

SANTA MONICA MOUNTAINS CONSERVANCY

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November 8, 2010

Mr. Jason Smisko, Senior Planner
City of Santa Clarita
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**One Valley One Vision
Draft Program Environmental Impact Report**

Dear Mr. Smisko:

The Santa Monica Mountains Conservancy (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. During the One Valley One Vision (OVOV) planning process, the Conservancy has repeatedly commented about the preservation of natural resources in the plan, or the lack thereof. Our understanding is that the City and County are issuing separate decisions based on one common Environmental Impact Report (EIR). We have attached our comments to the County, dated October 5, 2009, for inclusion in the City's records. The plan contains numerous well-intentioned policies and objectives to protect open space, habitat, and scenic ridgelines, but lacks mechanisms for any assured programmatic implementation of the proposed greenbelt surrounding the Santa Clarita Valley. Without stronger land-use controls on the periphery, growth will not be effectively directed to already urbanized areas as intended.

Plan Lacks Adequate Protection of Open Space

As stated in the Biological Resources section of the EIR, "The proposed General Plan goals, objectives, and policies do not provide a mechanism for the compensation of lost habitats when avoidance or minimization of impacts is considered to be infeasible." Despite its "smart growth" intentions, the proposed plan still calls for the wholesale conversion of prime habitat to development. And yet, when these impacts occur, the programmatic EIR is designed in such a way to write off future impacts as "significant and unavoidable" rather than making an honest attempt to partially avoid or mitigate them. Without a mechanism or incentive for habitat protection, the greenbelt exists only on paper. The land use map is the core of the plan, yet it shows a continuous expanse of land-use designations that would in fact sever the two halves of the Angeles National Forest and impede wildlife

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movement through the Newhall Wedge (area between SR-14 and I-5). The Conservancy urges the City and County to use their zoning authority to strongly protect habitat connectivity on all scales.

The Conservancy will continue to partner with the City to achieve common open space objectives. Through our joint efforts, we have successfully protected key habitat blocks, including the Whitney Canyon Open Space Preserve and the Santa Clarita Woodlands. However, this partnership is limited in what it can accomplish in comparison to the Valley's overall preservation needs and objectives. Acquisition is but one tool for directing growth away from prime habitat areas. Only the City and County can go farther by reducing zoned densities and creating land use regulations for rural areas that emphasize permanent deed-restricted habitat preservation. The OVOV plan is deficient for relying too heavily on acquisition to the exclusion of other land protection methods.

The land use map is the defining feature of any general plan, yet the OVOV map provides no direction for habitat conservation efforts. Instead, unincorporated land is zoned continuously for one dwelling unit per two acres, even when lot sizes are larger than this. Zoned density should reflect the lot size in undeveloped areas to discourage subdivision in areas intended to remain rural. The only by-right development in rural areas should be one house per lot unless part of a deliberate growth management strategy or clustered existing community. The proposed zoning change from agricultural to residential makes this land use control critical for managing development in non-urban areas in a manner where habitat resources and connectivity can be permanently maintained.

As we commented previously, the greenbelt is meaningless without any definition or teeth. Where is the map showing its extent? What policies will apply to projects in the greenbelt, but not the rest of the plan area? How will permanent protection be achieved? Planned open space preservation must be seamlessly integrated with the land use plan. Known wildlife movement corridors and "missing links" should be overlaid on this map to evaluate the extent to which the plan adequately protects them. A model for effective policy collaboration is the Tierra Rejada Valley greenbelt consisting of the Cities of Thousand Oaks, Simi Valley, and Moorpark and Ventura County.

Inconsistent Plan Elements Create Conflicting Growth Patterns

Furthermore, the Circulation Element is thoroughly inconsistent with the Conservation and Open Space Element by proposing to double road capacity within rural areas that are presumably part of the greenbelt. However, it is difficult to make this assessment because

the extent of the greenbelt is so ill-defined. Widening these roads would irreparably damage wildlife movement by more than doubling vehicle-caused mortality and providing a barrier to genetic exchange:

- Agua Dulce Canyon Road
- Davenport Road
- Escondido Canyon Road
- Bouquet Canyon Road north of Copper Hill Drive
- The Old Road south of Calgrove Boulevard
- Placerita Canyon Road
- Shadow Pines Boulevard/Tick Canyon Road (proposed extension)
- Sierra Highway north of Vasquez Canyon Road

All of the above road projects must be removed from the OVOV plan to avoid decimating regional wildlife mobility. Completion of these extensions and widenings would induce residential growth in outlying areas and forever alter the character of outlying rural communities. Groundwater recharge rates and water quality will also suffer commensurately with increased road capacity as proposed and induced development. Transportation drives development and misguided transportation investments would attract residential development to the periphery to the detriment of fiscal and environmental sustainability.

Edge Effects Inadequately Addressed

The Conservation and Open Space Element is well-intentioned, but does not specifically address edge effects on Southern California ecosystems. In a setting like Santa Clarita, creating on-site habitat may be a much lower priority than avoiding natural habitat destruction in the first place. While open space in urban areas does have habitat value for birds, insects, and some urban-adapted small mammals, requiring or encouraging too much open space on urban parcels will lower effective densities and result in greater expansion into truly natural areas. The plan must strike a balance between maximizing the habitat value of urban open space and encouraging compact development that reduces development pressure on natural land. The plan should allow and encourage off-site habitat acquisition as a mitigation measure whenever natural land is proposed to be urbanized.

The element recommends buffers of 50 to 100 feet to protect wetlands and wildlife movement corridors. These values are much too low to substantially reduce edge effects

on these sensitive areas if corridor widths are just a few hundred feet wide or less. Movement corridors must be designed for target species, such as mountain lions, which require much greater buffers to not impact habitat connectivity. Under no circumstances should the buffer area for sensitive habitat features be less than the required brush clearance radius.

Plan Lacks Adequate Protection of Significant Resources

The County's proposed expansion of Significant Ecological Areas (SEA) is an important step for considering biological resources within potential development areas. Several areas extend into City jurisdiction. To adequately protect these resources, which include a complete array of valley ecosystems, the City must adopt the boundaries of the County SEAs and hold development to a higher standard in these areas. To reflect the best available biological science, the plan must fold in future acceptance of the pending County SEA boundary adjustments. The SEAs encompass numerous parcels slated for development within the City that deserve maximum impact avoidance. These properties should be dramatically down-zoned to reduce development in sensitive areas.

The plan also lacks adequate protection of riparian resources. Ridgelines are properly identified as valuable aesthetic and biological resources, but it is the riparian corridors that are home to the plurality of sensitive species and provide for linear wildlife movement. Policies should place a higher priority on preserving streams in their natural condition, particularly in areas where the urban footprint will expand. To truly protect riparian resources, the plan must prohibit all future hard-bottom channels. Armored channel walls should also be prohibited unless hydrological studies determine that no alternative designs are feasible. Proposed flood control improvements in Mint Canyon must maximize riparian habitat values. In addition, clear span bridges should be required for all public roads crossing riparian habitat. Reinforced concrete box culverts should be required for private road crossings rather than narrow culverts.

Lastly, the plan calls for multiple new six or eight-lane bridges over the Santa Clara River. In the spirit of impact avoidance, alternatives to bridge construction must be analyzed, including transportation demand management solutions to reduce the need for new capacity. Alignment alternatives, such as terminating the proposed Santa Clarita Parkway at Soledad Canyon Road must also be evaluated.

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

Sincerely,

ANTONIO GONZALEZ
Chairperson