

SANTA MONICA MOUNTAINS CONSERVANCY

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January 25, 2010

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, California 90012

**Disney/ABC Studios at the Ranch NOP Comments
19802 Placerita Canyon Road, Newhall
Tract Map No. TR071216**

Dear Ms. Tran:

The proposed project to construct a large studio and production facility at the Golden Oak Ranch in Placerita Canyon would be by far the most intensive land use in the vicinity. With the exception of the subject property, Placerita Canyon is mostly protected public parkland. Portions of the subject property east of the proposed development area are private in-holdings within the Angeles National Forest. The Santa Clarita Valley Area Plan designates all of the property as open space, hillside management, non-urban, or floodway/flood plain. The proposed urban use of the 56-acre development area would change the character of the canyon and permanently impact how the public accesses its parkland.

The use of the Ranch for filming has occurred for at least 50 years. The applicant has found an economically viable use of the land that leaves much of the natural areas on the property undisturbed. In addition, the applicant has shown good stewardship by planting a large number of coast live oaks throughout the property. Unfortunately, many of these oaks, including 18 heritage oak trees would be removed by the proposed project. However, the applicant has proposed to mitigate this impact at ratios far superior to the County's minimum replacement standard.

The Conservancy remains concerned about the proposed project's impact on Placerita Creek. Despite the fact that the initial impact of fill placement in the flood plain was done by Caltrans, by building on top of the pads, the applicant proposes to make the impacts permanent. The applicant proposes to alter the slope and stabilize the grading in its present location with native plants. While the proposed restoration is certainly an

improvement over the status quo, the Environmental Impact Report (EIR) should include an alternative restoring a wider flood plain between the two building pads. This environmentally superior alternative would set buildings and parking areas back from the creek according to the minimum buffer recommended by the California Department of Fish and Game. This would improve wildlife access to the creek and provide more space for the future construction of the proposed Placerita Creek Trail.

As identified in the Notice of Preparation (NOP), the proposed project would be visible from hiking trails on adjacent public parkland. The EIR should assess these visual impacts and evaluate whether the proposed vegetative screening is adequate.

The proposed structures would require perimeter brush clearance per County fire regulations. The EIR should assess the impact of clearance on presently undisturbed native plants and propose appropriate mitigation.

The proposed project includes many green features such as drainage swales, bio-remediation of storm water, drought-tolerant and native landscaping, and potentially solar panels. These features should become standard for development in the region. However, the project also proposes to extend municipal utilities over a mile in all directions. In the fast-growing Santa Clarita Valley, the growth-inducing impact of these utility extensions may nullify any benefit from the environmentally-friendly aspects of the proposed project. The only way to mitigate for such impacts is to place a conservation easement over the remainder of the property protecting Placerita Canyon in perpetuity. Such an easement would allow all activities currently permitted under Conditional Use Permit No. 04-089-(5) including, but not limited to, light agriculture, oil production, and construction of temporary structures for filming. All project alternatives considered by the EIR should include such an easement. The applicant and the Conservancy share an interest in protecting the canyon's visual resources.

The proposed Zone Change and Local Plan Amendment are discretionary actions by the County. The applicant proposes an intensive, urban land use in a currently undeveloped portion of the Santa Clarita Valley. Although the applicant has proposed a project with many environmental benefits, future responsible decisions by future owners cannot be guaranteed. Therefore the long-term public interest in preserving Placerita Canyon must be protected by a conservation easement on all areas not presently proposed for development.

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Please address any future documents to the attention of Paul Edelman at the letterhead address and questions to him at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson