

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



BY EMAIL ONLY

November 8, 2021

Governor's Office of Planning & Research

Nov 09 2021

STATE CLEARINGHOUSE

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, CA 90012
subdivisions@planning.lacounty.gov

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project, SCH # 2000011025, County of Los Angeles

Dear Mr. Sackett:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a draft Supplemental Environmental Impact Report (SEIR) by the County of Los Angeles (County) for the Entrada South and Valencia Commerce Center (VCC) Project (Project). The NOP's supporting documents included a Project Initial Study, Appendix IS-1, Appendix IS-2, and Appendix IS-3. CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is submitting comments as the trustee agency for the State's fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a), 1802; Pub. Resources Code, § 21070; Cal. Code Regs., tit. 14, § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect the State's fish and wildlife resources.

CDFW is also submitting comments as a potential responsible agency under CEQA (Pub. Resources Code, § 21069; Cal. Code Regs., tit. 14, § 15381) because the Project might require a permit from CDFW in the form of a streambed alteration agreement under Fish and Game Code section 1602 and/or of take authorization under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) and the Native Plant Protection Act (Fish & G. Code, § 1900 et seq.). CDFW expects the Project proponent to obtain appropriate authorization for the Project under the Fish and Game Code from CDFW.

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Project Description and Summary

Objective: The Entrada Planning Area consists of approximately 382 acres and the VCC Planning area consists of approximately 321 acres for a total of 703 acres. The NOP evaluates proposed development of the Project site, including 339 single-family residences; 1,235 multi-family residences; 730,000 square feet of commercial use; and a 9.4-acre elementary school. Facilities and infrastructure proposed as part of the Project include a network of roads and trails, drainage and water quality improvements.

In June 2017, CDFW, acting as lead agency, certified the final Environmental Impact Report (EIR) (SCH No. 2000011025) the County intends to supplement for the Project. The EIR evaluated the Newhall Ranch Resource Management and Development Plan and the Spineflower Conservation Plan (RMDP/SCP). The Project site is within the planning boundary of the RMDP/SCP and reflects changes and refinements to the planned development as compared to the EIR.

Entrada South

The Project as described in the SEIR plans to reduce the number of residential units from the EIR from 1,725 units to 1,574 units. This Project will also increase the non-residential square footage from 450,000 to 730,000 square feet. The Project also includes enhanced environmental protections by designating Unnamed Canyon 2 as open space. Unnamed Canyon 2 would be enhanced and restored with grade control structures and the addition of a storm drain connection.

VCC

The Project as described in the SEIR involves a reduction of permanent impacts to streams, vegetation communities, and the fish and wildlife resources in Hasley Creek and Castaic Creek. This reduction includes a development setback from Castaic Creek. The Project does not propose any new or additional buildout of the VCC Planning area beyond what was analyzed in the EIR.

Location: The Project site consists of undeveloped land within the Entrada and VCC Planning Areas analyzed in the EIR. More specifically, the Project is located within the northwest portion of Los Angeles County, west of I-5 and the City of Santa Clarita, on the north and south side of Magic Mountain Parkway, and south of Six Flags Magic Mountain theme park.

Comments and Recommendations

CDFW offers the following comments and recommendations below to assist the County in adequately identifying, avoiding, and mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. The SEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources. (Pub. Resources Code, § 21061; Cal. Code Regs., tit. 14, §§ 15003, subd. (i), 15151.) CDFW looks forward to commenting on the draft SEIR when it becomes available.

Specific Comments

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- 1) Jurisdictional Waters. The Initial Study acknowledges that the Project site includes multiple drainages including Hasley Creek, Castaic Creek, Magic Mountain Canyon tributary, and other unnamed drainages. Project activities would impact streams through activities including (but not limited to) fill of Magic Mountain Canyon tributary and other unnamed drainages, bank stabilization along Castaic Creek, and construction of creek crossings across an unnamed drainage and Hasley Creek, as shown in the Conceptual Land Use Plans on pages 20 and 22.

CDFW recognizes the Project proponent's efforts through the SEIR to significantly reduce impacts to streams and their associated fish and wildlife resources and enhance stream habitats where feasible. In addition, CDFW continues to coordinate closely with the Project proponent to further reduce impacts to Castaic Creek and other streams.

- a) Where development might occur near a stream but avoid impacts, the SEIR should provide a justification as to why a chosen setback distance of the proposed development would be effective to avoid impacts on streams and associated vegetation.
 - b) The SEIR should provide a stream delineation and analysis of impacts. CDFW recommends the SEIR discuss whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed.
 - c) CDFW requests a hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. Additionally, the hydrological evaluation should assess a range of sufficient flood event frequencies (such as the 100-, 50-, 25-, 10-, 5-, or 2-year frequency flood events) to evaluate existing and proposed conditions and erosion/scour potential. CDFW recommends the SEIR discuss the results and address avoidance, minimization, and mitigation measures that may be necessary to reduce potential significant impacts.
 - d) Stream crossings should be engineered and maintained in a manner that does not cause erosion or aggradation within the stream. Stream crossings should be engineered so that base flows for the watershed pass uninterrupted and the crossing structure withstands large storm events. CDFW recommends all stream crossings be designed in a manner consistent with the RMDP/SCP to minimize impacts to biological resources.
- 2) Analysis of Effects on Mountain Lion (*Puma concolor*). The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, unauthorized take of mountain lion in southern California is prohibited.

The Project area is within or adjacent to the Santa Susana Mountains where an evolutionarily significant unit of mountain lion in southern coastal California occurs (Riley 2014). Indirect impacts on mountain lion could result from habitat loss and increased human presence, traffic, noise, and artificial lighting. For example, as human population and

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communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Indirect impacts on mountain lion could also result from increased vehicle traffic and lighting, which could lead to increased wildlife injury or mortality from vehicle strikes and deter wildlife from using otherwise suitable habitat.

The EIR evaluated the Project's potential direct and indirect impacts to mountain lion and concluded impacts to mountain lion would be not significant including the required mitigation.

- a) Analysis and Disclosure: The SEIR should discuss the Project's potential impacts on mountain lion and habitat. Impacts on habitat include, but are not limited to, habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. Considering that mountain lion is now a candidate species, the SEIR should discuss how the Project may have direct and indirect impacts on mountain lion resulting from increased human presence, traffic, noise, and artificial lighting; edge effects including, but not limited to, introduction and invasion of non-native plant species into natural areas; attraction for wildlife with food or backyard conditions; predation and disease by domestic animals; and habitat fragmentation caused by volunteer trails. The SEIR should disclose how existing mitigation measures avoid potential direct take of mountain lion.

- 3) Fire. The Project proposes to decrease the development footprint in sites within a 'Very High' Fire Severity Zone (County of Los Angeles 2021) resulting more areas of urban/wildlife interface that may increase wildlife occurrences. Development in the wildland urban interface could increase fire frequency and intensity, thus impacting biological resources in adjacent undeveloped hillsides, open space, and wilderness. Moreover, fuel modification would need to occur in perpetuity as part of the Project. According to page 105 of the Initial Study, Mitigation Measure RMDP/SCP-PH-14 requires the development of a Wildfire Fuel Modification Plan. Fuel modification would result in additional, permanent habitat loss. CDFW recommends the SEIR discuss how the Project may impact open space/natural areas with respect to intensifying land use in areas that are highly susceptible to fire.

CDFW recommends the County consider additional measures in the SEIR to mitigate fire risk, frequency, and severity. CDFW also recommends the County include a discussion of how impacts to open space/natural habitats stemming from fuel modification are adequately mitigated.

- 4) Analysis of Effects on Wildlife. The Project's proposal to develop in the wildland urban interface could impact wildlife. Impacts could result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to wildlife injury or mortality. CDFW recommends the SEIR discuss whether the Project may have direct and indirect impacts on wildlife resulting from increased human presence, traffic, noise, and artificial lighting. An assessment of impacts on wildlife should also provide a discussion of edge effects, including, but not limited to, introduction and invasion of non-native plant species into natural areas; attraction for wildlife with food or backyard conditions; predation and disease by domestic animals; and habitat fragmentation caused by volunteer trails.

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- 5) Wildlife Movement. The Project proposes the construction of stream crossings which could impede wildlife movement between natural habitat areas/open space. Maintaining wildlife movement and habitat connectivity is essential for wildlife survival and is increasingly important considering habitat loss and climate change. CDFW recommends the SEIR evaluate the proposed stream crossings' suitability to allow wildlife movement where appropriate through the Project site. The SEIR should disclose what wildlife species (e.g., coyote, bobcat, mountain lion, and deer) would be able to utilize the open space affected by the constructed stream crossings.

Conclusion

We appreciate the opportunity to comment on the NOP for the Entrada South and Valencia Commerce Center Project to assist the County of Los Angeles in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Nicole Leatherman, Environmental Scientist, at Nicole.Leamer@wildlife.ca.gov or (858)-761-8020.

Sincerely,

DocuSigned by:


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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Erinn Wilson-Olgin – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang – Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis – Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Felicia Silva – Los Alamitos – Felicia.Silva@wildlife.ca.gov
Julisa Portugal – Los Alamitos – Julisa.Portugal@wildlife.ca.gov
Cindy Hailey – San Diego – Cindy.Hailey@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse - state.clearinghouse@opr.ca.gov

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