

January 26, 2026.

I printed out only the first page to save on paper. The full 58 page letter is included with the references on the USB drive

Theresa Relf

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2026 JAN 27 PM 2:31



January 26, 2026

*Sent via email, with references via FTP and FedEx*

Chair Michael R. Hastings and Members of the  
Regional Planning Commission  
Los Angeles County Department of Regional Planning  
320 West Temple St.  
Los Angeles, CA 90012  
[commission@planning.lacounty.gov](mailto:commission@planning.lacounty.gov)  
[comment@planning.lacounty.gov](mailto:comment@planning.lacounty.gov)

**Re: January 28, 2026 Regional Planning Commission Meeting Agenda Item No. 7 –  
Northlake Development (Project No. R2015-00408-(5))**

Dear Chair Hastings and Members of the Regional Planning Commission:

These comments are submitted on behalf of the Center for Biological Diversity (the “Center”) regarding the proposed Northlake Development (“Project”). The Center has reviewed the Recirculated Partial Final Supplemental EIR (“EIR”) closely and remains concerned that the EIR’s analysis of, *inter alia*, biological resources, wildfire, and transportation impacts is inadequate. The Center urges the Regional Planning Commission (“Commission”) not to approve the Project without first remedying these deficiencies.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

**I. The RPFSEIR Fails to Adequately Assess and Mitigate the Project’s Impacts to Mountain Lions and Wildlife Connectivity.**

The RPFSEIR fails to appropriately respond to the Center’s comments regarding mountain lions and wildlife connectivity, stating “[w]ith respect to the portions of the SEIR that were not recirculated, the doctrines of res judicata and collateral estoppel preclude litigation and/or relitigation of those issues states” (RPFSEIR at 2-22) and that “[c]ollateral estoppel bars relitigation of the mountain/wildlife movement [*sic*] and connectivity issues” (RPFSEIR at 2-24). However, as discussed in the Center’s May 29, 2025 comment letter, new and significant information regarding the conservation status of local mountain lions and the increasing threats they face, the movement of at least one mountain lion adjacent to the Project area, and the

## Jodie Sackett

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**From:** Chris Dittes <dittes.catc@gmail.com>  
**Sent:** Tuesday, January 27, 2026 10:27 PM  
**To:** Jodie Sackett  
**Subject:** Late-Breaking Safety Information – Agenda Item 7 (Northlake Phase 1) – Request for Continuance

**CAUTION: External Email. Proceed Responsibly.**

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**Subject:** URGENT – Late-Breaking Safety Information for Agenda Item 7 (Northlake Phase 1) – Omission of 34-inch SoCalGas Transmission Line from RPFSEIR

**To:** [jsackett@planning.lacounty.gov](mailto:jsackett@planning.lacounty.gov); (cc) Commission Secretary; (please forward to Commission Secretary for distribution)

**Date:** 01-27-26

**Re:** Agenda Item 7 – Northlake Phase 1 (Project No. R2015-00408; VTTM 073336; VTPM 073335; CUP RPPL2023004316)

**Dear Commissioners:**

**As a resident of the existing Northlake Neighborhood, representing region 5 on the Castaic Area Town Council, and directly affected by the gas pipeline accident, I respectfully ask that this statement requesting a continuance, be reviewed with the January 28, 2026 hearing for this project. Due to the critical nature of the incident, I ask that it also be included in the official project package. Recent developments regarding this gas pipeline have raised an environmental safety issue that has not been sufficiently evaluated in past or current revisions of the EIR.**

**Summary.** The **Recirculated Partial Final Supplemental EIR (RPFSEIR)** and hearing package for Northlake **omit** a known **34-inch SoCalGas high-pressure gas transmission line**—including its **hazard footprint, potential impact radius, and mitigation**. The package seeks **final certification of the RPFSEIR** and adoption of the **MMRP** at the January 28, 2026 hearing. Because the gas transmission line is **not analyzed** anywhere in the environmental record provided to the Commission, the County **cannot lawfully certify** the RPFSEIR or approve the entitlements at this time. I respectfully request a **continuance** and direction to staff to prepare a focused, site-specific pipeline hazard and consequence analysis with enforceable mitigation/avoidance before any approvals. [[Northlake...ined final | PDF](#)]

**What the County’s package shows.**

- The staff report requests that the RPC **certify the RPFSEIR, adopt the MMRP**, and **approve** the maps/CUP on **Jan 28, 2026 (Agenda Item 7)**. [[Northlake...ined final | PDF](#)]
- Project drawings and legal exhibits list **Southern California Gas Company** as the gas utility and label **“EXIST 34” GAS,” “GAS LINE CROSSING,”** and related gas easements across the site. **No PHMSA/49 CFR 192** analysis appears; there are **no hazard radii, no setback standards, no leak-detection/isolation commitments**, and **no pipeline-safety mitigation** in the hearing package. [[Northlake...final.pdf | PDF](#)]

**Why this is a CEQA defect.** CEQA requires disclosure/analysis of **significant hazards** and adoption of **enforceable mitigation before approval**. Gas transmission lines in **High Consequence Areas (HCAs)** require risk-based integrity management under **PHMSA’s 49 CFR Part 192, Subpart O**, which uses **potential impact radius** concepts linked to occupied structures. It is **not sufficient** to rely on general regulatory compliance without analyzing **how the project’s land uses interact with the hazard** and without **objective performance standards** (e.g., setbacks, isolation valves, leak detection, emergency access). Approving the project and certifying the RPFSEIR **without any analysis** of the 34-inch line would be an **impermissible failure to disclose** and an **improper deferral of mitigation**. [[case.plann...county.gov](#)], [[regulation...justia.com](#)]

**Requested Commission action.**

1. **Continue** Agenda Item 7 and direct staff to prepare a **site-specific gas transmission hazard and consequence analysis** that: (a) identifies the **HAIA** (hazard analysis influence area) using PHMSA methods; (b) models credible rupture/thermal/overpressure scenarios; and (c) establishes **setbacks/controls** for land uses, schools, senior housing, and high-occupancy spaces. [[case.plann...county.gov](#)]
2. Direct staff to bring back **enforceable mitigation/avoidance** (MMRP) and **“permit gate” conditions** that **prohibit grading/building/occupancy** within the HAIA until objective pipeline-safety **performance standards** (integrity verification, automatic/remote isolation, leak detection, emergency coordination) are **independently verified**. (Suggested language attached below.) [[regulation...justia.com](#)]

**Conclusion.** Given the complete omission of a known **34-inch SoCalGas transmission line** from the environmental analysis, the Commission should **not certify** the RPFSEIR or grant approvals at this time. A short continuance will allow staff to correct the record and present enforceable, site-specific pipeline safety measures commensurate with the risk.

Respectfully submitted,  
Chris Dittes

[phone/email]

**Evidence references for the administrative record** (for staff/Commission use):

- **Staff Report** (Jan 15, 2026) showing requested **RPFSEIR certification** and MMRP adoption for **Jan 28, 2026, Item 7**.
- **Map/plan sheets** noting **“EXIST 34” GAS,” “GAS LINE CROSSING,”** and gas-utility/easement callouts without safety analysis.
- **PHMSA Subpart O** (49 CFR Part 192) establishing HCA/potential impact radius-based integrity management for **gas transmission pipelines**.
- **CEQA “deferral of mitigation” guidance/case law**: mitigation must be **committed** with

**objective standards** before approval; agencies cannot “approve now, study later.” [[Northlake...ined final | PDF](#)] [[Northlake...final.pdf | PDF](#)] [[case.plann...county.gov](#)] [[regulation...justia.com](#)]

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Regards,

Chris Dittes

Northlake Resident, and CATC Director, Region-5

[dittes.catc@gmail.com](mailto:dittes.catc@gmail.com)

661-645-5378



**MOUNTAINS RECREATION & CONSERVATION AUTHORITY**  
King Gillette Ranch  
26800 Mulholland Highway  
Calabasas, California 91302  
PHONE (818) 878-0886

January 26, 2026

Planning Commission  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Recirculated Partial Final Supplemental Environmental Impact Report for the Northlake Phase 1 Project No. R2015-00408, etc., Not in Compliance with CEQA**

Dear Planning Commissioners:

The Mountains Recreation and Conservation Authority (MRCA) recommends the Los Angeles County Planning Commission (Commission) find that the Recirculated Partial Final Supplemental Environmental Impact Report (RPFS-EIR) for Northlake Phase 1 Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316 (Project) is not in compliance with the California Environmental Quality Act (CEQA) and deny the Project as presented to the Commission.

The supplemental findings of fact in the RPFS-EIR are unequivocally incorrect and inconsistent with Public Resources Code Sections 21081 and State CEQA Guidelines Section 15091 as the proposed Project requires compensatory mitigation to be performed on MRCA lands without consultation of, agreement with, or approval by the MRCA. Specifically, the RPFS-EIR identified southwestern spiny rush (*Juncus acutus*) occurrences on MRCA-owned lands to satisfactorily mitigate adverse impacts to documented southwestern spiny rush within the Project (see RPFS-EIR Mitigation Measure [MM] 5.2-5c). On October 5, 2022, the MRCA Governing Board approved MRCA Resolution No. 22-138 entering into a Mitigation Agreement pursuant to California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement 1600-2015-0271-R5 (and other regulatory permits) with Lennar Homes of California, LLC, to perform habitat mitigation on MRCA property in Marple Canyon associated with the Habitat Mitigation and Monitoring Plan for the Aidlin Hills Residential Project. MRCA has initiated this habitat restoration work in Marple Canyon and cannot provide the requisite off-site southwestern spiny rush compensatory mitigation as outlined in RPFS-EIR MM 5.2-5c.

Further, the proposed Partial Creek Avoidance Alternative (PCAA) would irreparably impact wildlife usage of an oversized box culvert below southbound Interstate 5 (I-5) on MRCA-owned land that provides protected wildlife crossing of I-5 between Marple and Grasshopper Canyons. Deterrence of wildlife use of this protected I-5 crossing in the regionally significant, multi-agency designed *Sierra Madre-Castaic Connection* linking the Southern California Ecoregion with the Tehachapi and Sierra Nevada ranges would result in additional wildlife-vehicle collisions on I-5 and Ridge Route Road and further reduce

the genetic viability of Central Coast and Southern California mountain lion (*Puma concolor*)—a candidate species for protection by California Endangered Species Act (CESA). Given the public trust doctrine codified by Fish and Game Code Section 1600 that wildlife (and their habitat) are held in trust for the people and the protection and conservation of fish and wildlife is of utmost public interest, the Commission has an opportunity to appropriately deny the Project while satisfying the requisite conditions of the Housing Accountability Act (HAA) whereby the Project has (1) specific, adverse impacts upon public health or safety and (2) no feasible method to satisfactorily mitigate or avoid these impacts as related to southwestern spiny rush and mountain lion.

Recent wildfires in the immediate vicinity of the Project include: Holser Fire (2020), Castaic Fire (2020), Route Fire (2021), Route Fire (2022), Hughes Fire (2025), and Canyon Fire (2025). See attached MRCA – Northlake 20-Year Fire Recurrence Map for reference. Repeat fires in the same area over a short interval often result in habitat type change where former oak woodlands are converted to chaparral shrublands and chaparral shrublands are converted to grasslands—each successive type change results in more fire prone, faster burning fuel types. Because the proposed Project’s development is sited over one mile from the nearest planned residential developments along Pine Crest Place, the Project unnecessarily fragments habitat and creates a fire-vulnerable island of development surrounded by flashy fuels.

The Project’s “planned” expansion of the wildland-urban interface in a California Department of Forestry and Fire Protection (CalFire) designated Very High Fire Hazard Severity Zone (VHFHSZ) endangers the public health and safety of future residents and overburdens local and mutual-aid fire departments tasked to defend ever expanding suburban sprawl. Additionally, the Project Area regularly receives high wind warnings issued by the National Weather Service to alert the public about dangerous weather conditions. As evidenced by the Palisades and Eaton Fires (2025), high wind events and wildfires can overwhelm home-hardening defenses and on-the-ground fire suppression, prevent aerial fire containment, and result in extensive destruction to life and property.

Given the extensive liabilities the County is experiencing from the Palisades and Eaton Fires (2025), the Commission should not further imperil the public, first responders, or the County’s fiscal solvency by approving 2,295 new residential units in a VHFHSZ with at least one decaying 34-inch, 600-psi petroleum pipeline running through failure-prone hillsides. The Commission should also recognize the unmitigated threat the Project poses to habitat (including southwestern spiny rush) and habitat connectivity that supports the persistence of State-protected mountain lions in Southern California.

The County must also ensure the Project applicants, developers, financiers, future residents, and insurance providers sufficiently understand the multitude risks of living next to a 34-inch, 600-pounds-per-square-inch pressured petroleum pipeline that ruptured on December 27, 2025, and forced thousands of area residents and visitors to shelter in place. Preliminary investigation indicates the gas pipeline exploded after a minor landslide below Ridge Route Road, on or near LA County APN 3244-014-050 owned by Northlake

Associates LLC, and approximately 250 feet from the primary ingress/egress for the Project. See attached MRCA – Northlake Gas Line Rupture Map for reference. Since there are other aging pipelines that run through the PCAA footprint, the Project's evaluation of hazards must include assessments of each petroleum pipeline, the adequacy of performed pipeline maintenance, and the planned future pipeline maintenance and/or replacement schedule(s) in the Project Area. The Project applicant must also prepare public outreach materials for all future residents (fee owners and renters) outlining emergency preparedness information about how to minimize sensitive-receptor exposure to any future gas line ruptures. Similar sensitive-receptor information should be prepared for future residents for information regarding the nearby Chiquita Canyon Landfill that is unable to abate toxic air pollution derived from uncontrolled decomposition of landfill waste. Commercial businesses within the Project must be required to publicly and prominently display emergency evacuation routes and effective methods to shelter in place.

In 2025, MRCA completed a Wildlife Conservation Board (WCB) funded implementation project to improve 2.5 acres of cover and forage for wildlife at the above-mentioned box culvert I-5 crossing on MRCA land. Throughout the course of this state-funded project that initiated in April 2020, MRCA's wildlife cameras documented several species using the I-5 culvert including: lion, deer, bobcat, coyote, roadrunner, quail, and weasel. Attached are select photos (see MRCA Marple Canyon Photo Exhibit) that document wildlife that will be directly impacted by Project construction and prevented from using this critical connectivity point across the 26-mile-plus I-5 wildlife barrier from State Route 138 (SR 138) to State Route 126 (SR 126) as identified on the Project's PCAA Exhibit 2 map. The same PCAA Exhibit 2 map also delineates presumed wildlife dispersal routes through the Project where wildlife will have to cross a new, at-grade, 64-foot-wide "Modified Industrial Collector" and several crossings of new, at-grade, 40-foot-wide "Local Collector" streets to travel between Grasshopper Canyon and Marple Canyon.

Grasshopper Canyon is currently undeveloped except for overhead and underground utilities and unpaved roads to service these utilities—virtually no barriers to wildlife movement. By developing Grasshopper Canyon, even with the reduced grading footprint for the PCAA, wildlife will be irreparably harmed by the Project's impacts to existing wildlife dispersal routes and forced to cross new Project roads that do not incorporate any avoidance or mitigation measures (such as oversized culverts or bridge spans, habitat cover to reduce vehicle noise and light impacts, etc.) that can facilitate east-west wildlife movement through the Project. The proposed "emergency vehicle access" road to the new school site will connect to Ridge Route Road within 450 feet of the I-5 crossing structure on MRCA property. At minimum, this school service road must be realigned to the south, as shown on MRCA – Northlake Road Alignment Alternative Map, to avoid and/or mitigate additional impacts to this existing I-5 wildlife crossing route of regional significance.

The proposed PCAA school service road's connection with Ridge Route Road is dangerously close (within 200 feet and on a slight curve) to the Marple Canyon access

road used by MRCA, Southern California Edison, SoCalGas Company, and contractors to enter and exit Marple Canyon. The gate at this location is a double-arm swinging gate and there is minimal room for parking along Ridge Route Road to unlock or close the gate. As designed, the school's service road will endanger authorized work crews and the public traveling Ridge Route Road. At minimum, the school service road should be moved to approximate the orientation shown in MRCA – Northlake Road Alignment Alternative Map; however, MRCA recommends a formal traffic study to align with appropriate site distances and intersection design criteria set forth in the California Highway Design Manual as Ridge Route Road is often used as a bypass for I-5 during extreme traffic conditions.

In furtherance of the multi-agency designed *Sierra Madre-Castaic Connection* to identify the least-cost corridor for movement of priority indicator species between the Tehachapi Range and the Transverse Ranges of Southern California, MRCA is conducting a project in coordination with California Department of Transportation (Caltrans), CDFW, U.S. Geological Survey (USGS), and other partner organizations, to study the 26-mile stretch of Interstate 5 (I-5) between SR 138 and SR 126 for wildlife permeability and opportunities to improve wildlife connectivity across I-5. CDFW and Caltrans have each designated this section of I-5 as a barrier to wildlife movement and genetic contact between increasingly homogenous Southern California species with their more heterogenous populations of the Tehachapi and Sierra Nevada mountain ranges.

Preliminary MRCA I-5 study data indicates the oversized box culvert on MRCA property below the southbound I-5 regularly transmits priority megafauna between Marple and Grasshopper Canyons. Complementary mountain lion field work is being collected by U.C. Davis's California Carnivores Program in coordination with U.S. Forest Service to determine how regional lions are, or are not, able to cross I-5. The U.C. Davis project has only recently collared a mountain lion west of I-5 near the Project Area; however, the extent of tracked mountain lion movement data, compared to mountain lion roadkill data, indicates that lions confined east of I-5 and south of SR 138 have limited points of access westerly across I-5 and any further reductions in wildlife connectivity across I-5 associated with the proposed Project will represent cumulative, avoidable impacts to a CESA-protected species. See MRCA – Northlake Puma Observation Map for reference.

Adding additional vehicle traffic to Ridge Route Road to serve the Project's 2,295 new residential units will reduce wildlife approaches to the CDFW and Caltrans recognized I-5 barrier and force wildlife to attempt dangerous at-grade crossings or attempt to use the northern Marple Canyon box culvert identified on PCAA Exhibit 2 that leads directly to an existing paintball/airsoft park that severely dissuades wildlife connectivity. Extensive roadkill data compiled for MRCA's I-5 wildlife connectivity study indicates Project development of Grasshopper Canyon will result in addition roadkill of priority megafauna species including mountain lion, mule deer, black bear, bobcat, coyote, and fox. Increased wildlife-vehicle collisions resultant from the Project will similarly endanger vehicle occupants, increase insurance costs, and increase commerce delays on an already congested I-5.

Through a series of acquisitions facilitated by the Trust for Public Land, in 2022 MRCA completed the 6,000-acre-plus Temescal-Hathaway Ranch acquisition that comprises the bulk of the County-designated Santa Felicia Significant Ecological Area (SEA). Project development would impact wildlife connectivity between Castaic Lake and the Santa Felicia SEA that abuts Ventura County and Lake Piru. Development of 2,295 residential units and associated roadway improvements would irreparably harm wildlife connectivity in this biologically unique and sensitive area between perennial water sources of Lake Piru and Castaic Lake. While Southern California is not currently experiencing drought conditions, climate change science anticipates future droughts punctuated by extreme rainfall events which requires conservation of existing surface water resources and preservation of access to surface water in support of rare, threatened, endangered, or at-risk wildlife.

Considering the threat to public health and safety posed by this Project and the inability of Project applicant to propose mitigation that satisfactorily avoids or mitigates impacts to wildlife and habitat, the Commission is fully justified to deny Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316.

Please address any correspondence to me by email at [chad.christensen@mrca.ca.gov](mailto:chad.christensen@mrca.ca.gov), by phone at (310) 589-3230, ext. 121, or at the above letterhead address.

Sincerely,



Chad Christensen  
Deputy Chief  
Natural Resources and Planning

Attachments: MRCA – Northlake Road Alignment Alternative Map  
MRCA – Northlake Gas Line Rupture Map  
MRCA – Northlake 20-Year Fire Recurrence Map  
MRCA – Northlake Puma Observation Map  
MRCA – Marple Canyon Photo Exhibit

The following Photo Exhibit accompanies the Mountains Recreation and Conservation Authority (MRCA) January 26, 2026, comments to the Los Angeles County Planning Commission and Department of Regional Planning regarding the Recirculated Partial Final Supplemental Environmental Impact Report (RPFS-EIR) for Northlake Phase 1 Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 0733356, and Conditional Use Permit No. RPPL2023004316 (Project) and Project's associated Partial Creek Avoidance Alternative (PCAA) that would irreparable harm regional habitat connectivity and MRCA's completed Marple Canyon I-5 Wildlife Crossing Enhancement Project (WCB Project ID 2019155).

The below Photos 1 through 6 provide sample wildlife camera images of various species documented to live-in and move-through Marple Canyon and Grasshopper Canyon. These representative wildlife camera captures were collected during the term of MRCA's habitat improvement project between April 3, 2020, and November 30, 2025.

Photos 7 and 8 provide overview pictures of MRCA's habitat improvement project to show the ecological lift through removal of non-native, invasive mustards, thistles, and ruderal grasses, establishing container plants of coast live oak, elderberry, coyote brush, mulefat, sagebrush, ceanothus, and toyon while recruiting expansion of native plants such as thicketleaf yerba santa, narrowleaf milkweed, and deerweed. Combined, these efforts will provide shade, cover, and forage for wildlife attempting to cross I-5 between Marple and Grasshopper Canyons.

Photos continue on the following pages.



**Photo 1.** Date: 2020-08-09. California quail (*Callipepla californica*) entering Marple Canyon box culvert below I-5 traveling west to east towards Grasshopper Canyon.



**Photo 2.** Date: 2020-11-05. Uncollared Mountain lion (*Puma concolor*) exiting Marple Canyon box culvert below I-5 traveling east to west from Grasshopper Canyon into Marple Canyon.



**Photo 3.** Date: 2021-07-24. Mule deer (*Odocoileus hemionus*) exiting Marple Canyon box culvert below I-5 traveling east to west from Grasshopper Canyon into Marple Canyon.



**Photo 4.** Date: 2022-04-19. Bobcat (*Lynx rufus*) entering Marple Canyon box culvert below I-5 traveling west to east towards Grasshopper Canyon.



**Photo 5.** Date: 2022-04-25. Coyote (*Canis latrans*) exiting Marple Canyon box culvert below I-5 and carrying prey capture (apparent ground squirrel).



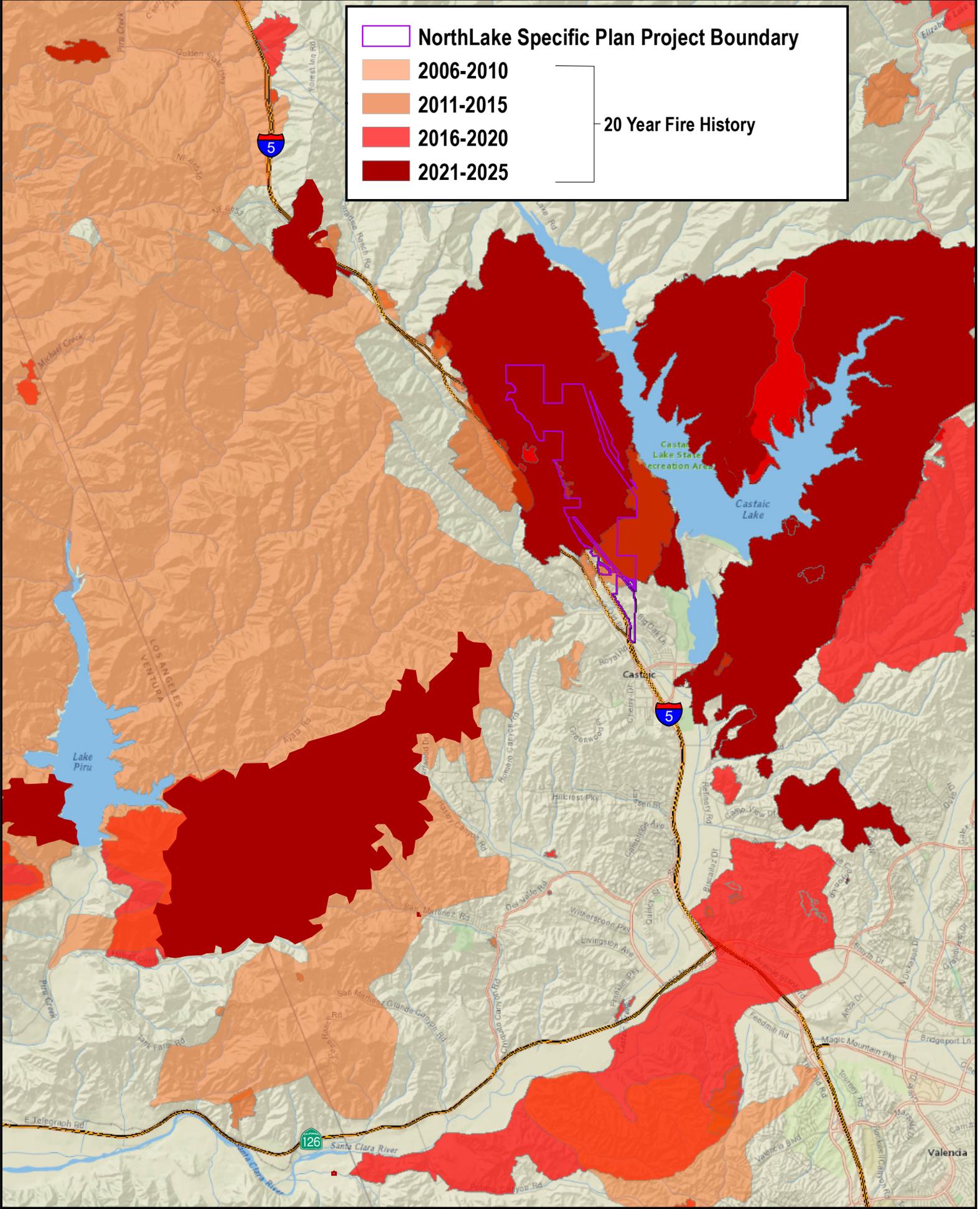
**Photo 6.** Date: 2022-05-15. Long-tailed weasel (*Neogale frenata*) captured on MRCA wildlife camera at Marple Canyon box culvert below I-5 connecting Grasshopper Canyon to Marple Canyon.



**Photo 7.** Date: 2020-05-11. Overview of MRCA I-5 Habitat Project area from Photo Monitoring site with box culvert below I-5 visible on right of frame. Note the prevalence of non-native, invasive mustard (yellow flowers) throughout.



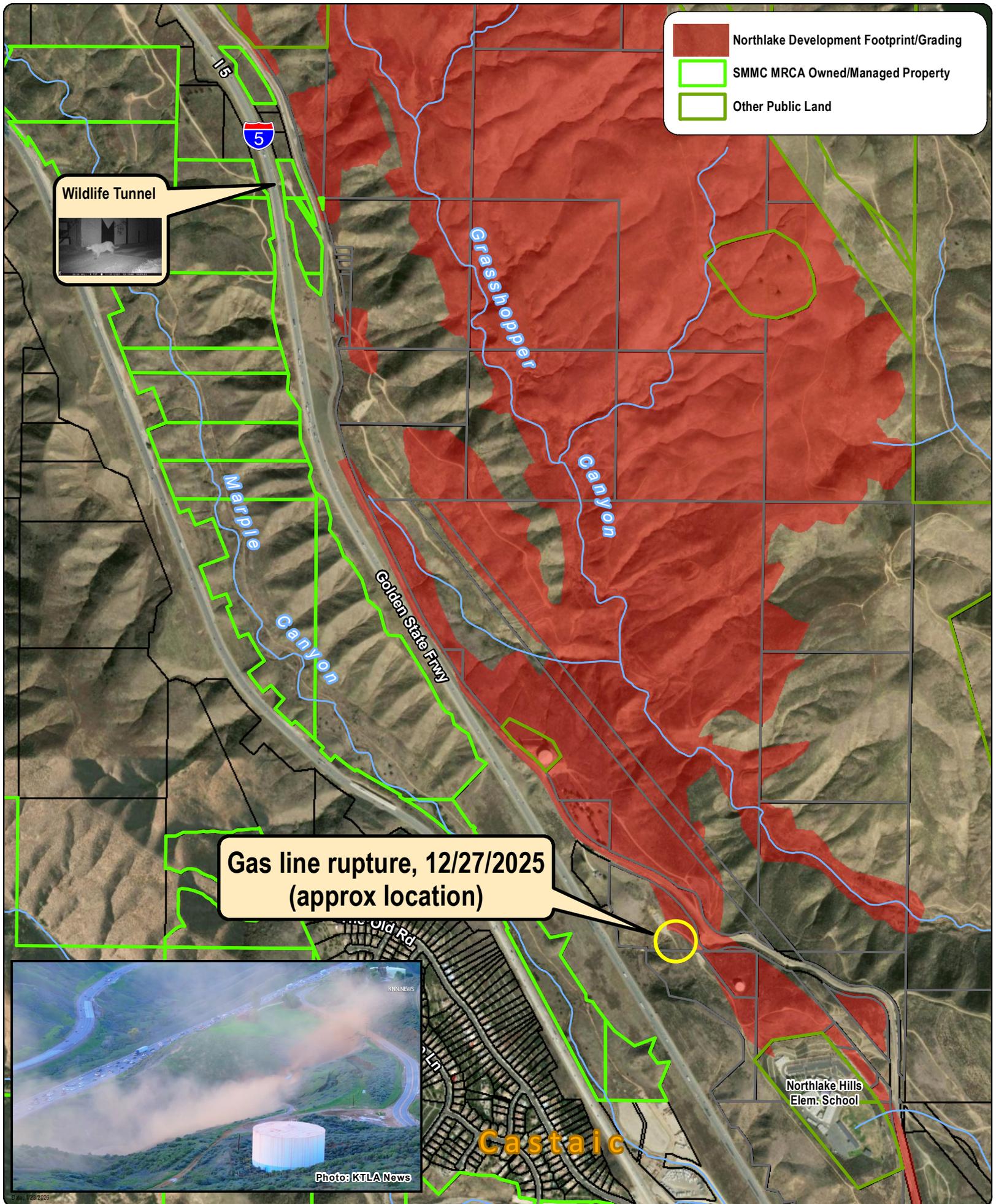
**Photo 8.** Date: 2025-10-01. Similar view as Photo 7 showing MRCA I-5 Habitat Project area mostly free of non-native vegetation with native "volunteer" and installed container plants established and thriving.



**Northlake Project No. R2015-00408 Phase 1**

**Northlake 20-Year Fire Recurrence Map**

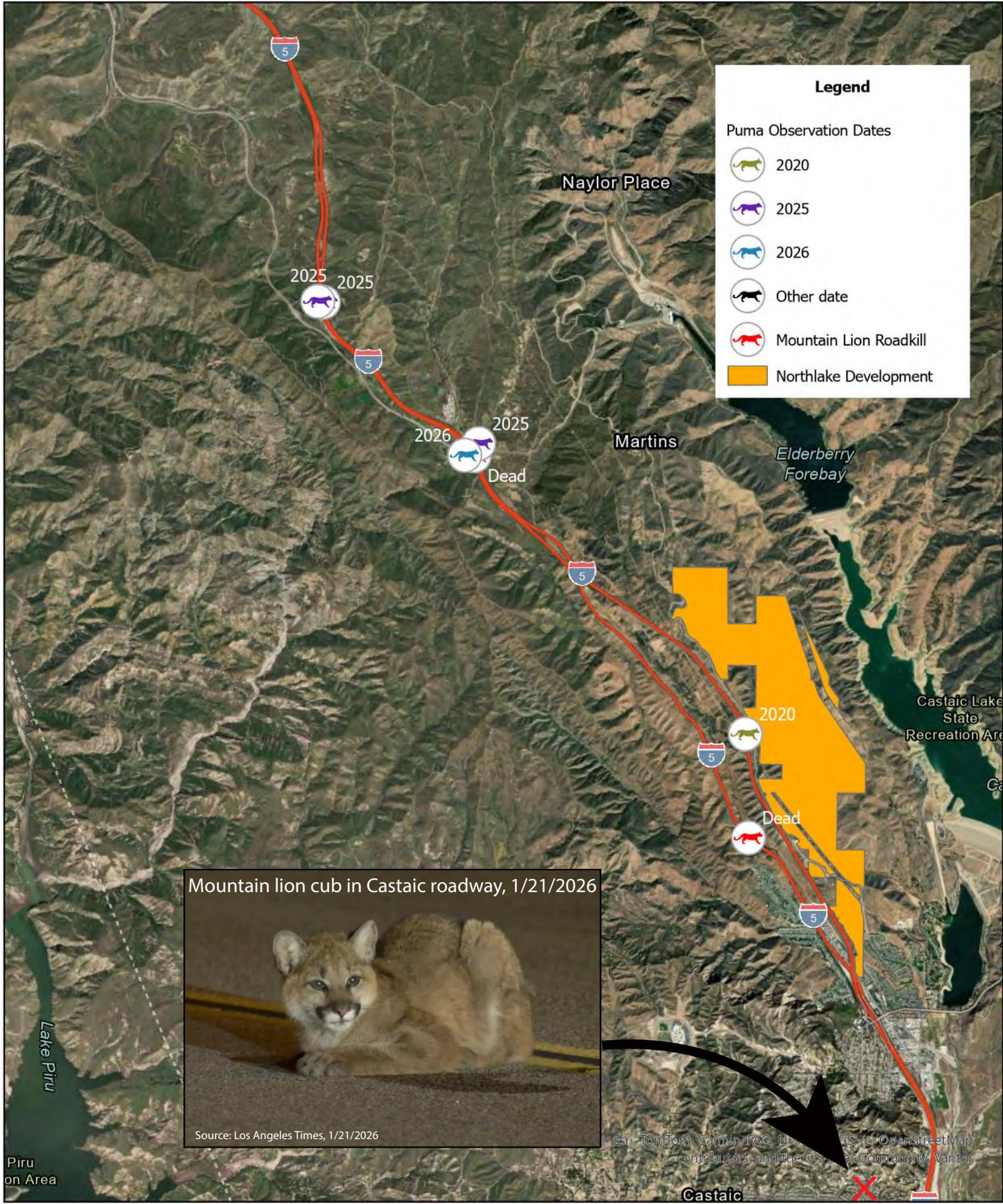
0 0.5 1 Miles



**Northlake Project No. R2015-00408 Phase 1**

**Northlake Gas Line Rupture Map**

0 250 500 Feet



**Legend**

Puma Observation Dates

- 2020
- 2025
- 2026
- Other date
- Mountain Lion Roadkill
- Northlake Development

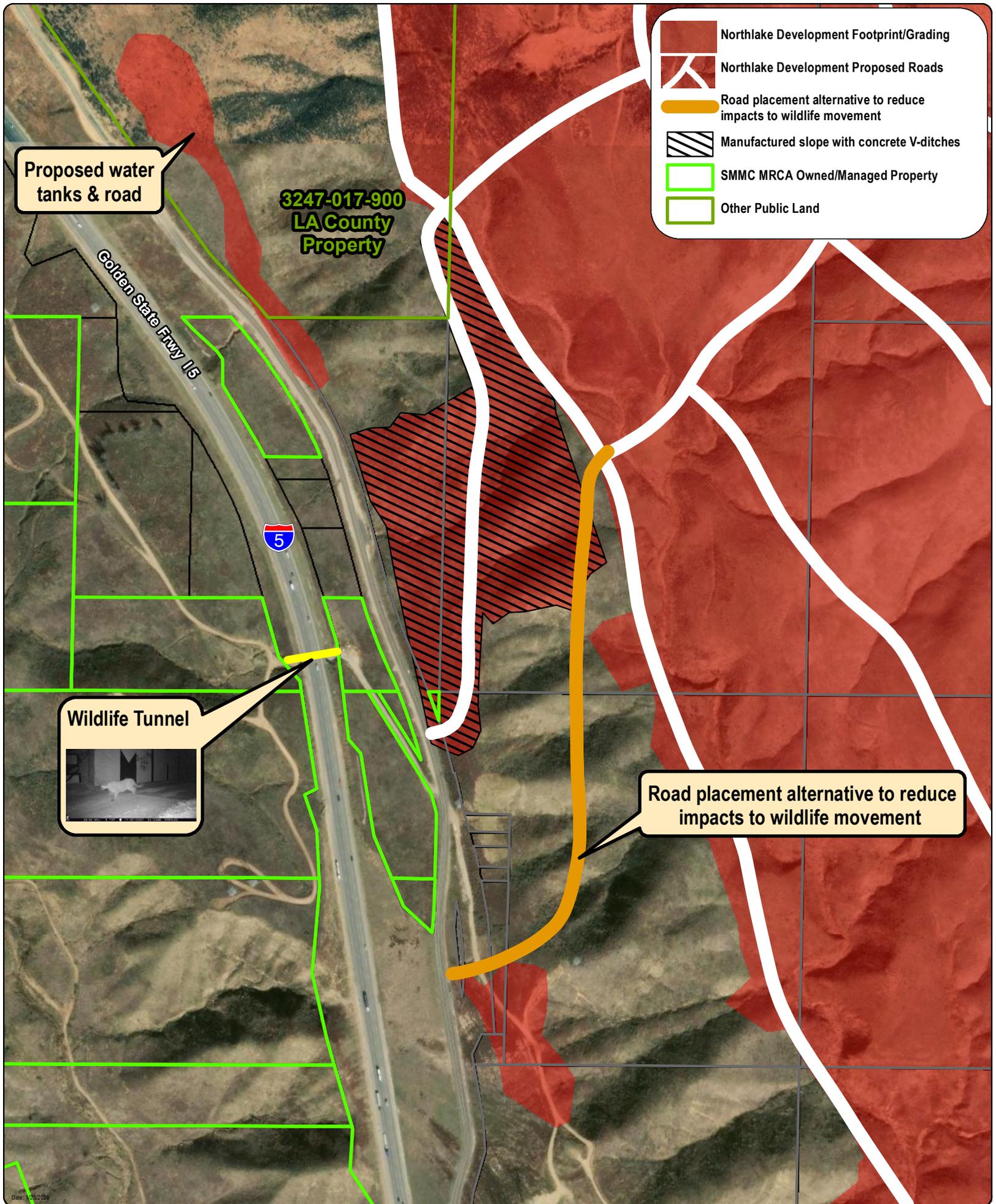


**Northlake Project No. R2015-00408 Phase 1**

**Northlake Puma Observation Map**

Source: UC Davis CA Roadkill Observation System & wildlife camera data collected 2020,2025-2026

0 0.25 0.5 1 Miles



**Northlake Project No. R2015-00408 Phase 1**

**Northlake Road Alignment Alternative Map**

Date: 1/23/2024



# SC Wildlands

Science & Collaboration for Connected Wildlands

P.O. Box 1052, Fair Oaks, CA 95628

[www.scwildlands.org](http://www.scwildlands.org)

January 27, 2026

Members of the Regional Planning Commission  
Los Angeles County Department of Regional Planning  
320 West Temple St.  
Los Angeles, CA 90012  
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**SUBJECT:** Comments Northlake Recirculated Partial Final Supplemental EIR (RPFSEIR)

Many thanks for the opportunity to comment on the proposed Northlake project. SC Wildlands' mission is to protect and restore systems of connected wildlands that support native species and the ecosystems upon which they rely. As such, our comments largely focus on the potential impacts of the proposed project on habitat connectivity and the need to ensure that wildlife movement is maintained.

The monumental importance of maintaining and restoring landscape connectivity between the Sierra Madre and Castaic Ranges across Interstate 5 (I-5) to sustain biodiversity, ecological and evolutionary processes, has sharpened greatly since the Northlake Specific Plan was originally adopted in 1992. Yet, throughout the various environmental review processes that this 33-year-old project has gone through – the significant and irreparable impacts that this project would most certainly cause to habitat connectivity and wildlife movement have never been properly analyzed and disclosed, as is required under CEQA. The landscape-level linkage between the Sierra Madre and Castaic Ranges is arguably one of the most important habitat linkages within the jurisdiction of Los Angeles County. All potential adverse impacts of the proposed project on habitat connectivity and wildlife movement for native resident or migratory wildlife species, including federally and state listed and candidate species, and established wildlife corridors must be evaluated, disclosed and mitigated as required by CEQA.

While SC Wildlands appreciates the modification to the proposed project footprint that eliminated the northernmost approximately 2,200 feet of development, as described in the April 23, 2023 Memo entitled, *NorthLake Partial Creek Avoidance Alternative and Associated Wildlife Movement Enhancements*, the 2-page analysis + maps is utterly insufficient to determine the adverse impacts of the project on habitat connectivity and wildlife movement. As stated in the memo, "The purpose of the biological analysis was to determine the effects on Wildlife Movement of the PCAA," yet the analysis relied entirely on regional least-cost corridor analyses designed to link Roadless Areas within Los Padres and Angeles National Forests (Penrod et al. 2005), with no field component or local analysis. The intent of least-cost corridor analyses is to identify the best potential movement routes between habitat areas targeted by the analysis, it does not identify all potential movement routes of importance at the local scale, as required by CEQA.

SC Wildlands urges the County not to certify this RPFSEIR because significant new information has become available, which is further described below. We implore Members of the Regional Planning Commission to deny Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316. The County should require a new EIR so that potential impacts to habitat connectivity and wildlife movement can be thoroughly analyzed and disclosed, and appropriate mitigation measures developed, as required by CEQA.

The Sierra Madre-Castaic Linkage (Penrod et al. 2005), first identified at the landmark California Missing Linkages: Restoring Connectivity to the California Landscape (Penrod et al. 2001) is one of several regionally important connections in the South Coast Missing Linkages Network (Figure 1; Beier et al. 2006, SC Wildlands 2008), which is widely considered the backbone of a regional conservation strategy for southern California, stitching together over 18 million acres of existing conservation lands, and maintaining connected wildlife populations from Baja California Norte to the southern Sierra Nevada, and from the beaches of Camp Pendleton eastward to the deserts of Anza-Borrego Desert State Park. The Sierra Madre-Castaic Linkage is an essential landscape connection for east-west connectivity through the South Coast Ecoregion, providing connectivity between mountain ranges within the Transverse Ranges and between the Transverse and Coast Ranges.



Figure 1. South Coast Missing Linkages Network

While it's been over two decades since the Sierra Madre-Castaic Linkage design was completed in 2005, more recent connectivity and climate assessments, such as the California Essential Habitat Connectivity Project (Spencer et al. 2010), Omniscap Present-Day Connectivity (TNC and Conservation Science Partners 2017), Climate Resilient Connectivity for the South Coast Ecoregion of California (Jennings et al. 2019), Resilient and Connected Landscapes (TNC 2020), and Connectivity for Climate Adaptation (TNC 2020, Schloss et al. 2021) have all reinforced the landscape level importance and continued permeability of

the South Coast Missing Linkages Network. Most importantly, several of these subsequent analyses evaluated the connectivity importance of every pixel across California, and highlight the importance of the Northlake project area both under existing conditions and for climate adaptation, as described below.

Numerous wildlife-vehicle collisions resulting in roadkill have been documented between the I-5/SR-138 interchange and the Castaic Creek crossing of I-5, including 66 deer, 16 black bears, 16 foxes or coyotes, 6 mountain lions, and other species (California Roadkill Observation System, Figure 2). A great deal of these roadkill observations is adjacent to the proposed Northlake Project, including two mountain lions with the most recent killed on June 15, 2024. Projected increases in traffic from the proposed Northlake Project, on I-5, Ridge Route Road, and other access routes would likely increase wildlife-vehicle collisions and the potential adverse impacts to wildlife and human safety should be evaluated as part of a new EIR.

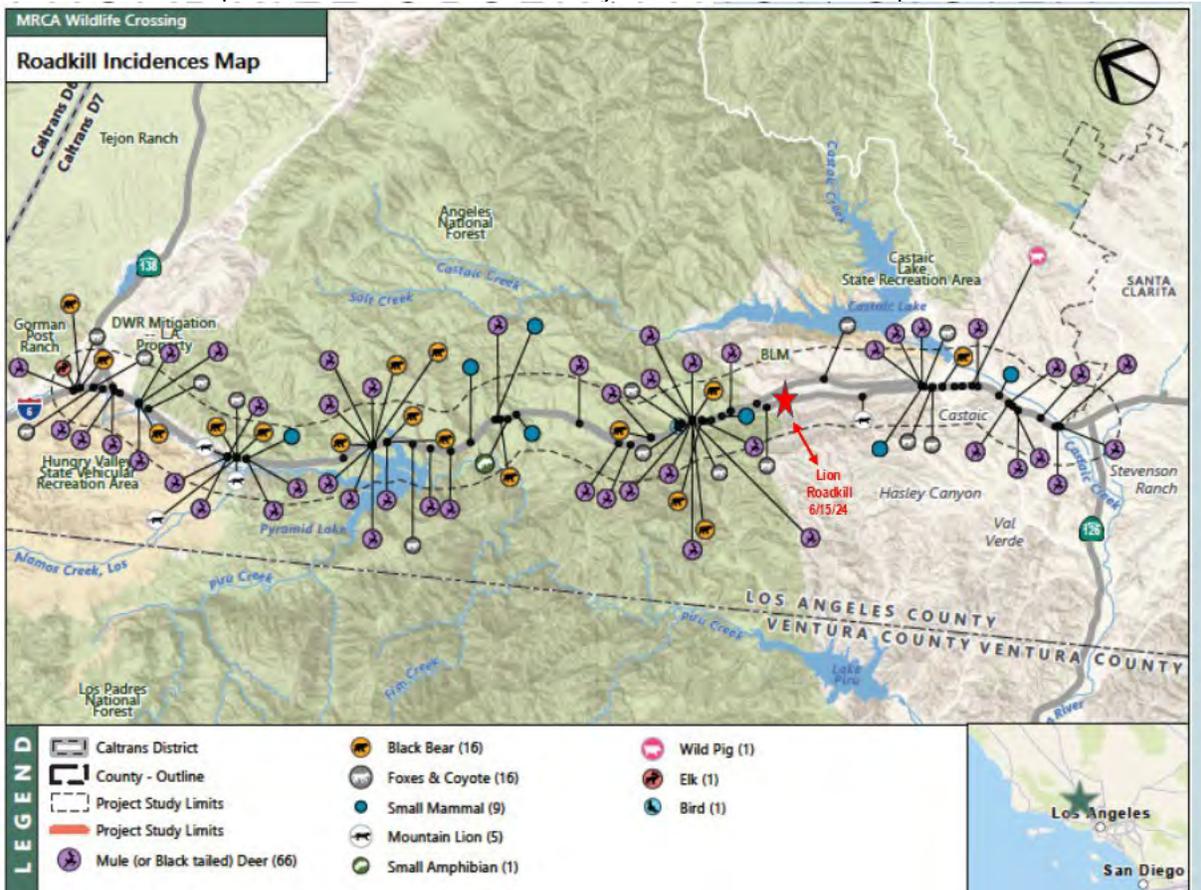


Figure 2. Documented roadkill on I-5 between the Sierra Madre and Castaic Ranges

National Park Service's Santa Monica Mountain Lion Project has been documenting habitat use, movement, and mortality of GPS-collared mountain lions in the Santa Monica Mountains and surrounding region for decades. GPS data shows collared lions have made their way northward into the Sierra Madre Mountains, some crossing several highways along the way, though NPS has not documented successful crossings of I-5. Both P-16 and P-32's dispersal paths (Figure 3) have led them to the eastern Sierra Madre Range directly across from the Proposed Northlake Development, where P-32 was hit on I-5.



**P-32 Dispersal Path**

National Park Service  
U.S. Department of the Interior

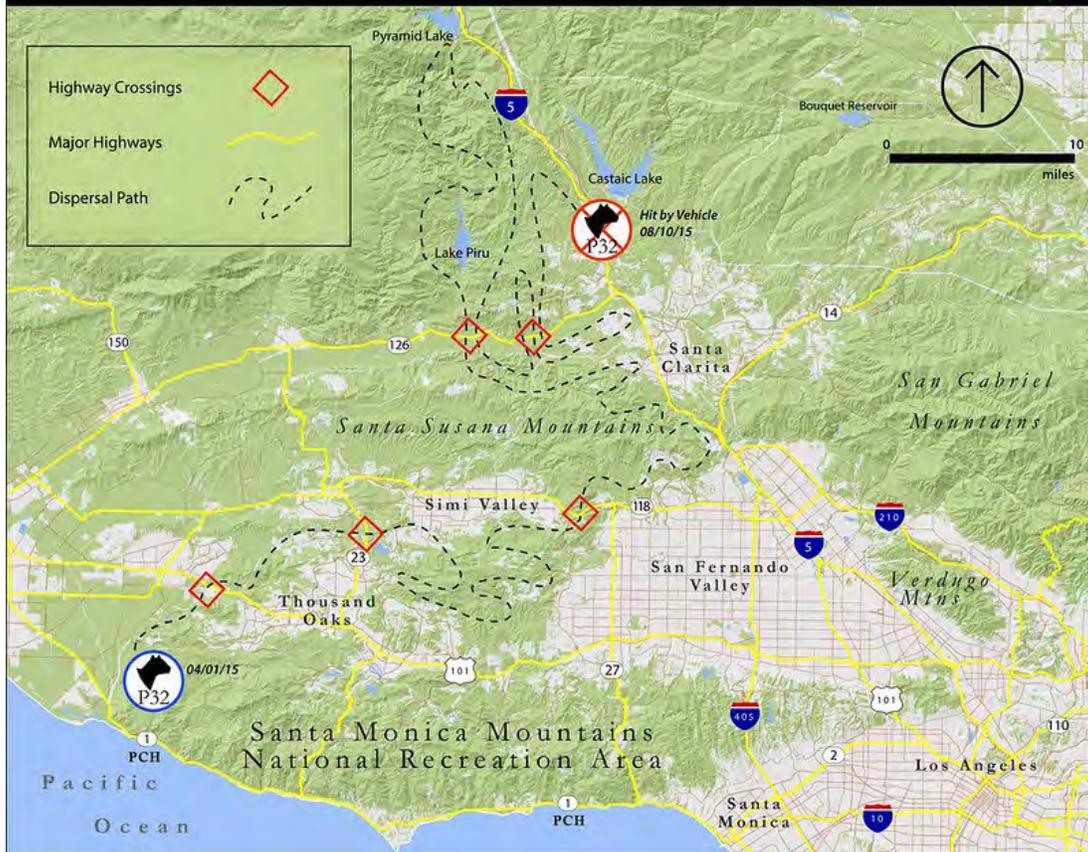


Figure 3. Mountain lion dispersal pathways (National Park Service Santa Monica Mountain Lion Project)

While the barrier effects of I-5 have been well documented, there is also extensive new data documenting wildlife passage across I-5. Mountains Recreation and Conservation Authority (MRCA) conducted camera trap surveys at a box culvert under I-5 on their Marple Canyon property that lies within the median of the north and southbound lanes, directly adjacent to the Proposed Northlake Development. Mountain lion, bobcat, coyote, and mule deer have been detected using this structure (C. Christensen, MRCA, pers. comm.). Wildlife Conservation Board (WCB) recently granted MRCA funding to restore habitat in and around this crossing structure to provide cover and screen nighttime lighting due to its strategic importance



Camera data documenting wildlife use of I-5 box culvert at Marple Canyon directly across from proposed Northlake Development (Mountains Recreation & Conservation Authority).

for wildlife movement and maintaining the genetic viability of mountain lion populations in this part of the Transverse Ranges. MRCA also recently purchased the 6,065-acre Temescal Ranch in the designated Santa Felicia Significant Ecological Area (SEA; LA County 2019) directly west of their Marple Canyon property and the proposed Northlake Development in order to conserve landscape connectivity and core habitat in the foothills of the Sierra Madre and Castaic Ranges.

California Department of Fish and Wildlife (CDFW) has identified a Wildlife Barrier (I-5 Sierra Madre to Castaic Ranges W231) for remediation on I-5 for mountain lion, mule deer, black bear, and mesocarnivores, which is adjacent to, and extends the entire length of the proposed Northlake Specific Plan (see web map [Terrestrial Wildlife Connectivity Barriers](#)). The I-5 Sierra Madre to Castaic Ranges Wildlife Barrier meets 7 of the 10 criteria that CDFW uses to evaluate each potential barrier segment (Penrod 2020, CDFW 2022):

- Important habitat or landscape linkage identified in a species movement or regional connectivity study, or necessary for connectivity between or within important habitat blocks.
- Movement corridors for sensitive, keystone, or other high priority species according to species-specific studies, genetic studies, or published recovery plans.
- Areas suggested by available data to be important or functionally significant crossing locations where barrier improvement would benefit wildlife populations, as identified by cameras or GPS data, or by the presence of landscape features where animals are known to cross more frequently than other areas (e.g., riparian corridors, canyon bottoms, ridges, and open space corridors).
- Areas where animals actively approach but are unable or refuse to cross.
- Quality of adjacent habitat surrounding the barrier within a landscape context.
- Durability of conservation status of adjacent lands (public lands, conservation easements, or lands with committed partners/landowners) and patch size.
- Linkages that could facilitate range shifts due to climate change (e.g., connects lower to higher elevations or habitats latitudinally).

In January 2024, an I-5 Connectivity Working Group was established, whose members include US Fish and Wildlife Service, US Forest Service, National Park Service, Tejon Tribe, California State Parks, California Department of Fish and Wildlife, California Department of Transportation, Los Angeles County, MRCA, Santa Monica Mountains Resource Conservation District, UC Davis Wildlife Health Center, The Nature Conservancy, Trust for Public Land, Wildlife Conservation Network, The Wildlands Conservancy, and SC Wildlands. The I-5 Connectivity Working Group was formed to advance research, land protection and wildlife crossing infrastructure in two habitat linkages of regional and statewide importance (i.e., Sierra Madre-Castaic Linkage, Tehachapi Connection), with the ultimate goal of restoring functional connectivity across I-5 to support day-to-day movements of wildlife seeking food, shelter, or mates; juvenile dispersal; seasonal migration, gene flow, recolonizing unoccupied habitat after a local population goes extinct, and for species to shift their geographic range in response to global climate change.

In February 2024, MRCA, in partnership with Wildlife Conservation Network, The Nature Conservancy, and SC Wildlands, and in collaboration with the I-5 Connectivity Working Group, submitted a preproposal to the California Wildlife Conservation Board (WCB) for an *Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan* (Figure 3). WCB requested a full proposal,

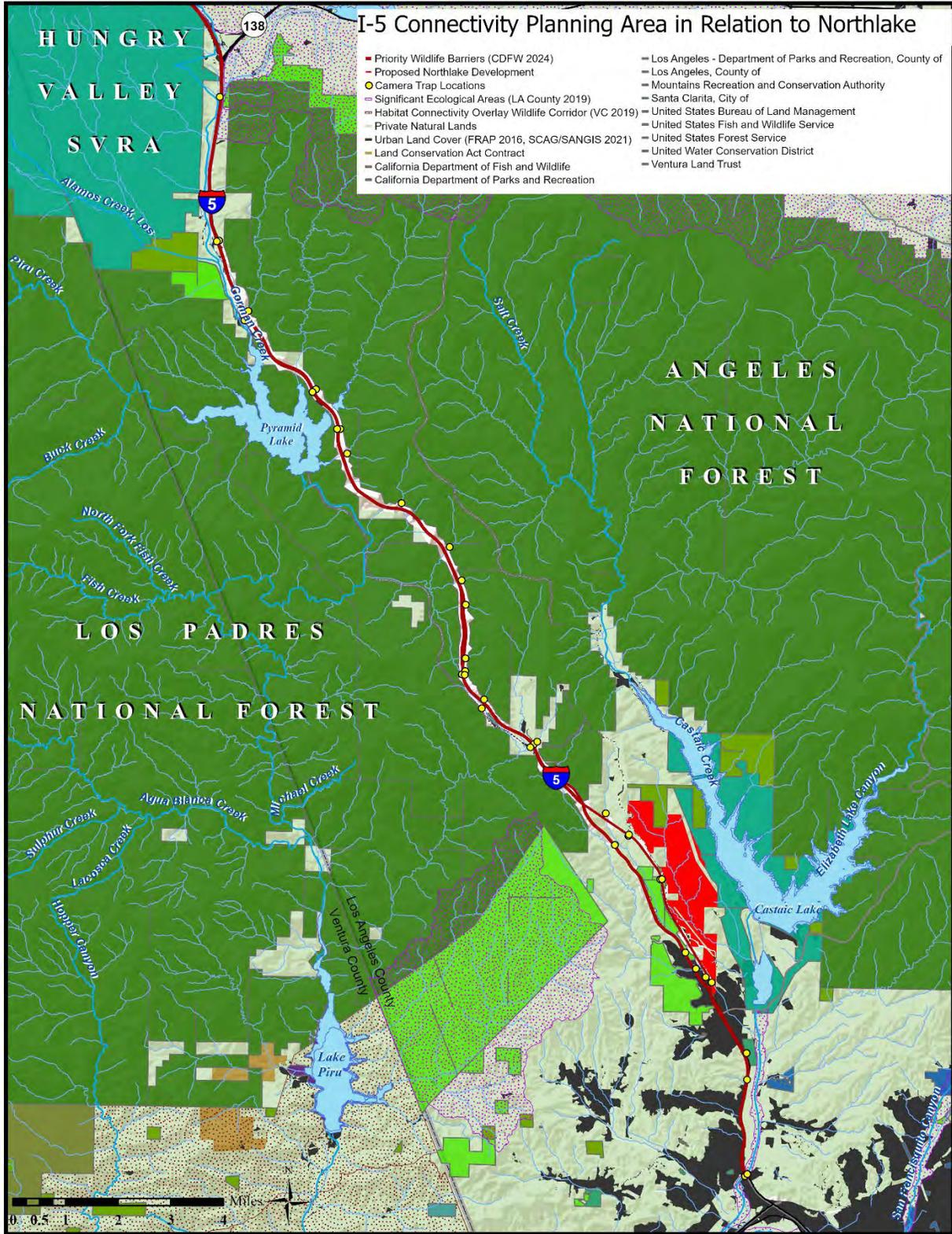
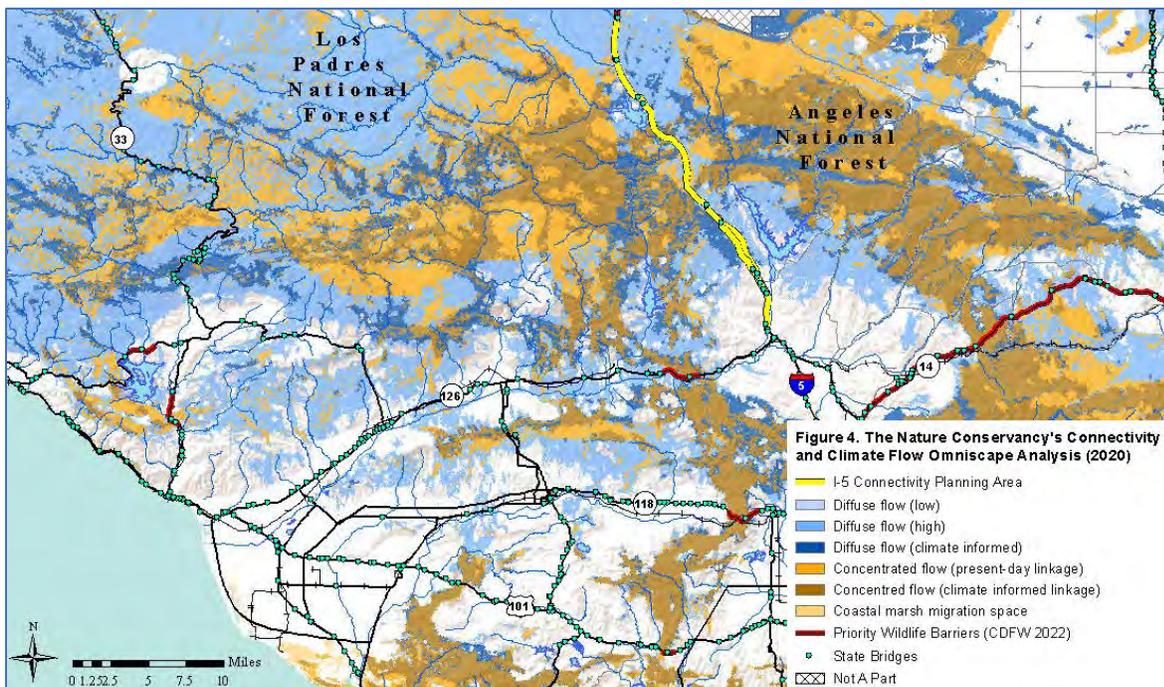


Figure 3. I-5 Wildlife Crossing Infrastructure Improvement Plan study area and existing camera trap locations

which was submitted in June 2024. The project was approved for 4.9-million dollars in state funding at the February 2025 WCB meeting and MRCA received a Notice to Proceed with the project in March of 2025.

The *Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan* project is currently developing a wildlife crossing assessment and infrastructure improvement “master plan” for a 26-mile stretch of I-5 to restore functional habitat connectivity (e.g., wildlife movement and gene flow) between the Sierra Madre and Castaic Ranges. The entire planning area for this project is within Los Angeles County. The wildlife crossing infrastructure improvement plan is using existing data, such as connectivity analyses, roadkill and camera trap efforts described above, as well as collecting new data through field studies, including camera trap surveys, wildlife transects, and opportunistic roadkill, to identify locations and recommendations for a system of wildlife crossings including enhancement of existing and creation of new crossings and associated features such as wildlife exclusion fencing and jump-outs, along I-5 between the SR138 interchange and where Castaic Creek crosses I-5, which includes the Northlake Project area. Once the master plan is complete, feasibility and constraints analyses will be conducted for at least 4 priority wildlife crossing locations, and at least one priority wildlife crossing will be advanced through the Caltrans planning, design, and environmental review process (PID, PA/ED, PS&E) of appropriate level CEQA/NEPA documents to deliver 35% and 65% design plans/specifications and cost estimates for at least one priority structure. The primary outcome will be a wildlife crossing infrastructure improvement “master plan” to improve habitat connectivity across I-5 to maintain viable wildlife populations, reduce dangerous wildlife-vehicle collisions, allow species to shift their ranges in response to climate change, and ensure the ecological integrity of California’s existing conservation investments.

The Nature Conservancy’s (2020) Connectivity and Climate Flow analysis (Figure 4) underscores the critical importance of maintaining and restoring connectivity three regionally significant linkages associated with Los Angeles County, the Sierra Madre-Castaic Ranges, San Gabriel Mountains-Castaic Ranges, and



Santa Monica Mountains-Sierra Madre Ranges, both today and for species to shift their ranges in response to climate change. This analysis identifies the entire Sierra Madre-Castaic Linkage as extremely intact with continuous, diffuse flow in much of the linkage with several wide east-west present-day and climate informed linkages. Importantly, this analysis indicates that the Proposed Northlake Project area and the Santa Felicia SEA recently conserved by MRCA support intact, diffuse connectivity flow to the south of the Sierra Madre-Castaic Linkage. Maintaining intact habitat and connectivity and addressing the barrier effects of I-5 to restore functional connectivity across the highway is essential to allow species to shift their ranges in response to changing habitat conditions related to climate change, and to recolonize areas after environmental perturbations exacerbated by climate change (e.g., wildfire, floods). Nearly 90-million dollars have been spent on the Wallis Annenberg wildlife overpass currently under construction, largely to restore connectivity for mountain lion populations between the Santa Monica Mountains and Sierra Madre Mountains, so individuals can access other regionally important connections, like Sierra Madre-Castaic.

While the *Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan* will address connectivity improvements for a taxonomically diverse group of species, emphasis is being placed on benefits to at-risk wide-ranging species such as mountain lion. In April 2020, the CDFW Commission found that listing the mountain lion as threatened under the California Endangered Species Act (CESA) may be warranted and designated mountain lion in southern California as a candidate species. Under CESA, species classified as a candidate species are afforded the same protection as listed species. I-5 bisects almost continuous lion habitat (Dellinger et al. 2020; Figure 5), including nearly the

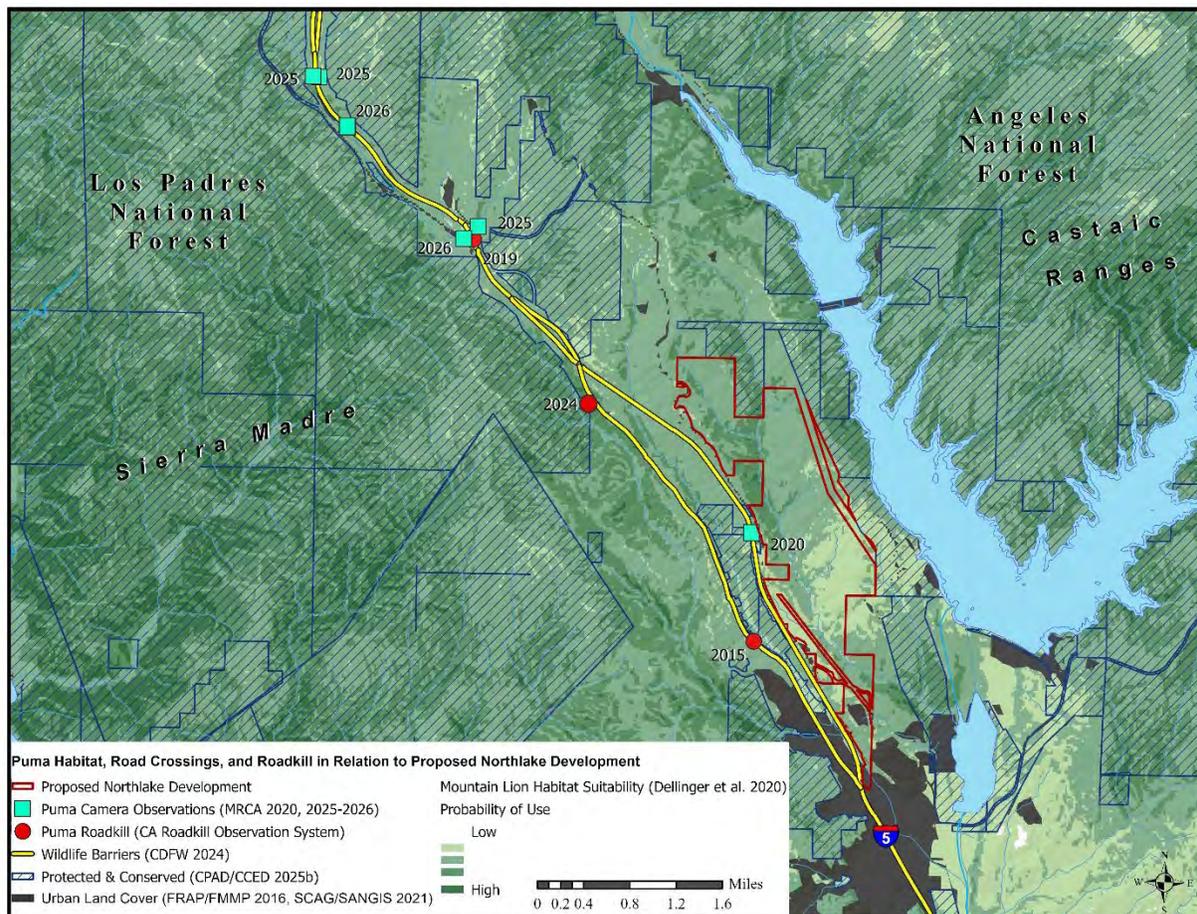


Figure 5. Puma Habitat, Road Crossings and Roadkill in Relations to Proposed Northlake Development.

entirety of the proposed Northlake Project area. The above data shows high quality mountain lion habitat all along Grasshopper Creek that the RPFSEIR proposes to fill, and upland habitat throughout the Northlake Project area that connects to conserved lands to the north and south and to the culvert leading to MRCA's Marple Canyon property that was used by a lion in 2020. Yet, the mountain lion was not reviewed as a protected species within the RPFSEIR. In December of 2025, CDFW released [A Status Review of the Petitioned Southern California/Central Coast ESU of Mountain Lion in California](#), which recommends listing all six petitioned populations as threatened. To ensure compliance with CESA, potential impacts to this species must be evaluated, disclosed and mitigated.

Territorial carnivores like mountain lions that occur at low densities and have large individual area requirements are particularly sensitive to habitat loss and fragmentation (Fahrig 2002, Henle et al. 2004, Gálvez et al. 2018) and at higher risk of extirpation (Soulé and Terborgh 1999). Dispersal is crucial for healthy cougar population dynamics but freeways and major roadways in southern California significantly limit demographic connectivity, juvenile dispersal, and cause direct mortality (Riley et al. 2014, Vickers et al. 2015, Gustafson et al. 2022). Mountain lion populations in the highly fragmented landscape of southern California lack adequate connectivity to one another (Riley et al. 2006, Beier et al. 2006, Riley et al. 2014, Zeller et al. 2017, Dellinger et al. 2020a) and have become genetically isolated (Vickers et al. 2015, Benson et al. 2016, Dellinger et al. 2020b). The recent state-wide mountain lion genetic study (Gustafson et al. 2022) indicates the Sierra Madre-Castaic Linkage is a vitally important connectivity area between the Sierra Nevada, Coast and Transverse Ranges and identifies the Sierra Madre population as a valuable source population for restoring genetic diversity to lion populations in the Transverse Ranges to the south and west (and beyond). The ecological consequences of losing mountain lions in southern California could have cascading effects through the entire ecosystem (Soulé and Terborgh 1999, Thorne et al. 2006, Ripple et al. 2014, Dellinger et al. 2020 a,b). Connectivity between the Sierra Madre and Castaic Ranges is vitally important for restoring gene flow to southern California mountain lion populations.

The Project Team for the Wildlife Crossing Infrastructure Improvement Master Plan are currently assessing the functionality of existing bridge and culvert structures to support wildlife movement and identifying locations for the construction of new or improved crossing structures and associated wildlife fencing as part of the master plan for ameliorating the barrier effects of I-5 over the long term. The Project Team began deploying camera trap stations at existing bridge and culvert structures on I-5 on 11/18/25 (see Figure 3 above for camera trap locations). Within hours of camera deployment, two lion photos were captured at a box culvert associated with a Caltrans sand shed roughly 3 miles north of the proposed Northlake project, well within the distance an individual could cover in less than an hour. In fact, 8 lion photos have been captured by the project at this structure, at the bridge for Templin Highway, and at a structure south of here, closer to the proposed Northlake Project in less than 2 months of camera deployment. In fact, all structures currently being monitored on I-5 directly west of the Northlake Project boundary are being regularly used by wildlife, not "Limited East-to-West and West-to-East Movement" as suggested in the *Northlake Partial Creek Avoidance Alternative and Associated Wildlife Movement Enhancements* Technical Memorandum dated April 23, 2023.

The Project Team is also coordinating with the UC Davis California Carnivores Program, which has been investigating mountain lion habitat use, movement and mortality in the region since 2022. From 2022-2025, their focus was on collaring individuals further north in the Tehachapi Connection (Penrod et al. 2003), where they captured several individuals west of I-5 and east of SR58. Figure 6 below depicts GPS data of



Recent documented mountain lion crossings and detections on I-5 within daily movement range of Northlake (MRCA).



Recent photo documentation of regular use of I-5 structures used by wildlife to move between the Sierra Madre and Castaic Ranges directly adjacent to the Proposed Northlake Development (MRCA).

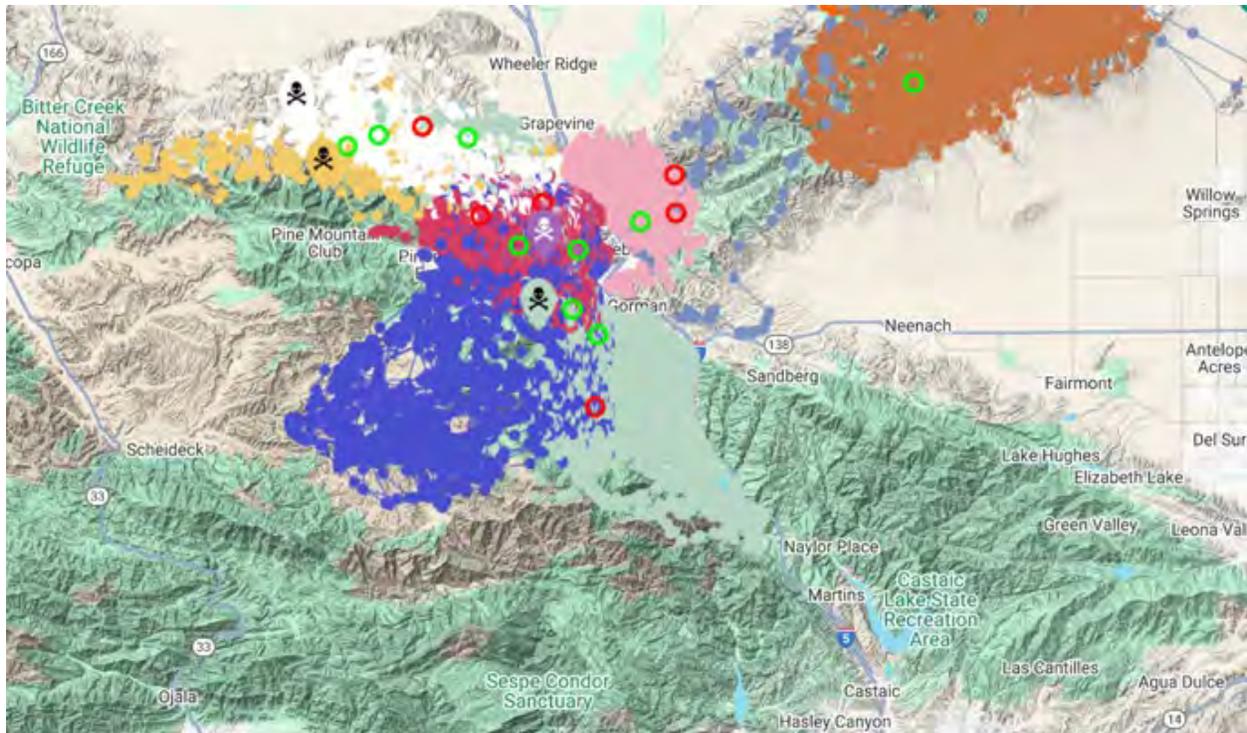


Figure 6. GPS collar data for several mountain lions (UC Davis California Carnivores Program).

several individual collared lions, showing the barrier effects of I-5 but also successful crossings of I-5 and SR58 by a few individuals that established home ranges in the Tehachapi Mountains, with a few individuals making their way southward into the Sierra Madre-Castaic Linkage. The current phase of the study, *"Understanding ecological and human-related factors affecting felid movement in a critical wildlife linkage"* is focused on the Sierra Madre and Castaic Ranges. UC Davis scientists began efforts to collar lions east of I-5 and south of SR138 on Forest Service lands in January 2026. We expect that the forthcoming data from collared mountain lions in the Castaic Ranges will show similar patterns to those in the Tehachapi Connection -- that lions are utilizing suitable habitat throughout the range and that at least some individuals are successfully navigating across or under I-5. This UC Davis effort is expected to extend through 2028.

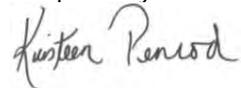
The County is currently in the process of updating the Open Space Element of its General Plan to address SB 1425 and AB 1889, as required by law, providing an opportunity to address landscape connectivity based on existing conditions. The Sierra Madre-Castaic Linkage (Penrod et al. 2005) is one of the most important landscape linkages within the jurisdiction of Los Angeles County, with the others being the San Gabriel-Castaic Linkage (Penrod et al. 2004) and the Santa Monica-Sierra Madre Linkage (Penrod et al. 2006), all of which should be fully captured in the forthcoming update to the County's Open Space Element. As described in the fact sheet, *the County's role in the protection, conservation, and preservation of natural resources and open space areas is vital for the region. The Open Space Element was last updated in 2015 and is required to be updated by January 1, 2026, by recent State laws SB 1425 and AB 1889. SB 1425 requires local governments to revise their open-space plans by January 1, 2026, to enhance equitable access to open spaces, promote climate resilience, and explore rewilding opportunities, ensuring these elements are integrated with environmental justice policies. AB 1889, also known as the Room to Roam Act, focuses on enhancing wildlife connectivity, supporting biodiversity, and mitigating the impact of human activities on natural habitats, must be completed by January 2028* [CNR-Element-Update\\_FAQ.pdf](#). SC Wildlands applauds the County for being proactive in their efforts to comply with SB 1425 and AB 1889 to

address the impacts of development on wildlife movement and habitat connectivity and ensure climate resilience and equitable access to open space.

SC Wildlands implores Members of the Regional Planning Commission not to certify this RPFSEIR. We urge the Commission to deny Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316, due to noncompliance with CEQA. The County should require a new EIR so that potential impacts to habitat connectivity and wildlife movement can be thoroughly analyzed and appropriate mitigation measures developed. The data currently being collected for the *Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan* and the UC Davis Study *Understanding ecological and human-related factors affecting felid movement in a critical wildlife linkage*, can be provided to the County to inform the impact analyses of a new EIR for the Proposed Northlake development, which should have been completed as part of the environmental review processes to date, as required by CEQA.

Thank you again for the opportunity to comment. Please add SC Wildlands to your notice list for all future updates on this proposed project and do not hesitate to contact us with any questions.

Respectfully submitted,



Kristeen Penrod, Director  
SC Wildlands  
[www.scwildlands.org](http://www.scwildlands.org)

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