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**DRAFT**

January 23, 2012

Ms. Jessica M. Frank
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, California 91355

**Draft Environmental Impact Report Comments
Mancara Residential Project at Robinson Ranch, Santa Clara River
SCH No. 2006041029**

Dear Ms. Frank:

The Santa Monica Mountains Conservancy's recommendations for the project in its 2006 Notice of Preparation comments were completely ignored. The Draft Environmental Impact Report (DEIR) proposes a project that represents the absolute extension of high density suburban sprawl into the core habitat of the upper Santa Clara River watershed with zero feet of ecological buffer area. This cookie cutter subdivision also by-passes 1.25 miles of rural subdivision and ranches to project this density into core habitat and greenbelt. It further provides road and utility access via "D" Street for additional suburban sprawl deeper into upper Santa Clara River watershed core habitat eastward. The proposed development is totally out of character with surrounding development and incongruous with both the terrain and ecological resources of where it is proposed. Both the proposed project and the 79 unit "Reduced Density Alternative" seem wholly contrary to the City's efforts to maintain a viable greenbelt around the existing suburban core.

The proposed project would permanently alter 172 of 187 acres on site and require the movement of over a million cubic yards of earth not considering any potential remedial grading in a high potential liquefaction area. The site contains more plant communities than any Environmental Document ever reviewed by the Conservancy other than the multi-thousand-acre Newhall Ranch and Ahmanson Ranch developments. No where else is the loss of 172 acre of habitat or even 72 acres of habitat not a significant unavoidable adverse ecological impact.

The DEIR is completely deficient for not analyzing the habitat linkage value of the watercourse running along the southern and western property boundaries to the Santa Clara River.

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The DEIR is further deficient because the only biological impact in the summary of impacts and mitigation measures that addresses any habitat loss is, "Development associated with the proposed project and other related cumulative projects could result in adverse impacts related to biological resources." The DEIR concludes that this impact is not significant if mitigation measures BIO-1 through BIO-49 are required and implemented. Mitigation measures BIO-1 through BIO-49 provide zero defined permanent mitigation for the permanent loss of 172 acres of habitat. What if one measure of BIO-1 through BIO-49 is not implemented? The DEIR includes not one word of explanation of how BIO-1 through BIO-49 will offset the impacts to 172 acres and additional cumulative impact development.

The only rationale in the Draft Environmental Impact Report (DEIR) that rejects the Reduced Density (Environmentally Superior) project alternative is the following statement:

All of the 16 project objectives identified would be met by the Reduced Density Alternative, with the exception of (it would not) ... create an economically feasible project that offers single-family residential lots to serve the current and projected market. The alternative analysis goes on to state, "The alternative would not accommodate projected growth in the Santa Clarita Valley to the extent as the proposed project," as another reason that the Reduced Density Alternative can be rejected. Is that an adequate unsupported justification to dismiss an otherwise full consistent superior alternative?

The DEIR alternatives analysis is completely flawed. Alternatives must be feasible. The DEIR includes not a word why the Reduced Density Alternative is not economically feasible. The Conservancy hopes the City agrees and does not certify the subject Environmental Impact Report.

The project is being piece-mealed if the 14-acre not-a-part acres to be developed separately in the southwest corner is not considered in the subject DEIR

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Please address any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address, by phone at (310) 589-3200 ext. 128, and by email at edelman@smmc.ca.gov.

Sincerely,

ANTONIO GONZALEZ
Chairperson