

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



October 27, 2014

Tyler Montgomery  
Los Angeles County  
320 West Temple Street  
Los Angeles, California 90012

**Notice of Preparation Comments**  
**Aidlin Hills Project PN 00-136**  
**SCH No. 2014091027**

Dear Mr. Montgomery:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced project that abuts the Conservancy's Pico Canyon Park, a component of the Santa Clarita Woodlands.

The proposed project with 1,300,000 cubic yards of grading, 102 houses, large water tanks, and an intrusive, elevated secondary access road would represent a major intrusion into the Santa Susana Mountains core habitat area. Much of that grading a 1,500-foot-long section of development would be starkly visible from Pico Canyon Road. That viewshed would be further marred by a 1,500-foot-long 200-foot-wide fuel modification zone below that long row of ridgeline houses. The majority of that northern boundary fuel modification zone would actually be offsite on adjacent private property in Venturan sage scrub habitat that comes directly to the edge of Pico Creek. This loss of up to 4.5 acres of sage scrub on extremely steep slope with Pico Creek at their base is a potentially significant biological and hydrological (erosion) impact. The combined development visibility, including lighting, and the fuel modification is a potentially significant visual impact from Pico Canyon Road. The opposite side of Pico Canyon has a long stretch of scenic natural land forms. As proposed, the project would adversely affect an approximately 4,000-foot-long section of viewshed along a scenic roadway.

The property is zoned Zoned A-2-2 Heavy Agricultural Zone with minimum two-acre lot sizes. Why does the Notice of Preparation not disclose that the proposed project would need a zone change? The required 13,000 cubic yards of grading for each house exemplifies that the proposed project is incongruous with the steep terrain and numerous water courses. The Draft Environmental Impact Report (DEIR) must include an alternative project that does not require a zone change.

The DEIR must also include a reduced footprint alternative that does not cut the top off the ridgeline along the northern project boundary. That alternative should include back cutting on the ridgeline and placing fill behind it.

The DEIR must also include an alternative project entirely defined within the proposed project footprint at a density that would not require an emergency access road to be constructed on top of a line of fill placed across Wickham Canyon. Such a ranchette project may have exponentially less infrastructure costs because it might not require complete implementation Pico Canyon Road, such large water tanks, large infiltration basins, channelization of Pico Creek and Wickham Creek, street lighting, curbs and gutters, extensive riparian habitat mitigation, and HOA common areas. It would need less water supply. Newhall Ranch needs to widen Pico Canyon Road so there is no argument that this developer must pay for it to ensure it will be built on the private sector dime.

The DEIR must address the growth inducing effects of the proposed project that would provide road access and utilities to a minimum of four ownerships and seven legal parcels in upper Wickham Canyon. The DEIR must disclose which of those parcels have legal recorded access through the subject property and describe the scope and location of such easements in detail. The DEIR must describe how the project was designed or not designed to accommodate connections to these easements. The DEIR must disclose what legal arrangements have to been made with any and all of these up canyon owners to provide new access and utilities. Disclosure of that information is essential for an adequate DEIR growth inducing analysis. The up canyon habitat is exceptionally rich and it abuts a long interface of public open space that could be adversely affected. It is imperative that the DEIR project description and mitigation measures be written such that no post-approval easements can be granted to these owners that would result in growth potential not addressed in the DEIR.

The project and all of its DEIR alternatives should include a public trail from Pico Canyon Road up Wickham Canyon to the proposed public open space lot. Any DEIR alternative that includes the emergency access road to Verahda Court should include a large culvert for Wickham Creek that accommodates both adequate stream flow and safe equestrian use. Such a tunnel would function for night time wildlife movement too. The absence of a large soft bottom culvert across the middle of Wickham Creek could have a significant adverse biological impact on amphibian and reptile movement with the Wickham Canyon

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watershed. Ideally that emergency access road would not have any lighting allowed per a condition and mitigation measure.

It is imperative that the remainder open space lots/areas be fully transferred in fee simple to a public park or open space agency as a prerequisite of tract map recordation.

The DEIR must address how proposed perimeter slope and entry way irrigation will adversely impact south coast horned lizards via sustaining Argentine ant populations.

The DEIR must address in detail what County Flood Control District clean out requirements will be placed on the proposed storm water infiltration basins. Ideally they would be sized and designed to require no clean out and the resulting plant communities could mature and provide both exceptional habitat and a unique natural amenity for the project.

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,

LINDA PARKS  
Chairperson