

SEATAC Comment:

Indicate whether small mammal trapping was configured for sensitive species or for general purposes.

DMEC Response:

- *Text was revised on page 49 (in the Methods subsection) to:*

“Small Mammal Trapping

DMEC conducted small mammal trapping (catch-and-release) in September and October of 2005 for general species detection (identification) and population size purposes. Small mammals were trapped over the course of three consecutive nights, using Sherman live traps to help account for any herbivorous small mammal species (special-status or otherwise) that inhabit the project site and to aid in the population estimations for the project site fauna.

- *Text was also revised on page 54 (in the Biota Survey Results subsection) to:*

“Small Mammal Trapping

Small mammal trapping was conducted for general species detection (identification) and population size purposes. Small mammals were trapped over the course of three nights, using Sherman live traps, to help account for any herbivorous small mammal species (special-status or otherwise) that inhabit the project site and to aid in the population estimations for the project site fauna. Table 6, Small Mammal Trapping at Lyons Canyon Ranch, summarizes the small mammal trapping results.”

Precedes Page 49 of Biota Report

SEATAC Comment:

Animal movement routes appear to converge on graded areas. Provide mitigation measures or explain how developed areas will continue to foster the movement of wildlife.

DMEC Response:

This request is based on the perception obtained from examining the original map of Wildlife Travel Paths at Lyons Canyon Ranch created by DMEC (Figure 18), which did not adequately depict the extent of trails known expected onsite. DMEC conducted focused vegetation mapping and field surveys onsite, but did not apply the same methods to mapping the wildlife routes in the surrounding area. That led to the impression that all wildlife leads to one area on the Lyons Canyon Ranch property, appearing as a significant wildlife movement corridor. Hence, DMEC applied the same mapping methods from the onsite surveys to the surrounding area to create accurate and consistent wildlife paths and distribution before making changes to the impact assess. After revising the Wildlife Travel Paths at Lyons Canyon Ranch map (on the following page, which is still Figure 18) to consist of local movement paths within the project site, the apparent significance of the area of wildlife convergence that was previously illustrated was no longer so apparent. The impact assessment on Local Wildlife Movement, based on this newly created Figure 18 (which follows this blue comment page), illustrates that the level of significance prior to mitigation is less than significant.

Since wildlife corridors (linking two core habitats) currently do not exist within the property boundaries (only wildlife paths exist onsite), the impact analysis for Impacts to Wildlife Corridors and Habitat Linkages (provided in Section 5, Project Impacts) will be addressed specifically in terms of loss of wildlife movement paths onsite and in terms of interference with wildlife movement within Lyon Canyon.

The impact assessment is addressed on page 132. Text was revised to:

“Loss of Wildlife Movement Paths Onsite

Most wildlife paths existing onsite represent local movement paths between onsite habitats. Habitat to be retained onsite will still be accessible to wildlife from adjacent habitats, even with the loss of a large number of localized paths due to the proposed project. The paths shown on Figure 28, Impacts to Wildlife Travel Paths on Lyons Canyon Ranch, illustrate the impacts to the paths as a result of the proposed project. Figure 28 includes known and observed paths as well as theoretical paths based on where wildlife typically move/travel. The actual number of paths impacted onsite can only be estimated. Wildlife will be able to use the remaining habitats within the periphery of the developed portion of the project site after construction, and wildlife movement may occur within the fuel modification zone since significant vegetation will be removed or thinned from that zone (up to 200 feet from all structures). The fuel modification zone will be more accessible for wildlife movement with much of the vegetation removed in these areas; however, wildlife may be reluctant to use such areas with very little cover and/or shelter resources. This means that wildlife will most likely use only the outside edge of the fuel modification zone, adjacent to intact natural vegetation. Regardless, the loss of portions of some wildlife movement paths onsite is considered a *less than significant* impact, since several paths will remain intact onsite.

Level of Significance Before Mitigation: Less than Significant”

SEATAC Comment:

Several sensitive animal species are not discussed; review the document for completeness in relation to the CDFG Special Animals List.

DMEC Response:

- *DMEC reviewed the CDFG Special Animals List and found that nine (9) additional special-status wildlife species (2 reptiles and 7 birds) should be added to the special-status wildlife species assessment.*
- *Text was revised on page 78 to say:*

“Special-Status Wildlife Resources

Sixty (60) special-status wildlife species have the potential to occur on Lyons Canyon Ranch, based on known occurrences in the vicinity of the project site. Table 5.6-13, Special-Status Wildlife Species with Potential to Occur at Lyons Canyon Ranch, provides a summary of those 60 special-status wildlife species tracked in the project region. Table 5.6-13 also provides information on the status, habitat requirements, and likelihood of occurrence.

No federal or state listed wildlife species were observed at Lyons Canyon Ranch; however, four special-status wildlife species were observed or detected onsite or immediately adjacent to the project site. Three special-status wildlife species were observed or detected by DMEC, including: Cooper’s Hawk (*Accipiter cooperi*) flying overhead, San Diego Desert Woodrat (*Neotoma lepida intermedia*) detected by a nest, and Oak Titmouse (*Baeolophus inornatus*). The fourth species, Nuttall’s Woodpecker (*Picoides nuttallii*), was observed in Towsley Park by Wendy Langhans with the Mountains Recreation and Conservation Authority (Wendy Langhans, pers. comm. 21 July 2005).

It should also be noted that DMEC observed an occupied Barn Owl (*Tyto alba*) nest in a Coast Live Oak (*Quercus agrifolia* ssp. *agrifolia*) tree onsite. Barn Owl is not a special-status species (and therefore is not listed in Table 5.6-13 below); however, all active raptor nests (of common or special-status species) are regulated by California Fish and Game Code Sections 3503, 3503.5, and 3513.

Of the 60 species tracked in the project region, 19 special-status wildlife species are *likely* to occur onsite, based on suitable required habitat present onsite, and based on the CNDDDB search results for special-status wildlife species tracked in the vicinity of the project site (CDFG 2005).”

- *The nine species were then added to the special-status wildlife list (provided in the Biota Report as Table 14, Special-Status Wildlife Species with Potential to Occur at Lyons Canyon Ranch). Table 14 was revised on page 80-86 to provide the additional nine special-status wildlife species as summarized on the next blue page.*
- *In addition, the following presents the page numbers on which changes were made to accommodate the new special-status wildlife species assessment:*
 - *Pages 87, 88, & 103: 2 new special-status (SS) bird species observed onsite added to text discussion;*
 - *Page 102: A summary of the 2 new SS bird species observed onsite;*
 - *Pages 104 & 105: The 7 new SS reptile & bird species likely onsite were added to text discussion;*
 - *Pages 105 & 106: The 2 new SS bird species observed onsite were added to the impact assessment;*
 - *Pages 107 - 109: The 7 new SS reptile & bird species likely onsite were added to the impact assessment;*
 - *Page 136: The 2 new SS wildlife species observed onsite were added to the cumulative impact assessment;*
 - *Page 137: Cumulative impact assessment revised to include new SS reptiles likely onsite;*
 - *Pages 137 & 138: Cumulative impact assessment revised to include new SS birds likely onsite;*
 - *Page 159: Added mitigation for impacts to the 2 new SS bird species observed onsite;*
 - *Page 160: SS reptiles likely onsite were added to BIO29; and*
 - *Page 161: Text changed to reflect the appropriate number of SS bird species likely onsite.*

Precedes Page 78 of Biota Report (See reverse side for additional revisions.)



Additions to Table 14.
Special-Status Wildlife Species with Potential to Occur at Lyons Canyon Ranch

Scientific Name	Common Name ¹	Fed. ²	State	G-Rank	S-Rank	CDFG	Habitat Requirements ³	Likelihood of Occurrence ⁴
REPTILES								
<i>Charina trivirgata</i>	Rosy Boa	-	-	G4G5	S3S4	-	Habitats with a mix of brushy cover and rocky soil such as coastal canyons and hillsides, desert canyons, washes and mountains.	Likely
<i>Coleonyx variegatus abbotti</i>	San Diego Banded Gecko	-	-	G5T3 T4	S2S3	-	Coastal and cismontane southern California. Found in granite or rocky outcrops in coastal sage scrub and chaparral habitats.	Likely
BIRDS								
<i>Ammodramus savannarum</i>	Grasshopper Sparrow	-	-	G5	S2	-	(Nesting) dense grasslands on rolling hills, lowland plains, in valleys & on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs & scattered shrubs. Loosely colonial when nesting.	Likely
<i>Baeolophus inornatus</i>	Oak Titmouse	-	-	G5	S3?	-	Oak woodlands. Cavity nester.	Known: one individual observed by DMEC
<i>Calypte costae</i>	Costa's Hummingbird	-	-	G5	S3?	-	(Nesting) desert riparian, desert and arid scrub foothill habitats.	Likely
<i>Carduelis lawrencei</i>	Lawrence's Goldfinch	-	-	G3G4	S3	-	(Nesting) nests in open oak or other arid woodland and chaparral, near water. Nearby herbaceous habitats used for feeding. Closely associated with oak trees.	Likely
<i>Chondestes grammacus</i>	Lark Sparrow	-	-	G5	S?	-	(Nesting). For nesting they prefer edges between grasslands & trees or bushes or open grassy oak woodlands. Scattered trees or shrubs required for lookout, song perches & cover.	Likely
<i>Picoides nuttallii</i> (nesting)	Nuttall's Woodpecker	-	-	G5S?	-	-	Prefers mesic habitats. Occupies chaparral plant communities mixed with scrub oak, wooded canyons, and riparian woodlands. Forages on tree trunks, probing crevices and chipping away loose bark.	Known: reported by Wendy Langhans (pers. comm. 21 July 2005)
<i>Toxostoma redivivum</i>	California Thrasher	-	-	G5S?	-	-	Chaparral-covered foothills.	Likely

¹ * = Nesting habitat protected. ** = Wintering site protected.

² Federal and State Listings: E = Endangered; T = Threatened; R = Rare; C = Candidate; FSC = Federal Species of Concern. CDFG Listing: SC = California Species of Concern; FP = Fully Protected; SPM = Specially Protected Mammal.

For special-status species definitions see Table 5.6-s 8 through 11 above.

³ Habitat requirements definitions: Ch = Chaparral; CSS = Coastal Sage Scrub; Gr = Grassland; JTW = Joshua Tree Woodland; PJW = Pinyon-Juniper Woodland; RS/W = Riparian Scrub/Woodland; so. Calif. = southern California.

⁴ Likelihood of occurrence based on species' habitat requirements and the presence of required habitat in the project site.

Known = the species has been reported as inhabiting or frequenting the project site;

Likely = Required habitat exists at the project site and has been reported nearby;

Possible = Marginal required habitat exists onsite, and/or required habitat exists in surrounding areas;

Unlikely = Required habitat does not exist at the project site nor does it exist nearby.



SEATAC Comment:

Grading and fuel modification footprints do not accommodate the BCA-recognized constraints.

DMEC Response:

The Lyons Canyon Ranch Project was first submitted to the City of Santa Clarita for the administrative and environmental process. A draft Environmental Impact Report and substantial preliminary planning had already taken place when the project switched to the County of Los Angeles because of associated Local Agency Formation Commission problems between the City and the County.

DMEC was brought into the process at that late stage to revise the EIR and project. Based on DMEC's constraints analysis, significant amount of wetlands were protected by proposing to move the road that would have significantly impacted Lyon Canyon Creek. Various project configurations were evaluated as to impacts to wetlands and the SEAs.

Based on DMEC's first estimate of the boundaries of SEA 63, the project footprint would have resulted in a minimal amount of impacts to the SEA area. At a subsequent meeting with County staff, a new map of the SEA was produced with a wider SEA 63, and new boundaries were delineated. These new boundaries placed the project deeper into SEA 63; however, DMEC's observations showed that while the project would have a significant impact on the SEA, much of the areas to be impacted were already moderately degraded. Mitigation measures that will be applied to the project, such as oak tree avoidance/planting and habitat restoration activities in the de-silting basins, will improve and create wildlife habitats with greater function than some of the habitats that currently exist onsite (pre-construction conditions). This recognized the existing (disturbed) conditions of habitats within SEA 63.

While the project impact assessment process did not formally follow the County's SEA assessment processes prior to submitting a formal application to the County, an attempt was made by the applicant, through DMEC, to perform a biological constraints analysis to develop the basic configuration of the proposed project. The primary example of this is the relocation of the primary access road out of Lyon Canyon in order to minimize impacts to wetland habitats.

No text revisions were made.

Precedes Page 127 of Biota Report

SEATAC Comment:

Wildlife movement through and within the site is a constraint that the proposed development will impact. Design components, such as drainage culverts and other potential bottlenecks to movement, must encourage use by a diversity of species.

DMEC Response:

DMEC agrees that wildlife movement through and within the site is a constraint that the proposed development will impact. The placement of the main road across Lyon Canyon Creek would create a significant barrier to wildlife movement onsite and to adjacent habitats. The bridge and culvert designs incorporated into the project will be created to accommodate a variety of wildlife species.

Since wildlife corridors (linking two core habitats) currently do not exist within the property boundaries (only wildlife paths exist onsite), the impact analysis for Impacts to Wildlife Corridors and Habitat Linkages (provided in Section 5, Project Impacts) will be addressed specifically in terms of loss of wildlife movement paths onsite and in terms of interference with wildlife movement within Lyon Canyon.

- *Text was revised on page 132 to:*

“Interference with Wildlife Movement within Lyon Canyon

The proposed project is composed of two general development areas, which are connected by a road through the ridge on the north side of Lyon Canyon Creek. This road and development potentially creates an effective barrier to terrestrial wildlife movement to the east side of the project site and would interfere with movement within Lyon Canyon (Figure 28). Although 57% of the project site would be preserved, portions of the remaining habitat will be isolated as relatively small islands surrounded by development. Connected areas will be reduced in value due to edge effects of the new adjacent land use. The impact associated with those adjacent land uses will vary depending on each species’ habitat requirements. This loss of habitat would not represent a significant impact to the most common wildlife species that use the project site habitats. The use of these areas by special-status wildlife species would likely result in a significant adverse impact to wildlife by preventing or restricting movement onsite.

Established wildlife corridors occur in the region outside of the project site, where neither the east-west nor the north-south known wildlife corridors cross the project site. Regardless, it is possible the proposed project would result in significant impacts to existing offsite wildlife movement corridors and onsite travel paths, especially within Lyon Canyon.

Level of Significance Before Mitigation: Significant”

- *Text was also revised on page 142 to:*

“Cumulative Impacts to Wildlife Movement within Lyon Canyon

The proposed project will reduce wildlife habitat by approximately 99.73 acres, but mitigation will maintain expected and known wildlife movement paths (primarily along Lyon Canyon Creek) to allow connectivity to habitats east of I-5 and south of the developed area of Newhall. Major wildlife linkages with core habitat areas to the north and east of the Santa Susana Mountains will not be affected by the proposed development. Therefore, the Lyons Canyon Ranch project will not contribute to the cumulative impacts to wildlife corridors and habitat linkages, and is considered a *cumulatively less than significant* impact.”

Precedes Page 132 of Biota Report (*See reverse side for additional revisions.*)

SEATAC Comment:

Mitigation through CC&Rs needs strengthening; a step-by-step chain of responsibility should be presented whereby the process of enforcement of CC&Rs is reasonably ensured.

DMEC Response:

- *The following revision is provided on page 146 of the Biota Report:*

“BIO1A Mitigation Measure for the Implementation of Conditions of Approval Related to Preserve Maintenance. The Lyons Canyon Ranch project shall provide for the establishment of a Home Owners’ Association (HOA) and the preparation of Conditions, Covenants, and Restrictions (CC&Rs) prior to the recordation of the final tract map as a condition of project approval. The HOA shall be governed by CC&Rs that describe all aspects of property maintenance of common area preserves and biological resource mitigation areas under control of the HOA. The HOA shall be fully funded, pursuant to, and consistent with, the recorded CC&Rs.

The Lyons Canyon Ranch project HOA shall maintain all common areas consistent with the applicable mitigation measures and conditions of approval adopted by the County of Los Angeles. The applicable mitigation measures and conditions of approval that fall under the responsibility of the HOA shall be explicitly specified in the CC&Rs, and shall be verified by the County of Los Angeles prior to recordation of the final tract map.

The HOA shall retain the services of a wildlands ecologist familiar with plants and wildlife native to the Santa Clarita region to provide review and approval of the specific activities of preserve parcels prior to installation consistent with the plant list approved by the County Biologist. The ecologist shall also oversee HOA maintenance staff, when performing the following maintenance, to ensure compliance with biological mitigation measures applicable to the project site:

- Fuel modification within common areas;
- Maintenance of privately owned wetlands restoration areas;
- Maintenance of common areas designated as preserves or mitigation areas; and
- Maintenance of privately owned trails.

Said landscape architect and/or HOA shall not be responsible for maintenance or oversight of activities within lands dedicated to Los Angeles County or any other agency. The HOA shall enforce the CC&Rs at all times through the terms outlined in the recorded CC&Rs.”

- *Mitigation Number BIO1A is also referred to on the following pages: 149, 152, 153, 154, 163, 164, 166, 167, 170, and 171.*

Precedes Page 146 of Biota Report *(See reverse side for additional revisions.)*

- *The following revision is provided on page 155 of the Biota Report:*

“BIO18A Mitigation Measure for the Implementation of Conditions of Approval Related to Landscaping. The Lyons Canyon Ranch project shall provide for the establishment of a Home Owners’ Association (HOA) and the preparation of Conditions, Covenants, and Restrictions (CC&Rs) prior to the recordation of the final tract map as a condition of project approval. The HOA shall be governed by CC&Rs that describe all aspects of property maintenance of common area landscape, and the overall regulation of aesthetics for the property grounds and buildings. The HOA shall be fully funded, pursuant to, and consistent with, the recorded CC&Rs.

The Lyons Canyon Ranch project HOA shall maintain all common areas, that are routinely maintained, consistent with the applicable mitigation measures and conditions of approval adopted by the County of Los Angeles. The applicable mitigation measures and conditions of approval that fall under the responsibility of the HOA shall be explicitly specified in the CC&Rs, and shall be verified by the County of Los Angeles prior to recordation of the final tract map.

The HOA shall retain the services of a licensed landscape architect familiar with plants native to the Santa Clarita region to provide review and approval of the landscaping of individual parcels prior to installation consistent with the plant list approved by the County Biologist. The landscape architect shall also oversee HOA maintenance staff, when performing the following maintenance, to ensure compliance with biological mitigation measures applicable to the project site:

- Fuel modification within common areas;
- Maintenance of street or roadway landscaping;
- Maintenance of parks;
- Maintenance of landscaped common areas; and
- Maintenance of roadway landscaping.

Said landscape architect and/or HOA shall not be responsible for maintenance or oversight of activities within lands dedicated in fee title to Los Angeles County or any other agency. The HOA shall enforce the CC&Rs at all times through the terms outlined in the recorded CC&Rs.”

- *Mitigation Number BIO1A is also referred to on the following pages: 156 and 171.*

SEATAC Comment:

SEATAC recommends a larger suite of mitigation methods for impacts to sensitive plants in addition to the proposed emphasis on translocation.

DMEC Response:

- Text was revised on page 149 to:

“Mitigation for Loss of Special-Status *Calochortus* Species Known Onsite

To mitigate for the loss of approximately 50 individual *Calochortus* plants, avoidance, bulb translocation, seed collection and propagation, and mitigation monitoring in protected locations are identified as four means to reduce the level of impact from significant to less than significant. This genus is not difficult from a production standpoint as long as species of *Calochortus* are not over-watered and are protected from predators (snails, slugs, birds, rabbits, and rodents) (Carol Bornstein, pers. comm. 30 January 2006).”

- Text was also revised on page 150 to:

“BIO11 Bulb Translocation: A pre-construction survey during the peak flowering period, approximately March through June, shall be conducted by a qualified botanist in the areas of the project site that will be disturbed, and all individual *Calochortus* plants shall be marked for relocation. Each impacted *Calochortus* bulb shall be clearly delineated with pin flags for collection by a qualified bulb collector. It is preferable to collect the bulbs after the flowering period when the plants are dormant. If necessary, the bulbs could be lifted when the shoots are just breaking the soil surface; however, care should be taken not to damage the bulb itself, as well as the root mass. Any lifted bulbs with shoots would require immediate planting since they are actively growing (since they are not dormant).

Another option for the relocation of the bulbs is to move the topsoil in large blocks from areas of high *Calochortus* concentration to the selected revegetation site. The salvaged bulbs or bulb-containing topsoil shall be translocated to an appropriate site(s) within the preserved portions of the project site.

A site analysis plan must be conducted of potential planting areas to identify the most appropriate mitigation site(s), which should be conducted prior to bulb collection. A detailed mitigation plan shall be prepared and submitted to the appropriate agency(ies) for review prior to implementation. The plan must be prepared by a qualified botanist as determined by Los Angeles County Regional Planning. Potential mitigation areas onsite are shown on Figure 29, Potential *Calochortus* Mitigation Areas.

BIO11A Seed Collection and Propagation: *Calochortus* are typically grown from seed for mitigation purposes (Carol Bornstein, pers. comm. 30 January 2006). A seasonal survey shall be conducted in suitable habitat after the flowering season to collect seeds. The survey shall be conducted by a qualified botanist familiar with the flora of the Santa Susana Mountains. Seeds shall be collected when ripe, cleaned, stored by a qualified nursery or institution with appropriate storage facilities, and transferred to a native plant nursery experienced with propagating *Calochortus* species and grown out to 1-gallon container size. The best time to sow seed is in the fall in conjunction with the onset of rain. *Calochortus* usually takes at least three (3) years to achieve flowering size, depending upon the species (Carol Bornstein, pers. comm. 30 January 2006). These plants shall be planted in suitable preserved habitat onsite at a ratio of 10 plants for every 1 plant impacted by the project. The propagated plants shall be maintained and monitored for a period of five (5) years after initial planting, with annual reports submitted to the County.”



- *And, text was revised on page 172 to:*

“Mitigation for Interference with Wildlife Movement within Lyon Canyon

Implementation of the following mitigation measures (presented above) would effectively mitigate local impacts to wildlife movement:

- BIO23, 25, and 26 (for impacts to special-status wildlife species), and
- BIO32 and 33 (for impacts from noise), and
- BIO37 and 38 (for impacts from human activity), and
- BIO39 and 40 (for impacts from night lighting), and
- BIO2 through 8, and BIO41 through 53 (for impacts to natural vegetation).

In addition, the proposed dim lighting and enlarged culverts to be implemented with the project development will help to mitigate for impacts to wildlife movement. A culvert/tunnel will be constructed over Lyon Canyon Creek to accommodate animal movement through the remaining habitats onsite and beyond. No additional mitigation measures are required.

Level of Significance After Mitigation: Less Than Significant.”