

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 22, 2018

David Peterson  
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**Revised Notice of Preparation Comments  
Mancara Residential Project, Santa Clara River  
(Master Case No. 06-349; SCH No. 2006041029)**

Dear Mr. Peterson:

The Santa Monica Mountains Conservancy (Conservancy) has issued two prior comment letters dated April 24, 2006 and January 23, 2012 regarding the proposed Mancara Residential Project (project) development and incorporates them by reference. The proposed project has grown worse with time and will be a testament of how the City of Santa Clarita (City) addresses land use directly adjacent to the new San Gabriel Mountains National Monument. It will also be a testament of the City's recognition that the proposed project is a piecemeal environmental review split from the land to the immediate east and a major source of growth-inducement with three full standard two-lane road stubs leading into undeveloped private land adjacent to the National Monument.

The subject 180-acre property comprises the City's southwestern interface with the San Gabriel Mountains National Monument and the Santa Clara River ecosystem. The Mancara site directly integrates with the largest core wildlife habitat in Los Angeles County and is wholly contained within the County-designated Santa Clara River Significant Ecological Area (SEA 23). Why is the City entertaining a high density residential development devoid of any permanently protected open space in this sensitive area? Why is the City entertaining such a high density project with overtly depicted road stubs to facilitate the development of the next large parcel under the same ownership group to the east? The proposed project includes a token riverside picnic area in flood plain land but zero permanently protected open space. The Draft Environmental Impact Report must address the rarity and potential function of the Oak Springs Canyon undercrossing of the railroad tracks a means for wildlife to travel between the Angeles National Forest and the Santa Clara River.

The proposed project could not be designed worse to inflict more adverse ecological impact on the subject property and on offsite properties. The proposed project would result in multiple significant unavoidable adverse biological impacts to the proposed development site, the southwesterly adjacent "Not a Part area (under the same ownership), the Santa

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Clara River floodplain, Oak Spring Canyon wash, and the adjacent privately-owned foothills to the east. The City must adopt a statement of overriding considerations for biological impacts if a semblance of the proposed project is approved. How can the City justify a project so totally incongruous with the site's location and biological resources?

### **Need for Reduced Impact Alternatives**

To avoid some biological impacts and reduce the level of impact significance, the Conservancy urges the City to require two alternatives in the Draft Environmental Impact Report. The first suggested alternative is called the *Enhanced River Habitat and Southern Wildlife Corridor Alternative*. The attached figure shows the boundary of this alternative. This alternative footprint would remove all residential development between the Metro railway ROW and the Santa Clara River. The three eliminated residential lots (107-109) are identified in the California Natural Diversity Database as an occurrence location of the Western spadefoot toad (*Spea hammondi*)—a federally listed sensitive species and a state listed species of special concern. With the exception of extended Lost Canyon Road, all of the subject property north of the railroad corridor would be dedicated (some developed and most natural) as a prerequisite of map recordation to the City for public enjoyment, viewshed, and flood plain habitat.

This alternative footprint is further shaped by eliminating six residential lots (Lots 14, 15, 16, 81, 82, and 83) in the southeastern corner of the proposed development. Elimination of these six residential lots is essential to guarantee a permanent protected habitat linkage through the subject property between the Oak Springs Road railroad undercrossing and the San Gabriel Mountains National Monument. The efficacy of that habitat linkage through the subject property also entails the suggested alternative requiring a permanent conservation easement on all portions of lots 84-97 between the proposed trail and Oak Springs Canyon wash. Those conservation easements could be held by the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA). Lastly the alternative would require the permanent protection of the now “Not a Part” area of the Tract Map in the southwest corner. Since when do developers get to carve off 14-acre portions of a parcel in a Tract Map rather than dedicate them as permanent open space?

With just the elimination of nine home sites and no map reconfiguration, this *Enhanced River Habitat and Southern Wildlife Corridor Alternative* would provide a high quality park and habitat amenity along the Santa Clara River and a high quality habitat linkage from the Oak Springs Canyon Road railroad undercrossing to protected Federal land, and improved ambience for the proposed trail along Oak Springs Canyon wash.

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The Conservancy also urges the City to include--as the environmentally superior alternative --an alternative based on the *Enhanced River Habitat and Southern Wildlife Corridor Alternative* but with the additional elimination of all grading that touches or encroaches on the eastern property boundary. Only with such “a no grading on the eastern boundary element” in a DEIR alternative can there be an alternative without adverse unavoidable significant growth-inducing impacts.

The revised NOP makes explicit the intent to develop the adjacent foothills of the Angeles National Forest (currently zoned Urban Residential) with the statement:

A portion of Lots 9 and 10 (along the eastern boundary of the site) would contain a temporary drainage desilting basin that would be utilized until a proposed ‘future’ street is extended easterly to accommodate a proposed development on the adjacent property to the east.

Combined with the lack of analysis for potential development of the 14-acre “Not a Part” area to the southwest of the project site, the cumulative effects of Urban Residential development for the easterly adjacent Angeles National Forest foothills must be considered during the impact analysis for this project.

### **Holt Avenue Access Alternative**

The proposed project intends to utilize the existing 100-foot wide Southern California Gas Company (SoCalGas) easement to construct a main street. If feasible, the Conservancy recommends analyzing a low density alternative that utilizes this existing SoCalGas easement to extend Holt Avenue as a primary entry point to the proposed development. Access via Holt Avenue would reduce the overall cost of the proposed development by eliminating a costly extension of Lost Canyon Road across the Oak Spring Canyon Wash and the proposed Metro ROW over-crossing. This concentration of development would alleviate unnecessary impacts to the downstream outlet of the Oak Spring Canyon Wash Floodway into the Santa Clara River floodplain.

### **Explanation for High Density Development at Public Wild Land Interface**

The most similar density residential developments to this proposed project are in the City’s Pinetree Annexation area north of the Los Angeles County Metropolitan Transportation Authority (Metro) right-of-way (ROW), north of the Antelope Valley Freeway (SR-14), and north of Soledad Canyon Road. The properties contiguous with the proposed project site are zoned Open Space, Rural Residential, Public/Institutional (railroad), and Urban

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Residential. Unfortunately, both properties that are zoned Urban Residential and contiguous to the subject property comprise either the Oak Spring Canyon Wash Floodway between the Metro ROW and the Santa Clara River or the foothills of the Angeles National Forest. This zoning scheme appears to prefer denser Urban Residential development as a buffer between Rural Residential and the Angeles National Forest.

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](mailto:edelman@smmc.ca.gov).

Sincerely,

IRMA MUÑOZ  
Chairperson