

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 26, 2015

Richard J. Bruckner, Director  
Department of Regional Planning  
Los Angeles County  
320 West Temple Street  
Los Angeles, California 90012

**Tapia Ranch Project**  
**Vesting Tentative Tract Map No. 53822**

Dear Mr. Bruckner:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Tapia Ranch project that was first filed with the County in 2007 and will soon be the subject of a Notice of Preparation of a Draft Environmental Impact Report (DEIR). The project would force approximately 400 homes into an isolated canyon with poor access and great distance from existing utilities and lighting. Although the proposed footprint threads a needle by mostly grading just to the edge of Tapia Creek, it requires 7,000,000 cubic yards of grading and many tall, 2,000-foot-long manufactured slopes to achieve this end.

As stated in the 2007 Initial Study, the project is both part of the Angeles National Forest core habitat area and a fundamental component of the regional habitat linkage that connects the National Forest to Castaic Creek and in a short distance to the Santa Clara River. Tapia Creek is the only drainage with riparian woodland that makes this habitat connection.

There is no way to mitigate the project's biological impacts below a level of significance. Great mountain bike trails, internally located community parks, and externally located trailhead staging areas do not mitigate regionally significant unavoidable significant adverse biological impacts, they make them incrementally worse.

The Castaic Creek undercrossing beneath Interstate 5 is an irreplaceable landscape feature that mitigates the interstate bisecting the Angeles and Los Padres National Forest core habitat areas. The reason is the broad width and ample height of the crossing structure. This crossing structure is part of one of the most endangered habitat linkages in the South Coast Region as identified the *Missing Linkages Study* (2000).

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Not only would the proposed project, and any similar alternatives, eviscerate an 8,000-foot-long stretch of an ecologically intact canyon, its access infrastructure (including lighting) would be concentrated at the already development clogged and narrow ecological pinch point at the Tapia Creek and Castaic Creek confluence. That infrastructure would have at least some minor growth-inducing impacts that would add to the cumulative degradation of ecological inter-connectivity between the Angeles National Forest and Castaic Creek.

The Conservancy cannot fathom any overriding considerations as to why the County would approve a development with approximately 7,000,000 cubic yard of grading and miles of access road in this ecologically key area. Most likely the project would also result in significant visual impacts from Interstate 5. The plethora of approved and yet to be constructed single family housing stock in the Santa Clarita Valley is in the tens of thousands. There is no compelling reason for the proposed project in its elongated, mass-graded form. CEQA militates for more avoidance of biological resources.

We encourage the County to shape the development of this project into either a much more clustered subdivision or ranchettes with a permanently protected, unfenced network of wildlife corridors through the property. Just the reduced lighting of ranchettes versus a 375-unit subdivision with street lights and park lighting would change the whole habitat capability of Tapia Canyon, if developed. Equal comparisons can be made too regarding the creation of impervious surfaces and artificial drainage structures.

The water supply issues of a leap frog development project of the proposed nature probably also is a regional concern.

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,

LINDA PARKS  
Chairperson