

SANTA MONICA MOUNTAINS CONSERVANCY

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May 17, 2011

Planning Commission
City of Santa Clarita
23920 Valencia Boulevard, Suite 140
Santa Clarita, California 91355
Attn: Jason Smisko, Senior Planner

**One Valley One Vision General Plan
Final Environmental Impact Report**

Honorable Planning Commissioners:

The Santa Monica Mountains Conservancy (Conservancy) supports the general thrust of the One Valley One Vision (OVOV) General Plan, but remains concerned about key aspects that potentially undermine realization of its goals. The plan is premised on a grand bargain between the City and the County to reverse decades of sprawl and concentrate future growth in existing urban areas. In exchange for tolerating additional growth in their community, City residents are expecting to preserve the open space and scenic vistas surrounding them. Unfortunately, OVOV accomplishes the former but falls short of the latter, exposing all Santa Clarita Valley residents to more outward growth without the hoped-for benefits derived from focused additional density. The Conservancy requests your consideration of the following recommendations to further the stated goals of the OVOV Plan and better protect natural resources in the Santa Clarita Valley. Should you not be prepared to adopt these changes, the Conservancy requests that you continue the item and direct staff to meet with us to resolve these outstanding issues.

1. Remove Rural Road Widenings from Plan

The Conservancy's letter on the Draft Environmental Impact Report (DEIR) noted that the proposed widening of eight rural roads would have a significant avoidable impact on wildlife movement by increasing wildlife mortality, discouraging crossings, and decreasing genetic exchange. The California Department of Fish and Game independently arrived at the same conclusion. The Final Environmental Impact Report's (FEIR) response to comments dismisses these concerns. *The Conservancy considers this to be a fatal flaw in the FEIR without revision and disclosure of these impacts.*

The science is quite clear in this respect: vehicle collisions are the leading direct human-caused sources of bobcat and mountain lion mortality in Southern California. Wider roads

increase mortality and decrease the frequency of successful crossings until a threshold width is reached where crossings are no longer attempted (i.e. across freeways). A study in New Mexico directly documented these effects on mountain lion populations.¹ Widening roads leads to faster vehicle speeds and larger traffic volumes, both of which are factors in vehicle-wildlife collision rates. Even the width of the pavement has a negative effect on mountain lion dispersal. Local research by the National Parks Service and others have observed frustrated dispersals among tracked carnivores and documented the resulting significant genetic differences across movement barriers.

The impacts of a policy of systematic road widening in rural areas are best evaluated at the plan level. These impacts are cumulative by nature because, while any one widening could feasibly be mitigated, even a succession of mitigated road widenings would decrease overall landscape-level permeability. The FEIR does not evaluate or disclose these potentially significant avoidable impacts.

Setting aside the issue of adequate review, the Conservancy believes that widening these roads is bad policy. The only possible justification for doubling road capacity within these rural areas is to promote further residential development in remote areas. The circulation models appear to assume traffic volume increases only possible if housing continues to sprawl into rural-zoned areas, leading to the misguided recommendation to increase capacity. Even worse, the extension of Shadow Pines Boulevard/Tick Canyon Road all the way to Davenport Road would divide a Significant Ecological Area and provide access to otherwise remote parcels, thereby inducing growth. The City is actively promoting protection of these resources through the Angeles Linkage Conceptual Area Protection Plan, so it is unclear why the general plan would then propose fragmenting the same habitat area. These road projects are in direct opposition to the intended goals of the OVOV plan.

The Conservancy requests that the following road widening projects be removed from the plan due to the aforementioned significant avoidable impacts on biological resources:

- 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

¹Sweaner, L. L., K. A. Logan, and M. G. Hornocker. 2000. Cougar dispersal patterns, metapopulation dynamics, and conservation. *Conservation Biology* 14:798-808.)

2. Decrease Development Density in Wildlife Movement Linkages

The OVOV plan includes visionary policies to establish a greenbelt around the Santa Clarita Valley. The greenbelt would consist of already protected land in both halves of the Angeles National Forest to the north and southeast, Santa Susana Mountains public parkland to the southwest, and the future Newhall Ranch High Country and Salt Creek dedication to the west. Less clear are the portions through the difficult Newhall Wedge (between I-5 and SR-14) and Angeles Linkage areas that would complete the greenbelt around the valley.

On a fundamental level, the Conservancy believes that land use policy should not encourage subdivision in critical “missing linkages” between core habitat areas. Rural housing development, even at low densities, fragments habitat. Its cumulative impact on wildlife movement should be minimized at the plan level. To mitigate this particular threat, parcels between Agua Dulce and the northeast City boundary should be zoned at a maximum density of 1 unit per 5 acres.

The Conservancy is very supportive of the Significant Ecological Area (SEA) boundaries adopted by the County and incorporated into the City’s plan. These are a critical tool for recognizing and protecting resources in designated areas. Of particular note is the expansion of the Santa Clara River and Santa Susana Mountains/Simi Hills SEAs to encompass regional wildlife movement corridors. To further protect areas where development is not desirable, a reduction in zoned density would complement the goals of the SEAs. This would be a legitimate use of zoning authority to protect the public interest in ensuring the ecological viability of landscape linkages.

3. Establish Inter-Jurisdictional Development Rights Transfer Program

Policy LU 1.3.4 encourages density transfers to protect natural slopes and areas of environmental sensitivity. The Conservancy fully supports this approach and encourages it to be developed into an inter-jurisdictional program that facilitates the transfer of development credits from rural areas to the urban core. Such a program would be the epitome of smart growth and provide economic incentive for open space preservation. The Santa Clarita Valley is an ideal location for such a pioneering land use policy.

The Conservancy therefore recommends that the City include an additional policy that directs staff to work with the County to establish an inter-jurisdictional development rights transfer program wherein development rights from all rural-zoned parcels are eligible for

transfer to urban-zoned areas, subject to reasonable conditions. Such a program could even provide a bonus for transferring rights from rural parcels within a SEA to leverage the benefits of such a program.

4. Establish Policies to Protect Riparian Corridors and Buffer Zones

Multiple plan policies aim to protect the valley's distinctive topographical features, including ridgelines, canyons, oak woodlands, rivers, and streams. The Conservancy supports these policies without reservation. However, the language of these policies is aspirational rather than practical. It is not clear how these policies would be implemented on the ground.

Fortunately, some features are protected with more specific language. Policy LU 6.1.1 designates ridgelines as scenic resources and encourages their preservation by specifically recommending a minimum 50-foot distance between grading and ridgelines to protect their aesthetic value. This specific policy is in addition to policies that generally discourage development on ridgelines and steep slopes.

The Conservancy believes a comparable approach is warranted for riparian corridors. Vital to Santa Clarita Valley ecology, riparian corridors provide local habitat for rare aquatic and amphibian species, movement corridors for mobile animals, water quality benefits, and groundwater recharge. No other landscape feature provides so many diverse ecosystem services. The Conservancy requests a policy that recognizes the importance of riparian corridors by protecting them with specific language that encourages the inclusion of riparian buffer areas on all Santa Clara River tributaries. Such language could easily be incorporated into Policy LU 1.3.6.

Inclusion of Recommendations will Further OVOV Goals and Protect Resources

The Conservancy recognizes that some of these recommendations pertain more directly to the County's jurisdiction. However, the protection of these resources is for the benefit of all Santa Clarita Valley residents. The City is agreeing to density increases that many residents oppose in order to guide regional growth in a sustainable direction. The Conservancy acknowledges and commends these efforts. Unfortunately the plan before you does not adequately protect resources in the County's jurisdiction to accomplish the City's goals. In other words, the County is not holding up its end of the bargain.

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The FEIR considers impacts to biological resources to be significant and unavoidable. The Conservancy concurs that some impacts would be significant, however many are avoidable with the minor changes requested above. If adopted by the City and the County, the above recommendations would remedy the plan's deficiencies and greatly improve natural resource protections in the Santa Clarita Valley.

Thank you for your consideration of these comments. If you have any questions, I can be reached at (310) 589-3200, ext. 128.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN
Deputy Director
Natural Resources and Planning