Letter No. 15



South Coast Wildlands

P.O. Box 1102, Idyllwild, CA 92549 Phone 951/659-9946 Fax 951/659-9927 www.scwildlands.org

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Jeff Hogan Community Development City of Santa Clarita 23920 Valencia Blvd. Santa Clarita, CA 91355 Fax 661 259 8125

Subject: Gates/King Additional Information Document

Please accept the following comments regarding the Gates/King Additional Information Document. These comments are submitted on behalf of South Coast Wildlands, a non-profit organization dedicated to ensuring functional habitat connectivity across California's South Coast Ecoregion. Our mission is to protect, connect, and restore the rich natural heritage of the South Coast Ecoregion by establishing a system of connected wildlands. Therefore, comments submitted herein are directed primarily at habitat connectivity issues.

The proposed project would essentially sever meaningful habitat connectivity between the San Gabriel and Santa Susana Mountains, large core areas that are functionally part of one ecological system. The value of already protected land in the region for biodiversity conservation, environmental education, outdoor recreation, and scenic beauty is immense. Much of the land in the linkage has already been protected though successful conservation planning efforts undertaken by the City of Santa Clarita, Santa Monica Mountains Conservancy, National Park Service, The Nature Conservancy, California State Parks, U.S. Forest Service, Mountain Recreation Conservation Authority, Mountain Restoration Trust, Friends of the Santa Clara River, and County, City and local agencies, although gaps in protection remain. The Santa Monica Mountains Conservancy has been working with other federal, state, county, and local agencies for over 25 years to protect the Rim of the Valley Corridor. The Los Angeles County General Plan update would establish 3 Significant Ecological Areas (SEA) in the Santa Monica-Sierra Madre Connection: the proposed Santa Monica Mountains SEA (99,430 acres) that crosses the 101 freeway at Liberty and Crummer canyons; the Santa Susana/Simi Hills SEA (26,795 ac) that covers the connection between the San Gabriel and Santa Susana Mountains; and the Santa Clara River SEA which covers the portion of the river in the Los Angeles County. Significant conservation investments already exist in the region but the resource values they support could be irreparably harmed by loss of connections between them.

South Coast Wildlands, working with our partners in the South Coast Missing Linkages effort recently completed a linkage design report for the Santa Monica-Sierra Madre Connection, which addresses habitat connectivity between the San Gabriel and Santa Susana Mountains. I've included the executive summary and a map of the linkage design in Attachment 1 and have

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enclosed a CD of the final review draft of the report. Please consider this information when analyzing the impacts of the proposed Gates/King project on habitat connectivity.

Respectfully Submitted,

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Kristeen Penrod Executive Director

Cc: Paul Edelman, Santa Monica Mountains Conservancy Ray Sauvajot, National Park Service Santa Monica Mountains National Recreation Area E.J. Remson, The Nature Conservancy



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Attachment 1, Executive Summary

Habitat loss and fragmentation are the leading threats to biodiversity, both globally and in southern California. Efforts to combat these threats must focus on conserving well-connected networks of large wildland areas where natural ecological and evolutionary processes can continue operating over large spatial and temporal scales—such as top-down regulation by large predators, and natural patterns of gene flow, pollination, dispersal, energy flow, nutrient cycling, inter-specific competition, and mutualism. Adequate landscape connections will thereby allow these ecosystems to respond appropriately to natural and unnatural environmental perturbations, such as fire, flood, climate change, and invasions by alien species.

The tension between fragmentation and conservation is particularly acute in California, because our state is one of the 25 most important hotspots of biological diversity on Earth. And nowhere is the threat to connectivity more severe than in southern California—our nation's largest urban area, and still one of its fastest urbanizing areas. But despite a half-century of rapid habitat conversion, southern California retains some large and valuable wildlands, and opportunities remain to conserve and restore a functional wildland network here.

Although embedded in one of the world's largest metropolitan areas, southern California's archipelago of conserved wildlands is fundamentally one interconnected ecological system, and the goal of South Coast Missing Linkages is to keep it so. South Coast Missing Linkages is a collaborative effort among a dozen governmental and non-governmental organizations. Our aim is to develop Linkage Designs for 15 major landscape linkages to ensure a functioning wildland network for the South Coast Ecoregion, along with connections to neighboring ecoregions. The Santa Monica-Sierra Madre Connection is one of the few remaining coastal connections in the South Coast Ecoregion; it is a critical landscape connection to restore and protect.

On July 29, 2002, 60 participants representing over 30 agencies, academic institutions, land managers, land planners, conservation organizations, and community groups met to establish biological foundations for planning landscape linkages in the Santa Monica-Sierra Madre Connection. They identified 20 focal species that are sensitive to habitat loss and fragmentation here, including 3 plants, 4 insects, 1 fish, 1 amphibian, 2 reptiles, 4 birds and 5 mammals. These focal species cover a broad range of habitat and movement requirements: some are widespread but require huge tracts of land to support viable populations (e.g., mountain lion, badger); others are species with very limited spatial requirements (e.g., harvester ant). Many are habitat specialists (e.g., cactus wren) and others require specific configurations of habitat elements (e.g. steelhead trout that uses rivers for migrating and streams for rearing and spawning). Together, these species cover a wide array of habitats and movement needs in the region, so that planning adequate linkages for them is expected to cover connectivity needs for the ecosystems they represent.

To identify potential routes between existing protected areas we conducted landscape permeability analyses for 3 focal species for which appropriate data were available. Permeability analyses model the relative cost for a species to move between protected core habitat or population areas. We defined a least-cost corridor—or best potential route—for each species, and then combined these into a Least Cost Union covering all 3 species. We then analyzed the size and configuration of suitable habitat patches within this Least Cost Union for all focal species to verify that the final Linkage Design would suit the live-in or move-through habitat needs of all. Where the Least Cost Union omitted areas essential to the needs of a particular species, we expanded the Linkage Design to accommodate that species' particular requirements to produce a

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final Linkage Design (Figure 46). We also visited priority areas in the field to identify and evaluate barriers to movement for our focal species. In this plan we suggest restoration strategies to mitigate those barriers, with special emphasis on opportunities to reduce the adverse effects of Interstate 101, and 5, and State Routes 23, 118, 126, and14.

The ecological, educational, recreational, and spiritual values of protected wildlands in the South Coast Ecoregion are immense. Our Linkage Design for the Santa Monica-Sierra Madre Connection represents an opportunity to protect a truly functional landscape-level connection. The cost of implementing this vision will be substantial—but the cost is small compared with the benefits. If implemented, our plan would not only permit movement of individuals and genes between the Santa Monica Mountains and the Sierra Madre Ranges, but should also conserve large-scale ecosystem processes that are essential to the continued integrity of existing conservation investments throughout the region. We hope that our biologically based and repeatable procedure will be applied in other parts of California and elsewhere to ensure continued ecosystem integrity in perpetuity.





