

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



June 1, 2009

Planning Commission
City of Santa Clarita
23920 Valencia Boulevard
Santa Clarita, California 91355

**Commercial Development Project Comments
CUP 08-005 Oak Tree Permit 08-006**

Dear Commission Members:

The proposed project on 9.97 acres is located at the scenic confluence of Elsmere Creek and Newhall Creek. Wildlife can enter the site via the large Elsmere Creek box channel under State Route 14 and across Sierra Highway via the cemetery and an abutting property to the north. The property is not isolated and currently functions as a wildlife corridor for some species between the San Gabriel and Santa Susana Mountains. The Mountains Recreation and Conservation Authority (MRCA) is currently implementing a 4-acre riparian habitat restoration project directly across the freeway along Elsmere Creek. The subject section of Newhall Creek and its confluence point with Elsmere Creek contains a broad range of riparian species diversity. The Mitigated Negative Declaration (MND) conclusion that the project is ecologically isolated is false.

Any project on this site should work with the constraints of the land. The applicant has been encouraging our staff to work towards accepting an open space dedication. However the proposed project fails to work with the constraints of the land and should be significantly modified before such an acceptance. The total direct loss of over an acre of fully function mature willow cottonwood woodland in the Santa Clara River watershed, and indirect adverse impact on the remaining two-plus acres of riparian woodland, is a significant impact that can be reduced through simple project modifications.

The approximately 4.0 acres of habitat restoration required by the California Department of Fish and Game in the approved Streambed Alteration Agreement (SAA) will only partially mitigate these impacts. That mitigation is deferred and not well defined. Onsite mitigation we be on a biological island. In addition it is extremely difficult to find protected three acre riparian mitigation sites for restoration. The Conservancy recommends that the Commission deny the project unless the loss of willow woodland is reduced to less than 0.5 acres and that the specific habitat replacement ratios and requirements in the SAA be incorporated as MND mitigation measures.

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The intersection of Newhall Road and SR 14 maintains a semi-rural ambience. The proposed project would drastically alter the visual qualities over a large area. Four story buildings, 434 parking spaces, and 50,000 cubic yards of imported fill are not consistent with the old town Newhall described in the Initial Study. We encourage the Commission to insist on a project that does not fill riparian habitat, channelize drainages, and that results in an ecologically meaningful habitat area. To achieve such a project the applicant would need to remove all development out of the areas south and east of Newhall Creek. That development-free area should be dedicated in fee to the City, the MRCA or the Santa Clarita Wildlife Corridor Conservation Authority prior to the issuance of a grading permit. Such a development configuration would also provide a permanent wildlife corridor under SR 14. The MND is deficient for not adequately addressing this inter-mountain range connectivity.

Please address any questions to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFFER
Chairperson