

SANTA MONICA MOUNTAINS CONSERVANCY

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October 17, 2022

Mr. Serge Stanich
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, California 95814



**Draft Project Environmental Impact Report/Environmental Impact
Statement for the Palmdale to Burbank Section of the
California High-Speed Rail (SCH 2014071074)**

Dear Mr. Stanich:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and requests for additional mitigation measures within the California High-Speed Rail Authority's (Authority) Draft Project Environmental Impact Report/Environmental Impact Statement (D-EIR/EIS) for the construction and operation of the Palmdale to Burbank Section of the High-Speed Rail (Project). Maps are attached for reference.

In general, the Conservancy supports the Project goals to improve multi-modal transportation options throughout California in a manner sensitive to, and protective of, California's unique natural resources. The transportation needs within the Project Area are primarily served by Interstate 5 (I-5), State Route 14 (SR-14), and the Union Pacific Railroad with service by Metrolink, BNSF Railway, and Amtrak, and the D-EIR/EIS recognizes the intercity transportation system between Palmdale and Burbank is insufficient to meet existing and future travel demands. If the SR14A Build Alternative—the Preferred Alternative for the proposed High-Speed Rail (HSR)—is selected, the following mitigation measures and recommendations must be included in the design to offset regional habitat fragmentation impacts from the proposed Project.

Mitigation Measure No. 1: Construct a new SR-14 wildlife undercrossing between the Spring Canyon Tract No. 48086-01 dedicated open space and City of Santa Clarita-owned Bee Canyon open space. This undercrossing should be a bored tunnel with a minimum 13-foot diameter and would not require any cut and over freeway traffic disruption. See Attachment D – SR14A Spring and Bee Canyons Map with proposed undercrossing location. Construction access to the east tunnel entrance area is excellent. The nexus for this additional mitigation measure follows below.

The SR14A Build Alternative proposes the HSR emerge from a tunnel in Bee Canyon approximately 1.33 miles northeast of Bee Creek's confluence with the Santa Clara River in Soledad Canyon. The HSR route then remains at grade for approximately 1.13 miles in Bee Canyon before spanning the Santa Clara River. The entirety of Bee Canyon and portions of Soledad Canyon containing the floodplain of the Santa Clara River are part of a Los Angeles County (County) designated Significant Ecological Area (SEA) serving as the primary east-west linkage between coastal habitats and desert-montane habitats. This section of the proposed Project Area is identified in the South Coast Missing Linkages (SCML) Project *San Gabriel – Castaic Connection* representing the least-cost corridor for several wildlife species to move between the Saugus (northern) and Tujunga (southern) units of the Angeles National Forest (ANF). The approximate 3.25-mile stretch of SR-14 between Stonecrest Road undercrossing and Agua Dulce Creek undercrossing comprises a significant regional-scale wildlife movement barrier. See Attachment A – SR14A Build Alternative Overview Map and Attachment B – SR14A Segment 2 and Vicinity Map for reference. Construction of additional, at-grade facilities like the HSR and appurtenant structures will further reduce wildlife permeability in this critical habitat linkage.

The *San Gabriel – Castaic Connection* identifies a fill slope supporting SR-14 for a new wildlife undercrossing structure to connect Spring Canyon (north of SR-14) with Bee Canyon (south of SR-14). The D-EIR/EIS Figure 3.7-25 (Mountain Lion Habitat within the Resource Study Area) indicates the recommended Spring Canyon – Bee Canyon wildlife crossing structure would directly support mountain lion Breeding and Foraging Habitat connectivity. The D-EIR/EIS Figure 3.7-48 (Wildlife Corridor Impermeability Map: SR14A Build Alternative) shows the proximity of the at-grade SR14A Segment 2 that contributes an additional 1.13 miles of impermeable wildlife barrier to this vital habitat corridor. The Conservancy recommends the Authority coordinate with the California Department of Transportation (Caltrans) to design and construct the recommended SR-14 undercrossing between Spring and Bee Canyons as part of the mitigation for new impacts to terrestrial wildlife movement related to at-grade HSR construction and operation and legacy impacts of SR-14.

Mitigation Measure No. 2: Minimize HSR bridge footings within the Santa Clara River floodplain.

As presented in the D-EIR/EIS, the SR14A Build Alternative would require spanning the Santa Clara River as this perennial stretch of river exits Soledad Canyon south of SR-14 to avoid affecting habitat for the unarmored threespine stickleback (UTS; *Gasterosteus aculeatus williamsoni*). UTS are a fully protected species under state law and under immense pressure from continued Santa Clara River floodplain development and climate

change impacts. Near this same location, ephemeral Bee Creek joins the Santa Clara River and is, per Figure 3.8-A-47 (SR14A Central Subsection (Center) Surface Water Callout), designated as Federal Emergency Management Agency (FEMA) Special Flood Hazard Area Zone A. The Conservancy recommends that bridge span design place footings as far as feasible from the Santa Clara River active channel and outside FEMA Zone A Special Flood Hazard Area to minimize construction and operational disturbances to this vital water resource and wildlife corridor. See Attachment D – SR14A Spring and Bee Canyons Map for the Bridge Footing Avoidance Zone.

In addition, the Conservancy is concerned about improvements to Lang Station Road—whether temporary improvements during construction or permanent improvements related to the planned Traction Power Facility—through the floodplain of the Santa Clara River and its associated SEA. All efforts should be made to elevate any roadway and HSR infrastructure out of the floodplain to reduce impacts to the SEA and increase infrastructure resilience to climate change impacts.

Mitigation Measure No. 3: Restrict construction activities within 30 feet of the Santa Clara River wetted channel.

Due to the sensitivity of UTS and UTS habitat within the Santa Clara River, the proposed BIO-MM#85 minimum setback of 10 feet from the Santa Clara River wetted channel is insufficient protection for UTS and UTS habitat. The Conservancy recommends a minimum buffer of 30 feet (or a buffer distance recommended by the California Department of Fish and Wildlife [CDFW]) from the river's wetted channel where no construction related activities would be allowed to prevent loss of cover habitat for aquatic species and to prevent fuel or fluid leaks from operated heavy equipment impacting UTS or UTS habitat during temporary and permanent bridge construction. Maintaining the recommended minimum 30-foot setback from the Santa Clara River wetted channel will also help BIO-MM#86, BIO-MM#87, BIO-MM#88, BIO-MM#89, and BIO-MM#90 achieve their stated goals.

Mitigation Measure No. 4: Elevate Soledad Canyon Road at the convergence of Bee Canyon and Soledad Canyon with new, large-dimension box culverts or arch spans for wildlife permeability and to restore prior hydrology potential.

During peak commute hours or off-peak hours with traffic delays on SR-14, many motorists use two-lane Soledad Canyon Road as an alternative route between Santa Clarita and Acton. While Soledad Canyon Road is a County-designated Scenic Highway, it often becomes a high-volume, high-speed thoroughfare for impatient commuters. As Soledad Canyon Road travels northeastward from its SR-14 interchange, it generally

parallels SR-14 and the Santa Clara River. Near its interchange with Stonecrest Road, Soledad Canyon Road begins an easterly descent onto a raised berm within the floodplain of the Santa Clara River and Bee Creek, FEMA Zone A Special Flood Hazard Area, before the road bends southward along an at-grade elevation above the floodplain. To mitigate for ever increasing traffic volume, the Project must include elevating an approximate 1,000-foot-long section of Soledad Canyon Road (see Attachment D – SR14A Spring and Bee Canyons Map) to complement the recommended SR-14 wildlife undercrossing between Spring and Bee Canyons immediately north of this section of roadway and *increase* wildlife permeability within the Santa Clara River SEA and between the ANF's Saugus and Tujunga units. Proper design and footing spacing will also improve roadway resiliency for flood impacts resulting from less frequent but more intense storm events consistent with current climate change models.

Recommendation No. 1: Buy out ungraded, undeveloped Spring Canyon Tract No. 48086-01 as the northerly approach to a new SR-14 wildlife undercrossing in a CAL FIRE designated Very High Fire Hazard Severity Zone to improve wildlife movement and create extensive Project offsite mitigation potential.

The Conservancy's recommended SR-14 wildlife undercrossing between Spring and Bee Canyons has public ownership to the south via City of Santa Clarita's recent acquisition of the majority of Bee Canyon to serve as a greenbelt buffer. To the north of SR-14, Los Angeles County Flood Control District owns the western parcel along the terminus of Valley Canyon Road and eastward are several recorded but as-yet undeveloped 500-unit single-family residences all within a CAL FIRE designated Very High Fire Hazard Severity Zone in State Responsibility Area. Of these subdivisions, Tract No. 48086-01 directly connects to the SR-14 wildlife undercrossing and is comprised of a single 155-acre lot, Lot 1, that was accepted by the County for open space purposes in July 2017.

Considering the vast amounts of habitat preservation that will be required as compensatory mitigation for permanent impacts of the HSR construction and operation, the Conservancy recommends the Authority acquire, or fully fund the public acquisition of most, if not all, of Tract 48086, Tract 48086-01, Tract 48086-02, and Tract 48086-03 within Spring Canyon to help preserve the habitat and wildlife corridor identified by the SCML *San Gabriel – Castaic Connection* between the Saugus and Tujunga units of the ANF and reduce the ever-increasing risk of building another 500 homes in a state-recognized very high fire danger area.

Recommendation No. 2: Coordinate with Mountains Recreation and Conservation Authority (MRCA) regarding impacts to Park, Recreation, and Open Space Resources and opportunities for compensatory mitigation.

The MRCA is a joint powers agency established in 1985 between the Conservancy, the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages over 80,000 acres of parkland owned by the Conservancy, MRCA, and other local joint powers authorities including the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA) and Desert and Mountain Conservation Authority (DMCA). MRCA is a United States Army Corps of Engineers approved in-lieu fee mitigation partner and a CDFW approved conservation easement holder.

The MRCA holds fee title interests, conservation easements, and manages SCWRCA and DMCA land interests along portions of the SR14A Build Alternative route and within the 1000-foot Core Habitat Resource Study Areas of this proposed Project route. MRCA has active restoration projects on either side of SR-14 at the Agua Dulce Creek undercrossing that might be impacted by HSR construction and operation. In addition, MRCA owns the property that contains the Briggs-Edison Road connection to Agua Dulce Canyon Road that is proposed for widening. See Attachment C – SR14A Agua Dulce Canyon Map for reference. Coordination with MRCA will facilitate mitigation measures to reduce Park, Recreation, and Open Space Resources impacts related to temporary and permanent impacts related to construction and operation of the HSR.

MRCA is also actively working in partnership with United States Fish and Wildlife Service (USFWS), United States Forest Service (USFS), CDFW, Caltrans, Los Angeles County Department of Public Works, Metropolitan Water District of Southern California, Southern California Edison, and various other local governments, public utilities, and non-profit entities to preserve and restore habitat in the upper Santa Clara River watershed and upper Los Angeles River watershed—among other areas. Upon determination of suitable compensatory mitigation by jurisdictional agencies, the Authority is encouraged to coordinate with MRCA regarding opportunities to implement preservation, establishment, re-establishment, restoration, or enhancement of appropriate habitat types.

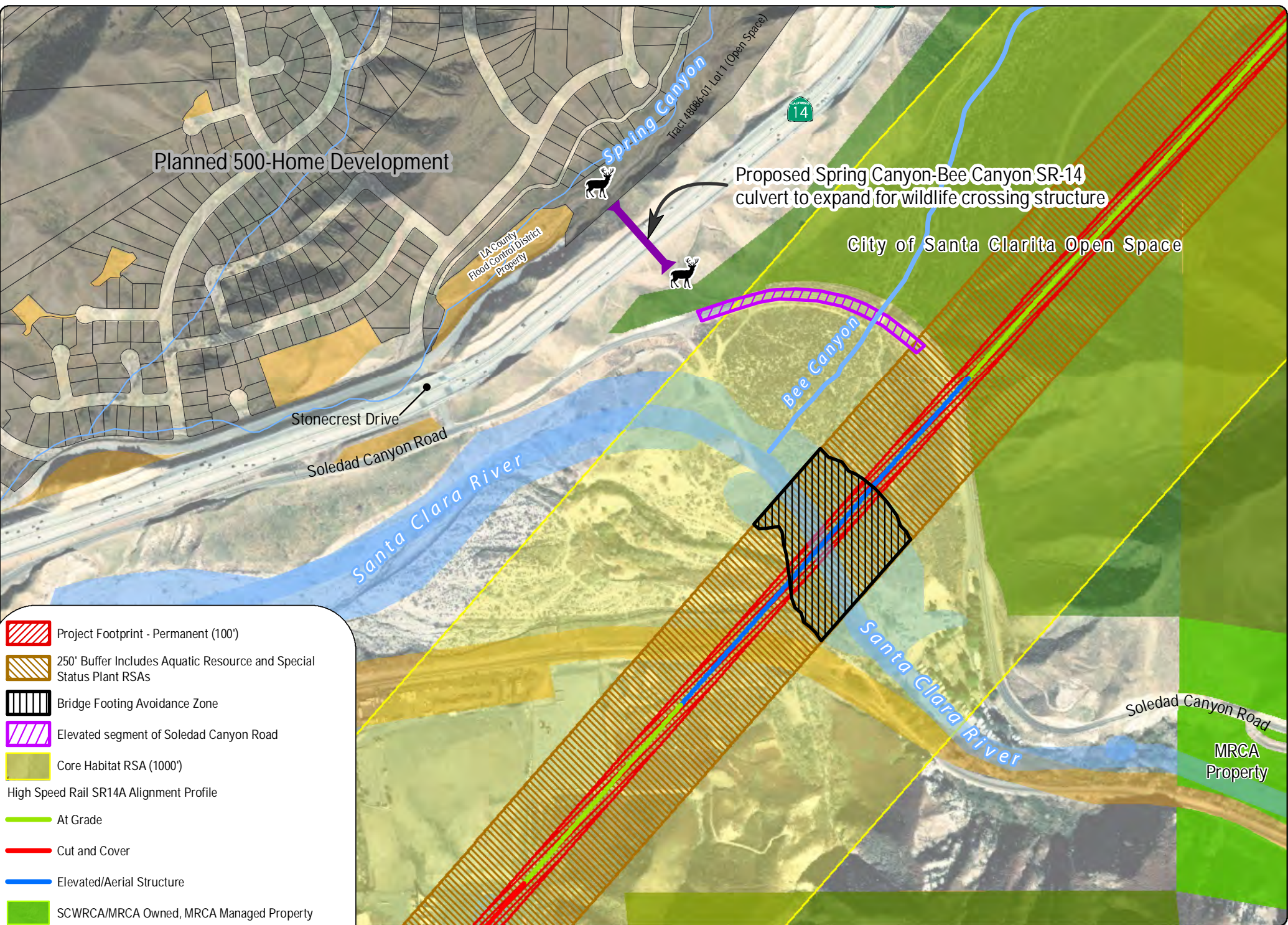
Please direct any future correspondence to Paul Edelman of our staff by email at edelman@smmc.ca.gov, by phone at 310-589-3200 ext. 128, or at the above letterhead address.

Sincerely,

A handwritten signature in black ink that reads "Linda Parks". The signature is fluid and cursive, with the first name "Linda" being more prominent than the last name "Parks".








LINDA PARKS
Chairperson

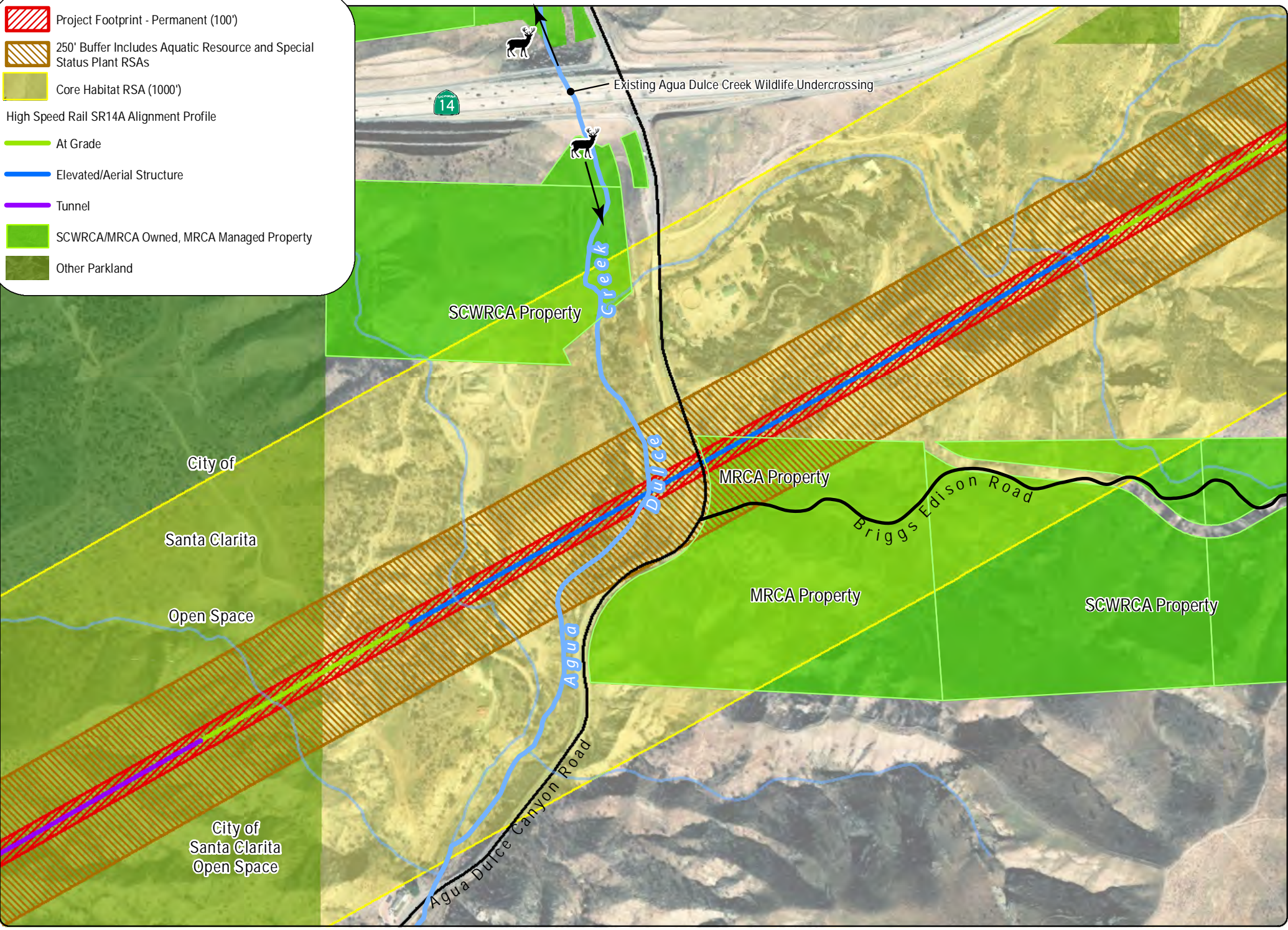
Attachments: A – SR14A Build Alternative Overview Map
B – SR14A Segment 2 Vicinity Map
C – SR14A Agua Dulce Canyon Map
D – SR14A Spring and Bee Canyons Map



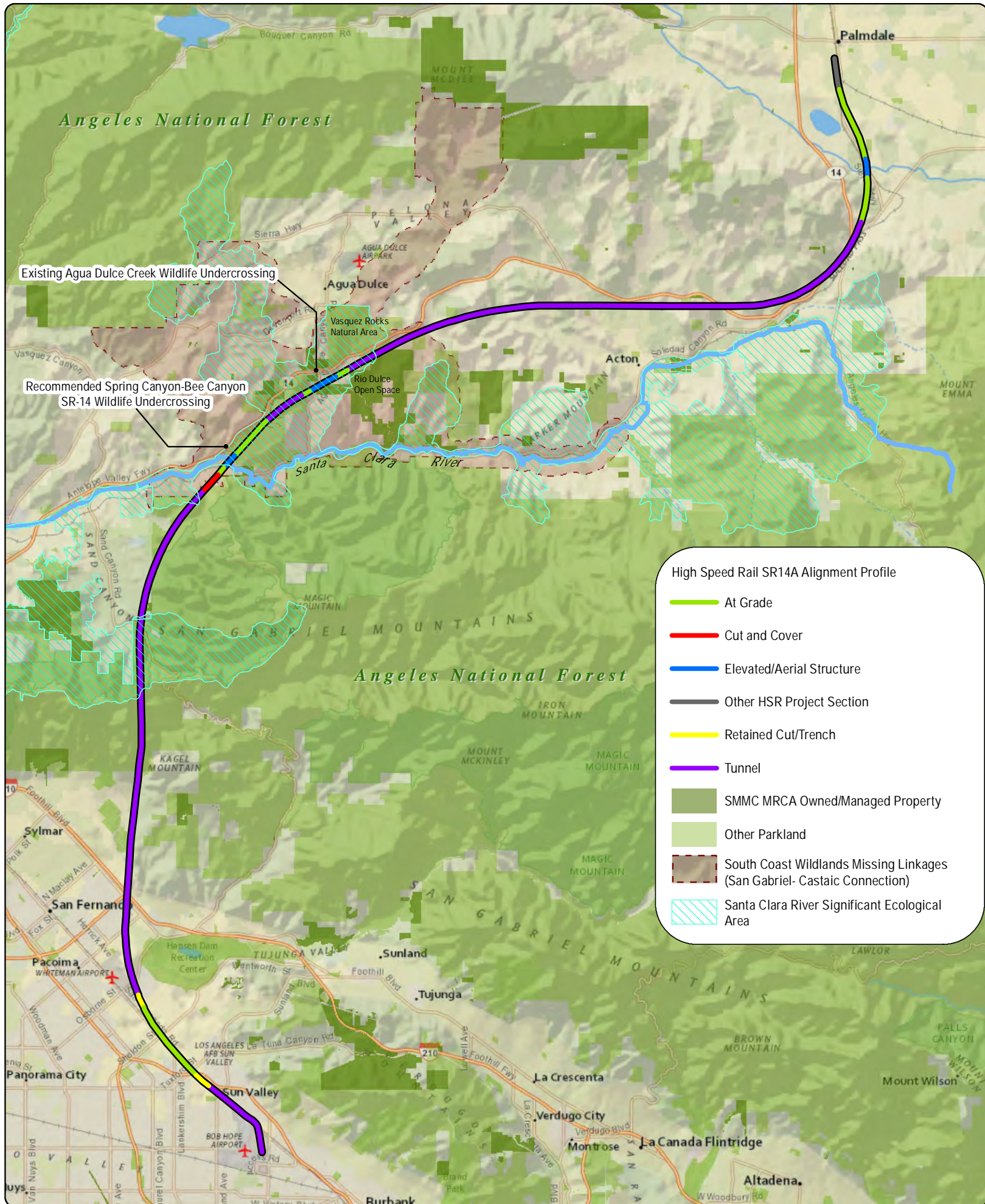
- Project Footprint - Permanent (100')
- 250' Buffer Includes Aquatic Resource and Special Status Plant RSAs
- Bridge Footing Avoidance Zone
- Elevated segment of Soledad Canyon Road
- Core Habitat RSA (1000')
- High Speed Rail SR14A Alignment Profile**
- At Grade
- Cut and Cover
- Elevated/Aerial Structure
- SCWRCA/MRCA Owned, MRCA Managed Property
- Other Public Land
- Other Parkland

CALIFORNIA HIGH-SPEED RAIL AUTHORITY - PALMDALE TO BURBANK PROJECT
 SR14A Spring and Bee Canyons Map

-  Project Footprint - Permanent (100')
-  250' Buffer Includes Aquatic Resource and Special Status Plant RSAs
-  Core Habitat RSA (1000')
- High Speed Rail SR14A Alignment Profile
 -  At Grade
 -  Elevated/Aerial Structure
 -  Tunnel
-  SCWRCA/MRCA Owned, MRCA Managed Property
-  Other Parkland



CALIFORNIA HIGH-SPEED RAIL AUTHORITY - PALMDALE TO BURBANK PROJECT
 SR14-A Agua Dulce Canyon Map



Date: 10/7/2022

