

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 20, 2005

Mr. Jason Mikaelian, AICP  
Associate Planner  
Planning and Building Services  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 300  
Santa Clarita, California 91355

**Comments on Notice of Preparation for Soledad Townhomes Project  
(Master Case No. 04-444), Santa Clara River Watershed**

Dear Mr. Mikaelian:

The proposed project consists of the development of 30 acres of land to construct a residential community with 437 for-sale multiple-family dwelling units, a maximum of 10,000 square feet of commercial uses, associated recreation uses, and on-site private roads. (The Assessor's parcel numbers [APNs] and acres provided in the Notice of Preparation [NOP]/Initial Study [IS] do not correspond to shape of the project site shown on the Preliminary Landscape Plan provided by you at our request. We assume that the correct project boundary is depicted by APNs 2849-027-001, 002, 003, 004, 005, and 2849-001-027.) The Preliminary Landscape Plan appears to show that the entire approximately 30 acres would be developed or modified. The NOP/IS (p. 1) states that the project site is currently graded pursuant to the recorded Parcel Map No. 20838. Traffic improvements, construction of bank stabilization along the southern bank of Santa Clara River, and a trail system have been completed.

The Draft Environmental Impact Report (DEIR) should explicitly explain why a new DEIR is being prepared for a recorded tract map, whether significant changes are being proposed to the previously approved project, and the reason for those changes. The DEIR should also explain the status of that tract map (i.e., expirations), and expand upon the ability of the new DEIR to allow for additional changes or improvements to the project.

The Santa Clara River is an important wildlife corridor. The proposed project is adjacent to and within to the Santa Clara River. Habitat nodes and buffers should be maintained along the river corridor to maintain the ecological function, particularly in narrower areas such as the location the proposed project.

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The Santa Monica Mountains Conservancy recommends that the project be limited to 250 feet from the edge of the channel. Grading and improvements should be excluded from this 250-foot-buffer, while trails and native habitat restoration should be permitted. A fee title dedication should be required to be granted to an appropriate agency capable of managing land for resource protection such as City of Santa Clarita, Santa Clarita Watershed Recreation and Conservation Authority, or Mountains Recreation and Conservation Authority. Long-term management funding, in the form of a Community Facilities District, should also be required. This is necessary because this project site is located a narrow point in the river. Also the land use of the large parcel just north of the river is undetermined, and absent legal assurances, it cannot be assumed that it will remain as open space.

An analysis of an aerial photo of the site and surroundings shows that the site is a chokepoint connecting open space habitat to south of the Santa Clara River. (Development along Soledad Canyon Road hinders open space connections to the south, just east and west of the project site.) The Conservancy recommends that the western tip of the project site be avoided. The project and DEIR alternatives should provide a minimum 200-foot-wide wildlife corridor on the site to take advantage of the open space associated with the Metrolink facility, just south of Soledad Canyon Road. A fee title dedication should also be required of this open space, under the same conditions as described above.

The DEIR should provide an estimate of the acreage of alluvial scrub, if any, to be impacted by the proposed project. All impacts to this vegetation type should be avoided.

Thank you for your consideration of these comments. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson