although the Conservancy notes that some small areas were added since the SEA Update Study 2000;
- Support Wildlife Corridor Conservation Authority's comments regarding the Puente Hills SEA;
- Apply a more comprehensive approach to designating the boundaries of the Santa Clara River SEA; and
- Consider including the Baldwin Hills as an SEA.

Thank you for the opportunity to comment on this document. We look forward to reviewing and commenting on the EIR. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

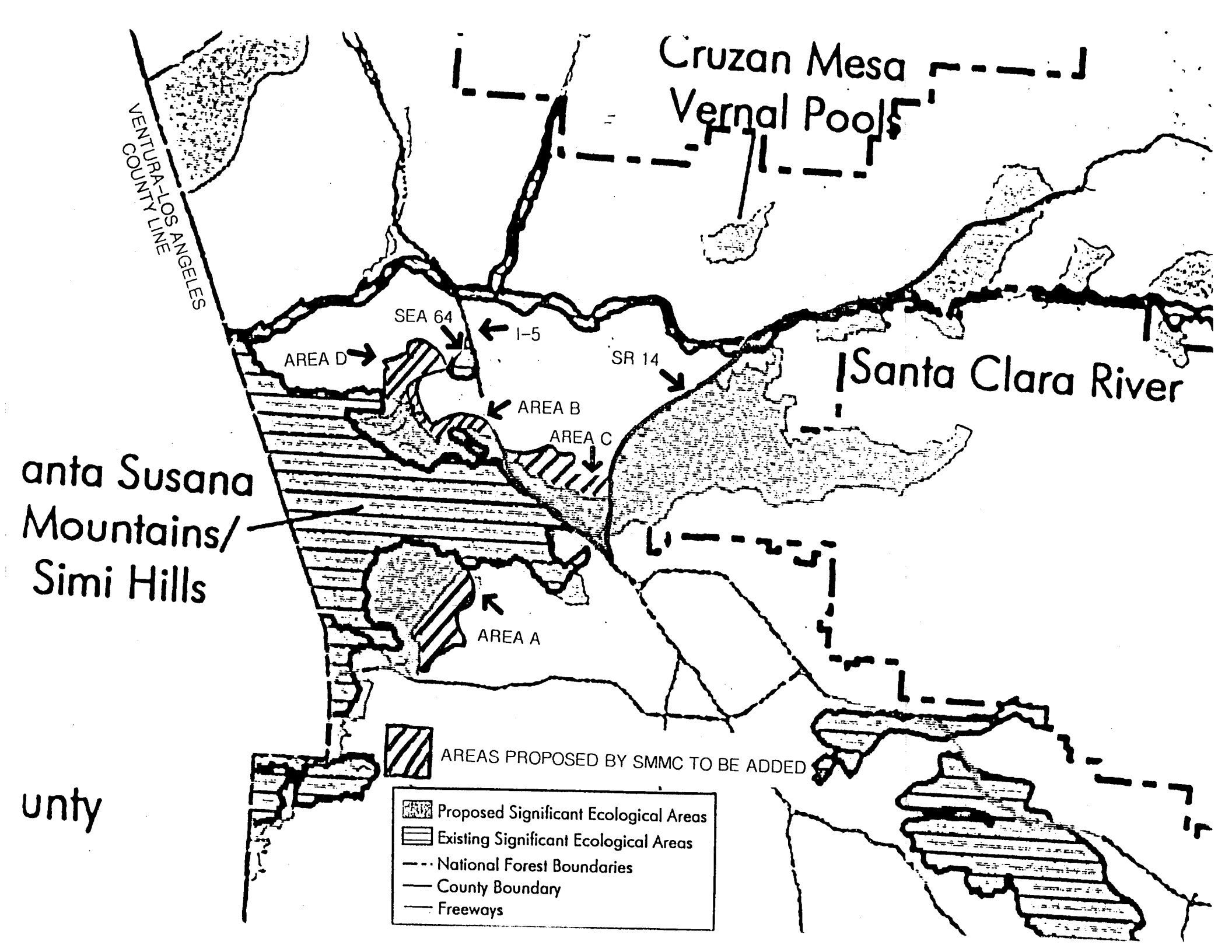
Sincerely,

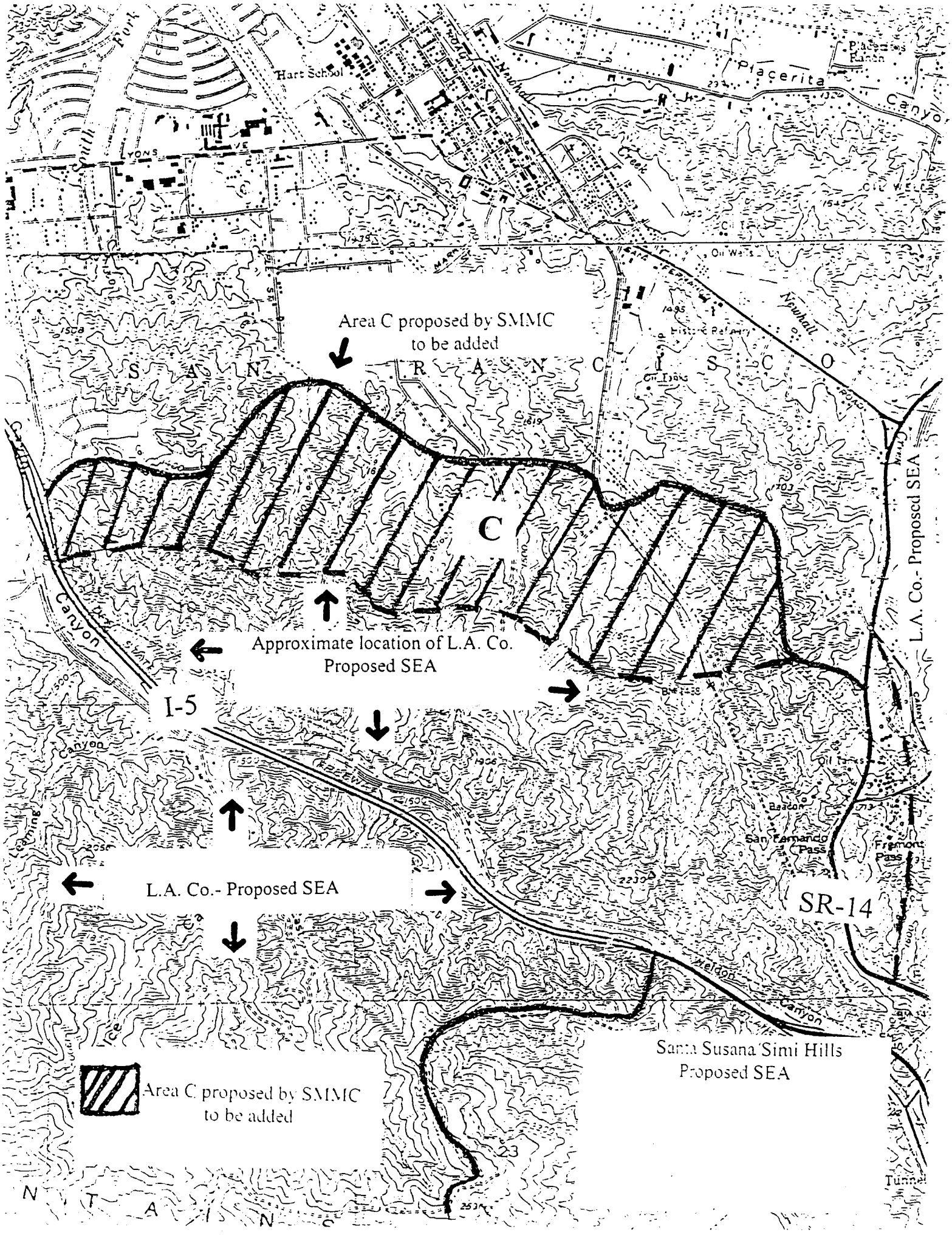
MICHAEL BERGER
Chairperson

Literature cited

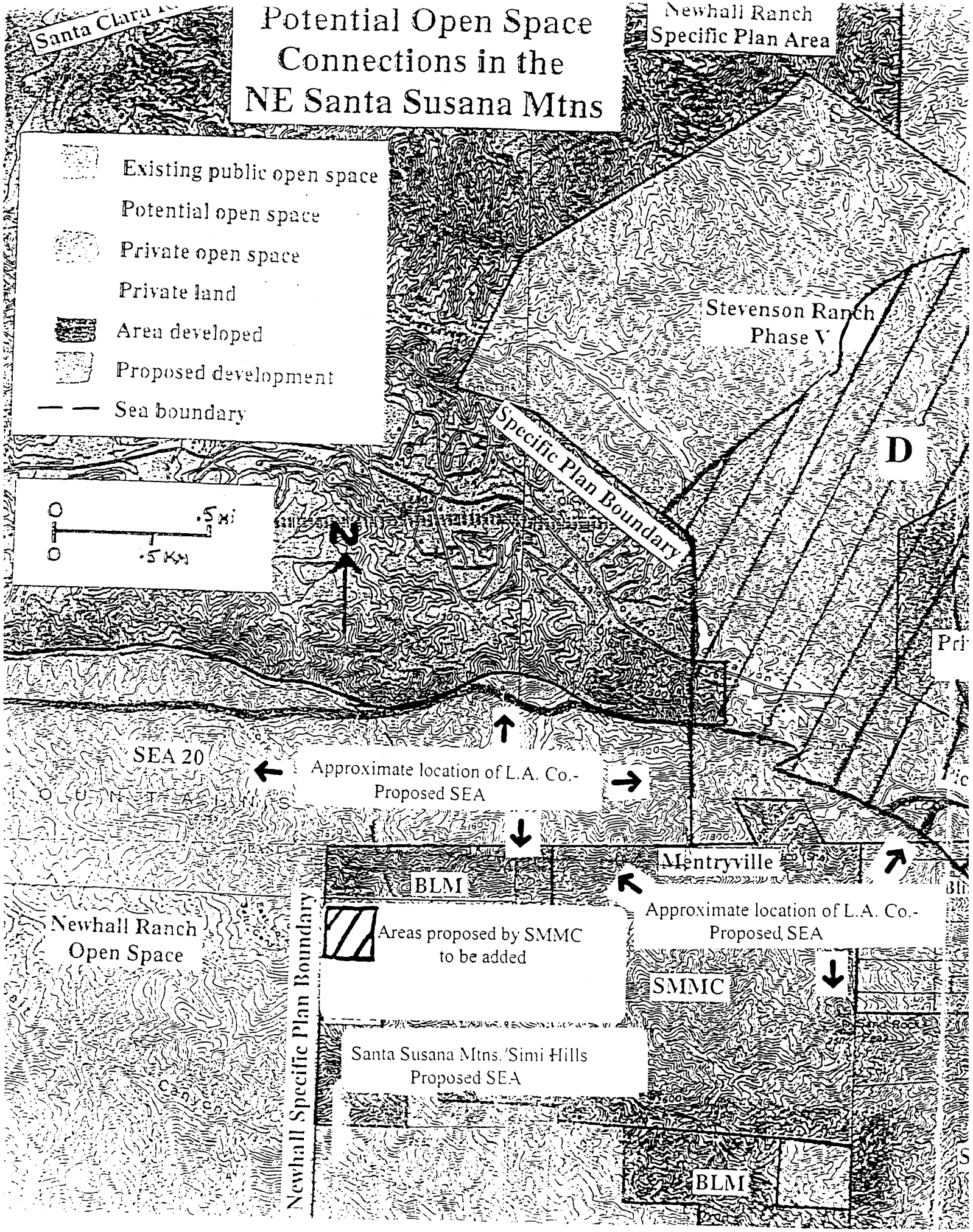
PCR Services Corporation (PCR), Frank Havore & Associates, and FORMA Systems. 2000a. Los Angeles County Significant Ecological Area Update Study 2000 Background Report. Prepared for Los Angeles County Department of Regional Planning. November.

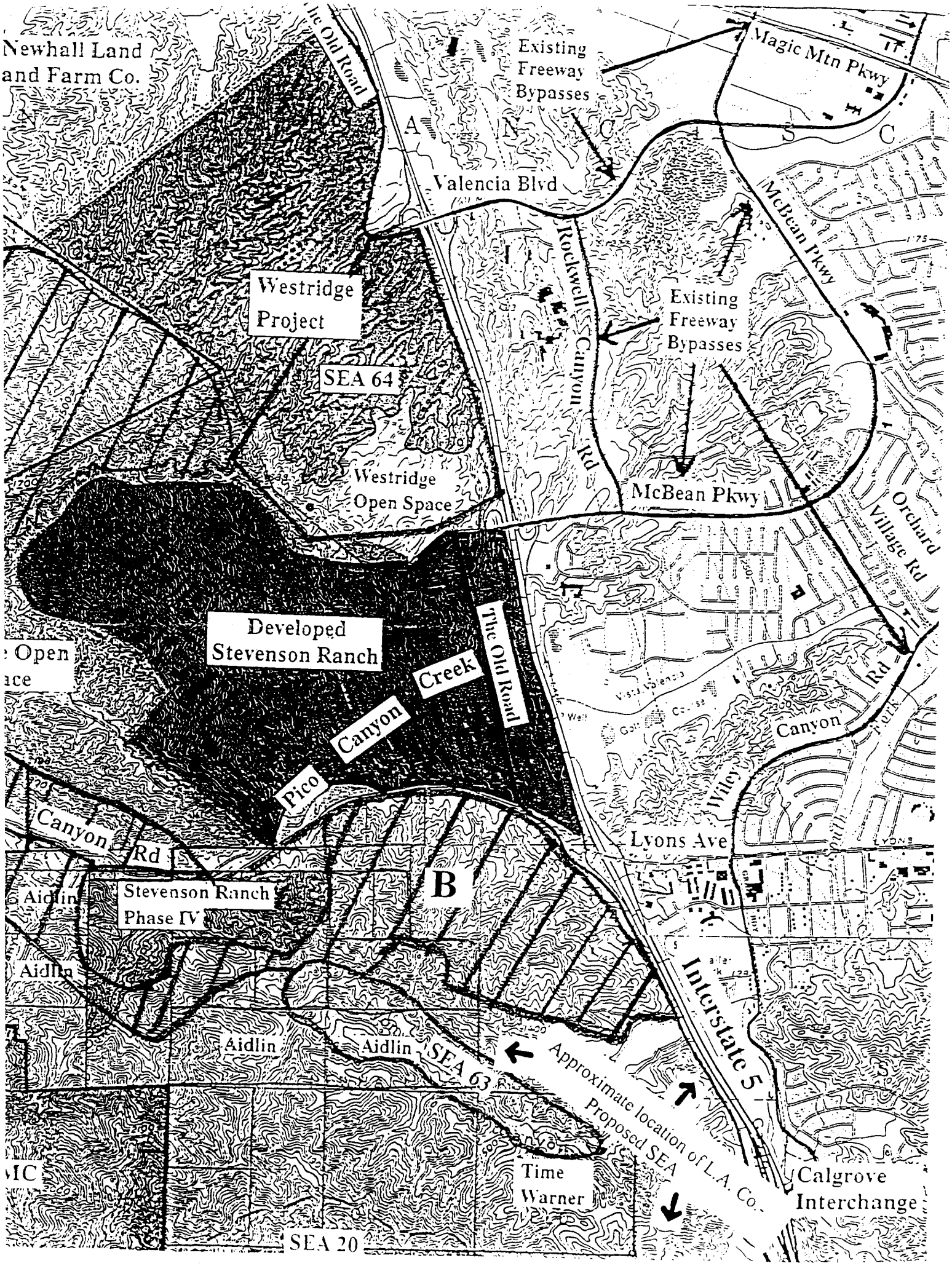
PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.


Cruzan Mesa
Vernal Pools
VENTURA-LOS ANGELES COUNTY LINE
SEA 64
I-5
AREA D
SR 14
Santa Clara River
AREA B
AREA C
anta Susana
Mountains/
Simi Hills
AREA A
unty
AREAS PROPOSED BY SMMC TO BE ADDED
Proposed Significant Ecological Areas
Existing Significant Ecological Areas
National Forest Boundaries
County Boundary
Freeways



Area C proposed by SMMC
to be added
C
Approximate location of L.A. Co.
Proposed SEA
I-5
L.A. Co.- Proposed SEA
L.A. Co.- Proposed SEA
SR-14
Santa Susana/Simi Hills
Proposed SEA
Area C proposed by SMMC
to be added
Hart School
Placerita
Canyon
Newhall
Creek
Oil Wells
Oil Tanks
Beacon
San Fernando Pass
Fremont Pass
Weldon
Canyon
Canyon
Canyon
Tunnel


Potential Open Space Connections in the NE Santa Susana Mtns
Santa Clara R
Newhall Ranch Specific Plan Area
Existing public open space
Potential open space
Private open space
Private land
Area developed
Proposed development
Sea boundary
Stevenson Ranch Phase V
Specific Plan Boundary
D
0 .5 mi
0 .5 Km
SEA 20
Approximate location of L.A. Co.- Proposed SEA
Mentryville
BLM
Approximate location of L.A. Co.- Proposed SEA
Newhall Ranch Open Space
Areas proposed by SMMC to be added
SMMC
Santa Susana Mtns./Simi Hills Proposed SEA
Newhall Specific Plan Boundary
BLM


Newhall Land
and Farm Co.
The Old Road
Existing
Freeway
Bypasses
Magic Mtn Pkwy
Valencia Blvd
McBean Pkwy
Rockwell Canyon Rd
Existing
Freeway
Bypasses
Westridge
Project
SEA 64
Westridge
Open Space
McBean Pkwy
Orchard Village Rd
Developed
Stevenson Ranch
The Old Road
Creek
Canyon
Pico
Canyon Rd
Stevenson Ranch
Phase IV
B
Lyons Ave
Interstate 5
Aidlin
Aidlin
Aidlin
Aidlin
SEA 63
Approximate location of L.A. Co.
Proposed SEA
Time
Warner
Calgrove
Interchange
SEA 20