

**SANTA MONICA MOUNTAINS CONSERVANCY**

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July 18, 2022

Governor's Office of Planning & Research

**Aug 11 2022**

**STATE CLEARINGHOUSE**

Erica Gutierrez, AICP  
County of Los Angeles  
Department of Regional Planning  
Principal Planner, Subdivisions Section  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, California 90012

**Notice of Preparation Comments for The Trails at Lyons Canyon Project  
SCH No. 2022060346, Project No. 2021-001195- (5),  
Case No(s). Vesting Tentative Tract Map No. 83301 (RPPL 2021003061), Conditional  
Use Permit No. RPPL 2021003113, Zone Change No. RPPL 2021003163,  
Oak Tree Permit No. RPPL 2021003070**

Dear Ms. Gutierrez:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced Notice of Preparation for a 504 dwelling unit mixed-residential project requiring a zone change to grade over 2.7 million cubic yards and eliminate 454 protected trees in the Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA). The subject property abuts parkland owned by both the City of Santa Clarita and the Mountains Recreation and Conservation Authority (MRCA). Why would the County vote to up zone agricultural land with exceptional watershed, biological and visual resources when many iterations of economically viable developments are possible on an existing flat disturbed ten-acre frontage portion of the property? Ten acres of housing can provide many dwelling units and economic return. Open space lands and watershed recharge areas are invaluable in 2022. This letter outlines resource avoidance alternative projects for analysis in the DEIR.

Any project that eliminates or extensively damages the oak studded hill in the southeast corner of the subject property would result in unavoidable significant adverse biological and visual impacts. Any project footprint that requires filling and channelizing any portion of Lyons Creek would result in unavoidable significant adverse biological impacts. The proposed project both eliminates the subject oak studded hill and partially channelizes both Lyons Creek and a substantial tributary and thus would require a statement of overriding considerations for both biological and visual impacts. The same need for a statement of overriding considerations would also be true for any DEIR

alternatives that damage these two described geological and hydrological features. CEQA demands significant impact avoidance if possible.

The Draft Environmental Impact Report (DEIR) must include the full analysis of at least one project alternative that requires neither grading the oak studded hill in the southeast property corner or requires any substantive streambed alteration impact to the main USGS blue line channel of Lyons Creek or the USGS blue line channel tributary that joins it within the northern part of APN 2826-002-026. A project designed with those two parameters would provide for ten-flat-disturbed acres of development area.

Because of that existing disturbance, if the elevations of that flat area need to be raised for flood purposes, such an avoidance alternative could include the import of offsite soils. It could also include harvesting soil from just outside CDFW jurisdictional area to raise pads closest to Lyons Creek. The addition of flood plain area does not constitute a stream bed alteration or water quality impact and could provide an exceptionally cost effective and visually beneficial tree mitigation area.

With all such suggested avoidance alternatives, why would any retention basins be needed other than to temporarily clean and retain runoff from the developed 10-acre area? There would be no other changes to the existing hydrological conditions in Lyons Canyon leading to the existing culvert at the Old Road adjacent to MRCA land. Ten pre-disturbed, highly-compacted, road front acres by existing utilities in Santa Clarita provide a lucrative development asset without the need for a zone change, streambed alteration permit, oak tree mitigation, extensive stormwater infrastructure, and most likely water tank and Fire Station.

There is no economic hardship need to eliminate a scenic small oak studded mountain next to a public trailhead or to bridge or fill Lyons Creek or any of its USGS blue line tributaries. A ten-acre flat area can accommodate a mix of commercial and residential development. The DEIR should include a maximum ten-acre (no mountain or stream grading) alternative with no zone change and one with a zone change component to provide decisionmakers with the best set of alternatives to consider. The DEIR must make clear if, and why, a dedicated Fire Station lot is required for development of the subject property, particularly in the case of a reduced footprint-resource avoidance projects suggested in this letter.

The Notice of Preparation is deficient for not including the significant loss numbers of both SEA protected trees and all oak trees.

Erica Gutierrez, AICP

Notice of Preparation Comments Vesting Tentative Tract Map No. 83301

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The DEIR must study the ecological value of the MRCA's abutting public open space parcel in the northeast project corner. This parcel connects Lyons Creek to a large culvert under both the Old Road and Interstate 5 that is available for smaller mammal and herpetofauna cross-freeway-movement. How will the project's addition of a new culvert affect the effectiveness of this adjacent culvert for herpetofauna movement via changing flow and soil moisture conditions? How will the introduction of development from the project affect the resources on the MRCA open space via annual fuel modification, irrigation, and lighting?

The project area is in an SEA and a CDFW approved Conceptual Area Protection Plan (CAPP). It is integral to the core habitat of the Santa Susana Mountains and habitat for the candidate threatened southern California mountain lion population. Because of this ecological sensitivity. The DEIR mitigation measures must include a minimum 2:1 mitigation ratio for impacts to all Sensitive Natural Communities with mid to high level rankings.

Please contact Paul Edelman of our staff with all questions and correspondence at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov) or at the above letterhead address.

Sincerely,

A handwritten signature in black ink that reads "Linda Parks". The signature is written in a cursive, flowing style.

LINDA PARKS  
Chairperson