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March 26, 2018

Ms. Marie Pavlovic
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

**Supplemental Draft Environmental Impact Report Comments
Tesoro Del Valle Project (Revised Vesting Tentative Tract
Map No. TR51644-1, SCH No. 2016101031)**

Dear Ms. Pavlovic:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Supplemental Draft Environmental Impact Report (SDEIR) for the Tesoro Del Valle Project's Phases B and C (Project). A project with 9 million cubic yards of proposed grading would totally alter a large section of regional landscape in the Santa Clara River watershed. The permanent loss of X acres of habitat in Southern California cannot be mitigated below a level of significance. The project also has significant growth-inducing impacts via providing secondary access to the multi-hundred-acre proposed Tapia Ranch development.

The subject property is situated at the absolute edge of the Angeles National Forest extended core habitat area. The project is a classic 1980s mass graded suburban sprawl endeavor that is totally unaccompanied by public transportation. The permanent conversion of hundreds of acres of core habitat regardless of the habitat type is an unavoidable significant adverse biological impact to this core habitat area. The California Environmental Quality Act (CEQA) requires the avoidance and/or reduction of significant impacts where possible. The SDEIR represents a new project and new environmental analysis baseline. A new EIR means that prior CEQA analyses provide no by-right entitlements.

County Must Approve Reduced Development Alternative

The SDEIR demonstrably shows that major biological impacts can be both substantially avoided and reduced via approval of the SDEIR Reduced Development Area Alternative. The SDEIR concludes that the Reduced Development Area Alternative:

“would meet all of the Project objectives identified in Section 6.3. However, this alternative would meet Objectives 4, 8, and 9 to a lesser extent as compared to the proposed Project given the reduction in dwelling units,

Ms. Marie Pavlovic

SDEIR Comments Tesoro Del Valle Project (Revised VTTM TR51644-1 SCH 2016101031)

March 26, 2018

Page 2

parks, and recreational uses.”

The applicant has no right to demand more units than the Reduced Development Area Alternative provides because it does not fully meet a single project objective. The Reduced Development Area Alternative meets all of the project objectives; and for an EIR alternative to be valid it must be feasible.

Since SDEIR Objective 4 is to “Provide a range of housing with a minimum lot size of 5,000 square feet in Phases B and C,” the Reduced Development Area Alternative would provide *more* residential units in Phases B and C than were originally proposed in 1999 (245 units as compared to 237 units).

Objectives 8 and 9 refer to “recreational opportunities” and “features that provide regional benefits (e.g. the Cliffie Stone Memorial Trail, fire protection, quality circulation design).” The Reduced Development Area Alternative does not in any way restrict the opportunity for the Project to improve the Cliffie Stone Memorial Trail or to connect to other local trails for hiking, biking and/or equestrian purposes.

Possible Project Alternative to Provide More Units than Reduced Development Area Alternative

The Conservancy reiterates that the County must adopt a statement of overriding considerations for biological impacts for the approval of any project more damaging than the Reduced Development Area Alternative. If the County opts for such more damaging project alternatives, the Conservancy offers an alternative development footprint (Maximum Suggested Development Footprint) to offer more housing while retaining key habitat resources.

To accommodate the “circulation design” referenced in Objective 9 and also meet all other identified Project objectives, the Conservancy offers an alternative development design (Maximum Suggested Development Footprint) as shown on the attached exhibit. This alternative project maintains the proposed “A Street” connections to Tesoro Del Valle Drive and Avenida Rancho Tesoro. It also clusters the residential development between “A Street” and the previously constructed Phase A.

With this design, “A Street” will not only help confine the indirect (edge effect) impacts of the proposed development but it will also provide a uniform buffer of defensible space along the project perimeter for wildfire protection. If a helipad is still a required condition of approval, and it cannot be located elsewhere, then a location along the proposed

Ms. Marie Pavlovic

SDEIR Comments Tesoro Del Valle Project (Revised VTTM TR51644-1 SCH 2016101031)

March 26, 2018

Page 3

emergency vehicle access easement in favor of the adjacent Tapia Canyon Ranch Project (405 single-family residential units on 1,167 acres) would provide the logical site for a helipad relocation.

The Conservancy's Maximum Suggested Development Footprint (MSDF) alternative would eliminate the need to remove any of the oak trees within the existing Coast Live Oak Woodland at the easterly boundary of the proposed grading limits. Indirect impacts related to upslope grading in the drainages above this and other on-site Coast Live Oak Woodlands would be eliminated.

Project Epitomizes Sprawl Without Transportation Sustainability

While SDEIR Section 5.11.3 references "... new or substantially revised policies and regulations that have been passed, adopted or approved since certification of the 1999 Final EIR, or those that were not previously discussed in the 1999 Final EIR," and cites the Regional Housing Needs Assessment for an additional need of 30,145 dwelling units in unincorporated Los Angeles County to meet growth demands, the SDEIR does not integrate the Regional Transportation Plan/Sustainable Communities Strategy or include analysis of increased density opportunities related to Accessory Dwelling Units (ADUs) as provided in Senate Bill 229 and Assembly Bill 494. By not providing bus turnouts, car pool lots, dedicated bike routes, or any other improvements to support or encourage the proposed Project's connectivity to multi-modal transportation, the Tesoro Del Valle development presumes single-occupancy vehicles for all residential transportation needs. In order to help meet the region's projected housing demand, the proposed Project seeks a density transfer of 475 un-built units from Phase A to the currently contemplated Phases B and C, yet the proposed Project does not contemplate ADUs as a means to increase density while minimizing the development footprint. The Conservancy encourages the County and the applicant to analyze a development alternative that incorporate multi-modal transportation connectivity and ADUs as a means to minimize impacts to biological resources and help meet the regional housing needs.

Cumulative Indirect Impacts of Proposed Project

According to a recently published ten-year long study in, and around, Salt Lake City, Utah, by Logan E. Mitchell, et al. (*Long-term urban CO₂ trends*, PNAS March 2018, 201702393, <https://doi.org/10.1073/pnas.1702393115>): "Population growth in rural areas that experienced suburban development was associated with increasing emissions while population growth in the developed urban core was associated with stable emissions." Because suburban development into a rural and undeveloped area is proposed with the

Ms. Marie Pavlovic

SDEIR Comments Tesoro Del Valle Project (Revised VTTM TR51644-1 SCH 2016101031)

March 26, 2018

Page 4

Tesoro Del Valle Project, this study indicates a measurably larger increase in greenhouse gas emissions within the Santa Clarita Valley is likely to result as compared with an equivalent urban infill residential unit development. As proposed, the proposed Project will have a negative effect on the City of Santa Clarita's and Los Angeles County's ability to meet the greenhouse gas reduction goals defined by Assembly Bill 32 and Senate Bill 375. This study further substantiates the need to explore ADUS as a means to increase development density and preserve rural, undeveloped lands as extant carbon sinks that help mitigate the greenhouse gas emissions primarily associated with residential transportation.

A cumulative effect of the Project's build-out is referenced in Table 5.17-9: "To accommodate the proposed through lanes [on Copper Hill Drive], the Copper Hill Bridge over the San Francisquito Creek would need to be widened to its planned ultimate configuration of three eastbound and three westbound through lanes." Have the impacts on transportation/traffic, greenhouse gas emissions, biological resources, land use, and noise of this growth-inducing requirement been analyzed elsewhere? Would ultimate build-out of Copper Hill Bridge facilitate development north along San Francisquito Canyon Road or other projects east along Copper Hill Drive? If so, that analysis should have been included in the SDEIR. MM Trans-3 appears to condition Project approval upon the applicant's payment of per unit fees to the County's Valencia Bridge and Major Thoroughfare District. If widening of Copper Hill Bridge is required to approve the proposed Project's development, then the SDEIR must include environmental analysis of construction improvements to, and operation of, Copper Hill Bridge.

If you have any questions for our agency, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at (310) 589-3200, ext. 128, by email at edelman@smmc.ca.gov, or at the above letterhead address. Thank you for your time and consideration.

Sincerely,

CRAIG SAP
Chairperson