

SANTA MONICA MOUNTAINS CONSERVANCY

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March 25, 2024

Governor's Office of Planning & Research

April 16 2024

Planning Commission
City of Santa Clarita
23920 Valencia Boulevard, Suite 140
Santa Clarita, California 90012

STATE CLEARINGHOUSE

**Draft Environmental Impact Report Comments
Wiley Canyon Project Master Case 20-238
Tentative Tract Map No. 83295 – SCH No. 2022030626**

Dear Commissioners:

The Santa Monica Mountains Conservancy, a CEQA trustee agency, finds that the Draft Environmental Impact Report (DEIR) is fatally flawed because of a total lack of both onsite and local analysis of wildlife movement and habitat connectivity potential. The DEIR is further deficient for its absence of any tribal consultation.

In its August 15, 2022 Notice of Preparation comments, the Conservancy requested specific, detailed habitat connectivity analyses for two connections through the proposed project from habitat located west of Interstate 5 to a habitat block that abuts the east side of Wiley Canyon Road. The subject property includes a portion of that habitat block which contains a parcel owned by the Mountains Recreation and Conservation Authority (MRCA). The Conservancy's concerns and comments about habitat connectivity and the inclusion of DEIR alternatives to address the issues were totally dismissed in the DEIR.

The first unanalyzed habitat connection is under the freeway, by channel and culvert, via the south fork of the Santa Clara River to the above-described habitat block. The DEIR refers to the south fork as a regional wildlife corridor but totally dismisses/omits the portions of the south fork both within and adjacent to the project site as not being a wildlife corridor because its functional presence does not affect whether a habitat will become isolated and because it is not contained in the South Coast Missing Linkages Study. We beg to differ. Adequate connectivity to both much further northward open public lands via the south fork, and to the described habitat block, depends on how much development adversely affects the existing habitat in both the south fork and its immediate buffer lands.

The second unanalyzed habitat connection is via a culvert under the Old Road and freeway that carries Lyons Creek (from an MRCA property) to both the south fork of the

Santa Clara River, and via a short section dead end of freeway frontage road, to the north end of the subject Wiley Canyon Project. Both this north end of the project and the Lyon Creek channel provide considerable habitat connectivity for both a State-listed threatened mountain lion population and other medium-bodied native predator species. Please see the attached figure that illustrates these habitat connections that received zero DEIR analysis.

DEIR alternative 4, which leaves a 200-foot-wide open space buffer gap at the north end of the project property, solves both for a substantial level of habitat connectivity and for unmitigable noise impacts to the adjacent low-income community. The Conservancy agrees that this is the environmentally superior alternative. It also further buffers the transition area of the south fork where it goes from soft bottom to hard bottom. This alternative would create permanent public open space and significant acreage for ground water infiltration and ground water infiltration projects.

But no DEIR alternative maximizes the dimension and quality of the riparian habitat area where the south fork emerges from a culvert just east of the northbound Calgrove Boulevard onramp. That area is a wildlife receiving and sending area for use of the culvert to essentially cross between the Santa Susana and San Gabriel mountains.

Any project approval must permanently protect the portion of the project east of Wiley Canyon Road for both its habitat connectivity and viewshed value.

In conclusion, the project as proposed, would result in unavoidable significant adverse impacts to habitat connectivity between the Santa Susana and San Gabriel mountains across Interstate 5.

Please address any correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, of our staff at the above letterhead address or via edelman@smmc.ca.gov.

Sincerely

STEVE VERES
Chairperson