

SANTA MONICA MOUNTAINS CONSERVANCY

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March 24, 2019

Ben Jarvis
City of Santa Clarita
23920 Valencia Boulevard, Suite 140
Santa Clarita, California 91355

Princessa Crossroads Development Project
Notice of Preparation Comments
SCH No. 2019029137

Dear Mr. Jarvis:

The Santa Monica Mountains Conservancy (Conservancy) offers the following Notice of Preparation comments on the proposed Princessa Crossroads Development Project on 189.2 acres. The proposed project includes 710 residential units and 680,000 square feet of business park/retail/office uses that require an absolute minimum of five million cubic yards of grading. Much of the grading footprint is on land owned by the City of Santa Clarita and the City of Los Angeles Department of Water and Power (DWP). The proposed project is antithetical to the City's objectives to maintain land forms and obtain commensurately-scaled open space dedications. The project exemplifies mass grading and it provides no meaningful permanent open space dedication. The project fully urbanizes a wild area of the Santa Clara River watershed. That existing wild open space provides visual relief and buffer to the City's sports complex and to Golden Valley High School. All of that benefit would be eliminated by the proposed project.

As proposed, the project would result in unavoidable significant adverse biological, Greenhouse gas emission, and visual (aesthetic) impacts. As proposed the project would not provide any ecologically substantial open space area. As proposed the project would eliminate over 150 acres of high quality groundwater recharge area mostly through the creation of impermeable surfaces. Roads, parking lots, structures, and compacted manufactured slopes with v-ditches and down drains are not effective for ground water recharge. Where would the runoff from the 189 acres go and what physical mechanisms are planned to infiltrate that runoff onsite or on adjoining public property? The City has a serious ground water over draft problem.

Based on the study of the most currently available Google Earth photography, the site appears moderately well connected via the high tension power line corridors to much larger habitat blocks and the Santa Clara River located to the north. In addition the site appears

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to be an essential stepping stone between the Santa Clara River and the minimum 3.5-square-mile contiguous habitat block located west of Golden Valley Road and Sierra Highway and south of Soledad Canyon Road. That 3.5-square-mile habitat block also connects to the South Fork of the Santa Clara River. The subject property has a smattering of dirt road but for all intents and purposes is high quality habitat with reasonably good connectivity both west to the South Fork and north to the Santa Clara River. Arterial roads are obstacles but not absolute barriers. The Draft Environmental Impact Report (DEIR) must analyze the habitat connectivity value of the subject project and mitigate for the loss of connectivity between the above described 3.5-square-mile habitat block and the Santa Clara River.

The California Natural Diversity Data Base shows that a vernal pool harboring a Federally listed threatened fairy shrimp population is located just south of the proposed Via Princessa extension. The DEIR must address how the hydrology of this pool will be protected and how street lighting and public access will be minimized in perpetuity.

Clearly the City is vested in this project because it provides a park for the City on City-owned land. The Conservancy urges the City to require the following alternative in the DEIR to reduce biological, visual, and green house gas emission impacts.

No Development South of Via Princessa Extension Alternative

The most important impact avoidance alternative would be a *No Development South of Via Princessa Extension Alternative*. This alternative would also have to include a dedicated wildlife undercrossing beneath the Via Princessa extension that allows near-optimal wildlife movement under the roadway with connections on each side to the DWP power line corridor. The wildlife culvert under the Via Princessa extension must be ten feet tall and twenty feet wide to accommodate movement by mule deer under a greater-than-four lane arterial street. Street lighting would also be customized by this new under-crossing to maximize its utility to wildlife. For wildlife to get from this point to Golden Valley Road they would have to travel a short distance on the large manufactured slopes below the Golden Valley High School ball fields. Wildlife crossing of Golden Valley Road appears to be relegated for the time being to at-grade crossings. This alternative would maximize protection of the vernal pool with fairy shrimp, provide adequate habitat connectivity between the Santa Clara River and the 3.5-square mile habitat block on the opposing side

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of Golden Valley Road. It would also buffer the High School and provide the school with a dedicated natural area for science study. This alternative would require the fee simple dedication of all the ungraded land located south of the Via Princesa extension as a condition of the opening of the road to any public use. The alternative would require conservation easements over any portions of the property located north of the Via Princesa extension that are necessary for wildlife to move between the DWP power line corridor and the new dedicated wildlife under-crossing. It would also include a funding source that guaranteed a minimum of \$10,000 annually with an annual CPI adjustment to the land management agency. That management funding would be above and beyond any regulatory requirements required by agencies to protect the Federally-listed threatened fairy shrimp and their habitat.

The gross elimination of over 150 acres of quality sage scrub, riparian, and grassland habitat that is well connected to core habitat is an unavoidable significant biological impact. If the City does not take the ecological high road and permanently protect all of the land south of the Via Princesa extension, the City should require payment of a considerable fund to put exclusively towards the acquisition of replacement habitat-as now does Los Angeles County. We hope that the City can match or even exceed the ecological leadership of Los Angeles County. There is no debate to be had about the nexus of such mitigation. The County requires the like kind replacement of the habitat types destroyed and requires such mitigation prior to map recordation. It is up to the developer to deliver the deeds to a public agency. The Conservancy urges the City to require such like kind habitat replacement to address the cumulative loss of habitat along the greater Santa Clara River corridor upstream of Highway 5.

For this proposed project that requires the obliteration of all existing land forms via over 5 million cubic yards of grading, the open space mitigation must be commensurate. The economic generation of 710 residential units and 680,000 square feet of commercial space can support an extensive open space mitigation fund. The City should include providing open space acquisition funding to the Santa Clarita Watershed Recreation and Conservation Authority too.

The DEIR alternatives must also include large, oversized storm water retention basins that can serve as near-permanent habitat components and provide the maximum possible groundwater infiltration capacity on the site and perhaps the City-owned property. The severe overdraft of the groundwater near and below the Santa Clara River warrants no less

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of an effort. Does the proposed project contain all the necessary infrastructure and long term funding to address TMDL issues?

Please direct questions and future documents to Paul Edelman of our staff at the above letterhead address, at edelman@smmc.ca.gov, and 310-589-3200 ext. 128.

Sincerely,

IRMA MUÑOZ
Chairperson