

1-15-21

Planning Commissioners  
City of Santa Clarita  
and Hai Nguyen, Project Planner  
23920 Valencia Blvd., Suite 302  
Santa Clarita, CA 91355

Via email: Hai Nguyen [HNGUYEN@santa-clarita.com](mailto:HNGUYEN@santa-clarita.com)

**Please copy to all Commissioners and enter into the Administrative Record.**

## **Comments on the EIR for Sand Canyon Resort Project MC 18-021 and associated permits, located in a Very High Fire Hazard Zone, agenda item**

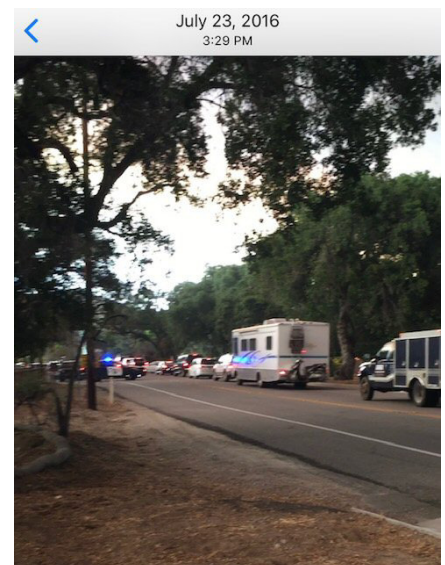
Honorable Commissioners:

The Angeles Chapter Wildlands Urban Interface Wildfire (WUI) Committee was formed to address proposed projects in Very High Fire Hazard zones (VHFHZ) in Los Angeles and Orange Counties that are considered or approved in spite of the dangers from wildfires to current and future residents, wildlife, and without considering the costs to the public of fighting wildfires to protect these projects.

This development is an example of a cavalier disregard for the growing danger of massive wildfires in these areas that have been so prevalent in the last few years throughout the state of California. The recent Sand Fire in this immediate area that resulted in the death of two people, the loss of many horses and of local wildlife, and the loss of 18 homes, is a prime and very relevant example of why we must stop building in these fire-prone areas. Further, the toll on public safety and the environment on top of the financial cost of fighting these mega fires is no longer acceptable.

***We oppose this massive construction in a VHFHZ because it would put thousands of guests in harm's way in the event of a wind driven wildfire.*** It would also endanger existing residents as they attempt to evacuate on a two lane road were hundreds of additional cars would add to an already grave evacuation problem. ***The EIR is deficient in failing to analyze the time required to evacuate and the project's potential to slow the evacuation of others in the community with possible deadly results, creating an unacceptable risk to public safety.***

There can be no doubt of the hazard this approval would create for the community by simply viewing pictures of the stalled traffic which evacuating residents faced during the 2016 wind driven Sand fire which occurred in this exact location. According to the United States Forest Service, 3,379 firefighters were assigned to the fire which prompted the evacuation of at least 10,000 homes. On Tuesday July 26, Los Angeles County declared a state of emergency. The fire burned over 41,000 acres (150 km<sup>2</sup>) and resulted in two deaths and the loss of many horses and other pets and the loss of 18 homes. (Los Angeles Times article attached). Panicked residents were stuck in traffic for several hours. Had the wind turned, there would have been an even greater loss of life due to the inability of residents to evacuate in a timely manner.





The proposed project would result in the replacement of existing open space in a VHFHZ that was formerly a part of the Robinson Ranch Golf Course with a new resort and spa consisting of the following: • Main Hotel - three-story building with 241 rooms/keys totaling approximately 165,000 square feet, and back of house and mechanical, electrical, and plumbing space in the Main Hotel basement totaling approximately 23,000 square feet, • Wedding Hotel- three three-story buildings with 81 rooms/keys totaling approximately 50,000 square feet air conditioned space and 17,500 square feet of open non-air-conditioned space with an outdoor wedding ground and pergola • View Villas - 14 two-story villas with 56 rooms totaling approximately 110,000 square feet • Oak Villas - nine one-story villas with nine rooms/keys totaling approximately 38,000 square feet and one two-story villa with five rooms/keys totaling approximately 9,500 square feet • Function Wing - meeting center and atrium (32,500 square feet), a ballroom (10,000 square feet), another ballroom (3,000 square feet), meeting rooms (4,500 square feet), and pre-function space (6,200 square feet) • Dining - three restaurants with kitchens, pantries and back-of-house totaling approximately 25,000 square feet • Children's Center - approximately 7,000 square feet including nursery, and a teen arcade • Spa/Gym/Salon - Spa, gym and salon facilities as well as a retail boutique totaling approximately 33,000 square feet • Parking - 375 parking stalls and 18 car parking spaces in Oak Villa garages.

*This is too large a facility for an area zoned as rural in the City General Plan.*

Additionally, among other approvals, the project would require

- Removal or modification of the open space requirement from the previous golf course entitlement, Master Case 95-049 for Robinson Ranch
- Zone Change to change the zone from Open Space (OS) to Community Commercial (CC) for two of the proposed four lots
- General Plan Amendment to change the land use from Open Space (OS) to Community Commercial (CC) for two of the proposed four lots

*The Sierra Club opposes the conversion of dedicated Open Space. We also believe that it is not legal to remove a mitigation requirement for a previous development approval.*

The Commission should be aware that the County of Los Angeles, who would be responsible for fighting whatever wildfire occurs here through its County Fire Department, has recently passed several motions opposing building in Very High Fire Hazard Zones (VHFHZ), and requiring evacuation plans and evacuation time analysis. (motions attached).

Defending this area from wild fires will be very expensive for the County. We have attached a report (“Losing Ground”) that indicates the costs of building in such areas, both to the County

and the public. We ask that you request the County to provide a cost of services study for this development and begin to generate fees to ensure that adequate financing of fire services can be provided.

We oppose further incursions into fire hazard areas, especially in areas that have limited evacuation routes, not only because of the danger to current and future residents. We also oppose such projects due to the cost of defending such residents from the likely increased occurrence of wildfires as temperatures rise creating drier and hotter conditions due to climate change.

Thank you for considering our comments.

Sincerely,

***Members of the Angeles Chapter  
Wildlands Urban Interface Wildfire Committee***

Attachments

1. News – Los Angeles Times, Sand Fire
2. LA COUNTY Supervisors’ motions regarding building in VHFH areas
2. “Losing Ground”

CC: Supervisor Kathryn Barger

## Sand fire burns more than 37,000 acres in Santa Clarita Valley, prompting state of emergency



Dillon Deaton / Los Angeles Times

By Brittny Mejia, Hailey Branson-Potts, Matt Hamilton  
Los Angeles Times July 26, 2016 7:51 AM,

A state of emergency was declared Tuesday for Los Angeles County, where the Sand fire has scorched 37,701 acres, destroyed homes and led to at least one fatality in Santa Clarita Valley.

Acting Gov. Tom Torlakson, the state's top education official [who is filling in this week while Gov. Jerry Brown](#) attends the Democratic National Convention in Philadelphia, issued the emergency order, a move that helps quickly get aid to affected communities.

An emergency order was also issued for Monterey County, where firefighters [are battling the Soberanes fire](#).

Nearly 3,000 firefighters continued Tuesday evening to battle the Sand fire, which was 25% contained, according to fire officials.

Advertisement

"There's still a lot of firefighting to be done," U.S. Forest Service spokesman Justin Correll said.

[Sand fire updates: More than 37,000 acres burned in Santa Clarita Valley mountains »](#)

Although the Los Angeles County Sheriff's Department allowed most residents to return home Monday evening, hundreds of residents [in three areas](#) were still under evacuation orders.

L.A. County declared a local emergency Monday as the wildfire continued to grow.

The massive blaze erupted Friday along the northbound 14 Freeway at Sand Canyon Road. At least 18 structures have been destroyed and one damaged in the Angeles National Forest near Bear Divide and Sand Canyon areas, according to the Los Angeles County Fire Department.

The fire has been blamed for one fatality.

Robert Bresnick, 67, was discovered dead about 7:20 p.m. Saturday inside a burned car in a driveway outside a home in the 26700 block of Iron Canyon Road.

Bresnick was visiting a friend when evacuation orders went out to residents, said Ed Winter, spokesman for the Los Angeles County coroner's office. But Bresnick was apparently "uncooperative" and did not want to leave, he said.

As flames approached, his friend began evacuating, but Bresnick went back inside the home.

"They were trying to get him to leave," Winter said.

He later emerged from the home, but it was too late.

Bresnick's friend ran for the hills, while Bresnick got into his car just as flames swept over the area.

Twenty minutes later, firefighters found his burned body inside the car, Winter said.

Neighbors on Tuesday said he was trying to rescue his dogs and got caught in the fire. Residents said his girlfriend fled with her pet before the flames ran through the home.

Morgan Franklin, who lives across the street from the home, said the couple had three dogs.

"Her house is gone, her boyfriend is gone," Franklin said. "It's crazy."

Investigators used dental records to identify Bresnick, officials said. An autopsy will be performed to determine an official cause of death.

Powerful winds have fueled flames, which were intensified by excessive heat and low humidity. The blaze scorched thousands of acres of forestland that hadn't burned in several decades.

Ash from the fire fell throughout Los Angeles County, and smoke created an apocalyptic haze, even triggering air-quality advisories as far away as Reno.

On Tuesday, the South Coast Air Quality Management District extended a smoke advisory for the Antelope Valley, Santa Clarita Valley and parts of the San Gabriel Mountains. Officials warned that the air could reach unhealthy levels because of the smoke.

The fire already left scorch marks that could be seen from space, [according](#) to NASA. Satellites traveling above the Earth recorded images showing slightly darkened canyons and hills in the Santa Clarita Valley.

Sand Fire Burn Scar <https://t.co/cwuSqjpmJJ> #NASA [pic.twitter.com/sJcEwxpFW2](https://pic.twitter.com/sJcEwxpFW2)

— NASA Earth (@NASAEarth) [July 25, 2016](#)



The National Weather Service warned that 25 to 30 mph winds were expected through Thursday in the Santa Clarita Valley and area mountains. Strong winds were also forecast for the Antelope Valley.

“Elevated fire danger is expected to persist through late in the week and possibly through the weekend,” the weather service said. “The potential for rapid growth and extreme fire behavior will continue, for existing fires and for any new fire that occurs.”

The weather service urged “extreme caution,” especially in areas with heavy brush.

The strong winds fed uncertainty about the fire. Along Agua Dulce Canyon Road, residents were under an evacuation order, but some were hunkered down in their homes, keeping a watchful eye on the blaze.

Victoria Donohoe, 50, and her long-term boyfriend remained inside their home of more than two decades.

“We’ve been through this before,” Donohoe said.

Her water supply was getting low, and like other residents here, she was prohibited from reentering the neighborhood if she drove past the police checkpoint. If the flames encroached, she said she had already set aside personal documents, pictures and clothes.

“We can tell when it’s going to get close,” she said, “and we’re prepared to leave.”

*Times staff writer Veronica Rocha contributed to this report.*

[brittny.mejia@latimes.com](mailto:brittny.mejia@latimes.com)

[hailey.branson@latimes.com](mailto:hailey.branson@latimes.com)

[matt.hamilton@latimes.com](mailto:matt.hamilton@latimes.com)

MOTION BY SUPERVISOR SHEILA KUEHL

February 11, 2020

**Title 21 and 22 - Reduce Damage to Life and Property from Wildfires**

At least once every year, wildfires destroy or threaten the homes of Los Angeles County residents. In 2018, the Woolsey Fire burned 96,949 acres across two counties, destroyed 1,121 residential and commercial structures and damaged another 189 structures in Los Angeles County alone, and resulted in the deaths of three people. The County incurred approximately \$52 million in fire suppression costs and estimates that the insured losses from the Woolsey Fire will total between \$3 and \$5 billion (Citygate After Action Review of the Woolsey Fire Incident). This fire epitomizes a growing trend toward bigger and more destructive wildfires.

In response to the increasing number of devastating wildfires, Governor Newsom released the “Wildfires and Climate Change: California’s Energy Future” report on April 12, 2019. This report recommends that local governments begin to deprioritize new development in areas of the most extreme fire risk. This motion is consistent with the Governor’s directive and allows for Los Angeles County to take a leadership role in the effort to reduce damage to life and property from wildfires.

**MOTION**

SOLIS \_\_\_\_\_

RIDLEY-THOMAS \_\_\_\_\_

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Recent studies indicate that climate change has resulted in wildfires that last longer and occur more frequently. In 2007 and 2008 alone, wildland fires burned over 147,000 acres, destroyed 570 residences in the unincorporated areas. In 2009, the Station Fire burned nearly 160,000 acres and destroyed 76 residences. This fire occurred months before the Santa Ana winds, which often exacerbate wildfires in the fall and spring months.

The County is one of six communities that will receive technical assistance in 2020 under a national program proposing to address the growing challenges associated with wildfire through land use planning. As an increasing number of communities are affected by wildfire across the U.S., the Community Planning Assistance for Wildfire (CPAW) program provides much-needed support at the local level. Through CPAW, community and local stakeholders will collaborate with a team of professional land use planners, foresters, risk modelers, and researchers to identify opportunities to address wildfire through the planning process. The CPAW program will analyze the County's development and land use regulations and provide recommendations to increase safety and reduce the threat of wildfire to homes and businesses.

The Los Angeles County General Plan's goals and policies provide for the deprioritization of new development in areas of high fire risk. Its Guiding Principles state that the General Plan "includes goals, policies and programs to minimize risks and discourage development in areas that are prone to safety hazards, such as earthquakes, floods and wildfires." The General Plan also recognizes the increasing cost of wildfires. Its Safety Element states that:

*The rise in temperatures and prolonged periods of drought increase the fire ignition potential and may increase the frequency and duration of wildfires. Wildfires also have negative impacts on air quality. As exposure to smoke and particulate matter has immediate and long-term*



*public health impacts, populations may suffer from eye irritations, respiratory problems, and complications to existing lung and heart conditions. Wildfires also have major economic impacts and have the potential to cost the County millions of dollars every year.*

This motion calls for the development of land use solutions that reduce the economic, air quality, and health impacts from wildfires by limiting new development within areas of extreme fire risk. This is consistent with, and supportive of, the following specific goals and policies of the General Plan's Safety and Land Use Elements:

- *Goal S 3: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.*
- *Policy S 3.1: Discourage high density and intensity development in VHFHSZs (Very High Fire Hazard Severity Zones).*
- *Policy S 3.2: Consider climate change implications in fire hazard reduction planning for FHSZs (Fire Hazard Severity Zones).*
- *Policy S 3.3: Ensure that the mitigation of fire related property damage and loss in FHSZs limits impacts to biological and other resources.*
- *Policy S 3.6: Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.*
- *Policy S 3.7: Site and design developments located within FHSZs, such as in areas located near ridgelines and on hilltops, in a sensitive manner to reduce the wildfire risk.*
- *Policy S 4.1: Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness*

*and response capabilities, risk communication, and the dissemination of public information.*

- *Policy S 4.2: Support County emergency providers in reaching their response time goals.*
- *Policy S 4.3: Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.*
- *Policy S 4.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.*
- *Policy LU 11.6: Ensure that subdivisions in VHFHSZs site open space to minimize fire risks, as feasible.*

The VHFHSZs are one of Los Angeles County's Special Management Areas. Per the General Plan's Land use element, "these areas require additional development regulations to prevent the loss of life and property, and to protect the natural environment and important resources. The General Plan minimizes risks [from] hazards and discourages development in Special Management Areas."

**I, THEREFORE, MOVE** that the Board of Supervisors instruct the Director of Regional Planning, in consultation with the Department of Public Works, Fire Department, Office of Emergency Management, and County Counsel, to prepare and submit amendments to Los Angeles County Code Title 21 and 22 intended to reduce damage to life and property from wildfires. These amendments may include, but are not limited to, requirements that new development in FHSZs pass strict tests for egress during an extreme, wind-driven fire event. Standards should be set for length of time for safe community evacuation. For example, a standard could be established based on the

percent of a community evacuated within one hour of warning. The Director of Regional Planning shall also consider an amendment that requires a mandatory denial recommendation of any project shown to compromise public safety. Finally, the Director shall consider an amendment that requires a denial recommendation of plan amendments that increase allowed density/intensity within FHSZs. The Director of Regional Planning shall return to the Board of Supervisors within one year to present these proposed amendments to Title 21 and 22.

S:NE/Title 21 and 22 - Reduce Damage to Life and Property from Wildfires

MOTION BY SUPERVISOR KATHRYN BARGER

OCTOBER 13, 2020

**AMENDMENT TO ITEM #8 - VERY HIGH FIRE HAZARD SEVERITY ZONES**  
**COUNTY LEGISLATIVE PRIORITY**

As recent years and the last few months have shown, the potential for wildfires to devastate unincorporated County communities remains an ever-present danger. Each year the State of California seems to break records for the total number, size of, and damage caused by wildfires.

Accordingly, on February 11, 2020, the Los Angeles County Board of Supervisors unanimously approved a Motion by Supervisor Sheila Kuehl to direct applicable County Departments to prepare and submit amendments to Los Angeles County Code Title 21 and 22 intended to reduce damage to life and property from wildfires. The Motion further directed that the Director of Regional Planning should, "...consider an amendment that requires a denial recommendation of plan amendments that increase allowed density/intensity within Fire Hazard Severity Zones."

Land use planning is most effective when adjudicated at a local level. The California chapter of the Institute for Local Government notes, "Local agencies are given land use planning authority or police power to shape their communities in both the federal and California constitutions. This is because land use planning and community development have far reaching impacts on the general health, safety, and welfare of residents. Economic vitality, environmental health and quality of life are all influenced by land use and community design decisions."

Given that this Board has taken action to develop comprehensive land use policies to limit and mitigate wildfire risks, the need for State action seems duplicative and unnecessary.

**I, THEREFORE, MOVE** that the Board of Supervisors oppose legislative proposals that would increase housing density in Very High Fire Hazard Severity Zones (VHFHSZs)

MOTION

SOLIS \_\_\_\_\_

RIDLEY-THOMAS \_\_\_\_\_

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BARGER \_\_\_\_\_

MOTION BY SUPERVISOR SHEILA KUEHL

October 13, 2020

**Very High Fire Hazard Severity Zones County Legislative Priority**

Five of the largest wildfires in the history of the State of California have occurred this year. The Bobcat fire in Los Angeles County has burned 114,901 acres and continues to burn. In 2018, the Woolsey Fire burned 96,949 acres across two counties, destroyed 1,121 structures, and resulted in the deaths of three people. The County of Los Angeles (County) incurred approximately \$52 million in fire suppression costs and estimates that the insured losses from the Woolsey Fire will total between \$3 and \$5 billion. These fires illustrate a growing trend toward bigger, more frequent, and more destructive wildfires in our state.

In response to the increasing number of devastating wildfires, Governor Newsom released the “Wildfires and Climate Change: California’s Energy Future” report on April 12, 2019. This report recommends that local governments begin to deprioritize new development in areas of the most extreme fire risk. To that end, the County is undertaking a comprehensive review of our development policies in Very High Fire Hazard Severity Zones (VHFHSZ) in order to improve safety and reduce the threat of wildfires to homes and businesses by limiting new development within areas of extreme fire risk.

**MOTION**

SOLIS \_\_\_\_\_

RIDLEY-THOMAS \_\_\_\_\_

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BARGER \_\_\_\_\_

In the last State legislative session there were a number of bills introduced that could increase development density in VHFHSZs. However, the wildland urban interface is clearly not the appropriate place to increase density. Excluding VHFHSZs from any legislative proposals that expand development opportunities is the safest, most prudent course of action. We must collectively reduce wildfire risk - not increase it.

The County is committed to working collaboratively with the State to implement innovative solutions to our shared housing crisis. This year, the Los Angeles County Board of Supervisors is on track to adopt a slate of housing ordinances with the objective of preserving existing affordable units while easing regulations to increase housing development and the production of affordable units. Most recently, the County has experienced great success in permitting Accessory Dwelling Units and small lot subdivisions as well as enacting several new transit-oriented specific plans targeting housing production near transit stations. All of the County's current and proposed housing ordinances exceed the minimums set by state legislation.

We must recognize that a multi-pronged approach to addressing wildfire hazards is needed, including the role of land use planning. Increasing density and incentivizing development in areas of extreme fire risk is contrary to our collective public policy goals of saving lives and reducing fire risk.

**I, THEREFORE, MOVE** that the Board of Supervisors support legislation to limit new development within areas of extreme fire risk and oppose new proposals that would increase housing density in Very High Fire Hazard Severity Zones (VHFHSZs).