SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

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Lynda Hikichi
County of Los Angeles
Department of Regional Planning
Land Divisions Section
320 West Temple Street
Los Angeles, California 90012

Tapia Ranch Development
Notice of Preparation Comments

Dear Ms. Hikichi:

The Santa Monica Mountains Conservancy offers the following Notice of Preparation comments on the proposed 405-unit single-family residential Tapia Ranch project. Attached is the Conservancy's January 26, 2015 letter on the project that is hereby incorporated into this Notice of Preparation letter.

The project comprises approximately 1,500 acres within a totally undeveloped series of canyons. The remoteness of the project is illustrated by both the tortuous proposed access road and emergency access road to the yet-to-be-approved Tesoro de Valle project final phases. If there ever was a case of forcing a 400-plus home project into an inaccessible area, this project exemplifies it. The secondary access road by itself would result in significant biological impacts. The Draft Environmental Impact Report must include an alternative project that does not require the construction of a secondary access road. Because the project is proposed in a large southern lobe of great Angeles National Forest core habitat area and not against existing development, all of its ecological impacts are amplified by extensive edge effects all around the development footprint.

From the Castaic Creek origin of the project's proposed road improvement system to its connection with the proposed Tesoro project road system, it requires a contiguous three mile long development footprint. The majority of that footprint would either be dense new neighborhood or fully lit streets with the 4,000 traffic trips a day based on the standard of 10 trips a day per home. It would also create an unprecedented three-mile long fuel modification zone.

Combined with the yet unapproved final phases of the Tesoro project, the proposed project would create an approximately 2,000-acre island of habitat between them. The Draft Environmental Impact Report (DEIR) must address the creation of this habitat island and the effects on its future ability to sustain less human tolerant wildlife species. The DEIR must also address the long term potential of a fully protected habitat linkage from the Angeles National Forest to the confluence area of Castaic, Charlie, and Tapia Canyons. The DEIR must analyze which portions of properties must be permanently protected to achieve that landscape function.

A new bridge over Castaic Creek and an accompanying major access road to the project would create prime access to adjacent Charlie Canyon. If both Charlie and Tapia Canyons are developed, the ability for wildlife to travel from the Angeles National Forest to the confluence area of Castaic, Charlie, and Tapia Canyons would be severely and permanently degraded. Castaic Creek is the most significant wildlife crossing either under or over Interstate 5 from the Santa Clara River to at least Highway 138. The DEIR must address the effects of the project on wildlife movement to and from Castaic Creek through the project boundaries. The project bridge over Castaic Creek must have a free span (with mid-stream abutments) of at least 350 feet for wildlife movement and riparian habitat purposes.

The project design maximizes the length of urban - wildlife interface area. The project would require over a hundred acres of permanent brush clearance area. The DEIR should include a compact clustered development alternative that requires less than 25 acres of permanent fuel modification zone.

Please direct all questions and correspondence Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by email at edelman@smmc.ca.gov.

Sincerely,

CRAIG SAP
Chairperson