



Lisabeth Rothman  
(310) 923-2554  
lrothman@HepnerMyers.com

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***By Email***

Mayor Laurene Weste ([lweste@santaclarita.gov](mailto:lweste@santaclarita.gov))  
Mayor Pro Tem Patsy Ayala ([payala@santaclarita.gov](mailto:payala@santaclarita.gov))  
Councilmember Jason Gibbs ([jgibbs@santaclarita.gov](mailto:jgibbs@santaclarita.gov))  
Councilmember Marsha McLean([mmclean@santaclarita.gov](mailto:mmclean@santaclarita.gov))  
Councilmember Bill Miranda ([bmiranda@santaclarita.gov](mailto:bmiranda@santaclarita.gov))

Re: Master Case No. 25-030 and The Master's University Proliferation of RHOPs in Placerita Canyon

To the Honorable Mayor Weste, Mayor Pro Tem Ayala, and Councilmembers Gibbs, McLean, and Miranda:

We represent Placerita Canyon Property Owners Association (PCPOA) in connection with the City of Santa Clarita's (City) issuance of Residential High Occupancy Permits (RHOPs) in increasing numbers in the Placerita Canyon Special Standards District as defined in Santa Clarita Municipal Code (SCMC) section 17.39.020 (PCSSD), and the City's consideration of The Master's University (TMU) proposal to amend its Master Plan (Amendment). The intent and purpose of the PCSSD set forth in SCMC section 17.39.020 is "to protect, maintain, preserve and enhance the secluded, rural equestrian character of the community...and protect the light, air, and privacy of existing single-family residences from negative impacts." As described in this letter, TMU's lack of compliance with the Master Plan currently in effect since 2009 and Amendment directly conflicts with the PCSSD and must be modified.

As you know, PCPOA historically has worked cooperatively with the City to ensure that the PCSSD maintains its unique rural equestrian character while still allowing for development of nearby projects. As City Councilmembers, you are charged with ensuring compliance with the SCMC, enforcing the Municipal Code, and in reviewing and approving development proposals. Accordingly, we are writing today to provide you with PCPOA's comments, concerns, and requests for the City to address and implement needed protection of the PCSSD as required by SCMC Section 17.39.020.

We have two specific areas of concern. First, TMU's extensive use of RHOPs for student housing in the PCSSD was never contemplated nor were the impacts analyzed when the TMU Master Plan and 2019 10-year extension to the Master Plan were adopted. The RHOPs are having significant impacts on traffic

and fire safety.<sup>1</sup> There must be a moratorium on RHOPs until analysis of the impact of current use has been accomplished as required under the California Environmental Quality Act (CEQA). To that end, we believe that ensuring the recommendations of the Development Review Committee's (DRC) conditions regarding RHOPs are included in the Amendment and its Environmental Impact Report (EIR) are critical.

Second, as discussed in more detail below, the proposed changes to the original Master Plan – namely, changing the location of the 55,000 square foot chapel/conference center (section 3.1)- and the recommendations of the DRC's conditions regarding RHOPs- will require preparation of a Subsequent rather than a Supplemental Environmental Impact Report required under CEQA Guidelines section 15162.

## **1. Excessive Issuance of RHOPs in Placerita Canyon Is Improper Under the Current Master Plan.**

The RHOP statute (SCMC Chapter 23.50) allows for a potentially unlimited number of occupants in single family residences in Santa Clarita as long as there is at least one off- street parking space for every occupant over 18 year of age with a vehicle or valid driver's license. Since the 2009 approval of TMU's Master Plan, none of the planned dormitories were built, and the full time student population has continued to grow. TMU has been using RHOPs in increasing numbers to substitute for those on-campus dormitories. But the current Master Plan never contemplated nor did the EIR analyze the extensive current use of RHOPs for student housing as an interim measure before dormitories could be built.

**Placing interim student housing in Placerita Canyon is outside the scope of the Master Plan and is prohibited.** Use of the residences for student housing also violates CEQA since this use and its resulting increased traffic and potential increase in fire hazard impacts did not exist in 2009 and therefore were not analyzed in the EIR for the original Master Plan nor considered in connection with the 2019 extension. The use of RHOPs and the consequences of same must be analyzed now. If TMU wanted to provide interim student housing in Placerita Canyon before construction of dormitories, the 2019 Master Plan extension required identification of proposed housing in Placerita Canyon, analyzing traffic and fire hazard impacts, at a minimum, because TMU knew at that time that it planned to continue to increase the number of students but would be unable to house them on campus for years into the future. Instead, it did not disclose its intention to use RHOPs to serve as student housing. In fact, TMU still has not disclosed how many residences it intends to purchase and how many of those will be turned into RHOPs. The EIR must analyze the use of RHOPs for student, staff, and faculty housing regardless of the named owner of the property. We suggest that the City require that all applications for TMU use must be submitted by TMU. Last year, TMU listed RHOPs for short term rentals (e.g. Airbnb, Vrbo) outside the academic year, and we ask that the City prohibit this practice going forward.

Currently, it is our understanding that TMU has 25-27 RHOP applications for the next 12 month period and owns up to 38 family home properties in Placerita Canyon. The City's permitting process requires applications and approvals to occur prior to use. TMU's applications and approvals occur well after the academic year commences. The City should subject all RHOP applications to the same approval process and standards as other permitting processes and establish a uniform date by which applications for the upcoming twelve months must be submitted. More important, approval of this many RHOPS is

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<sup>1</sup> Encompassed within these are pedestrian, equestrian, cyclists, and small utility vehicles (golf carts) safety and emergency ingress and egress.



contrary to the intent and purpose of the PCSSD. The approval of RHOPS in Placerita Canyon is incompatible with the purpose and goals of the PCSSD set forth in SCMC Section 17.39.020, is creating a traffic and fire safety hazard, and Section 17.39.020 needs to be amended to prohibit RHOPS within the PCSSD.

The increase in intensity of use in Placerita Canyon has increased traffic and daily trips in the Canyon. The RHOP ordinance does not limit the number of occupants per house except based on parking spaces per vehicle and each residence could house over 20 people/vehicles if enough parking spaces were available. This significantly increases the number of daily trips in Placerita Canyon—all of which were not analyzed and remain unmitigated. The original CEQA finding of insignificant fire hazard and traffic impact was based on the construction of the planned Master Plan dormitories, decrease in traffic in Placerita Canyon from student commuting, and finding that traffic impacts were fully mitigated. That is no longer the case under the Amendment and there is a concomitant potential increase in fire hazard that remains unaddressed as a result.

At a minimum, CEQA requires that the City impose a moratorium on additional RHOPS in Placerita Canyon, and further approvals of RHOPS needs to cease. The City must determine a maximum number of RHOPs for TMU in Placerita Canyon. The impact on traffic and fire hazards must be analyzed and found to be less than significant for the use of RHOPs to continue pending City consideration of the Amendment which must include and analyze impacts of a specified, limited number of RHOPs. At the end of this academic year, subject to the agreement of Placerita Canyon homeowners and TMU's demonstration of **no current significant impact under current usage**, the current level use of RHOPS in Placerita Canyon within the PCSSD may continue without increase until after CEQA analysis and the City's consideration of the Amendment.

## **2. The Current Version of the Amendment Does Not Account for TMU RHOPs, Their Impacts, and How They Will be Utilized Once Dormitories Are Occupied**

The Amendment acknowledges the special consideration to be given to Placerita Canyon because of its designation as a Special Standards District under SCMC Section 17.39.020. However, there are no provisions to ensure that the secluded, rural equestrian character of the community is protected, maintained, preserved and enhanced in accordance with the stated purpose of that section.

As a wildlands adjacent steep canyon, sufficient access to and evacuation from Placerita Canyon is critical during emergencies. The original Master Plan purported to address this issue in Section 3.4.3 by acknowledging community concerns and proposing to build a new emergency-only road for the east end of the campus that would be limited to residents of Placerita Canyon, with access provided from the Canyon through the Reese Center parking lot and a control gate to prevent cut through traffic. However, the City questioned in its June 2025 comments on the strikethrough Master Plan document whether this was still the case. Emergency access roads shown in the Amendment do not appear to show a connection from Placerita Canyon to any secondary exit. Hence, there is no indication whether this secondary emergency evacuation route is still planned or would be sufficient given the significant increase in Placerita Canyon traffic since 2009, in large part created by the RHOPs.

We are pleased to see that the DRC's November 25, 2025 comments address a number of the problems created by the unrestrained approvals of RHOPs in the Canyon. We urge the City to enforce Comment PL12 which would require TMU to include within the Amendment an impact analysis of all



residential properties owned by TMU in the PCSSD, including those that are currently operated as RHOPs, for which TMU is currently in the process of obtaining RHOPs in the Placerita Canyon area, or for which TMU plans to apply. The DRC comments identified that the Centennial planning area and existing property should be considered as one unit, not separate campuses. While impacts from properties in Placerita Canyon outside the campus boundary should be analyzed, the properties in Placerita Canyon which are not adjacent to the campus boundaries should not be deemed to be annexed into the campus. To do so would further upset the secluded, rural equestrian character of the community that SCMC Section 17.39.020 commits to preserve.

We strongly urge the City to commit to ensuring that the following DRC's comments on DL.13. requiring TMU to provide an operational plan that includes a detailed description addressing the following RHOP concerns, as well as the ones we have identified, are enforced:

- Intended Use – provide a detailed explanation about the purpose and functions that single-family residences will fulfill within the framework of the Master Plan.
- Duration of Use - the anticipated duration of the use of off-campus student housing.
- Analysis - a detailed analysis that evaluates the impact of the off-campus student housing on the community including traffic, fire hazards, and evacuation issues in the Amendment and EIR that the City is requiring.
- Implementation- identify procedures for adding to or removing single-family residences from the Master Plan.
- Phasing Plan – identify the conditions, procedures and timing for phasing out off-campus student housing within Placerita Canyon or converting it into faculty or staff housing.

These comments demonstrate the DRC's concerns that the RHOPs have existing impacts on traffic and fire safety that have never been analyzed. This further supports the need for a moratorium in the issuance of RHOPs in Placerita Canyon, and first requiring construction of dormitories in a phased construction of the amended Master Plan,

This also highlights that the City needs to commit to enforcing the proposed provision in TMU's proposed Amendment that current RHOPs will be used only for faculty and staff housing after the dormitories are constructed, and no further RHOPs be approved. TMU currently has 25-27 RHOP applications for the next 12 month period but appears to own up to 38 properties in Placerita Canyon. The Amendment proposes a maximum of 85 full time faculty and 125 staff members. PCPOA wants a commitment from TMU and the City limiting the planned housing for faculty and staff in Placerita Canyon to existing RHOP locations and limit their use to single families as intended for this Special Standards District.

### **3. Changes to the Master Plan and 55,000 square foot Chapel/Conference Center Location Require Preparation of a Subsequent EIR**

The City currently proposes use of a supplemental EIR. This proposal is not appropriate because the use of a supplemental EIR is limited to only those changes or additions needed to make the prior EIR adequate. Here, however, a subsequent EIR is required because there have been substantial changes to the project and to the circumstances under which the project is being undertaken that will require major revisions to the EIR, and the revisions to the project will require evaluation of project impacts that were not considered in the prior EIR. See Public Resources Code §21166; CEQA Guidelines §15162.

The Amendment will move the proposed 55,000 square foot chapel/conference center location from the Hilltop campus where Dockweiler Drive extension terminates to the to be developed Centennial campus which is a non-contiguous area on other side of campus and on the Canyon floor. The City is requiring TMU to account for use of RHOPs for student housing in the Amendment. Both are changes to the original Master Plan that were not considered in the original EIR. *Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.*, (2016) 1 Cal.5<sup>th</sup> 937, 949, 950. Specifically, the extensive use of RHOPs for student housing was never considered in the EIR and has significant traffic and fire safety impacts in Placerita Canyon that were not analyzed or mitigated. Moving the chapel to the other side of the campus use of which was never considered or analyzed for this purpose, and is located at a completely different and lower elevation, increases intensity of use at the proposed new location and creates traffic, fire safety, and pedestrian safety issues that were not evaluated in the prior EIR. Hence, the Master Plan does not remain the same project as before. The assumptions regarding the absence of significant impacts concerning fire safety and traffic in the original Master Plan were based on the primary if not exclusive use of Dockweiler Drive to access the campus and chapel<sup>2</sup> which are no longer valid under the Amendment.

Moreover, the Amendment contemplates student access by walking to the Centennial campus and 55,000 square foot chapel/conference center but does not provide a safe pedestrian route. Figure 3.2 shows significant student pedestrian traffic crossing Placerita Canyon Road without a bridge. Given the volume of pedestrian traffic, construction of a pedestrian bridge –perhaps a City-standard paseo-pedestrian bridge - at this location should be considered for pedestrian safety and impacts of its construction analyzed in the Subsequent EIR if the Amendment is to be approved.

The changed location of the 55,000 square foot chapel/conference center and main campus entrance will necessitate use of both Placerita Canyon Road and Placeritos Boulevard, the latter of which was never previously considered or analyzed for vehicle and pedestrian traffic. The original Master Plan EIR’s analysis of project trip distribution does not consider use of Placeritos Boulevard as an access point to the campus. See figures 5.10-5 and 5.10-6. This is because that EIR proposed that the terminus of Dockweiler Drive serve as the main campus entry at the original location for the 55,000 square foot

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<sup>2</sup> See, e.g., Original Master Plan p. 1.1 (providing a new main entry from Dockweiler would remove traffic from Placerita Canyon); p. 1.10 (Dockweiler Drive would allow the University to utilize its southern property and offer alternative emergency access from Placerita Canyon); DEIR at 5.10-13 (access to campus is currently limited to Placerita Canyon Road which currently provides the main entrance); 5.10-35 (most of traffic will be diverted from Placerita Canyon Road to Dockweiler Drive “due to the proposed master plan orientation of the campus” which is now being changed).

chapel/conference center. Parking was to be created at the new main campus entrance off Dockweiler. and access from Placerita Canyon Road was to be limited by removing a main, existing parking lot off Placerita Canyon Road (Master Plan at 3.21) thus decreasing traffic on Placerita Canyon Road for campus access. Moving the 55,000 square foot chapel/conference center and primary campus entrance changes all impact analyses based on assumptions in the original Master Plan.

At a minimum, a new traffic survey which accounts for traffic patterns that will be created based on the change in location of the 55,000 square foot chapel/conference center and intensity of use, and the use of a defined number of RHOPs for student, staff and faculty housing must be conducted, and the results must be factored into fire safety analysis. Other new potential impacts must also be addressed. For example, requiring thrice weekly or daily pedestrian access to the 55,000 square foot chapel/conference center by up to 1,500 students to the changed location, and the increase in traffic hazards due to proposed incompatible uses of Placerita Canyon Road and Placeritos Boulevard by such a large number of pedestrians must be analyzed. The adequacy of only 313 parking spaces for the 55,000 square foot chapel/conference center must be revisited since it is clear that its use will not be limited to chapel services. Section 3.5 describes a “large new parking area will be provided near the new campus center to serve the chapel and new classroom buildings.” This small number of spaces appears inadequate.<sup>3</sup>

In addition, the Amendment is silent as to other proposed uses of the 55,000 square foot chapel/conference center for events other than chapel and their frequency. Will there be public speaking events? Concerts? And how do these events relate to the use of the TMU campus for conferences and other events as described at <https://santaclaritaconferencecenter.com>, proposed uses that were not mentioned nor analyzed as part of the original Master Plan? The Amendment needs to provide specific proposals regarding the number of events, number of attendees, traffic and parking for the same, and the EIR must analyze access, traffic, and parking impacts since it is unrealistic to expect attendees to park at lots at the terminus of Dockweiler Drive and walk across campus and two canyons to access the 55,000 square foot chapel/conference center, and 313 parking spaces will be inadequate for a large number of attendees.

Also, as stated previously, it is unclear whether the emergency evacuation access for Placerita Canyon Road through the east end of the campus contained in the original Master Plan (section 3..4.3 at page 3.15) remains as part of the Master Plan Amendment, and whether and how that will be impacted by the other proposed changes. At a minimum, the City must prepare a new traffic study and fire protection plan that includes analysis of evacuation routes, as well as analyze new, increased traffic impacts just from the changes the Amendment proposed.

If, however, TMU should decide to develop the 55,000 square foot chapel/conference center in its original proposed location in the Hilltop campus at the terminus of Dockweiler Drive, most of the new impacts would not occur, and environmental analysis of impacts from RHOPs potentially could be accomplished with a mitigated addendum.

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<sup>3</sup> Appendix F (along with other appendices) to the Master Plan containing the parking analysis prepared by Linscott, Law & Greenspan apparently has not been provided for public review.

#### 4. Conclusion

If TMU wants to achieve its expansion goals, it must do so without further infringing on Placerita Canyon's unique Special Standards District status. We remain available and willing to work with TMU and the City to achieve that end. But as decision makers for the City, we believe you must carefully balance the needs of the Placerita Canyon community against TMU's actions and changes proposed in the Amendment to ensure that Placerita Canyon remains protected as required by SCMC Section 17.39.020.

Very truly yours,



Lisabeth Rothman

cc: Jason Crawford, Director of Community Development ([jcrawford@santaclarita.gov](mailto:jcrawford@santaclarita.gov))  
Patrick Leclair, Planning Manager ([pleclair@santaclarita.gov](mailto:pleclair@santaclarita.gov))  
Jasmine Almora, Associate Planner ([jalmora@santaclarita.gov](mailto:jalmora@santaclarita.gov))