

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 1, 2020

Hai Nguyen  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, California 91355

**Bouquet Canyon Residential Development  
and Bouquet Canyon Road Realignment  
Draft Environmental Impact Report Comments  
SCH No. 2018121009**

Dear Mr. Nguyen:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed project to build 375 residential units and realign Bouquet Canyon Road by:

1. Eliminating over 2 million cubic yards of earth from a City-designated Significant Ridgeline and moving them onsite to create flat terrain.
2. Permanently losing 10 acres of non-wetland Waters of the United States.
3. Eliminating 26 oak tree with four different oak species.
4. Permanently impacting 84 acres--including beyond the property boundary
5. Providing no natural open space and no connectivity to natural open space.

The DEIR conclusions that these impacts are mitigated below a level of significance is troubling. The DEIR provides no substantive on the ground mitigation for these natural resources because there will be no ungraded area with native soil conditions remaining onsite to implement biological mitigation that provides commensurate resources for natural communities. Offsite streambed mitigation is deferred mitigation. The project completely butchers all the natural land forms and biological resources on the site. The project as proposed cannot avoid or mitigate significant biological impacts which requires a statement of overriding considerations.

The Conservancy hopes that the City concurs that this level of biological loss and land form modification on Bouquet Creek next to public youth facilities is not in the public interest in regard to retaining natural green space, retaining natural water courses and their recharge capability, and not facilitating growth that further exacerbates traffic congestion. The Conservancy hopes that the City does not make the decision to sacrifice the above level

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of biological resources just to facilitate the road realignment. If the City makes the decision to go with a road realignment, the Conservancy recommends patience and a much better natural lands outcome from the proposed development project. Unfortunately, the DEIR spells out the linkage between the 2 million cubic yards of grading and the road realignment because one of the project objectives is: *Minimize grading of a significant ridgeline, while providing the necessary amount of grading to construct the new segment of Bouquet Canyon Road in the preferred alignment.*

The twisted logic of the DEIR is demonstrably illustrated by the below conclusion on Page 5.0-2 in the Alternatives section:

“The proposed alterations to the significant ridgeline in the western part of the site, while extensive, would not be considered a significant impact, because this is not the most visually prominent ridgeline feature in this area and the visible changes would be limited to motorists along the adjacent segment of old Bouquet Canyon Road and nearby homes, as opposed to changing a scenic feature within a scenic vista that is enjoyed by a large mobile or stationary viewing audience located along a scenic travel corridor. The project would substantially change the visual character of the site through topographical alterations and removal of natural open space features that would be replaced by a new community of low-scale homes, with highly visible manufactured slopes, a variety of building masses, a different and more extensive landscape palette, and outdoor lighting fixtures that do not presently exist.”

In essence the DEIR above concludes that replacing a natural significant ridgeline with homes, manufactured slopes, non-native landscaping, and lighting is a one to one visual equivalency.

Fortunately, the Draft Environmental Impact Report (DEIR) includes one alternative that respects the landscape and its biological resources. For an EIR to be valid all of its alternatives must be feasible. Thereby, Alternative 3 is feasible for the City to approve and implement.

The Conservancy supports Alternative 3: Reduced Alterations to Bouquet Creek, Oak Trees, and Sensitive Habitat. The DEIR concurs that Alternative 3 is the environmentally superior alternative. Alternative 3 follows the science of conservation biology - all other

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development alternatives completely ignore it and maximize the demise of natural resources in the City. Alternative 3 meets every Project Objective in the Project Description except the one in italics above that requires enough grading to generate the dirt to realign the Bouquet Canyon Road with mass cut and fill grading.

In all cases, in regard to the loss of riparian habitat in Bouquet Creek, the Conservancy concurs with the CDFW recommendation to require the creation of similar habitat (including full hydrologic and geomorphic function) at a ratio not less than 6:1.

Multiple questions raised in the Conservancy's Notice of Preparation comments were not addressed in the DEIR--such as--the following question. The use of County correctional facility land to facilitate the proposed development appears to be a gift of public funds. What compensation will the County receive for the loss of its land to private uses and other public uses? How will a new major boulevard next to a youth correctional facility affect the youth?

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

Sincerely,

IRMA MUNOZ  
Chairperson