

SANTA MONICA MOUNTAINS CONSERVANCY

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June 17, 2024

Mr. Tom Richards, Chair
California High-Speed Rail Authority
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Sacramento, California 95814
palmdale_burbank@hsr.ca.gov

Via Electronic Transmission

**California High-Speed Rail Authority's Final Environmental
Impact Report/Environmental Impact Statement for the
Palmdale to Burbank Section (SCH 2014071074)**

Dear Mr. Richards:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations regarding the California High-Speed Rail Authority's (Authority) Final Project Environmental Impact Report/Environmental Impact Statement (F-EIR/EIS) for the construction and operation of the Palmdale to Burbank Section of the High-Speed Rail (Project). This letter supplements the Conservancy's comment letter submitted on October 17, 2022. Maps are attached for reference.

The Conservancy is partners with several public agencies forming joint powers authorities that service the Project Area including the Mountains Recreation and Conservation Authority (MRCA), Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), and the Desert and Mountain Conservation Authority (DMCA). Collectively with the Conservancy, these agencies work to maximize the protection of habitat and viewsheds wherever possible. The vast majority of at grade and elevated sections of track are proposed on land interests owned by these three local agencies.

The F-EIR/EIS provides an unparalleled treatise on baseline biological resources in the subject areas. However, the F-EIR/EIS remains deficient in its analysis of baseline inter-mountain range connectivity, adverse inter-mountain range habitat connectivity impacts, and its total lack of even a single permanent mitigation measure for such permanent impacts. The mountain ranges that need to be better connected lie directly on either side of State Route 14 and connect the two portions of the Angeles National Forest. The proposed project undoubtedly degrades the baseline level of inter-mountain range

connectivity along this approximately 18-mile-long section of highway from the Santa Clara River to the Pear Blossom Highway interchange with exposed track (at grade and elevated), permanent noise and light impacts, and long-term temporary construction and maintenance impacts. The F-EIR/EIS concludes that the baseline level of cross-State Route 14 habitat connectivity, in combination with the implementation and operation of the Project, will provide for adequate inter-mountain range connectivity. The F-EIR/EIS does not even address the full range of existing State Route 14 potential wildlife crossing structures nor how secure each is from degradation via future potential private or public infrastructure development. The F-EIR/EIS does not adequately support the above conclusion of no significant adverse Project impact on inter-mountain range habitat connectivity.

BIO-MM#64: Establish Wildlife Crossings. Implementation of wildlife crossings along impermeable portions of the alignment will ensure that movement along wildlife movement corridors is not constrained. Therefore, impacts on wildlife movement corridors would be reduced.

BIO-MM#64 is the only F-EIR/EIS permanent mitigation measure to benefit wildlife movement, but it only provides for future potential connectivity under the actual High Speed Rail project by Una Lake east of State Route 14 and thus has zero relevancy to connecting the two mountain ranges divided by State Route 14 – more broadly between the two sections of the Angeles National Forest.

The F-EIR/EIS is deficient for not adequately analyzing potential permanent cross-highway connectivity impacts of the proposed project on the section of State Route 14 between Stonecrest Drive and the Pear Blossom Highway-State Route 14 intersection – a road section over 18 miles in length. The F-EIR/EIS relies on the small Stonecrest Road - State Route 14 undercrossing as adequate for an over eight-mile-long section of highway between the Santa Clara River undercrossing and Agua Dulce Canyon Road and Creek.

The Authority responded to a prior Conservancy recommendation to coordinate with Caltrans to construct a State Route 14 wildlife crossing structure between Spring and Bee Canyons with the unsupported counter assertion that Stonecrest Road is already good for wildlife crossing under SR-14. Stonecrest Road would serve as the sole point of ingress/egress for a fully-approved 542-unit single-family residential development. Plus, Stonecrest Road empties onto a higher speed section of Soledad Canyon Road that has cliffs on the other side of the road. Ideally, the Authority will purchase the subject yet-to-be constructed Spring Canyon development as advanced mitigation.

The F-EIR/EIS will remain deficient until it includes a mitigation measure that requires construction of either a new dedicated wildlife overpass or underpass to bridge the approximate 3.25-mile segment of SR-14 from Stonecrest Road to Agua Dulce Canyon Road. That overpass or underpass must be completed prior to the operation of any High Speed Rail trains. Otherwise, the only two options for cross-highway wildlife movement in the section of highway would be Stonecrest Road with fatal flaws for an adequate regional connectivity crossing structure and Agua Dulce Canyon with two elevated tracks bisecting the canyon just south of the highway. The latter contains longstanding compensatory riparian mitigation sites directly beneath the proposed elevated tracks.

In response to the Conservancy's prior comments that the Authority coordinate with Caltrans to construct an SR-14 undercrossing tunnel between Spring and Bee Canyons, the Authority claims a tunnel would need to be approximately 550 feet in length and would exceed the Federal Highway Administration's Wildlife Crossing Structure Handbook recommendation for tunnel lengths less than 260 feet. The Conservancy believes a tunnel with a maximum length of 260 feet is feasible at the location identified in our prior comment letter, and it could be fully contained (north and south landings) within the existing Caltrans right-of-way. Beyond the right-of-way, lands south of SR-14 in Bee Canyon are already publicly protected. The land on the immediate north side of SR-14 is required as a fee simple open space dedication to be offered to Los Angeles County or another public agency.

The MRCA's F-EIR/EIS comment letter dated June 5, 2024 identifies four locations between Stonecrest Road and Agua Dulce Canyon Road where a wildlife overcrossing of SR-14 could be accommodated. See attached MRCA map.

A less effective but more practical mitigation measure to solve for the project's otherwise unavoidable significant adverse impacts to inter-mountain range habitat connectivity across State Route 14 is for the Authority to fully buyout the approved 542-unit single-family residential development in Spring Canyon and include well defined measures to enhance the Stonecrest Road undercrossing and its transition across Soledad Canyon Road.

Recommendation for Increased Habitat Mitigation Ratios

The Authority should provide compensatory mitigation for all temporary and permanent HSR-related impacts to Bee Canyon at a minimum ratio of 3:1 as established by other regulatory agencies for impacts to high-quality habitat within Southern California. For lands deemed low-priority habitat in other HSR-impacted areas, the Authority should provide a compensatory mitigation ratio of no less than 2:1.

Mr. Tom Richards, California High-Speed Rail Authority
High-Speed Rail Project Final-EIR/EIS Palmdale to Burbank Section (SCH 2014071074)
June 17, 2024
Page 4

Bee Canyon contains documented occurrences of federal-listed threatened and California Department of Fish and Wildlife (CDFW) species of special concern California gnatcatcher (*Polioptila californica californica*), CDFW watch-list Bell's sparrow (*Artemisiospiza belli belli*) and rufous-crowned sparrow (*Aimophila ruficeps canescens*), and a California Native Plant Society ranked "rare and threatened" Riversidian Alluvian Fan Sage Scrub habitat assemblage with known occurrences of federal- and state-listed endangered slender horned spineflower (*Dodecahema letoceras*).

Please direct any future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, by email at edelman@smmc.ca.gov, by phone at 310-589-3200 ext. 128, or at the above letterhead address.

Sincerely

STEVE VERES
Chairperson

Attachments: CA HSR – Bee Canyon to Agua Dulce Canyon – Vicinity Map
CA HSR – Bee Canyon to Agua Dulce Canyon – Area Map
CA HSR – Bee Canyon to Agua Dulce Canyon – CNDDDB Map
CA HSR – Bee Canyon to Agua Dulce Canyon – Public Access Map



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
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June 5, 2024

Tom Richards, Chair
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Via Electronic Transmission

Recommendations Regarding the Palmdale to Burbank High-Speed Rail Project's Final Environmental Impact Report/Environmental Impact Statement

Dear Mr. Richards,

The Mountains Recreation and Conservation Authority (MRCA) is a local public agency dedicated to the acquisition, preservation, and protection of open space, wildlife habitat, and urban, mountain, and river parkland that is accessible to the public. The MRCA manages over 75,000 acres of public lands that it owns or is owned by the Santa Monica Mountains Conservancy, Santa Clarita Watershed Recreation and Conservation Authority, or other partner agencies. The MRCA owns/manages several properties along the State Route 14 (SR-14) corridor for California High-Speed Rail Authority's (Authority) proposed Palmdale to Burbank Project Section of the High-Speed Rail Project (Project), and thus offers the following comments and recommendations on the Authority's Final Environmental Impact Report/Environmental Impact Statement (F-EIR/EIS).

In general, MRCA 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 and agrees with the Authority's determination that the SR-14A Build Alternative is the Preferred Alternative for the proposed High-Speed Rail (HSR) connecting Palmdale to Burbank. MRCA hopes to work in collaboration with the Authority on the below recommendations in much the same manner MRCA supported California Department of Transportation (Caltrans) to plan, design, engineer, permit, and now construct the Wallis Annenberg Wildlife Crossing of the 101 Freeway at Liberty Canyon.

Recommendation No. 1: Contribute to a new SR-14 wildlife crossing structure between Spring and Bee Canyons along the approximate 3.25-mile segment of SR-14 from Stonecrest Road to Agua Dulce Canyon Road.

Construction of HSR in Bee Canyon will add approximately 1.3 miles of continuous, at-grade barrier to wildlife movement and further fragment wildlife and habitat connectivity between the Saugus (northern) and Tujunga (southern) Units of the Angeles National Forest (ANF). As shown in the attached maps, this area comprises a critical section of the South Coast Missing Linkages Project's *San Gabriel-Castaic Connection* based on

the habitat and movement needs of 15 focal species (four mammals, four birds, three reptiles, two plants, one insect, and one amphibian) and refined to five species (mountain lion, badger, mule deer, Pacific kangaroo rat, and California spotted owl) for permeability analysis. The South Coast Missing Linkages Project was a multi-agency endeavor including California Natural Resources Agency, U.S. Forest Service, California State Parks, National Park Service, Santa Monica Mountains Conservancy, The Nature Conservancy, and Zoological Society of San Diego, among other partners, collaborating to document and map least-cost corridors for habitat connectivity and wildlife movement. The *San Gabriel-Castaic Connection* specifically identifies the Spring-Bee Canyon confluence as a prime area to facilitate wildlife movement between the separated ANF units.

Additionally, the California Department of Fish and Wildlife (CDFW) recognizes the importance of habitat connectivity between ANF units and has a designated Angeles Linkage Conceptual Area Protection Plan (Angeles CAPP) to facilitate preservation of open space in this area and enhance north-south wildlife movement.

MRCA recommends the Authority consult with Caltrans to reach 65-percent design plans including a Project Initiation Document (PID), Project Approval and Environmental Document (PA/ED), and Plans, Specifications and Estimates (PS&E) for one of the four identified locations along SR-14 between Stonecrest Road and Agua Dulce Canyon Road where lands on either side of SR-14 are above grade and would facilitate a wildlife overcrossing less than 175-feet in length and less than 100-feet wide.

Recommendation No. 2: Fully mitigate HSR construction and operation impacts to natural resources at Lang Station Open Space at Bee Canyon.

As shown in the attached maps, Bee Canyon contains documented occurrences of federal-listed threatened and CDFW species of special concern (SSC) California gnatcatcher (*Polioptila californica californica*), CDFW watch-list Bell's sparrow (*Artemisospiza belli belli*) and rufous-crowned sparrow (*Aimophila ruficeps canescens*), and a California Native Plant Society ranked "rare and threatened" Riversidan Alluvial Fan Sage Scrub habitat assemblage with known occurrences of federal- and state-listed endangered slender horned spineflower (*Dodecahema leptoceras*).

Within the report materials published for the *San Gabriel-Castaic Connection*, Figure 10. "Least Cost Corridor for Mountain Lion (*Puma concolor*)" indicates the connection between Spring and Bee Canyons to be an area of high permeability for mountain lions between the separated units of the ANF.

MRCA also holds Conservation Easements (CSE) comprising approximately 107 acres granted by the City of Santa Clarita within Bee Canyon as recorded on Instrument No. 20101285843 (9/13/2010) in the Los Angeles County Recorder's Office pursuant to CDFW Streambed Alteration Agreements Nos. 1600-2005-0754-R5, 1600-2005-0565-R5, and 1600-2006-160-R5. The proposed SR-14A Build Alternative daylight on a

portion of Santa Clarita's Bee Canyon property identified as APN 3210-014-270 subject to said CSE. MRCA is concerned about prohibited uses within the CSE including, but not limited to, fencing, structures or paving, lighting, grading, material storage, any removal, trimming, cutting, or pruning of native plants, and installation of any above or below ground utilities.

Because portions of Bee Canyon are already encumbered by a CSE to preserve existing habitat and all of Bee Canyon is considered high-priority habitat for mountain lions (a candidate species under the California Endangered Species Act [CESA] within the Southern California evolutionary significant unit and CESA-protected) and other rare, threatened, or endangered species, the Authority must provide compensatory mitigation for all temporary and permanent HSR-related impacts to Bee Canyon at a minimum ratio of 3:1 as established by other regulatory agencies for impacts to high-priority habitat within Southern California. For lands deemed low-priority habitat, MRCA recommends a compensatory mitigation ratio of no less than 2:1.

Stonecrest Road is not a viable, long-term wildlife crossing of SR-14 because it proposed as a primary access point for the development of 542 single family residences in Spring Canyon. Increased traffic, noise, lighting, and trash from the proposed development will deter wildlife utilization of Stonecrest Road. However, if the Authority purchases (all or significant portions of) the proposed tract developments in Spring Canyon opposite SR-14 from Bee Canyon, then Stonecrest Road can become a protected wildlife crossing with additional wildlife fencing and strategic habitat improvements to guide animals safely away from SR-14 and Soledad Canyon Road. The Authority's pursuit of this option would alleviate the need for Recommendation No. 1 above.

Recommendation No. 3: Fully mitigate HSR construction and operation impacts to public recreation and fire agency resources at Lang Station Open Space at Bee Canyon.

MRCA disagrees with the Authority's analysis of public recreational impacts to the Santa Clara River Trail and other existing trails within Bee Canyon. On page 3.15-99 of the F-EIR/EIS, the Authority states:

The remaining 152 acres [of Santa Clarita's Lang Station at Bee Canyon property] would remain available for open space. Because the Refined SR14 and SR14A Build Alternative alignments intersect the property, there are portions to the east of the alignment that would not be accessible from the western portion of the property where the main trail [and trailhead] is located. These areas of the property east of the permanent footprint contain no recreation facilities. These areas also do not currently appear accessible from the main trail. On-site surveys of the site did not reveal trails to the eastern side that have been used by or maintained for recreational users.

Cursory review of publicly available aerial imagery shows a spur trail and fire road approximately 1,500 feet from the trailhead that travels east across the proposed HSR

route and up to a Los Angeles County-designated Significant Ridgeline with near-360-degree views. This informal trail and fire road then follows the ridge divide northeasterly between Bee Canyon and Soledad Canyon with no other known access points from adjacent public lands. The out-and-back distance from trailhead to promontory lookout is approximately 1.75 mile and MRCA staff have, on multiple occasions, witnessed hikers ascending or descending this lookout trail. The main trail in Bee Canyon is near the canyon bottom and does not provide the same opportunities for expansive views.

Development of the HSR as proposed will require relocating the trailhead that is already within 175-feet of Bee Creek's channel. Moving the trailhead to the west and closer to Bee Creek will result in impacts to Bee Creek's channel and/or bank that are not addressed in this F-EIR/EIS.

Therefore, MRCA recommends the Authority purchase additional lands on the opposite side of Soledad Canyon Road, specifically APN 3210-017-055 that has had historical development and could easily accommodate public parking, ADA-accessible restroom(s), and a trailhead to serve Lang Station Open Space at Bee Canyon trails. This same property will support footings for the HSR bridge over the Santa Clara River and could be used as a temporary HSR construction staging yard to minimize impacts within Bee Canyon.

To maintain fire safety in this CalFire-designated Very High Fire Hazard Severity Zone, MRCA also recommends the Authority connect an existing dirt road on APN 3210-017-040 to the above-mentioned ridgeline fire road. This will allow fire agencies to maintain access to this high fire frequency area and provide public recreation connection to eastern portions of Lang Station Open Space at Bee Canyon.

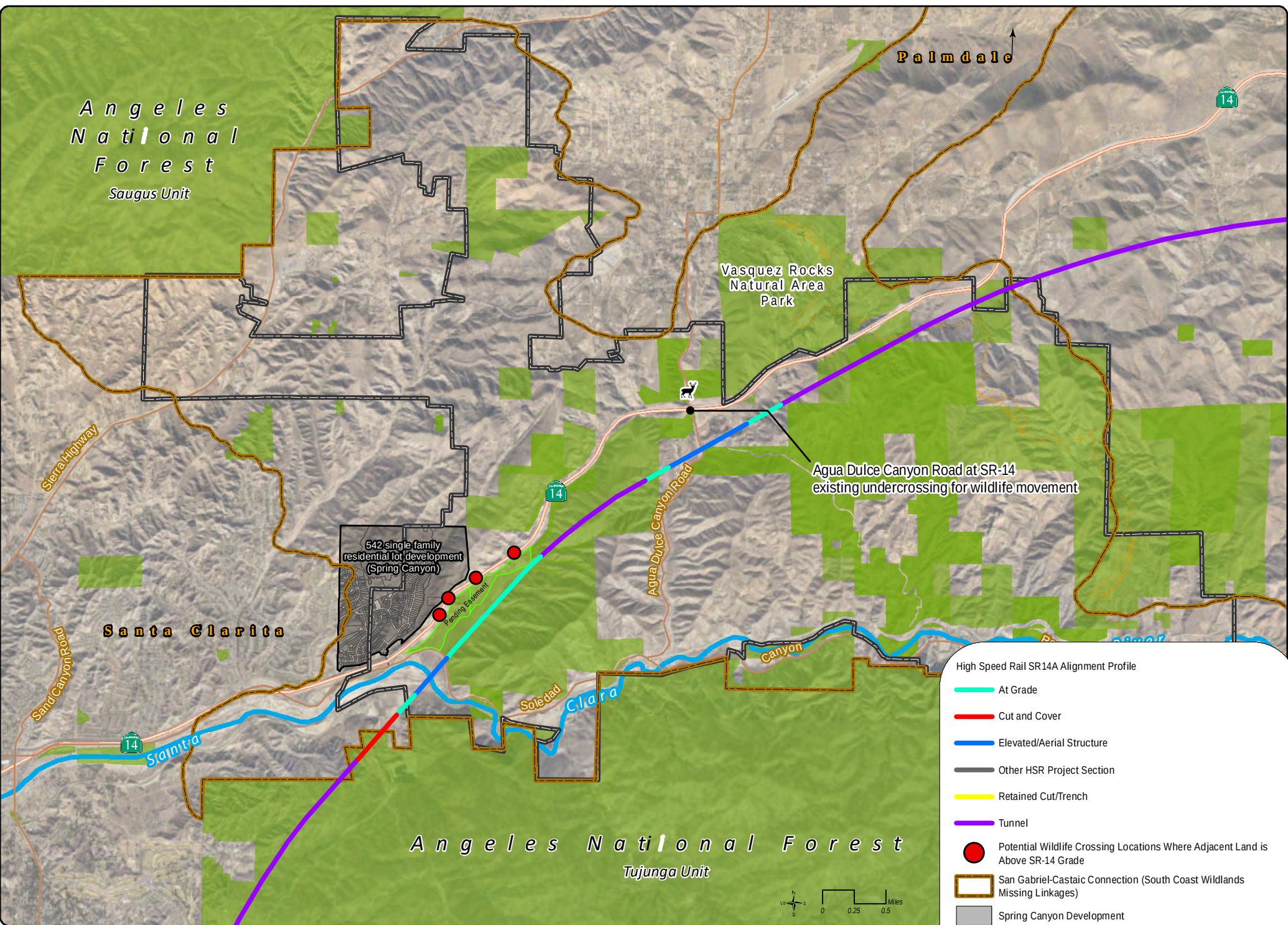
Please direct any future correspondence to Paul Edelman, Chief of Natural Resources and Planning for the MRCA, by email at paul.edelman@mrca.ca.gov, by phone at 310-589-3200 ext. 128, or at the above letterhead address.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", with a stylized flourish at the end.

George Lange
Chairperson

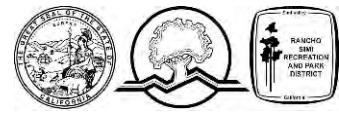
Attachments: CA HSR – Bee Canyon to Agua Dulce Canyon – Vicinity Map
CA HSR – Bee Canyon to Agua Dulce Canyon – Area Map
CA HSR – Bee Canyon to Agua Dulce Canyon – CNDDDB Map
CA HSR – Bee Canyon to Agua Dulce Canyon – Public Access Map



High Speed Rail SR14A Alignment Profile

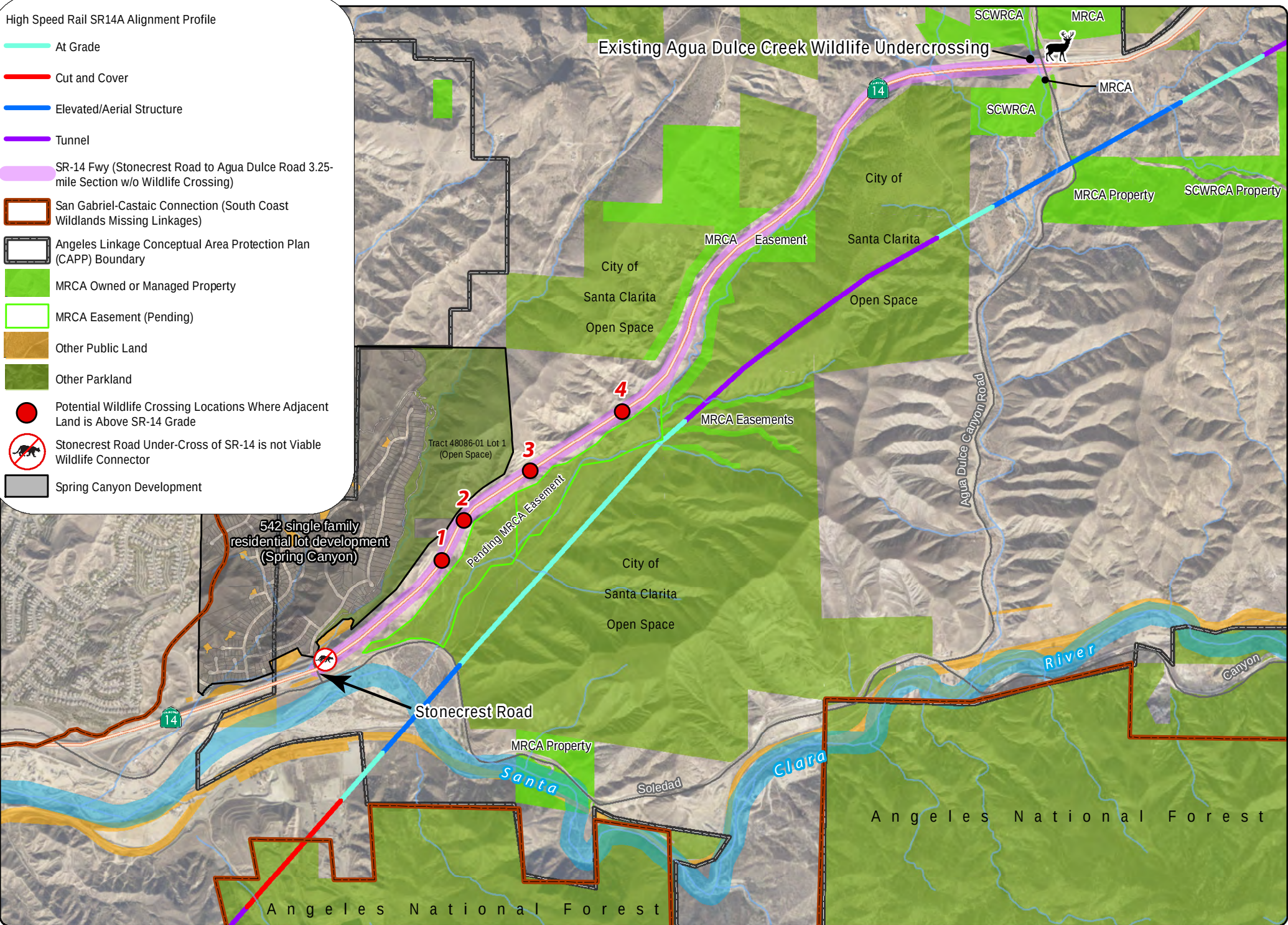
- At Grade
- Cut and Cover
- Elevated/Aerial Structure
- Other HSR Project Section
- Retained Cut/Trench
- Tunnel
- Potential Wildlife Crossing Locations Where Adjacent Land is Above SR-14 Grade
- San Gabriel-Castaic Connection (South Coast Wildlands Missing Linkages)
- Spring Canyon Development
- Angeles Linkage Conceptual Area Protection Plan (CAPP) Boundary
- Parkland

CA HSR – Bee Canyon to Agua Dulce Canyon
Vicinity Map



High Speed Rail SR14A Alignment Profile

- At Grade
- Cut and Cover
- Elevated/Aerial Structure
- Tunnel
- SR-14 Fwy (Stonecrest Road to Agua Dulce Road 3.25-mile Section w/o Wildlife Crossing)
- San Gabriel-Castaic Connection (South Coast Wildlands Missing Linkages)
- Angeles Linkage Conceptual Area Protection Plan (CAPP) Boundary
- MRCA Owned or Managed Property
- MRCA Easement (Pending)
- Other Public Land
- Other Parkland
- Potential Wildlife Crossing Locations Where Adjacent Land is Above SR-14 Grade
- Stonecrest Road Under-Cross of SR-14 is not Viable Wildlife Connector
- Spring Canyon Development

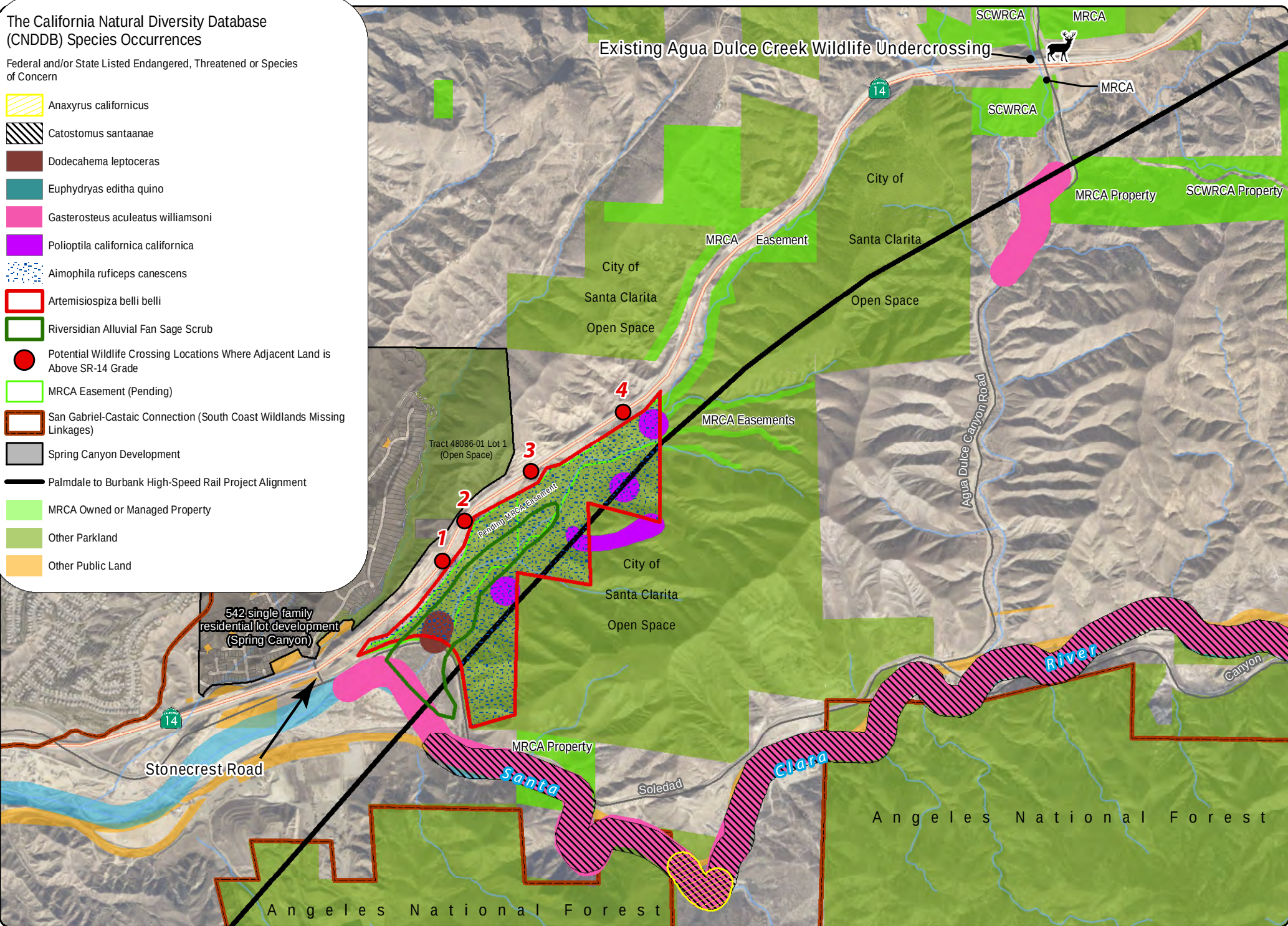


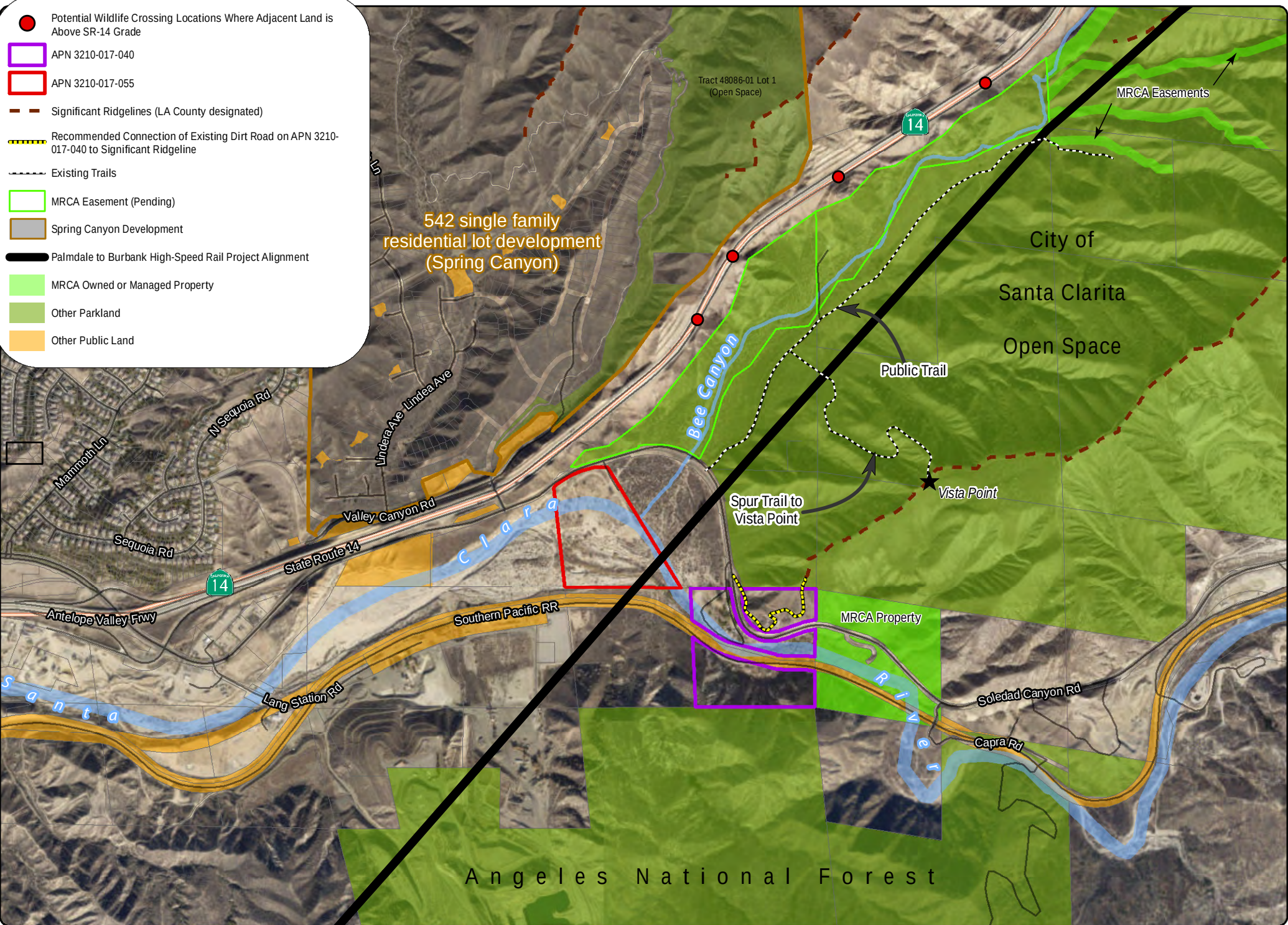
CA HSR – Bee Canyon to Agua Dulce Canyon
Area Map

The California Natural Diversity Database (CNDDB) Species Occurrences

Federal and/or State Listed Endangered, Threatened or Species of Concern

-  *Anaxyrus californicus*
-  *Catostomus santaanae*
-  *Dodecahema leptoceras*
-  *Euphydryas editha quino*
-  *Gasterosteus aculeatus williamsoni*
-  *Poliophtila californica californica*
-  *Aimophila ruficeps canescens*
-  *Artemisiospiza belli belli*
-  Riversidian Alluvial Fan Sage Scrub
-  Potential Wildlife Crossing Locations Where Adjacent Land is Above SR-14 Grade
-  MRCA Easement (Pending)
-  San Gabriel-Castaic Connection (South Coast Wildlands Missing Linkages)
-  Spring Canyon Development
-  Palmdale to Burbank High-Speed Rail Project Alignment
-  MRCA Owned or Managed Property
-  Other Parkland
-  Other Public Land





CA HSR – Bee Canyon to Agua Dulce Canyon
Public Access Map