

**SANTA MONICA MOUNTAINS CONSERVANCY**

LOS ANGELES RIVER CENTER AND GARDENS  
570 WEST AVENUE TWENTY-SIX, SUITE 100  
LOS ANGELES, CALIFORNIA 90065  
PHONE (323) 221-8900  
FAX (323) 221-9001  
WWW.SMMC.CA.GOV



July 15, 2024

Planning Commission  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 140  
Santa Clarita, California 90012

**Additional Draft Environmental Impact Report Comments  
Wiley Canyon Project Master Case 20-238  
Tentative Tract Map No. 83295 – SCH No. 2022030626**

Dear Commissioners:

The Santa Monica Mountains Conservancy, a CEQA trustee agency, commented on the Wiley Canyon project Draft Environmental Impact Report (DEIR) in a March 2024 letter within the prescribed comment period. At the June 18, 2024 Planning Commission hearing, minor project changes were introduced. Those project changes do nothing to address that the DEIR is still fatally flawed because of a total lack of both onsite and local analysis of wildlife movement and habitat connectivity potential. The DEIR is further deficient for its absence of alternative design efforts to avoid riparian and riparian buffer habitat.

The iconic valley project site is fundamental to the southern viewshed entrance both to the City of Santa Clarita and the Santa Clarita Valley. Interstate 5 descends out of the scenic, wild Newhall Pass with the freeway viewshed transitioning into lower elevation hills with some dispersed low-rise development. The proposed project, and all its DEIR alternatives, would transform a pivotable property in this unique viewshed into a multi-story, near-monolith of development with hundreds of lighted windows and token, tiny open space patches.

The proposed project fails both to mitigate this significant adverse viewshed impact and retain an adequate onsite amount of biologically fully functional riparian habitat for its own value and for its ability to facilitate wildlife movement between habitat blocks described in the Conservancy's two comment letters to date and shown on the attached figure.

Why is the City moving forward with a project that would ruin these existing public resources when there are multiple ways to shape a better, similar, more compact project? Why is the City on board with a project that requires over 1,000,000 cubic yards of flood plain soil re-compaction and the import of 100,000 cubic yards of earth. Why does the DEIR fail to mention the 1,000,000 cubic yards of alluvium and the greenhouse gases and water necessary to re-compact it? Why is the City quietly standing by for a project that

transforms a signature Santa Clarita Valley open space area with ten unique plant communities into a property with wall-to-wall lighted parking lots, multi-story buildings, berms, concrete retention basins, and a greatly channelized south fork of the Santa Clara River?

Why not instead allow for a wider, lush, and hydrologically freer river channel to benefit all citizens, wildlife, ground water recharge, and the occupants of the proposed project? Why not require a 100-foot-wide one-hundred-percent natural area (onsite) along the northern project boundary to complement the adjacent low-income community's directly adjacent open space? That 100-foot-wide buffer (onsite) could be planted with native trees and perennial grasses both for their amenity, green house gas reduction, and wildlife values. It could have private pathways and be full of wildlife.

Why would the City miss this opportunity for more nature, views, and higher neighborhood amenity values? Clearly from the public hearing testimony, local community members strongly object to the proposed monolithic – traffic inducing development. Who then wants it? What pressures do staff and decision makers feel to support it?

The project shows no sensitivity or innovation to achieve the added above-described public viewshed and ecological benefits. As proposed it just offers miniature-scale benefits for unknown future project occupants.

DEIR Alternative 4 includes a mostly 200-foot-wide onsite open space buffer between the low-income community to the north and the project's proposed development elements. It also pulls back some building footprints (but not channelization) from a portion of the project's river interface. We agree with the DEIR findings that Alternative 4 is the environmentally superior project. It avoids and reduces significant impacts. And, importantly, per the DEIR findings, it meets all the project objectives.

The public, however, deserves an even better project. No portion of the existing riparian, or riparian buffer, habitat (including at the key upstream end by the freeway) should be further constricted from its current condition until such constriction is physically vital to connect with the downstream flood control infrastructure. In addition, no project building should be over two stories in height to preserve adequate elements of current significant viewshed.

There is no evidence in the record that requires the City to approve a project of the magnitude of the proposed project or that of any of the DEIR alternatives. The project requires a broad set of discretionary approvals. There is no disclosure or analysis in the DEIR about how new State right-to-build laws are impacting the project footprint, design, and density. The City legally is unconstrained to approve a significantly reduced project footprint.

The Conservancy urges the Commission not to recommend certification of the DEIR and to require circulation of a Supplemental EIR with some project alternatives that collectively combine both the project objectives and the public visual and ecological values of the property.

The project objectives are qualitative not quantitative. A reduced footprint project can meet all the project objectives by providing lesser spatial area for each of the objectives.

Of course, the applicant will say such public environmentally superior alternative projects are economically infeasible. But, without the provision of a highly transparent and detailed economic analysis provided to the City addressing specific reduced footprint alternatives, such assertions are only as good as hearsay given the profit motive of the developer. The City is not required to only approve a project that a developer claims is profitable without support of such a claim.

Why should the public and the environment shoulder the permanent impacts of a project by a developer who bought a property that needs to recompact 1,000,000 cubic yards of flood plain soils and bring in 10,000 – yes 10,000 10-cubic yard dump trucks – of extra topping to make a project work? We can all do better for the environment.

The Conservancy, as the area's chief State planning agency, urges the Commission to do what is best for this regionally significant viewshed and pivotal regionally significant habitat linkage section of river adjacent to Interstate 5 wildlife undercrossings, and listen to the locals who understand the importance of this land.

Please address any correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, of our staff at the above letterhead address or via [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,  
  
STEVE VERES  
Chairperson