

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5730 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90263
PHONE (310) 589-3300
FAX (310) 589-3207



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SMMC 11/8/10
Agenda Item 10(e)
Attachment

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

**Santa Clarita Valley Area Plan Update One Valley One Vision
Project No. R2007-01226-(5) SCH No. 2008071119**

Dear Mr. Glaser:

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor zone which includes major portions of the One Valley One Vision planning area. The Conservancy is also concerned with land use issues in virtually all remaining portions of the project planning area because adjacent actions can and do affect public resources within the Rim of the Valley Trail Corridor zone.

Between December 16, 1999 and December 23, 2008, the Conservancy submitted a minimum of six comment letter on County General Plan updates. Every letter included specific comments about natural resources located within the unincorporated portions of the Santa Clarita Valley. The Final Environmental Impact Report (FEIR) or the re-circulated DEIR should clarify how those comments on the overarching General Plan would integrate with the proposed Area Plan and whether or not they have been addressed.

Significant Ecological Area (SEA) Boundaries not Determined

The area that requires the most clarification is that of the proposed new Significant Ecological Area (SEA) boundaries. One can only assume that the Planning Commission and the Board of Supervisors will not have approved the new boundaries by the time the subject FEIR is presented for certification. The DEIR's reference to and impact analysis foundation on the draft SEA boundaries shall remain deficient until those boundaries become an approved part of the General Plan.

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Inadequate Attempt to Avoid or Reduce Biological Impacts

The entire DEIR analysis of biological impacts is so oversimplified and generalized such that decision makers cannot possibly understand the ecological ramifications of certifying the environmental document. We do not believe that Programmatic DEIRs can slip into that level of generality.

The DEIR categorically concludes that the proposed project, and every alternative project, would result in unavoidable significant adverse ecological impacts. (The one exception in the alternatives section is addressed in the paragraph following the next paragraph.) The only component of the DEIR that briefly contemplates the reduction of significant adverse biological impacts is Alternative 2 - Preservation Corridor Alternative. However, that alternative is rejected because it does not adequately meet project objective numbers 14, 17 and 27.

Those three project objectives deal with a mix of land uses to support basic residential needs, a commitment to affordable work force housing, and an integrated transit system, respectively. No analysis is provided on how Alternative 2 would not sufficiently meet these three project objectives just because Alternative 2 would result in slightly less population and houses in 5,225 acres of designated regional wildlife corridor in Soledad Canyon. The Conservancy sees no connection on how Alternative 2 could impede these project objectives such that the DEIR rejects it.

We also question the DEIR conclusion in the Environmentally Superior Project analysis that Alternative 2 would reduce ecological impacts to a level less than significant. How can a plan that cannot mathematically result in less than 15,000 acres of permanently lost habitat not result in unavoidable significant adverse biological impacts?

Inadequate Range of DEIR Alternatives

Alternative 2 - Preservation Corridor Alternative only reduces allowable density in a 5,225-acre area identified as a regional wildlife corridor by the South Coast Wildlands project. It includes no changes to reduce biological impacts anywhere else in the plan area. One DEIR alternative that modestly reduces potential impacts in a single section of the ecologically rich plan area does not represent an adequate range of alternatives.

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For the record Alternative 2 is also fundamentally flawed for not including all areas in the Angeles Linkage (Soledad) Conceptual Protection Plan (CAPP) that implements the subject South Coast Wildlands core linkage elements. Regional Planning representatives were one of a dozen agencies that produced this CAPP for connecting the two lobes of the Angeles National Forest across State Route 14.

Any environmental document for the subject planning area that does not include implementation of the CAPP is deficient for excluding a multi-agency regional ecological land use priority and plan adopted by the California Department of Fish and Game.

Any environmental document for the subject planning area that also does not include an alternative that recognizes all scientifically described inter-mountain range wildlife corridors in the plan area shall remain deficient.

Any environmental document for the subject planning area that does not include an alternative that significantly reduces development density along the edge of most core or large habitat areas shall remain deficient. Random reduction of density in such areas where terrain makes such development nearly infeasible does not constitute a fully analyzed effort to reduce impacts. The DEIR or FEIR must include an explanation of how the proposed density reductions will specifically reduce biological impacts in each affected watershed. We understand that a project specific analysis is not feasible but a watershed, or equivalent, level analysis for this type of alternatives analysis is warranted.

Promised Open Space and Green Belt but No Teeth to Produce Either

The DEIR states that it will result in more protected open space than under the existing Area Plan. Changing land use designations can help bring about such results, but it can in no way come close to assuring them. The DEIR clearly states that it is nothing more than a policy document that has no effect on underlying zoning.

How can the proposed project create 4,098 additional acres of open space without a single penny of acquisition money or a single new filed project to identify and analyze? That DEIR assertion is completely unsupported.

The only DEIR mitigation measure (3.7-3) for the loss of habitat is to allow habitat acquisition for compensation. The measure refers to amorphous policies (10.1.3, 10.1.11, and 10.1.12) for implementation. These policies have zero teeth, zero specifics and are basically totally pie in the sky-non-specific statements. They are not mitigation measures

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that can be verified. The DEIR is flawed without more substantive and enforceable mitigation measures for substantial habitat loss, including bulk loss of ordinary chaparral.

How can the proposed project incorporate the provision of a green belt that provides more protected open space than currently exists today? The project description is flawed for not including enough precision on this issue. There is no Land Use Green Belt map in the DEIR as is referenced to within the document. It is basically a concept with no definition.

The green belt expansion assertions in the DEIR are also not consistent with the proposed reduction of 10,224 acres of rural land with the proposed project.

What kind of green belt along the edge of existing development would for example be provided for on the Stevenson Ranch Phase V property?

The DEIR states, "The Land Use Element is designed to ensure that the irreplaceable natural resources and open spaces are preserved and protected from encroachment by future development." All lost open space is irreplaceable. The DEIR is deficient for being based on numerous sweeping assertions with no implementation or factual back up.

Drainage and slope easements are counted as "protected open space" under the OS-C-Conservation designation. This is misleading and those types of land uses should be identified as permanently disturbed open space.

Basic Essence of Project and DEIR

The proposed project and DEIR essentially are a vehicle to change development density over hundreds of square miles. The vision of One Valley One Vision is to increase density in all but a few isolated pockets where terrain is prohibitive. Policies are important but the permanent land use designations are more important for the long term ecological state of the upper Santa Clara River watershed.

The end result of the proposed project could well be the significant increased diminution of biological resources both within and around the edges of all existing development. The Conservancy asserts that much more can be done with the new Area Plan to pro-actively reduce potential impacts to ecological resources both within and around the edges of all existing development.

Recommendations for Adequate DEIR Alternatives

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We make the following recommendations of elements to include in project alternatives that would increase the probability of significantly adding to the greenbelt around developed plan areas and also within developed areas - particularly along the Santa Clara River and its tributaries.

For example the River Setback Policy LU 6.1.2 should include a greater mandatory setback of 75 feet as opposed to 50 feet. Neither passes agency or scientific muster but every additional foot increases habitat quality and availability and improves the public experience. The Conservancy supports riparian systems with some natural upland buffer as opposed to contrived buried bank stabilization. Each of these tributaries is important for wildlife movement (in many cases regional wildlife movement) and the Area Plan must make provision for continued movement capability in a world where no new open space will be created from already developed areas. The opposite trend will occur where there will only be less and less open space remaining. Designing long riparian corridors as wildlife movement corridors must compensate for future development encroachment.

The only meaningful mechanism we see to increase green belt area and habitat quality around the existing development in the plan area is to make the wholesale change of RL 2 and RL 5 designated areas to RL 10. The area where high concentrations of RL 10 most definitely make ecological sense is the Soledad Canyon watershed.

The DEIR must include more specifics about both capturing and infiltrating storm water.

Currently, upstream from State Route 14 municipal wells are progressively lowering the watertable below the Santa Clara River year after year. The direct and indirect adverse ecological impacts to the river vegetation are evident. Until such groundwater pumping is eliminated, and the river water levels are restored, it is difficult not to question the DEIR conclusion that the proposed increase in population and development density beyond the current plan would not result in unavoidable, potentially irreversible, significant impacts to water supply.

The DEIR must address critical habitat for California gnatcatcher and the soon to be revised critical habitat for red-legged frog.

Lastly the North Lake Specific Plan should be eliminated because it is obsolete under all sound planning principles.