

SANTA MONICA MOUNTAINS CONSERVANCY

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March 30, 2015

Mr. Kim Szalay
Special Projects Section
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, Room 1362
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**Comments on Notice of Preparation for Entrada North
Project No. R2013-02833**

Mr. Szalay:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the vicinity of the subject project. The Conservancy is greatly concerned with development along the Santa Clara River and potential habitat loss associated with the proposed project. We concur with the Notice of Preparation (NOP) that the potential impacts on biological resources are significant and recommend avoidance and mitigation commensurate with the amount of habitat loss.

The Santa Clara River is an important wildlife corridor. The proposed project is adjacent to and within to the Santa Clara River. Habitat nodes and buffers should be maintained along the river corridor to maintain the ecological function, particularly in narrower areas such as the location the proposed project.

The project proposes to construct over 7,000 linear feet of bank stabilization along the Santa Clara River. The banks of the Santa Clara River feature rich high quality sensitive habitat such as cottonwood-willow riparian forest, woodland, scrub, wetland and other riparian vegetation, all of which have been destroyed at an astonishing rate in the Santa Clara Valley and host a multitude of sensitive wildlife species. The figures in the NOP show that no efforts were made to reduce the significance level of impacts to biological resources. The DEIR must show an alternative that avoids riparian habitat and provides an adequate riparian buffer.

The Conservancy recommends that the project be limited to 250 feet from the edge of the Santa Clara River. Grading and improvements should be excluded from this 250-foot-

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buffer, while trails and native habitat restoration should be permitted. A fee title dedication should be required to be granted to an appropriate agency capable of managing land for resource protection such as Santa Clarita Watershed Recreation and Conservation Authority, or Mountains Recreation and Conservation Authority. Long-term open space management funding, in the form of a Community Facilities District, should also be required. This is necessary because this project site is located along many narrow points in the river. Such an open space configuration fully solves for both regional habitat connectivity along Santa Clara River. It would also not preclude passive recreation uses such as trails or landscaped stormwater infiltration depression.

Please direct any questions and all future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by phone at 310-589-3200, ext. 128.

Sincerely,

LINDA PARKS
Chairperson