

**SANTA MONICA MOUNTAINS CONSERVANCY**

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May 21, 2012

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Los Angeles County  
Department of Regional Planning  
Special Projects Section, Room 1362  
320 West Temple Street  
Los Angeles, California 90012

**Disney - ABC Studios at the Ranch Project**  
**Draft Environmental Impact Report Comments**  
**SCH No. 2010011010**

Dear Ms. Tran:

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor Zone that includes the sum of the 890-acre Golden Oak Ranch. The Conservancy submitted a Notice of Preparation (NOP) comment letter dated January 25, 2010.

As stated in the NOP comment letter, the proposed project would create a 44-acre modern business park with 60-foot-tall buildings, and 1200 parking places on another 10 acres in an otherwise four-mile-long section of "building free" San Gabriel Mountains viewshed along the east side State Route 14 and Interstate 5. The attached figure shows how the State Route 14 entry into Placerita Canyon is flanked on all sides by public parkland owned by the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), United States Forest Service, City of Santa Clarita, and the Mountains Recreation and Conservation Authority (MRCA).

In Los Angeles County, generally projects located in scenic viewsheds with one million cubic yards of grading (35,000 truck trips of soil export), loss of 158 oak trees, loss of two acres of willow riparian habitat, impacts in designated Critical Habitat for coastal California gnatcatcher, and impacts within proposed Significant Ecological Area, result in the permanent protection of a substantially greater amount of natural open space than is affected by adverse direct and indirect project impacts.

The proposed project, and every DEIR alternative, offer not a single acre of permanently protected open space. The applicant clearly counters with an argument that it is in Disney's interest to keep the remaining open space open for film back drops and to provide habitat

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for the planted mitigation oak trees. Why would Disney, or its successors, ever build any homes or more commercial uses on a prime property with perfect freeway access, scores of acres of disturbed flat land, upgraded utilities (sewer main, million gallon ridgeline water tank, and onsite two-acre electrical substation), and unparalleled scenic surroundings? The Conservancy would like to see that question put to sleep forever.

With such a visible proposed project in a regionally significant viewshed/natural area and with a level of development that is an order of magnitude outside of the existing General Plan designations, the public deserves to know that the remainder of the Golden Oak Ranch will not ever be subjected to any permanent development. Anything less leaves open a CEQA piecemeal project issue and an unnecessary community tension regarding whether or not Golden Oak Ranch can be permanently considered a part of the western San Gabriel Mountains ecosystem, the Santa Clara River watershed recharge area, and western gateway to the Angeles National Forest.

The Conservancy urges the applicant to step up to the conservation plate and diffuse that community tension and uncertainty by, in writing, agreeing to a voluntary project condition that places a conservation easement over the remaining undeveloped portions of the Golden Oak Ranch as a condition precedent to any permit issuance. The allowed uses within that conservation easement can accommodate any and all uses for filming and events proposed by Disney, but not allow any permanent development of any type unless allowed by the public agency conservation easement holder. With this customized conservation easement prescription, if Disney has no intent ever to construct permanent development, the voluntary provision of such an easement would garner great public trust and appreciation. The absence of such an action to benefit the public trust sows a lack of trust and decades of uncertainty.

The obvious conservation easement holders are SCWRCA or the MRCA. The easement holder must be a public agency accountable to the public.

Absent the applicant's written voluntary agreement to the above described comprehensive conservation easement project condition over the remainder of the Golden Oak Ranch, the Conservancy does not support the proposed project because of its scale and impacts in a sensitive location. In such case, the Conservancy recommends the Environmentally Superior Alternative. This Reduced Program Alternative with six sound stages on the 23 freeway adjacent acres of already disturbed fill pad area would avoid and eliminate significant environmental impacts including 700,000 cubic yards of grading and provide an

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equal level of protection as the proposed project over the remainder of Golden Oak Ranch.

Please address any future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address, by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov) and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson