

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Impact Analysis Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Notice of Preparation Comments  
for The Lyons Canyon Ranch Project  
Tentative Tract Map No. 53653 - SCH No. 2003031086**

Dear Ms. Chen:

The proposed Lyons Canyon Ranch development project is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Conservancy is concerned about the proposed project generating significant adverse impacts to the biological and visual resources and growth-inducing impacts.

**Importance of Including Regional Open Space Context**

The project site is located immediately north of Towsley Canyon Park owned by the Mountains Recreation and Conservation Authority (MRCA). Towsley Canyon Park is part of over 5,000 acres of parkland surrounding the proposed development. The Draft Environmental Impact Report (DEIR) must address both the proximity of nearby parkland and the fact that much of the 232-acre project site is integral to one of the most ecologically rich portions of the Santa Susana Mountains core habitat area.

The site poses many constraints to development including extensive flood plain acreage, dense oak groves where there is buildable terrain, and a single means of access. Surrounding terrain makes it quite unlikely that any substantial portions of the offsite private property to the east and west will be developed. In which case, development of the back (western) section of the subject property would inevitably represent a deep intrusion into what otherwise in all probability will remain a wilderness recreation area.

**Selection of DEIR Alternatives**

Any project approved on the site should reflect the highest possible level of avoidance relative to drainage and oak tree resources. In addition, any approved project should leave ecologically functional sized habitat areas, as opposed to steep slopes surrounding large cut

and fill areas with islands of “saved” oak trees. The existing project proposal does not provide the type of ecologically functional habitat block that should be protected on a 232-acre property.

In the case of land use in Lyon Canyon, the need for housing should not result in a mass graded project being forced into steep, ecologically valuable landscapes. The DEIR alternatives analysis must include a project that limits development to the easternmost 80 acres, closest to Interstate 5(15). However, the same alternative should include no grading on any slope visible from the 15 except for several hundred feet interior to the site if necessary. If small oak groves, that are not visible from the Old Road or 15, and would otherwise be completely cutoff from any other contiguous habitat, need to be sacrificed to achieve such an alternative project, that action should be explored in the alternatives analysis.

If the applicant rejects such a project both as not meeting his objectives and being economically infeasible, the County should hold firm with existing General Plan protections of which the applicant is obligated to be aware. The ecological and watershed significance of the subject property warrant the County holding the line with the existing zoning. The lure of a few senior housing units should not trigger the permanent loss of what amounts to an entire watershed.

The DEIR should include at least one economically feasible alternative that impacts less than 100 oak trees (the proposal destroys 226).

As currently designed the project has a high edge to interior area ratio. The result would be scores of acres of required brush clearance and resulting habitat degradation in perpetuity. The DEIR should include at least one economically feasible alternative that impacts less than 100 oak trees and requires less than 20 acres of fuel modification.

#### **Growth-Inducing Potential to Interior Parcels**

A substantial block of private land is located interior (west) of the site. Both the proposed project, and potential alternative projects, pose the potential of supplying both utility and road access to this block of private land. The DEIR must disclose whether such potential exists based on title information. If any easements to any adjoining properties are recorded, they must be disclosed and accurately plotted in the DEIR for decision makers to understand. Any potential prescriptive easements must also be addressed. The DEIR must disclose all existing access agreements with adjoining and near-adjoining landowners. Without this information the growth inducing potential of the project would not be

adequately disclosed. To ensure that no such undisclosed growth-inducing actions occur after a project approval, the DEIR must include a conservation easement or fee simple dedication to a public agency other than Los Angeles County that essentially seals the project from providing utilities or access to any property outside of the 232-acre project boundary.

### **Issues Related to Offsite Brushing**

As proposed the project appears that it would required more than 20 acres of brush clearance outside of the project boundary. None of that would be on public land. However we are sensitive to such actions and suggest that the DEIR both call out such offsite fuel modification and include a mitigation measure requiring a permanent irrevocable funding source for the future HOA to do that brushing. It is much cleaner when projects are designed to have all brushing occur within the subject ownership.

### **Additional Requests for DEIR Information**

Every attempt must be made to keep open space lighting impacts to a minimum. The DEIR must include measurable levels of light allowable at all open space interface areas.

The DEIR must also identify all of the permanent surface water sources located on the project site. Every attempt must be made to protect and avoid permanent water sources.

The DEIR must include an analysis of what percentage of the remaining oak trees in each DEIR alternative would be located within 75 feet of a house, yard, road, or parking lot. This information is imperative for decision makers to assess the ecological value the remaining oaks on site. Proximity to development decreases the ecological value of an oak tree.

### **Ecologically Functional Debris Basins**

We challenge the County and the project applicant to design innovative debris basins for the subject project. The key factor to design into the basins is to minimize or eliminate maintenance. Reduced maintenance (disturbance) equates to greater permanent habitat value. The preservation of existing flood plain area (to maximize area for sediment management) is the key. In the case of the subject property, that may require a section of elevated road.

### **Need for Fee Simple Open Space and Conservation Easement Dedications**

The ungraded portions of the property should be dedicated in fee to the Mountains Recreation and Conservation Authority (MRCA), the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), or a similar public entity. To pay for management

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of the open space the funds must be ensured through the establishment of a community facilities district (CFD). Both the MRCA and SCWRCA have the authority to be the local agency sponsor for such a CFD.

Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address.

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson