

SANTA MONICA MOUNTAINS CONSERVANCY

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January 11, 2021

Bill Miranda, Mayor
City Council
City of Santa Clarita
23920 Valencia Boulevard
Santa Clarita, California 91355

**Draft Environmental Impact Report for the Sand Canyon Resort Project,
SCH No. 2018101039**

Honorable Mayor Miranda and Council Members:

The Santa Monica Mountains Conservancy (Conservancy) objects to the proposed Sand Canyon Resort Project (Project) as described in the Draft Environmental Impact Report (DEIR) prepared in November 2020 and filed under SCH No. 2018101039.

The proposed Project seeks to develop the approximate 75.54-acre Lot 79 of Tract 52004 and further identified by Assessor Parcel Number 2840-002-025; however, as determined by the City of Santa Clarita's approval of the Revised Master Case 95-049 for Tract 52004, Section 3.c. of City Council Resolution No. 96-120 states "The project would preserve approximately 300 acres of land into perpetuity as recreational/open space."

Now, a new developer is proposing a "premiere golf resort" scheme to ignore City Council Resolution No. 96-120 and develop one-quarter of the 300-acre in perpetuity recreational/open space previously required to minimize the permanent habitat loss resulting from the construction of Tract 52004. This scheme involves subdividing Lot 79 and re-zoning approximately 32.4 acres for high-intensity development:

... a hotel with a three-story building; a spa garden inn within three three-story buildings; villas associated with the hotel (23 buildings); three restaurants; a spa/gym/salon; conference and ballroom space; meeting rooms; outdoor recreation consisting of two pools, one tennis court, two pickleball courts, 2 miles of on-site pedestrian pathways, and a nine-hole "chip and putt" golf course; and a total of 400 new parking stalls, including 18 parking spaces in villa garages. (DEIR Nov. 2020, page 3-1)

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These direct impacts to in perpetuity recreational/open space include the removal of at least 21 mature oak trees and loss of 0.20 acres of non-wetland waters of the United States, 0.03 acres of wetland waters of the United States, 0.49 acres of California Department of Fish and Wildlife jurisdictional riparian habitat, and 0.23 acres of Regional Water Quality Control Board waters of the state. Indirect impacts to habitat include fuel modification to accommodate the proposed development within a designated Very High Fire Hazard Severity Zone.

By paving and/or hardening the surface of 32.4 acres of Lot 79, the proposed development will contribute to increased heat-island effects of development in this semi-rural area, prevent storm water infiltration (necessitating an increase in the size of the existing sediment detention basin), and significantly increase the number of tourists ill-prepared to evacuate from a site with an "... average fire return interval for the area within 3 miles of the project site is 1.2 years, with many fires having occurred within the same year. Average fire return intervals for large fires (>1,000 acres) within 3 miles of the project site is 6.9 years ... (CAL FIRE 2018a)" (DEIR Nov. 2020, page 4.17-3).

Regardless of whether the developers of Tract 52004 properly followed through with the in perpetuity dedication of the 300 acres as required by City Council Resolution No. 96-120, the current Project is clearly in direct opposition to preserving these recreational/open space lands. Thus, the Conservancy recommends that the City Council both not certify the subject Draft EIR and deny the Sand Canyon Resort Project.

Thank you for your consideration. Please address any questions and send all correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200 ext. 128 or at the above letterhead address.

Sincerely,

IRMA MUÑOZ
Chairperson