

SANTA MONICA MOUNTAINS CONSERVANCY

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July 26, 2010

Ms. Maral Tashjian
County of Los Angeles Regional Planning Department
Special Projects Section
320 W. Temple Street, Room 1340
Los Angeles, California 90012

**“The Entrada Project”
County Project No. 00-210-(5)**

Dear Ms. Maral Tashjian:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency in the vicinity of the subject project. The Conservancy is greatly concerned with the virtually unmitigated habitat loss associated with the proposed project. We concur with the Notice of Preparation (NOP) that the potential impacts on biological resources are significant and recommend mitigation commensurate with the amount of habitat loss.

The project is located on a partially disturbed site between the Magic Mountain theme park and existing development to the south, west of the 5 Freeway. The project proposes to extend arterial streets into presently undeveloped land. As in the developments to the south, these extended arterial streets are designed to facilitate future construction in the different project areas, in this case for Newhall Ranch’s Mission Village. Extending streets, utilities, and other municipal services to undeveloped areas is the definition of growth-inducing; therefore the Conservancy strongly disagrees with the NOP’s assertion that “the project does not have the potential to induce substantial direct or indirect growth.” To the contrary, the current project finances infrastructure that makes future development, whether presently planned or not, technically and economically more feasible, increasing temporal and permanent habitat loss by enabling earlier development of adjacent parcels. Project impacts must be considered in the context of potential build-out of the Newhall Ranch Specific Plan and the adjacent Stevenson Ranch Phase V.

The Conservancy’s primary concern is the acreage of natural land to be urbanized. The project proposes to remove 382 acres of grassland, coastal sage scrub, chaparral, and alluvial scrub ecosystems, all of which have been destroyed at an astonishing rate in the

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Santa Clarita Valley. Rather than a context-sensitive approach, the project proposes to totally transform the site’s topography with 8.1 million cubic yards of grading. Furthermore, the project’s impacts are not confined to the site, requiring over 100 acres of off-site grading for a borrow site and other impacts in another natural area.

The unique resources of this site include the endangered San Fernando Valley spineflower on the east end and a blue line tributary of the Santa Clara River on the west. The EIR must identify and mitigate impacts to these biological resources. The pending Newhall Ranch Spineflower Conservation Plan will require a conservation area larger than that shown on the preliminary plans. Impacts to aquatic resources and alluvial scrub habitat should be avoided or, if unavoidable, must be fully mitigated. Preliminary plans show complete elimination of the stream which, given the constraints from the spineflower conservation area, is likely unmitigable on-site.

Denser development concentrates environmental impacts on a smaller footprint and reduces per-capita impact. Increasing density should be used as a tool to reduce the consumption of raw land on the urban periphery rather than to constantly expand urbanized areas. The economic savings from compact development on this site should be reinvested in off-site preservation of open space to protect other natural areas from urbanization. Otherwise, the theoretical environmental benefits of density are not realized.

To adequately mitigate the loss of significant biological resources, including large habitat areas and a blue line stream, off-site preservation is essential. The project expands the urban boundary westward, narrowing the Santa Susana Mountains ecosystem. The configuration of the site does not lend itself to on-site dedication of open space beyond that already required for spineflower preservation. The only appropriate mitigation would be permanent acquisition of open space in this developing corridor to be protected by an appropriate management agency, such as the Mountains Recreation and Conservation Authority (MRCA). A similar project without such on-site constraints would typically dedicate more than 50 percent of the project area as permanent open space. To mitigate for impacts to over 500 acres of habitat, at least 250 acres should be preserved off-site. The MRCA could acquire this acreage at a rate of \$20,000 per acre within a period of 18 months. We therefore recommend that the County require a condition that the applicant be required to provide 250 acres of permanent open space with the option of paying a fee of \$20,000 per acre not provided on-site for land acquisition within the Santa Clara River watershed between I-5 and the County line. We estimate that the on-site preserve will be approximately 100 acres, leaving 150 to be mitigated off-site.

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If you have any questions, please contact Paul Edelman at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson

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