

# CITY OF SANTA CLARITA METROWALK SPECIFIC PLAN

## FINAL SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

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Prepared for:



City of  
**SANTA CLARITA**

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**FEBRUARY 2021**



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Pursuant to Section 21155.2 of the Public Resources Code (PRC), a Sustainable Communities Environmental Assessment (SCEA) was prepared for the MetroWalk Specific Plan Project. In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, a 30-day public review and comment period commenced on December 22, 2020 and ended on January 21, 2021. Six public comments were received during the comment period. These comments are included as part of this document. No new significant environmental issues or impacts, beyond those already covered in the SCEA, were raised during the comment period. While no provisions of CEQA require a response to the comments received on the Draft SCEA, responses to the comments received have been provided below. The comments received and the corresponding responses do not (1) alter the analysis or conclusions of the Draft SCEA, (2) involve any new significant impacts, (3) involve a substantial increase in the severity of any environmental impacts, (3) require substantial revisions to the SCEA, or (4) add significant new information.

### 1.1 PROJECT SUMMARY

The MetroWalk Specific Plan Project would include development of up to 498 residential units in four planning areas, on an approximately 20.4-acre site in the City of Santa Clarita (City) in northern Los Angeles County. The Project Site is generally located north and west of the Metrolink train tracks and east of Lost Canyon Road in the Canyon Country community of the City. The proposed residential units would comprise a mix of housing types, including market-rate apartments and townhomes, age-qualified apartments, and affordable senior apartments. A multi-use path would link the Project Site with the future Metrolink Vista Canyon Station to the east and the Vista Canyon Specific Plan Project to the north while connecting various private amenities throughout the Project Site, including park nodes, open space, a central clubhouse, and a playground. The multi-use path would terminate at a public plaza at the far eastern area of the Project Site, which would provide a publicly accessible outdoor amenity adjacent to the future Metrolink station and a connection to commercial uses, trails, and other amenities within the Vista Canyon Specific Plan area.

The average density of the Project Site would be 24.6 units per acre, while the maximum allowable density permitted within the Specific Plan area would be 30 dwelling units per acre. The floor area ratio for the Project would be 0.76.

The Project would require the following discretionary actions from the City: (1) a General Plan Amendment to change the General Plan land use designation from Business Park to Specific Plan; (2) a Zone Change to change the zoning designation from Business Park to Specific Plan; (3) approval of the MetroWalk Specific Plan to establish specific development standards in support of a development of up to 498 total residential units; (4) Tentative Tract Map 83087 to subdivide the property for the development of up to 498 total residential units; (5) a Development Review Permit for all new development and construction projects; and (6) an Architectural Design Review. The Project would also require the annexation of the Project Site into the Los Angeles County Sanitation Districts' Jurisdictional Boundary for which approvals from the City, as well as the Los Angeles County Sanitation Districts and the Local Agency Formation Commissions, are needed.

### 1.2 REQUIRED FINDINGS

The City of Santa Clarita finds, upon review of the entire administrative record, that:

- The Project qualifies as a transit priority project pursuant to PRC Section 21155;

## 1.0 INTRODUCTION

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- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the Project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG);
- The Project contains more than 50 percent residential use, provides a minimum net density greater than 20 units per acre, and is within 0.5 mile of a major transit stop or high-quality transit corridor included in a regional transportation plan;
- The Project is a residential or mixed-use project as defined by PRC Section 21159.28(d);
- The Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including the SCAG 2020-2045 RTP/SCS Program Environmental Impact Report (PEIR), the City of Santa Clarita One Valley One Vision PEIR, and the Vista Canyon Specific Plan EIR;
- An Initial Study was prepared to identify all significant or potentially significant impacts of the Project based on substantial evidence in light of the whole record;
- All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA in an Initial Study have been identified and analyzed in the Initial Study prepared for the Project; and
- With respect to each significant effect on the environment required to be identified in the Initial Study, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance.

Therefore, the City of Santa Clarita finds that the Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.2.

Section II, Comments on the Draft SCEA and Responses, has been prepared in support of this SCEA.

### 1.3 ORGANIZATION OF THE FINAL SCEA

This Final SCEA is organized into four sections as follows:

**Introduction.** This section (above) provides introductory information summarizing the key elements of the Sustainable Communities and Climate Protection Act and information about the Project.

**Comments on the Draft SCEA and Responses.** This section presents all comments received by the City during the 30-day public review period for the Draft SCEA (December 22, 2020 through January 21, 2021), as well as responses to those comments.

**Errata and Clarifications.** This section consists of minor revisions and clarifications to the Draft SCEA in response to comments received, as well as minor staff edits.

**Mitigation Monitoring and Reporting Program.** This section provides the full MMRP for the Project. The MMRP lists the mitigation measures by environmental topic and identifies the method of review verification, responsible agency, and timing for each measure.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

This section provides a list of commenters and copies of the comments received with responses to those comments.

### 2.1 LIST OF COMMENTERS

**Table 2.1-1**, List of Commenters on the Draft SCEA, assigns a number to identify the commenter and notes the general topic area covered by each comment letter.

**Table 2.1-1  
List of Commenters on the Draft SCEA**

Letter No.	Individual/Signatory	Affiliation	Date	Comment Topics
1	Erin Wilson-Olgin Environmental Prog. Manager I South Coast Region	California Department of Fish and Wildlife	01/20/2021	Biological Resources
2	Miya Edmonson IGR/CEQA Branch Chief	California Department of Transportation – District 7 Office of Regional Planning	01/15/2021	Transportation and Parking
3	Ronald M. Durbin Chief, Forestry Division Prevention Services Bureau	County of Los Angeles Fire Department	01/19/2021	Fire Protection Services, Erosion Control, Watershed Management, Biological Resources, Cultural Resources, Oak Trees, and Hazardous Materials
4	Shine Ling, AICP Manager, Transit Oriented Communities	Los Angeles County Metropolitan Transportation Authority	01/21/2021	Metrolink Facilities, Metro Right-of-Way, Access, Construction Monitoring, Transportation and Transit, Parking, and Signage
5	Adriana Raza Customer Service Specialist Facilities Planning Department	Los Angeles County Sanitation Districts	01/21/2021	Wastewater Collection and Treatment Facilities
6	Rick Vasilopoulos Associate Water Resources Planner	Santa Clarita Valley Water Agency	01/07/2021	Water Supply

### 2.2 COMMENTS AND RESPONSES TO COMMENTS

This subsection includes copies of the comment letters received on the Draft SCEA, as identified in Subsection 2.1, List of Commenters, with the comments numbered for reference and responses to the comments.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



January 20, 2021

Ms. Erika Iverson  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, CA 91355  
[Elverson@santa-clarita.com](mailto:Elverson@santa-clarita.com)

**Subject: Draft Sustainable Communities Environmental Assessment for the Metrowalk Specific Plan Project, City of Santa Clarita, Los Angeles County**

Dear Ms. Iverson:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Sustainable Communities Environmental Assessment (DSCEA) from the City of Santa Clarita (City; Lead Agency) for the Metrowalk Specific Plan Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

1-1

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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#### Project Description and Summary

**Objective:** The proposed Project consists of the development of up to 498 residential units in four planning areas on an approximately 20.4-acre site in the City of Santa Clarita. The proposed Project would include a multi-use path that would link the Project site with the future Metrolink Vista Canyon Station to the east and the Vista Canyon Specific Plan Project to the north. Among the residential units and paths found throughout the Project site will be open space, a central clubhouse, and a playground. The multi-use path would terminate at a plaza at the far eastern area of the Project site, providing access to the future Metrolink station and a connection to the neighboring Vista Canyon Specific Plan area. Other Project-related activities involve the removal of existing vegetation, grading of the Project site, installation of utility infrastructure, and road construction.

**Location:** The Project site is situated a little under 1,000 feet south of the Santa Clara River in the Canyon Country community of the City of Santa Clarita in Northern Los Angeles County. The site is generally bound on the west by Lost Canyon Road and on the south and east by the Metrolink train tracks. The Assessor's Parcel Number associated with the Project is 2840-004-009.

#### Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

#### Project Description and Related Impact Shortcoming

##### Comment #1: Impacts to Sensitive Vegetation Communities

**Issue:** Section 4.2 of Appendix D: Biological Resources Assessment (BRA) describes "Sensitive Plant Communities and Critical Habitats" found on and adjacent to the Project site. Page 17 states that "approximately 3.5 acres comprises fragmented stands of big sagebrush scrub.... *Artemisia tridentata* ssp. *parishii* is not itself a rare plant, but a stand of this subspecies is considered a sensitive natural community by CDFW (CDFW 2020a) due to its relative rarity across the state." According to California Native Plant Society (CNPS), big sagebrush scrub (*Artemisia tridentata* ssp. *parishii*) has a rarity ranking of S2.

**Specific impacts:** Project-related ground disturbing activities, such as grading and grubbing, may result in the loss of a sensitive natural community and habitat destruction.

**Why impacts would occur:** Project implementation includes grading, vegetation clearing, construction, and other activities. This may result in permanent loss and potentially decline or local extirpation of a sensitive plant community.

**Evidence impacts would be significant:** CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3, and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences. Impacts to sensitive vegetation communities should be considered

1-1  
(Continued)

1-2

1-3

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive plant species will result in the Project having a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS).

1-3  
(Continued)

Page 4-68 of the DSCEA states that "[a] portion of the Project site is within the Santa Clara River SEA designated by the County and included in the City's Overlay Zone." According to Table 5: Recommended Preservation Ratios for SEA CUP of the [Los Angeles County Regional Planning Significant Ecological Areas \(SEA\) Ordinance](#) Implementation Guide (Los Angeles County 2020), natural communities ranked S2 should be mitigated at a ratio of at least 4:1. Additionally, Table 5 also indicates that Species of Special Concern (SSC) and their habitats should also be mitigated by at least a ratio of 4:1.

1-4

The DSCEA describes the Project site as having formerly been used for agriculture and currently disturbed. CDFW avoids applying value judgement on whether a disturbed natural community should be mitigated and to what extent so long as the vegetation community meets alliance criteria, regardless of presence or level of disturbance.

1-5

#### Recommended Potentially Feasible Mitigation Measure(s)

**Mitigation Measure #1:** CDFW recommends mapping vegetation communities. Surveys should be conducted by a qualified botanist with appropriate experience and knowledge of southern California flora. Surveys should follow CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Surveys should be completed prior to implementing Project-related ground disturbing activities.

1-6

**Mitigation Measure #2:** If the Project cannot feasibly avoid impacts to sensitive vegetation communities, either during Project activities or over the life of the Project, the City should mitigate for impacts at no less than 6:1 for S2 communities. Utilizing a replacement of at least 6:1 for acres impacted by Project-related activities will attempt to remedy an assortment of impacts:

1-7

- loss of habitat located in the Santa Clara River SEA (which requires at least 4:1 ratio)
- the loss of the sensitive vegetation itself (which only has 6 to 20 occurrences in existence)
- the loss of function of that vegetation as habitat for SSC
- loss of riparian habitat in the Santa Clara River floodplain
- temporal loss of functioning sensitive habitat

**Recommendation #1:** In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the State (Fish & G. Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the [Manual of California Vegetation](#) (MCV) (CNPS 2020; Sawyer et al. 2008). To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this

1-8

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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classification system. This would allow CDFW to appropriately comment on potential impacts to sensitive plants and vegetation communities.

1-8  
(Continued)

#### Comment #2: Impacts to Nesting Birds

**Issue:** Portions of the Project site were historically used for agriculture. Page 15 of the BRA indicates that California horned lark (*Eremophila alpestris actia*), a California Species of Special Concern (SSC), has a moderate potential to be found on the Project site. It states that "[t]he species is known to utilize recovering agricultural habitats and was detected during surveys for the adjacent Vista Canyon project."

In addition, a review of [California Natural Diversity Database \(CNDDDB\)](#) indicates that there are historic observations of coastal California gnatcatcher (*Polioptila californica californica*), an Endangered Species Act (ESA-) -listed threatened species and an SSC, in the immediate vicinity of the Project site (CDFW 2020b).

**Specific impact:** Project construction and related activities may result in increased nesting mortality due to nest abandonment or decreased feeding frequency. The Project may result in temporal or permanent loss of bird nesting habitat.

**Why impacts would occur:** Coastal California gnatcatcher (gnatcatcher) is a non-migratory songbird that occurs in or near coastal scrub vegetation communities throughout portions of Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego Counties and extends south into northwestern Baja California. At the time of listing gnatcatcher by USFWS in 1993, they estimated about 2,562 pairs of gnatcatchers remaining in the United States (USFWS 1993). In a more recent study using more rigorous sampling techniques, it was estimated that there were 1,324 gnatcatcher pairs in Orange and San Diego Counties (Winchell and Doherty 2008). With a limited range and the steady urbanization of Southern California, the loss of coastal sage habitat is likely to inhibit the recovery of the population.

1-9

Construction activities, continued usage of trails, and routine maintenance during the breeding season for nesting birds could result in the loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Impacts could result from noise disturbances, increased human activity, dust, ground disturbing activities (e.g., staging, access, excavation, and grading), and vibrations caused by heavy equipment. The Project as proposed would clear vegetation that could provide bird nesting habitat (e.g., ground cover and shrubs). The temporal or permanent loss of vegetation may substantially impact birds that could return to the Project site year after year (Figueira et al. 2020; Haas 1998). Site fidelity exhibited across the avian taxa reflects the benefits associated with previous knowledge of a particular location, likely improving territory acquisition, foraging efficiency, potential breeding partners, and predator avoidance (Figueira et al. 2020).

**Evidence impacts would be significant:** Nests of all birds and raptors are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Take or possession of migratory nongame birds designated in the Federal Migratory Bird Treaty Act of 1918 (Code of Federal Regulations, Title 50, § 10.13) is prohibited under Fish and Game Code section 3513. The loss of occupied habitat or reductions in the number of sensitive and special status bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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#### Recommended Potentially Feasible Mitigation Measure(s)

**Mitigation Measure #1:** CDFW recommends the City retain a qualified biologist with a gnatcatcher survey permit. The qualified biologist should survey the Project site to determine presence/absence of gnatcatcher. The qualified biologist should conduct surveys according to USFWS [Coastal California Gnatcatcher \(\*Polioptila californica californica\*\) Presence/Absence Survey Guidelines](#) (USFWS 1997). The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.

1-10

**Mitigation Measure #2:** CDFW recommends that no construction occur from February 15 (January 1 for raptors) through August 31.

**Mitigation Measure #3:** CDFW recommends that a qualified avian biologist with survey experience conduct a thorough survey of all suitable nesting. Surveys should be completed no more than 7 days prior to the beginning of any Project-related ground-disturbing activities or vegetation removal. Surveys should be conducted in the immediate work/disturbance area plus a 500-foot buffer. Positive detections should be reported to CDFW prior to the any Project-related ground disturbing activities or vegetation removal.

1-11

**Mitigation Measure #4:** If nesting birds or raptors are identified, a qualified biologist should determine the nesting status and set up species-appropriate no-work buffers for construction activities. CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active CESA-listed bird nests. No Project activities should be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers should be increased if needed to protect the nesting birds. Buffers should be clearly delineated and marked around the active nest site as directed by the qualified biologist. Temporary fencing and signage should be maintained for the duration of the Project as determined by the qualified biologist. A qualified biologist should advise workers of the sensitivity of the buffered areas. Workers should be advised not to work, trespass, or engage in activities that would disturb nesting birds near or inside the buffer.

**Mitigation Measure #5:** It should be noted that the temporary exclusion of Project activities within nesting buffers during nesting season may not constitute effective mitigation for the purposes of offsetting Project impacts associated with loss of breeding and nesting habitat. Effective mitigation for impacts to nesting habitat for birds requires structurally (e.g., ground cover, subshrubs, shrubs, and trees) and species diverse vegetation as a part of habitat restoration.

1-12

Additional mitigation, separate from impacts to vegetation communities, would be necessary to compensate for the temporal or permanent loss of occupied nesting habitat within the Project site. CDFW recommends the qualified biologist/City consult with CDFW to determine proper mitigation for impacts to occupied habitat. Mitigation would be based on acreage of impact and vegetation composition. Depending on the status of the bird species impacted, replacement of

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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habitat acres should increase with the occurrence of an SSC. Replacement acres would further increase with the occurrence of a CESA-listed species.

1-12  
(Continued)

**Recommendation #1:** Take under the ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.

1-13

#### **Comment #3: Impacts to California Species of Special Concern**

**Issue:** CDFW is concerned that Project-related activities may result in significant impacts to the following Species of Special Concern (SSC):

- *Reptiles:* coastal whiptail (*Aspidoscelis tigris stejnegeri*) and coast horned lizard (*Phrynosoma blainvillii*)
- *Mammals:* San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)

As indicated on Page 15 of the BRA, the above SSC have a moderate potential for occurrence on the Project site. The BRA states that coast horned lizard and San Diego jackrabbit were detected during surveys for the adjacent Vista Canyon Project in 2008. A review of CNDDDB shows historic records of coastal whiptail as recently as 2015 on the Project site.

**Specific impact:** Project construction and related activities, directly or through habitat modification, may result in direct injury or mortality of SSC.

**Why impact would occur:** Project implementation includes grading, vegetation clearing, and other activities that may result in direct mortality, population declines, or local extirpation of SSC reptile and mammal species.

1-14

**Evidence impact would be significant:** An SSC is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role.
- is listed as ESA-, but not CESA-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed.
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status.
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA status (CDFW 2020c).

Project construction and activities, directly or through habitat modification, may result in direct mortality, reduced reproductive capacity, population declines, or local extirpation of SSC. CEQA provides protection not only for State and federally listed species, but for any species including

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the City, (CEQA Guidelines, § 15065).

1-14  
(Continued)

#### Recommended Potentially Feasible Mitigation Measure(s)

**Mitigation Measure #1:** Pursuant to the [California Code of Regulations, title 14, section 650](#), the City/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW 2020d). An LSA Agreement may provide similar take or possession of species as described in the conditions of the agreement.

1-15

CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).

**Mitigation Measure #2:** The City should retain a qualified biologist(s) with experience surveying for or is familiar with the life history of each of the following species: coastal whiptail, coast horned lizard, and San Diego black-tailed jackrabbit. The qualified biologist should conduct focused surveys for SSC and suitable habitat no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist should conduct daily biological monitoring during any activities involving vegetation clearing or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location should be mapped and photographed. The qualified biologist should provide a summary report of SSC surveys to the City prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist should develop species-specific mitigation measures for implementation during the Project.

1-16

**Mitigation Measure #3:** Wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC should be captured only by a qualified biologist with proper handling permits. The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be submitted to the City prior to implementing any Project-related ground-disturbing activities and vegetation removal.

1-17

**Mitigation Measure #4:** The City, in consultation with a qualified biologist, should prepare a worker environmental awareness training. The qualified biologist should communicate to workers that upon encounter with an SSC (e.g., during construction or equipment inspections), work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so.

1-18

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 1 (Continued)

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City of Santa Clarita  
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**Mitigation Measure #5:** If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented. A formal report should be sent to CDFW and the City within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

1-19

#### Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

1-20

#### Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Santa Clarita in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines; § 15073(e)]. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at [Andrew.Valand@wildlife.ca.gov](mailto:Andrew.Valand@wildlife.ca.gov) or (562) 342-2142.

1-21

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

DBE58CFE24724F8

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW

Victoria Tang, Los Alamitos – [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov)  
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### Letter No. 1 (Continued)

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### Letter No. 1 (Continued)

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State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
<b>MM-BIO-1 – Sensitive Vegetation Surveys</b>	Vegetation surveys shall be conducted by a qualified botanist with appropriate experience and knowledge of southern California flora. Surveys shall follow CDFW's <a href="#">Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</a> (CDFW 2018). Surveys shall be completed prior to implementing Project-related ground disturbing activities.	Prior to construction	City of Santa Clarita
<b>MM-BIO-2 – Sensitive Vegetation Replacement</b>	If the Project cannot feasibly avoid impacts to sensitive vegetation communities, either during Project activities or over the life of the Project, the City shall mitigate for impacts at no less than 6:1 for impacts to S2 communities.	Prior to construction	City of Santa Clarita
<b>MM-BIO-3 – Coastal California Gnatcatcher Surveys</b>	The City shall retain a qualified biologist with a gnatcatcher survey permit. The qualified biologist shall survey the Project site to determine presence/absence of gnatcatcher. The qualified biologist shall conduct surveys according to USFWS Coastal California Gnatcatcher ( <i>Poliptila californica californica</i> ) Presence/Absence Survey Guidelines (USFWS 1997). The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol shall be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). Gnatcatcher surveys shall be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.	Prior to construction	City of Santa Clarita

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<b>MM-BIO-4 – Nesting Bird Surveys</b>	No construction shall occur from February 15 (January 1 for raptors) through August 31.	Prior to construction	City of Santa Clarita
<b>MM-BIO-5 – Nesting Bird Surveys</b>	A qualified avian biologist with survey experience shall conduct a thorough survey of all suitable nesting. Surveys shall be completed no more than 7 days prior to the beginning of any Project-related ground-disturbing activities or vegetation removal. Surveys shall be conducted in the immediate work/disturbance area plus a 500-foot buffer. Positive detections shall be reported to CDFW prior to the any Project-related ground disturbing activities or vegetation removal.	Prior to construction	City of Santa Clarita
<b>MM-BIO-6 – Nesting Bird Avoidance Buffers</b>	If nesting birds or raptors are identified, a qualified biologist shall determine the nesting status and set up species-appropriate no-work buffers. The following minimum no-disturbance buffers shall be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active CESA-listed bird nests. No Project activities shall be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds. Buffers shall be clearly delineated and marked around the active nest site as directed by the qualified biologist. Temporary fencing and signage shall be maintained for the duration of the Project as determined by the qualified biologist. A qualified biologist shall advise workers of the sensitivity of the buffered areas. Workers shall be advised not to work, trespass, or engage in activities that would disturb nesting birds near or inside the buffer.	Prior to construction	City of Santa Clarita

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## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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<p><b>MM-BIO-7 – Nesting Bird Buffers</b></p>	<p>Temporary exclusion of Project activities within nesting buffers during nesting season may not constitute effective mitigation for the purposes of offsetting Project impacts associated with loss of breeding and nesting habitat. Effective mitigation for impacts to nesting habitat for birds requires structurally (e.g., ground cover, subshrubs, shrubs, and trees) and species diverse vegetation as a part of habitat restoration.</p> <p>Additional mitigation, separate from impacts to vegetation communities, would be necessary to compensate for the temporal or permanent loss of occupied nesting habitat within the Project site. CDFW recommends the qualified biologist/City consult with CDFW to determine proper mitigation for impacts to occupied habitat. Mitigation would be based on acreage of impact and vegetation composition. Depending on the status of the bird species impacted, replacement of habitat acres should increase with the occurrence of an SSC. Replacement acres would further increase with the occurrence of a CESA-listed species.</p>	<p>Prior to construction</p>	<p>City of Santa Clarita</p>
<p><b>MM-BIO-8 – SSC Reptile and Mammal Surveys</b></p>	<p>Pursuant to the California Code of Regulations, title 14, section 650, the City/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. Please visit CDFW's <a href="#">Scientific Collection Permits</a> webpage for information (CDFW 2020d). An LSA Agreement may provide similar take or possession of species as described in the conditions of the agreement.</p>	<p>Prior to construction</p>	<p>City of Santa Clarita</p>

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<p><b>MM-BIO-9 – SSC Species Surveys</b></p>	<p>The City shall retain a qualified biologist(s) with experience surveying for or is familiar with the life history of each of the following species: coastal whiptail, coast horned lizard, and San Diego black-tailed jackrabbit. The qualified biologist shall conduct focused surveys for SSC and suitable habitat no more than one month from the start of any ground-disturbing activities or vegetation removal where there may be impacts to SSC. In addition, the qualified biologist shall conduct daily biological monitoring during any activities involving vegetation clearing or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location shall be mapped and photographed. The qualified biologist shall provide a summary report of SSC surveys to the City prior to implementing any Project-related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist shall develop species-specific mitigation measures for implementation during the Project.</p>	<p>Prior to construction</p>	<p>City of Santa Clarita</p>
<p><b>MM-BIO-10 – SSC Protection / Relocation Plan</b></p>	<p>Wildlife shall be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to adjacent appropriate habitat on site or to suitable habitat adjacent to the project area. SSC shall be captured only by a qualified biologist with proper handling permits. The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan shall be submitted to the City prior to implementing any Project-related ground-disturbing activities and vegetation removal.</p>	<p>Prior to construction</p>	<p>City of Santa Clarita</p>
<p><b>MM-BIO-11 – SSC Worker Training</b></p>	<p>The City, in consultation with a qualified biologist, shall prepare a worker environmental awareness training. The qualified biologist shall communicate to workers that upon encounter with an SSC (e.g., during construction or equipment inspections), work must stop, a qualified biologist must be notified, and work may only resume once a qualified biologist has determined that it is safe to do so.</p>	<p>Prior to construction</p>	<p>City of Santa Clarita</p>

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<b>MM-BIO-12 – SSC Injured or Dead Wildlife</b>	If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist shall be notified, and dead or injured wildlife documented. A formal report shall be sent to CDFW and the City within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.	Prior to construction	City of Santa Clarita
<b>Recommendations</b>			
<b>REC-BIO-1 – National Vegetation Classification System</b>	In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & G. Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the <a href="#">Manual of California Vegetation</a> (MCV) (CNPS 2020; Sawyer et al. 2008). To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names shall be provided as CDFW only tracks rare natural communities using this classification system. This would allow CDFW to appropriately comment on potential impacts to sensitive plants and vegetation communities.	Prior to construction	City of Santa Clarita
<b>REC-BIO-2 – Coastal California Gnatcatcher – USFWS Consultation</b>	Take under the ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.	Prior to construction	City of Santa Clarita

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Continued

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Letter No. 1**

Erin Wilson-Olgin  
Environmental Prog. Manager I  
South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

### **Comment No. 1-1**

This introductory comment acknowledges receipt of the Draft SCEA for the Project and introduces specific comments from the California Department of Fish and Wildlife (CDFW). This comment also identifies the statutory responsibilities of CDFW as California's Trustee Agency for fish and wildlife resources and as a Responsible Agency under CEQA. In addition, the comment summarizes the Project Description.

### **Comment No. 1-2**

The Project Site contains approximately 3.5 acres of big sagebrush (*Artemisia tridentata*) scrub, including a mix of subspecies of *A.t. parishii* (Parish's big sagebrush). While this is not a rare plant, *A.t. parishii* scrub is a habitat designated sensitive by CDFW due to its relative rarity across the State. CDFW asserts that Project-related impacts to the on-site vegetation would be significant and recommends that this impact be mitigated by mapping on-site vegetation and by compensating for impacts to big sagebrush scrub at ratio.

As stated in Section 4.0, Initial Study Checklist, of the Draft SCEA and the *MetroWalk Project Biological Resources Assessment* (BRA) prepared by Rincon Consultants, Inc. in October 2020, which was included in Appendix D of the Draft SCEA, impacts to sensitive vegetation communities would be less than significant because the on-site big sagebrush scrub is in degraded condition. CEQA only requires mitigation measures if substantial evidence exists of potentially significant environmental impacts. In particular, Section 15126.4(a)(4)(A) of the CEQA Guidelines states that there must be an essential nexus between the mitigation and a legitimate government interest (i.e., potential significant impact).

Furthermore, even though no mitigation measures are necessary, the mitigation ratio recommended by CDFW is excessive because it is not proportional to the Project's less-than-significant impact. Moreover, the CDFW-proposed mitigation ratio substantially exceeds recent ratios for higher quality habitats of this type of vegetation community in the Santa Clarita Valley. Higher quality habitats are areas that contain high-quality resources, such as contiguous areas of structurally diverse vegetation with food and water sources, or areas that support a disproportionately higher density of nesting birds (e.g., habitat selection or habitat occupancy).<sup>1</sup>

### **Comment No. 1-3**

Stands of *A.t. parishii* are listed as a Provisional Association with an S2 ranking. The provisional label is assigned when CDFW has fewer than 10 stands sampled but which they expect will prove to be more widespread.<sup>2</sup> During the survey, big sagebrush was in bloom, and the shrubs were identifiable to the subspecies level. Based on the survey, it was determined that approximately

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<sup>1</sup> Johnson, Matthew D., *Measuring Habitat Quality: A Review*, *The Condor*, Vol. 109, No. 3, 2007, pp. 489-504.

<sup>2</sup> California Department of Fish and Wildlife, Natural Communities website, available at <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/List>, accessed on January 27, 2021.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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50 percent of big sagebrush individuals possessed characteristics of *A.t. parishii*. Because the stands are not dominated by *A.t. parishii*, and the ecological significance is further diminished by their limited acreage, isolation from intact habitats, and the fact that most of the stands on-site have been disturbed (refer to Figure 4 of the BRA), the standardized quantitative rarity and threat parameters and weighted scores for rarity and threats should not be applied to this isolated population.

### **Comment No. 1-4**

While the Project is located within the designated Los Angeles County Santa Clara River Significant Ecological Area (SEA), County SEA standards do not apply to incorporated cities; instead, project proponents within the City are subject to the Santa Clarita Municipal Code (Section 17.38) and General Plan, and projects must undergo a Conformance Review. The Santa Clara River was designated an SEA primarily because of the threat of loss of suitable habitat for the unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), a federally and State-listed endangered species.<sup>3</sup> This species formerly occurred in the Los Angeles, San Gabriel, and Santa Ana rivers but is now restricted to San Francisquito Canyon, three areas in the Santa Clara River, and San Antonio Creek on Vandenberg Air Force Base. The adjacent floodplain of the Santa Clara River was included in this SEA to preserve this habitat. The Project area, while it currently supports a mixed and isolated population of big sagebrush, has routinely been disturbed for agricultural purposes, and neither population of big sagebrush provides suitable habitat for three-spined stickleback nor supports natural riparian vegetation that decreases runoff (e.g., erosion, siltation) of stickleback habitats downstream. In fact, because of the Vista Canyon Specific Plan development, the intervening urban development, including buildings and roadways, interrupts connectivity with the Santa Clara River. The Project would not contribute significantly to any direct or indirect impacts to the Santa Clara River.

Given the prevalence of non-native species, the disturbed condition of the Project Site and routine agricultural history, along with the adjacent construction, the Project site should not be considered SEA under the City's SEA definition. Furthermore, CDFW's recommendation is not in line with the requirements for other projects in the area or as described in the Los Angeles County SEA guidelines. As described in Section 4.0, Initial Study Checklist, of the Draft SCEA and on page 18 of the BRA, it is clear that although a portion of the Project Site is within the Santa Clara River SEA, the Project Site is distinct from the Santa Clara River hydrologically and ecologically and is also physically separated. The Project Site does not exhibit unique physical or biological diversity, and no offset is warranted here.

### **Comment No. 1-5**

Please refer to responses to Comment Nos. 1-3 and 1-4 above.

### **Comment No. 1-6**

CDFW recommends mapping of vegetation communities by a qualified botanist with appropriate experience and knowledge of southern California flora, following CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive*

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<sup>3</sup> California Department of Fish and Wildlife, Special Animals List, November 2020, available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>, accessed on January 27, 2021.



## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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*Natural Communities*.<sup>4</sup> CDFW asserts that surveys should be completed prior to implementing Project-related ground disturbing activities.

Vegetation communities within the Project area have been mapped and are illustrated in Figure 4, Vegetation and Land Cover Types (page 11 of the BRA). As described in the BRA, the Project Site is regularly maintained and consists primarily of ruderal habitat. Scattered patches of big sagebrush have emerged on the Project Site, as shown on the BRA's vegetation map. As described on page 17 of the BRA, two recognized subspecies of *Artemisia tridentata*: *A.t. tridentata* and *A.t. parishii* were observed on the Project Site.

Because the two subspecies are difficult to differentiate, pursuant to the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*, a focused visit to the Project Site was conducted on in September 2019, when the plants were in flower for the sole purpose of determining which subspecies was/were present and to obtain an indication of the prevalence (e.g., estimated total numbers, percent cover, density) of *A.t. parishii* in the Project area.

As indicated in the BRA, the Project Site contains big sagebrush scrub, the mapping of which was based on a supplemental focused protocol survey. Therefore, additional vegetation surveying and mapping are not warranted. Given the chronic disturbance at the Project Site, the prevalence of non-native species, the small acreage of native habitat present, the mixing of the sagebrush subspecies within the habitat patch, the Project Site's position surrounded by existing development, and the survey already conducted, there is no need for another vegetation community survey, as requested by CDFW.

### **Comment No. 1-7**

CDFW asserts that the City should offset impacts to the sagebrush community at a 6:1 ratio. However, as stated above, CEQA only requires mitigation measures if substantial evidence exists of potentially significant environmental impacts. Nevertheless, even if mitigation would be necessary to reduce a significant impact to less than significant, the CDFW-proposed 6:1 ratio is grossly disproportionate to much higher quality suitable habitat present in the area. For example, with the Newhall Ranch project, a major development project on which CDFW served as the CEQA lead agency,<sup>5</sup> where, unlike the Project, there were intact, high quality examples of this type of habitat, CDFW required mitigation at a ratio of 2.5:1, substantially less than the 6:1 ratio that it now proposes.

In addition, please refer to responses to Comment Nos. 1-3 and 1-4 above.

### **Comment No. 1-8**

CDFW recommends that, to determine the rarity ranking of vegetation communities on the Project Site, the Manual of California Vegetation (MCV) alliance/association community names be provided as CDFW only tracks rare natural communities using this classification system. CDFW

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<sup>4</sup> California Department of Fish and Wildlife, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*, March 20, 2018.

<sup>5</sup> California Department of Fish and Wildlife, *Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan EIS/EIR* (SCH # 2000011025), available at <https://wildlife.ca.gov/Regions/5/Newhall>, accessed on January 27, 2021.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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asserts that this would allow them to appropriately comment on potential impacts to sensitive plants and vegetation communities.

Vegetation communities within the Project area are illustrated on Figure 4, Vegetation and Land Cover Types (page 12 of the BRA). The MCV alliance/association community names are listed in **Table 2.2-1**, Summary of Estimated Vegetation/Land Cover Types for the Project Area, below.

**Table 2.2-1**  
**Summary of Estimated Vegetation/Land Cover Types for the Project Area**

Habitat Class	Plant Community or Land Cover (MCV/CDFW CA Code)	Conservation Status Rank	Acres
Scrub/Shrubland	Parish's Sagebrush ( <i>Artemisia tridentata</i> ssp. <i>parishii</i> ) Shrubland Association [35.110.16] <b>[Disturbed]</b>	Provisional G2/S2	3.5
Herbaceous	Non-Native Grasses and Forbs Mapping Unit	Not Ranked	16.8

Source: Rincon Consultants, Inc., *MetroWalk Project Biological Resources Assessment*, May 2020.

The conservation status rank (G2S2) is diminished by limited acreage, isolation from intact habitats, and on site disturbance. Therefore, application of the standardized quantitative rarity and threat parameters and weighted scores for rarity and threats are not appropriate for this isolated population.

### **Comment No. 1-9**

CDFW asserts that Project construction and related activities may result in increased nesting mortality due to nest abandonment or decreased feeding frequency. CDFW states that the Project may result in temporal or permanent loss of bird nesting habitat. CDFW recommends five mitigation measures and provides additional clarification of the definition of harm under the Endangered Species Act.

The referenced section of the BRA states that CDFW has designated the California horned lark as a Watch List species. The comment's reference to this species as a California Species of Special Concern (SSC) is not accurate. Based on the literature review and field surveys performed, the horned lark has a moderate potential to occur within the Project Site as identified on page 15 of the BRA. Potential impacts to California horned lark are described on page 22 of the BRA.

As identified in Section 4.0, Initial Study Checklist, of the Draft SCEA and the BRA, the Project Site does not support habitat suitable for nesting coastal California gnatcatchers (CAGN). The Project Site is disturbed, and remaining on-site vegetation is big sagebrush scrub and not the coastal sage scrub preferred by this species. The Project Site is also surrounded by development and lacks topography. As described in Section 4.0, Initial Study Checklist, of the Draft SCEA and on page 16 of the BRA, if CAGN is in the vicinity, it would most likely occupy undeveloped areas to the south of the Fair Oaks residential development where large contiguous intact stands of coastal sage scrub occur. Historic occurrences in the vicinity of the Project Site were located in habitat that consists of coastal sage scrub, which is absent from the Project Site. As such, the species is not expected to occur, and protocol surveys are not warranted.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Comment No. 1-10**

CDFW states that the California Natural Diversity Database (CNDDDB) has historic observations of coastal California gnatcatcher (*Polioptila californica californica*), an Endangered Species Act (ESA)-listed threatened species and an SSC, in the immediate vicinity of the Project Site. CDFW adds that “with a limited range and the steady urbanization of Southern California, the loss of coastal sage habitat is likely to inhibit the recovery of the population,” which would lead to a significant impact absent appropriate mitigation. Mitigation Measure #1 under Comment #2 requests that the City retain a qualified biologist with a gnatcatcher survey permit. The qualified biologist should survey the Project Site to determine presence/absence of gnatcatcher. The qualified biologist should conduct surveys according to USFWS.

As discussed in response to Comment No. 1-9 above, CAGN is not expected to occur on-site. Additionally, as described in Section 4.0, Initial Study Checklist, of the Draft SCEA and on page 23 of the BRA, federal and State laws prohibit the destruction of birds and their nests, eggs, and nestlings. If bird species are nesting on the Project Site, construction activities could inadvertently cause mortality or destruction of the nest in violation of these laws. **Mitigation Measure BIO-2** would prevent this by requiring pre-construction nesting bird surveys in advance of construction activities in the nesting season and installation of an avoidance buffer if nests are encountered. Thus, additional mitigation is not warranted.

### **Comment No. 1-11**

CDFW recommends three mitigation measures to address potential impacts related to nesting birds. The measures recommend limiting the timing of construction, pre-construction surveys, and implementation of avoidance measures, including no-disturbance buffers. These recommended actions are already incorporated into **Mitigation Measure BIO-2** in the Draft SCEA. **Mitigation Measure BIO-2** would require pre-construction nesting bird surveys to be conducted during the breeding season, along with avoidance of any active nests that are detected and an appropriate avoidance buffer. As such, additional mitigation is not warranted.

### **Comment No. 1-12**

CDFW states that temporary exclusion of Project activities within nesting buffers during nesting season may not constitute effective mitigation for the purposes of offsetting Project impacts associated with the loss of breeding and nesting habitat and adds that additional mitigation, separate from impacts to vegetation communities, would be necessary to compensate for the temporal or permanent loss of occupied nesting habitat within the Project Site.

The overall habitat quality of the Project Site is low, and the loss of the on-site ruderal and disturbed sagebrush scrub vegetation would not significantly reduce the extent of available nesting bird habitat in the region. There are large swaths of high-quality and contiguous areas of nesting habitat to the south of the Project area. Therefore, the temporary exclusion of nesting birds that may utilize the Project Site is not considered a significant impact warranting additional mitigation or compensation.

### **Comment No. 1-13**

CDFW cites a portion of the federal definition of “take” under the ESA related to indirectly or directly harming a listed species. Harm in the definition of “take” in ESA regulations means, “an act which actually kills or injures wildlife. Such act may include significant habitat modification or

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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degradation, where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.”

As described in Section 4.0, Initial Study Checklist, of the Draft SCEA and the BRA, no wildlife species are expected to occur on the Project Site that are listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) under the ESA or the CDFW under California ESA (CESA). Given the current environmental setting (i.e., baseline conditions) on the Project Site, development would not result in a significant habitat modification or degradation where it would actually kill or injure wildlife, indirectly or otherwise. In addition, per **Mitigation Measure BIO-2**, a pre-construction survey is required to ensure Project actions would not result in the direct injury or killing of a listed bird species. Therefore, consultation with the USFWS to comply with the ESA is not warranted in this case. Furthermore, construction of the Project would be subject to all applicable federal, state, and local regulations to protect nesting birds, including the Migratory Bird Treaty Act and California Fish and Game Code Section 3503.

### **Comment No. 1-14**

CDFW has stated that Project implementation includes grading, vegetation clearing, and other activities that may result in direct mortality, population declines, or local extirpation of SSC reptile and mammal species.

As addressed in Section 4.0, Initial Study Checklist, of the Draft SCEA and the BRA, the Project would remove all existing habitat, including on-site shrubs that provide nesting habitat, from the 20.4-acre Project Site. The black-tailed jackrabbit is a mobile species, and most individuals would be expected to avoid construction equipment. In the event that jackrabbits are not able to escape, injury or mortality to individual jackrabbits could occur due to being struck or crushed by vehicles. This impact would be especially acute if mother jackrabbits were injured or killed while tending their young. Similarly, since coastal whiptails and coast horned lizards are low-mobility species, it is unlikely they would be able to escape injury or mortality during site grading. Without mitigation and consistent with CDFW’s comment, the Project’s impacts on the black-tailed jackrabbit, coastal whiptails, and coast horned lizards would be potentially significant. However, these impacts would be reduced to a less-than-significant level by the relocation efforts required by **Mitigation Measure BIO-1**, during which qualified biologists would survey the Project Site for these species and usher them off-site if encountered. Because the habitat to be removed is largely in a degraded condition, and because habitats for the black-tailed jackrabbit, coastal whiptails, and coast horned lizards are abundant regionally, loss of habitat would not significantly impact these special-status species.

### **Comment No. 1-15**

CDFW recommends that the City retain an authorized and qualified biologist(s) with appropriate handling permits to capture, temporarily process, and relocate wildlife to avoid harm or mortality during Project construction activities. **Mitigation Measure BIO-1** in the Draft SCEA stipulates that collection and relocation of animals shall only occur with the proper handling permits.

### **Comment No. 1-16**

CDFW recommends that the City retain an authorized and qualified biologist(s) with experience surveying for or is familiar with the life history of the coastal whiptail, coast horned lizard, and San Diego black-tailed jackrabbit.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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**Mitigation Measure BIO-1** in the Draft SCEA requires a qualified biologist to conduct surveys for special-status species 30 days prior to grading activities and that the results of the surveys be provided to the City. CDFW's recommendation is noted, but no additional mitigation measures are necessary because the pre-construction survey by a qualified biologist and acquisition of proper handling permits would result in a less-than-significant impact.

### **Comment No. 1-17**

**Mitigation Measure BIO-1** requires a qualified biologist to conduct surveys for special-status species 30 days prior to grading. The measure also states that relocation will occur through live capture and release, or in the case of black-tailed jackrabbits, by encouraging the animals to leave the site. Individuals shall be relocated to nearby undisturbed areas with suitable habitat, as identified by the qualified biologist in consultation with City staff. With approval from City staff of the proposed relocation area, a separate relocation plan would not be warranted. CDFW's recommendation is noted, but no additional mitigation measure is necessary.

### **Comment No. 1-18**

CDFW recommends that the City, in consultation with a qualified biologist, prepare a worker environmental awareness training. **Mitigation Measure BIO-2** requires construction personnel instructed on the ecological sensitivity of nesting bird protective buffer areas. Nevertheless, the following mitigation measure (**Mitigation Measure BIO-3**), which involves a Worker Environmental Awareness Program (WEAP) as an effective additional means of minimizing impacts on biological resources, has been added in response to Initial Study Checklist Question IV.a on page 4-50 of the Draft SCEA (see Section 3.0, Errata and Clarifications, of this Final SCEA, for this addition):

**Mitigation Measure BIO-3: Worker Environmental Awareness Program.** Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources potentially occurring in the Project area. This training will include information about San Diego black-tailed jackrabbit, coastal whiptail, coast horned lizard, California horned lark, loggerhead shrike, as well as other special-status species with potential to occur in the Project area. The specifics of this program shall include identification of special-status species and habitats, a description of the regulatory status and general ecological characteristics of special-status resources, review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area, and all reporting requirements. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special-status species.

This change does not result in the Project creating any new or increased significant environmental impact already identified in the Draft SCEA.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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### **Comment No. 1-19**

Should an SSC be inadvertently harmed during construction, the Project applicant, in coordination with the biological monitor, will comply with all necessary federal, State, and local regulations, including providing notification to CDFW. In addition, contractors will be required to attend a WEAP training that would discuss avoidance and minimization measures to protect special-status species and how to report observations of said species, should they occur. As such, no additional mitigation measures are warranted.

### **Comment No. 1-20**

The Project would comply with the payment of fees upon filing of the Notice of Determination.

### **Comment No. 1-21**

CEQA does not impose the same requirements on a project that is eligible for evaluation under a SCEA as a mitigated negative declaration (CEQA Guidelines Section 15073(e)) as cited in CDFW's comment. CEQA does not require preparation of responses to comments received on the Draft SCEA. Pursuant to Public Resources Code (PRC) Sections 21155.2(4) and (5), the lead agency shall consider and review all comments received prior to acting on the SCEA. Nonetheless, responses were provided to each comment received on the Draft SCEA as presented in this Final SCEA and will be included in the administrative record for consideration by the decision makers prior to acting on the Project.

### **Comment No. 1-22**

As identified in responses to Comment Nos. 1-6 through 1-8, 1-10 through 1-13, and 1-15 through 1-17, no additional mitigation measures are necessary. **Mitigation Measure MM-BIO-11**, regarding SSC Worker Training and presented as Mitigation #4 under Comment #3 in CDFW's comments above, has been incorporated as Mitigation Measure BIO-3 in the Final SCEA (see Section 3.0, Errata and Clarifications, of this Final SCEA, for this addition).

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gov'n Newsom, Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 266-3574  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

January 15, 2021

City of Santa Clarita Planning Division  
Attn: Erika Iverson, Associate Planner  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, CA 91355

RE: MetroWalk Specific Plan Project –  
Sustainable Communities Environmental  
Assessment (SCEA)  
SCH# 2020120433  
GTS# 07-LA-2020-03461  
Vic. LA-14 PM R32.027

Dear Erika Iverson,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The MetroWalk Specific Plan Project would include development of up to 498 residential units that would comprise a mix of housing types, including market-rate apartments and townhomes, age-qualified apartments, and affordable senior apartments. A multi-use path would link the Project Site with the future Metrolink Vista Canyon Station to the east and the Vista Canyon Specific Plan Project to the north while connecting various private amenities throughout the Project Site, including park nodes, open space, a central clubhouse, and a playground. The multi-use path would terminate at a plaza at the far eastern area of the Project Site, which would provide a publicly accessible outdoor amenity adjacent to the future Metrolink station and a connection to commercial uses, trails, and other amenities within the Vista Canyon Specific Plan area. Given the Project's density and proximity to transit, it is considered a Transit Priority Project (TPP), eligible for CEQA streamlining pursuant to California Public Resources Code (PRC) Section 21155.

2-1

The nearest State facility to the proposed project is State Route 14. After reviewing the SCEA, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that prioritizes nearby transit service, like the proposed Project aims to facilitate. However, due to the amount of car parking, the MetroWalk Specific Plan Project is still designed in a way that induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose public transit and active

2-2

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### Letter No. 2 (Continued)

Erika Iverson  
January 15, 2021  
Page 2

modes of transportation. For any community or city to better support all modes of transportation and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) measures as an alternative to requiring car parking.

2-2  
(Continued)

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Any work that would affect the freeways and its facilities, Caltrans has the jurisdiction for review and approval. We recommend large size truck trips be limited to off-peak commute periods.

2-3

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2020-03461.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*



## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Letter No. 2**

Miya Edmonson  
IGR/CEQA Branch Chief  
California Department of Transportation – District 7  
Office of Regional Planning  
100 S. Main Street, Suite 100  
Los Angeles, CA 90012

### **Comment No. 2-1**

This introductory comment summarizes the Project Description and identifies the Caltrans facility near the Project Site. No specific comment regarding the contents of the Draft SCEA was provided.

### **Comment No. 2-2**

This comment asserts that the Project is currently designed to provide an amount of car parking that induces demand for additional vehicle trips and suggests design and management principles that prioritize other travel modes over driving to encourage the use of public transit and active modes of transportation. As identified in the Section 4.0, Initial Study Checklist, of the Draft SCEA, parking supply for new developments in the City of Santa Clarita is regulated by the Santa Clarita Municipal Code (SCMC). However, the Project's parking requirements would be regulated by the MetroWalk Specific Plan. The Project would include a total of 498 dwelling units. Per the SCMC, the Project would be required to provide a total of 966 parking spaces, but the Project proposes to provide approximately 902 parking spaces, resulting in 64 parking spaces fewer than required by the SCMC. Parking regulations in the Specific Plan are intended to provide the requisite number of parking spaces for all uses, while reinforcing the pedestrian-oriented character and accessibility to transit, amenities, and daily services intended to minimize vehicle trips and parking demand.

As also presented in Section 4.0, Initial Study Checklist, of the Draft SCEA, the Project satisfies all four criteria established under the City's and the California Governor's Office of Planning and Research's (OPR) Vehicle Miles Traveled (VMT) guidelines and thresholds to allow the City to screen out VMT impacts using project-specific characteristics, such as project location, project size, transit availability, and provision of affordable housing. More specifically, Criterion No. 2 relates to the whether the Project would "include more parking for use by residents, customers, or employees than other typical nearby uses, or more than required by the City." As discussed above, the Project's parking supply would be less than the required number of spaces by the SCMC, and, as such, the Project meets Criterion No. 2.

In addition, to support all modes of transportation and reduce VMT, pedestrian and bicycle access to the Project Site would be provided via sidewalks at the two unsignalized driveways along Harriman Drive and connect the eastern corner of the Project Site to the adjacent (Vista Canyon) trail system. To facilitate pedestrian access from the Project Site at the driveways, sidewalks are proposed on all public roads adjacent to the Project Site, including Lost Canyon Road and Harriman Drive. Marked pedestrian crossings would be constructed at the driveway intersections. The Project would also connect to a series of mixed-use trails, including the Santa Clara River trail at the intersection of Lost Canyon Road and Jakes Way. On-site pedestrian and bicycle circulation would be provided by a series of walkways and trails that join the two driveway entrances to the Vista Canyon trail system, as well as the proposed Metro Plaza and the future Metrolink Vista Canyon Station.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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### **Comment No. 2-3**

This comment states that transportation of heavy equipment and/or oversized vehicles on State highways requires a permit from Caltrans and recommends that truck trips be limited to off-peak commute periods. The Project would comply with any Caltrans permit requirements regarding transportation of equipment or materials to and from the Project Site.

2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

Letter No. 3



DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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KATHRYN BARGER
FIFTH DISTRICT

January 19, 2021

Erika Iverson, Associate Planner
City of Santa Clarita
Planning Division
23920 Valencia Boulevard
Santa Clarita, CA 91355

Dear Ms. Iverson:

NOTICE OF AVAILABILITY OF A DRAFT SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT, "METROWALK SPECIFIC PLAN PROJECT," WOULD INCLUDE DEVELOPMENT OF UP TO 498 RESIDENTIAL UNITS IN FOUR PLANNING AREAS, A MULTI-USE PATH WOULD LINK THE PROJECT TO THE PROJECT SITE WITH THE FUTURE METROLINK VISTA CANYON STATION, SANTA CLARITA, FFER 2020010128

The Notice of Availability of a Draft Sustainable Communities Environmental Assessment has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

3-1

The following are their comments:

PLANNING DIVISION:

4.0 Initial Study Check List

3-2

XV. Public Services, Fire Protection a) 1, paragraph one, sentence two should be corrected to state "Specifically, 15 fire stations with 14 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serve the Santa Clarita Valley."

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWTHORNE GARDENS, HAWTHORNE, HERMOSA BEACH, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRVINDALE, LA CANADA-FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWDALE, LOMITA, LYNNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, VERNON, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 3 (Continued)

Erika Iverson, Associate Planner  
January 19, 2021  
Page 2

#### **LAND DEVELOPMENT UNIT:**

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

This property is located within the area described by the Fire Department as a Fire Hazard Severity Zone. A "Fuel Modification Plan" shall be submitted to the Fuel Modification for review by the Fuel Modification Unit prior to building plan check approval. Please contact the Department's Fuel Modification Unit for details. The Fuel Modification Plan Review Unit is located at 605 North Angeleno Avenue in the City of Azusa CA 91702-2904. They may be reached at (626) 969-5205 or visit <https://www.fire.lacounty.gov/forestry-division/forestry-fuel-modification>

3-3

The Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Wally Collins at (323) 890-4243 or [Wally.Collins@fire.lacounty.gov](mailto:Wally.Collins@fire.lacounty.gov).

#### **FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

3-4

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

#### **HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

3-5

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### Letter No. 3 (Continued)

Erika Iverson, Associate Planner  
January 19, 2021  
Page 3

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:ac

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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### **Letter No. 3**

Ronald M Durbin  
Chief, Forestry Division  
Prevention Services Bureau  
County of Los Angeles Fire Department  
1320 North Eastern Avenue  
Los Angeles, CA 90063-3294

### **Comment No. 3-1**

This comment acknowledges receipt of the Notice of Availability of a Draft SCEA for the Project and introduces specific comments from the different divisions within the County of Los Angeles Fire Department (LACoFD).

### **Comment No. 3-2**

This comment corrects the information presented in the Draft SCEA regarding LACoFD facilities. The second sentence in response to Initial Study Checklist Question XV.a.i on page 4-169 of the Draft SCEA has been revised as follows (see Section 3.0, Errata and Clarifications, of this Final SCEA, for this revision):

Specifically, ~~46~~15 fire stations with ~~45~~14 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serve the Santa Clarita Valley.

This change does not result in the Project creating any new or increased significant environmental impact already identified in the Draft SCEA.

### **Comment No. 3-3**

As discussed in Section 4.0, Initial Study Checklist, of the Draft SCEA, the Project would be constructed to stringent standards to resist ignition and slow the spread of fire per LACoFD standards, and no building permits would be issued by the City until construction plans have been reviewed and determined to be in full compliance with all applicable standards for development in a Very High Fire Hazard Severity Zone, including a Fuel Modification Plan for LACoFD review.

It should be noted that the Project would change the existing conditions of the Project Site, as the entire Project Site would either be developed with impervious surfaces or managed landscape areas. As such, the risk of wildfire on the Project Site would be reduced through development of the proposed structures and improvements as compared with existing conditions. By converting the flammable landscape currently existing on the Project Site to a development featuring hardscapes, multiple residential facilities, and irrigated/managed landscaped areas, the Project would reduce fuel loads found on the Project Site and, thus, reduce the chances of a wildfire occurring or intensifying on-site and threatening surrounding properties. Further, because the Project would not involve storage, use, or disposal of significant quantities of hazardous materials, there would be no significant sources of hazardous materials that could add to the fuel load and produce harmful pollutants in the event of a wildfire.

### **Comment No. 3-4**

This comment identifies the statutory responsibilities of LACoFD's Forestry Division, including erosion control, which is addressed in the responses to Initial Study Checklist Question VII.b on

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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page 4-92, Initial Study Checklist Question X.a on page 4-127, Initial Study Checklist Question X.c on page 4-133, Initial Study Checklist Question X.f on page 4-137, of the Draft SCEA; watershed management, which is addressed in response to Initial Study Checklist Question X.a on page 4-128 of the Draft SCEA; rare and endangered species and vegetation, which are addressed in response to Initial Study Checklist Question IV.a on page 4-47 of the Draft SCEA; fuel modification for VHFHSZ, which is addressed in response to Initial Study Checklist Question XX.b on page 4-208 of the Draft SCEA; archaeological and cultural resources, which are addressed in response to Initial Study Checklist Question V.b on page 4-70 of the Draft SCEA; and oak trees, which are addressed in response to Initial Study Checklist Question IV.e on page 4-62 of the Draft SCEA. There are no oak trees existing on the Project Site.

### **Comment No. 3-5**

This comment acknowledges that LACoFD has no comments or requirements for the Project related to hazardous materials.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 4



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

January 21, 2021

Erika Iverson  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 120  
Santa Clarita, CA 91355  
Sent by Email: eiverson@santa-clarita.com

RE: MetroWalk Specific Plan Project  
Notice of Availability of Draft Sustainable Communities Environmental Assessment (SCEA)

Dear Ms. Iverson:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed MetroWalk Specific Plan Project (Project) located in the City of Santa Clarita (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

4-1

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Sustainable Communities Environmental Assessment (SCEA) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the future Metrolink Vista Canyon Station and Metrolink facilities and services which should be analyzed in the SCEA, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.<sup>1</sup>

4-2

In addition to the specific comments outlined below, Metro is providing the City and BluMax Santa Clarita, LLC (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at [www.metro.net/projects/devreview/](http://www.metro.net/projects/devreview/). We appreciate the coordination between the Applicant, City, and the Southern California Regional Rail Authority (SCRRA) with respect to the future Metrolink Vista Canyon Station, and encourage continued collaboration as the Project progresses.

4-3

#### Project Description

The Project includes developing up to 498 residential units, organized into four planning areas, on an approximately 20.4-acre site in the City of Santa Clarita. Project development would be guided by the proposed MetroWalk Specific Plan, which would provide development plans, infrastructure development plans, design guidelines, and the implementation program for the Project. The Project Site is located directly south of the Vista Canyon Specific Plan area, which allows for the buildout of residential, office, and commercial uses. The Metrolink tracks that make up the southern and eastern Project Site boundaries vary in elevation from

4-4

<sup>1</sup> See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 4 (Continued)

MetroWalk Specific Plan Project  
Notice of Availability of SCEA – Metro Comments  
January 21, 2021

approximately five (5) feet above the Project Site in the southwestern corner of the Project Site to approximately 15 feet above the Project Site at the northeastern corner of the site.

The Project Site is directly adjacent to the planned Vista Canyon Multi-Modal Center, which will include a Metrolink station that is slated for completion in 2023. The Vista Canyon Multi-Modal entrance will be located directly east of the Project Site, would be connected to the Project Site by a walking path, and will include a new passenger rail station, which will feature a commuter platform, pedestrian undercrossing, a seven-bay bus transfer station (slated for completion in 2021), and a park-and-ride lot. The Vista Canyon Multi-Modal Center will serve the in Santa Clarita/Antelope Valley commuter line, which provides service between the City of Lancaster in the Antelope Valley, Santa Clarita, and downtown Los Angeles.

4-4  
(Continued)

#### Recommendations for SCEA Scope and Content

##### *Metrolink Adjacency*

1. Operations: The Project site is adjacent to Metro-owned ROW operated and maintained by SCRRRA to run the Metrolink commuter rail service. The Applicant is advised that rail service operates in both directions and that trains may operate 24 hours a day, seven days a week, in the ROW adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to Metrolink ROW and future Metrolink Vista Canyon Station, the SCEA must analyze potential effects on rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to rail service; and temporary and/or permanent changes to customer access and circulation to the station. Specific impacts and mitigation measures that should be studied include:
  - a. Structure Setback: Structures that are immediately adjacent to the railroad ROW can pose safety hazards and may disrupt transit service and/or damage Metrolink infrastructure. Such conflicts can occur during Project construction and/or operation. The Applicant will generally not be permitted to access Metrolink ROW to maintain private development.

4-5

##### *Recommended mitigation measure.*

- i. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Santa Clarita/Antelope Valley commuter line infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain SCRRRA's approval of final construction drawings.
- ii. Setback: Where the Project property is immediately adjacent to Metrolink ROW (owned by Metro), all Project structures shall be set back five a minimum of five (5) feet from property line to allow adequate space for property maintenance.
- iii. Access: Any access to railroad property is strictly at the discretion of Metro and SCRRRA. The Applicant shall obtain specific Right-of-Entry temporary access permits from SCRRRA for any work performed on the Project's structures or property requiring access to the railroad ROW. Where feasible, the Applicant shall maintain fencing and walls at or near property lines from the private property side.
- iv. Construction Monitoring: The Applicant shall permit Metro and/or SCRRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Applicant shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Applicant shall notify Metro and

Page 2 of 4

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 4 (Continued)

MetroWalk Specific Plan Project  
Notice of Availability of SCEA – Metro Comments  
January 21, 2021

SCRRA of any changes to the construction/building plans that may or may not impact the ROW.

4-5  
(Continued)

1. **Advisories to Applicant:** The Applicant should continue design coordination of the future Metrolink Vista Canyon Station with SCRRA. The Applicant should also be advised of the following:
  - a. **Occupational Safety and Health Administration (OSHA) Requirements:** Demolition, construction and/or excavation work in proximity to Metrolink ROW with potential to damage rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
  - b. **Technical Review:** Metro and Metrolink charge for staff time spent on engineering review and construction monitoring.
  - c. **ROW Access:** The Applicant should contact SCRRA for Right-of Entry requirements. Information can be found at [www.metrolinktrains.com](http://www.metrolinktrains.com). Other requirements may include permits for construction of buildings and any future repairs, painting, graffiti removal, etc., including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement. This agreement will include an annual license fee and other requirements that meet safety standards for access to a ROW with active rail operations.
  - d. **Cost of Impacts:** The Applicant will be responsible for costs incurred by Metro and/or SCRRA due to Project construction/operation issues that cause delay or harm to Metrolink service delivery or infrastructure. The Applicant will also bear all costs for any noise mitigation required for the Project.

4-6

#### Transit Supportive Planning: Recommendations and Resources

Metro encourages the City and the Applicant to continue to coordinate and collaborate with Metrolink staff on linkages to the future Metrolink Vista Canyon Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. **Transit Supportive Planning Toolkit:** Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.
2. **Land Use:** Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the future Metrolink Vista Canyon Station, including orienting pedestrian pathways towards the station.
3. **Transit Connections and Access:** Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
  - a. **Walkability:** The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all

4-7

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 4 (Continued)

MetroWalk Specific Plan Project  
Notice of Availability of SCEA – Metro Comments  
January 21, 2021

public street frontages of the development site to improve pedestrian safety and comfort to access the nearby Metrolink Vista Canyon Station.

- b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.
  - c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: [http://media.metro.net/docs/sustainability\\_path\\_design\\_guidelines.pdf](http://media.metro.net/docs/sustainability_path_design_guidelines.pdf)
4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
  5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metrolink services or featuring the Metrolink brand and/or associated graphics should be coordinated with Metrolink staff.

4-7  
(Continued)

4-8

4-9

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at [DevReview@metro.net](mailto:DevReview@metro.net), or by mail at the following address:

Metro Development Review  
One Gateway Plaza  
MS 99-22-1  
Los Angeles, CA 90012-2952

Sincerely,

  
Shine Ling, AICP  
Manager, Transit Oriented Communities

cc: Roderick Diaz, Director of Planning, SCRRA  
Jay Fuhrman, Manager, Metro Regional Rail

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

Page 4 of 4

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Letter No. 4**

Shine Ling, AICP  
Manager, Transit Oriented Communities  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza, MS 9902201  
Los Angeles, CA 90012-2952

### **Comment No. 4-1**

This comment affirms the Los Angeles County Metropolitan Transportation Authority's (Metro) commitment to transit-supportive developments and Transit Oriented Communities (TOCs). No specific comment regarding the contents of the Draft SCEA was provided.

### **Comment No. 4-2**

This comment identifies Metro's statutory responsibility regarding transit systems and infrastructure. The comment introduces Metro's concerns regarding the Project's potential impacts on the future Metrolink Vista Canyon Station and Metrolink facilities. Please refer to responses to Comment Nos. 4-5 and 4-6 below.

### **Comment No. 4-3**

This comment confirms Metro's provision of its *Metro Adjacent Development Handbook* (A Guide for Cities and Developers) to provide information and guide for projects located adjacent to, below, or above Metro Transit facilities, including rights-of-way (ROWs), stations, bus stops, and services. The City acknowledges receipt of this handbook, which has been included as part of the administrative record for the Project.

### **Comment No. 4-4**

This comment summarizes the Project Description and the Project's location directly adjacent to the Vista Canyon Multi-Modal Center. No specific comment regarding the contents of the Draft SCEA was provided.

### **Comment No. 4-5**

Although the Project Site is located adjacent to Metro-owned ROW that is operated and maintained by the Southern California Regional Rail Authority (SCRRA), the limit of ground disturbance associated with Project construction would be at a minimum distance of 30 feet from the Metro-owned ROW with the structure setback of approximately 15 feet from the property line. As identified in the Draft SCEA, the Project proposes excavation to a maximum depth of 12 feet below ground surface. The extent of on-site grading and excavation and ground disturbance associated with Project construction is not anticipated to create any potential damage to the structural and systems integrity of tracks and related infrastructure, result in any disruption to rail service, or result in temporary and/or permanent changes to customer access and circulation to the future Metrolink Vista Canyon Station. In addition, the Project applicant would be required to obtain a notarized Letter of Permission for grading outside of the property lines/tract boundary from the adjacent property owner(s), including the SCRRA, to avoid any impacts on rail operations in the adjacent ROW. As such, no mitigation measures, such as those identified in the comment (e.g., measures related to setback, access, construction monitoring) are required. CEQA only requires mitigation measures if substantial evidence exists of potentially significant environmental

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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impacts. In particular, Section 15126.4(a)(4)(A) of the CEQA Guidelines states that there must be an essential nexus between the mitigation and a legitimate government interest (i.e., potential significant impact).

### **Comment No. 4-6**

The future Metrolink Vista Canyon Station is not part of the Project; therefore, this comment, which relates to the Applicant's continued design coordination with SCRRA, is not applicable to the development of the MetroWalk Specific Plan Project.

### **Comment No. 4-7**

The Project has been designed to include direct and convenient access to the Vista Canyon Multi-Modal Center, including the future Metrolink Vista Canyon Station. The Project would be a pedestrian-oriented community that would have convenient access to nearby services and amenities, including the Vista Canyon Specific Plan area to the north, which would feature a mix of office, commercial, retail, and residential uses surrounded by a Main Street thoroughfare (Vista Square). Proximity to Vista Canyon would offer Project residents accessibility to pedestrian-oriented shops, restaurants, and services within walking distance. Pedestrian circulation and access would be provided through sidewalks, trails, and multi-use paths proposed within the Project Site, which would also connect residential areas to the Vista Canyon Specific Plan area, the proposed Metro Plaza, the Metrolink Station, and the City's existing trail system along the Santa Clara River.

The Project would support first/last mile connections to transit by providing a multi-use pathway system, an ideal first/last mile connection to the Vista Canyon Multi-Modal Center directly east of the Project Site within easy walking/biking distance. The Project would also include an internal roadway system with extensive sidewalks and 100 bicycle parking spaces to facilitate pedestrian and bicycle travel throughout the Project Site. The Project would include signage for each planning area and building, recreation areas, Metro Plaza, and the Metrolink station, as well as ground-level wayfinding signage. All proposed signage would be designed in conformance with the applicable requirements set forth in the MetroWalk Specific Plan.

### **Comment No. 4-8**

Please refer to response to Comment No. 2-2 above.

### **Comment No. 4-8**

Please refer to response to Comment No. 4-7 above.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 5



**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

**Robert C. Ferrante**

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • www.lacsd.org

January 21, 2021

Ref. DOC 6007400

Ms. Erika Iverson  
Associate Planner-Metro Walk SCEA  
City of Santa Clarita  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, CA 91355

Dear Ms. Iverson:

#### **SCEA Response for Metro Walk SP Project**

The Santa Clarita Valley Sanitation District (District) received a Draft Sustainable Communities Environmental Assessment (SCEA) for the subject project on December 21, 2020. We offer the following comments regarding sewerage service:

1. The project area is outside the jurisdictional boundaries of the District and will require annexation into District before sewerage service can be provided to the proposed development. For a copy of the District's Annexation Information and Processing Fee sheets, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, and click on Annexation Program. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708. 5-1
2. Because of the project's location, the flow originating from the proposed project would have to be transported to the District's trunk sewer by local sewer(s) that are not maintained by the District. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or District's trunk sewer. The nearest District's trunk sewer is the Soledad Canyon Trunk Sewer Section 4, located in private right-of-way in the Santa Clara River southeast of the south terminus of Hidaway Avenue. The District's 15-inch diameter trunk sewer has a capacity of 2.7 million gallons per day (mgd). Because portions of this trunk sewer are nearing capacity, the District is undertaking efforts for design and construction of a relief sewer. Please submit a copy of the project's build-out schedule to the undersigned to ensure the timing of the proposed project is in relation to the timing of the relief sewer. The availability of capacity within the District's sewerage system should be confirmed as the development of the proposed project proceeds. 5-2
3. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a capacity of 28.1 mgd and currently processes an average flow of 19.6 mgd. 5-3
4. The expected average wastewater flow from the project, described in the assessment as a total of 348 residential apartments and 150 townhomes, is 83,538 gallons per day. For a copy of the District's average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Programs and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link. 5-4

DOC 6041408.SCVD99

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 5 (Continued)

Ms. Erika Iverson

2

January 21, 2021

5. The District is empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the District's Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the District to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the District's Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the District will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the District's Wastewater Fee Public Counter at (562) 908-4288, extension 2727

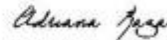
5-6

6. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the District's wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of District's facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the District's treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the District intends to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of District's facilities.

5-7

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at [araza@lacsd.org](mailto:araza@lacsd.org).

Very truly yours,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: D. Curry  
A. Schmidt  
A. Howard

DOC 6041408.SCVD99



## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Letter No. 5**

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department  
Los Angeles County Sanitation Districts  
1955 Workman Mill Road  
Whittier, CA 90607-4998

### **Comment No. 5-1**

This comment acknowledges receipt of the Draft SCEA for the Project and introduces specific comments from the Santa Clarita Valley Sanitation District (District) regarding sewerage service.

### **Comment No. 5-2**

This comment identifies the Project area to be outside the District's jurisdictional boundary and requires the Project Site to be annexed into the District before sewerage service can be provided to the Project. The Project Site's annexation into the District's jurisdictional boundary has been added to the required approvals by the City, the Los Angeles County Sanitation Districts, and the Local Agency Formation Commissions (LAFCo) in this Final SCEA (see Section 3.0, Errata and Clarifications, of this Final SCEA, for this addition).

### **Comment No. 5-3**

The Vista Canyon Water Reclamation Plant (WRP) would treat the wastewater generated by the Project. The proposed wastewater system on the Project Site would consist of a network of sewer pipeline of varying sizes that would generally follow the proposed internal roadways. Project sewer pipelines would deposit collected sewage from the Project Site to the two existing 10-inch-diameter sewer pipelines north of the Project Site. The Vista Canyon WRP would treat the wastewater generated by the Project, with all solids conveyed to the District's Valencia WRP for processing and disposal through the Sand Canyon Trunk Sewer Section 4 mentioned in the comment. However, the District is currently in design phase for a relief line to increase capacity of this trunk line to adequately serve the Project area. The construction of this relief line is anticipated to be completed prior to the opening and occupancy of the Project in 2027. The only wastewater improvements required for the Project are on-site connections to the infrastructure systems in place within Harriman Drive, Lost Canyon Road, and Cooper Street, which are subject to connection fees.

### **Comment No. 5-4**

The comment provides information regarding the District's facilities, including the Saugus WRP and Valencia WRP with a combined capacity of 28.1 million gallons per day (mgd) and which currently process an average of 19.6 mgd. Although the comment does not raise an issue regarding the content of the Draft SCEA, the information is noted for the administrative record and forwarded to the decision makers for consideration.

### **Comment No. 5-5**

The comment estimates the average wastewater flow from the Project to be 83,538 gallons per day (gpd). Although the comment does not raise an issue regarding the content of the Draft SCEA,

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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the information is noted for the administrative record and forwarded to the decision makers for consideration.

### **Comment No. 5-6**

The Project would be required to pay a fee to connect to the local sewer network. The City would not issue connection permits to the sewer system if it cannot be demonstrated that sufficient capacity exists to serve the proposed development.

### **Comment No. 5-7**

The comment does not pertain to the Draft SCEA. The comment is primarily made to inform the developer that the District intends to provide sewerage service up to the levels that are legally permitted based on existing capacity and any proposed expansion of District facilities. The comment is noted for the administrative record and forwarded to the decision makers for consideration.

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 6



Department of Water Resources

26501 Summit Circle, Santa Clarita, CA 91350-3049

(661) 297-1600 | yourSCVwater.com

January 7, 2021

City of Santa Clarita  
Planning Division  
Attn: Erika Iverson, Associate Planner-MetroWalk SCEA  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, CA 91355

**Re: Response to the Notice of Availability of a Draft Sustainable Communities Environmental Assessment (DSCEA) MetroWalk Specific Plan Project – (Master Case No. 20-45)**

Dear Ms. Iverson:

The project applicant is proposing to develop approximately 20.4 acres of land comprised of a residential development project of approximately 498 units into the Santa Clarita Valley Water Agency (SCVWA) service area. SCVWA would be the water wholesaler and retailer for the project. SCVWA has reviewed the Notice of Availability (NOA) for the Development and would like to submit the following comments regarding the DSCEA:

6-1

On June 8, 2016, the former CLWA Board of Directors and the former Board of Directors of Newhall County Water District (the forerunners of the SCVWA) adopted the 2015 Urban Water Management Plan (UWMP). This document serves as the basis for the evaluation of water supply impacts for new developments and in any Water Supply Assessment (WSA) for the project (if required).

6-2

The Draft Sustainable Communities Environmental Assessment notes that the project will have a less than significant environmental impact to Utilities and Service Systems. The final assessment should evaluate the following potential impacts to water utilities:

1. Prior to evaluating whether the new water supply required for the project will have a less than significant environmental impact, an estimation of the anticipated demand from the project should be determined with assistance from the SCVWA. Per California Water Code Section 10912, if the project has a demand equal to, or greater than, a 500-unit residential project, the preparation of Water Supply Assessment (WSA) must be requested by the City of Santa Clarita. SCVWA will prepare a WSA within 90 days of receipt of request, though it may extend the time if needed. If the demand is less than that of a 500-unit residential project, no WSA is required, though an evaluation of the project's water demand is still required to determine the proposed project's impact to water supply.

6-3

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

### Letter No. 6 (Continued)

2. The proposed project site is within the SCVWA's Santa Clarita Water District (SCWD) service area and the evaluation of impacts should address any needed new facilities either onsite or offsite to serve the proposed project. The needed facilities should be included in the final project description and included in the evaluation of the proposed project's impacts in the Final Sustainable Communities Environmental Assessment.

6-4

3. To avoid any potentially significant environmental impacts, mitigation measures should be required in the Final Sustainable Communities Environmental Assessment for the payment of all water supply related fees prior to the issuance of building permits. The project's conditions of approval should also reflect these requirements.

6-5

The UWMP states that potable water demand be reduced from both existing and future users by no less than 20 percent in response to the State of California Urban Water Use Targets for SBX7-7. Therefore, it is critical, if the project is to avoid significant cumulative impacts to water supply, that it incorporates water conservation measures into the project design. To ensure this occurs, the entitlements should include water conservation measures as conditions of project approval.

6-6

In particular, all manufactured slopes and newly landscaped areas should incorporate appropriate Irrigation Best Management Practices as recommended by the Irrigation Association Water Management Committee in the revised 2014 Landscape Irrigation Best Management Practices document. These measures can include, but are not limited to:

- Irrigation system design efficiently uses water resources.
- Install the irrigation system to meet the design criteria.
- Manage landscape water resources to maintain a healthy and functional landscape.

SCVWA appreciates your consideration of these comments and requests that we be provided a copy of all notices related to this project.

6-7

If you have any questions or comments, please contact me at (661) 705-7912.

Sincerely,



Rick Vasilopoulos  
Associate Water Resources Planner

cc: Steve Cole, Assistant General Manager  
Dirk Marks, Director of Water Resources

## 2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES

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### **Letter No. 6**

Rick Vasilopoulos  
Associate Water Resources Planner  
Santa Clarita Valley Water Agency  
26501 Summit Circle  
Santa Clarita, CA 91350-3049

### **Comment No. 6-1**

This comment acknowledges receipt of the Notice of Availability of a Draft SCEA for the Project and introduces specific comments from Santa Clarita Valley Water Agency (SCVWA).

### **Comment No. 6-2**

This comment states that the SCVWA 2015 urban Water Management Plan was adopted in June 2016, which serves as the basis for evaluation of water supply impacts for new developments and preparation of Water Supply Assessments for projects that are subject to the Senate Bill (SB) 610, which include residential developments of more than 500 dwelling units. Since the Project proposes no more than 500 units (i.e., 498 units), preparation of a WSA is not required.

### **Comment No. 6-3**

As identified in response to Initial Study Checklist Question XIX.d in Section 4.0, Initial Study Checklist, of the Draft SCEA, a demand analysis was conducted by SCVWA for the Project (see Appendix N of the Draft SCEA). The analysis indicates that the Project would generate an average daily water demand of 116 gallons per minute, which would represent approximately 0.3 percent of current water supply and available water supply in 2050. Since the existing water supplies are sufficient to serve the Project, the Project would not require new or expanded water entitlements, and impacts would be less than significant.

### **Comment No. 6-4**

As described in Section 2.0, Project Description, of the Draft SCEA, the proposed water delivery system would consist of a network of water mainlines of varying sizes that would generally follow major roadways. Project potable water pipelines would obtain water from the existing 12-inch-diameter potable water pipeline maintained by the SCVWA in Harriman Drive at the following two locations:

- 1) Approximately 440 linear feet east of the intersection of Harriman Drive and Lost Canyon Road
- 2) The intersection of Harriman Drive and Cooper Street

A network of smaller lines would be located within the planned roadway network and would distribute the water for connection to laterals located on individual buildings. Potable water storage would be supplied from the existing SCVWA infrastructure system.

Non-potable water demand would be met through the use of recycled water from the Vista Canyon Water Reclamation Plant (WRP) located adjacent to the western boundary of the Vista Canyon Specific Plan area, directly north of Humphreys Parkway.

## **2.0 COMMENTS ON THE DRAFT SCEA AND RESPONSES**

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As discussed in response to Comment No. 6-3 above, the demand analysis conducted by SCVWA for the Project indicates that existing water supplies are sufficient to serve the Project. As such, the Project would not require new or expanded water entitlements, and impacts to water supply would be less than significant.

### **Comment No. 6-5**

CEQA only requires mitigation measures if substantial evidence exists of potentially significant environmental impacts. In particular, Section 15126.4(a)(4)(A) of the CEQA Guidelines states that there must be an essential nexus between the mitigation and a legitimate government interest (i.e., potential significant impact). Since the demand analysis conducted by SCVWA for the Project indicates that existing water supplies are sufficient to serve the Project, no mitigation measures are required. The only improvements required for the Project are on-site connections to the infrastructure systems in place within Harriman Drive, Lost Canyon Road, and Cooper Street, which are subject to connection fees imposed as part of the required clearance from SCVWA prior to the issuance of building permits.

### **Comment No. 6-6**

As discussed in response to Comment No. 6-3 above, the demand analysis conducted by SCVWA for the Project indicates that existing water supplies are sufficient to serve the Project. As described in Section 2.0, Project Description, of the Draft SCEA, the Project would incorporate water conservation features, such as high-efficiency irrigation, low-flow faucets and toilets, and use of non-potable water from the newly constructed Vista Canyon WRP.

### **Comment No. 6-7**

SCVWA will be provided a copy of all notices related to the Project.

## 3.0 ERRATA AND CLARIFICATIONS

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This section consists of minor edits and changes to the Draft SCEA in response to public comments received, as well as minor staff edits, to revise or clarify the information in the Draft SCEA. The changes provide clarification and additional information for the Draft SCEA but do not alter the analysis or conclusions of the document.

Changes were made to the following pages as noted below and are identified with revision marks (underline for new text and strike through for deleted text).

### 3.1 CHANGES TO THE DRAFT SCEA IN RESPONSE TO PUBLIC COMMENTS

The following required approval has been added to page 2-31 in Subsection 2.4.4, Project Approvals, in Section 2.0, Project Description, of the Draft SCEA:

- Project Site Annexation into the Los Angeles County Sanitation Districts' Jurisdictional Boundary (approvals by the Los Angeles County Sanitation Districts and the Local Agency Formation Commissions also required).

The following mitigation measure has been added to page 4-50 in response to Initial Study Checklist Question IV.a of the Draft SCEA:

**Mitigation Measure BIO-3: Worker Environmental Awareness Program.** Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources potentially occurring in the Project area. This training will include information about San Diego black-tailed jackrabbit, coastal whiptail, coast horned lizard, California horned lark, loggerhead shrike, as well as other special-status species with potential to occur in the Project area. The specifics of this program shall include identification of special-status species and habitats, a description of the regulatory status and general ecological characteristics of special-status resources, review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area, and all reporting requirements. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special-status species.

The information presented in response to Initial Study Checklist Question XV.a.i on page 4-169 of the Draft SCEA has been revised as follows:

Specifically, ~~16-15~~ fire stations with ~~15-14~~ engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serve the Santa Clarita Valley.

### 3.2 STAFF-INITIATED CHANGES TO THE DRAFT SCEA

The following discussion regarding the future of the Metrolink Via Princessa Station has been revised and clarified based on the City's agreement with Metrolink:

### 3.0 ERRATA AND CLARIFICATIONS

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- Fourth sentence on page 2-1 in Section 2.0, Project Description, of the Draft SCEA:

The planned Metrolink Vista Canyon Station at the Vista Canyon Multi-Modal Center ~~will~~ may replace the Metrolink station located 1.6 miles west of the Project Site on Via Princessa.<sup>1</sup>

<sup>1</sup> The Metrolink Via Princessa Station was originally constructed as a temporary station in 1994 to provide a public transportation service immediately after the Northridge Earthquake. It is located upon a curve and does not meet current safety and customer service standards. Pursuant to the City's agreement with Metrolink, within two years of the Metrolink Vista Canyon Station becoming operational, the City and the Southern California Railroad Authority (SCRRA) agreed to work together to determine whether the Metrolink Via Princessa Station will remain open. If so, the station will need to be improved to comply with current safety standards and meet customer service requirements.

- Fifth sentence in the last paragraph on page 4-179 of the Initial Study Checklist Question XVII.a in Section 4.0, Initial Study Checklist, of the Draft SCEA:

Once the Vista Canyon Multi-Modal Center is complete, a new Metrolink station ~~will~~ may replace the existing Via Princessa Metrolink Station.

- First sentence in the last paragraph on page 4-184 of the Initial Study Checklist Question XVII.a in Section 4.0, Initial Study Checklist, of the Draft SCEA:

Regarding Criterion No. 3, the SCAG 2020-2045 RTP/SCS identifies projects in development, such as the Vista Canyon Transit Center, ~~which would relocate the existing Via Princessa Metrolink station to the Vista Canyon area, and include~~ including a bus transfer station and an adjacent parking structure with up to 750 parking spaces.

References to “Century City/Westwood” have been added to the discussion of regional bus service provided by the City of Santa Clarita Transit as follows:

- Third and fifth sentences on page 2-1 in Section 2.0, Project Description, of the Draft SCEA:

The Vista Canyon Multi-Modal Center will serve the Santa Clarita/Antelope Valley commuter line, which provides service between the City of Lancaster in the Antelope Valley, Santa Clarita, Century City/Westwood, and downtown Los Angeles.... Santa Clarita Transit provides local and regional (Commuter Express) bus service, operating local routes within the Santa Clarita Valley and regional routes to and from downtown Los Angeles, Century City/Westwood, Antelope Valley, Van Nuys, and the Warner Center.

- Third and fourth sentences in the Consistency Assessment of Goal 2 in Table 3.1-1, Consistency Analysis with the 2020-2045 RTP/SCS Strategy Policies, on page 3-3 in Section 3.0, Sustainable Communities Environmental Assessment Eligibility, of the Draft SCEA:

The Vista Canyon Multi-Modal Center will serve the Santa Clarita/Antelope Valley commuter line, which provides service between the City of Lancaster in the Antelope Valley, Santa Clarita, Century City/Westwood, and downtown Los Angeles. Santa Clarita Transit will provide local and regional (Commuter Express)



### 3.0 ERRATA AND CLARIFICATIONS

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bus service within the Santa Clarita Valley and to and from downtown Los Angeles, Century City/Westwood, Antelope Valley, Van Nuys, and the Warner Center.

- First sentence in the Consistency Assessment of Strategy 1(a) in Table 3.1-1, Consistency Analysis with the 2020-2045 RTP/SCS Strategy Policies, on page 3-6 in Section 3.0, Sustainable Communities Environmental Assessment Eligibility, of the Draft SCEA:

**Consistent.** The Project would develop a variety of new housing types, including affordable senior housing, adjacent to the Vista Canyon Multi-Modal Center, which provides regional rail and bus service to the City of Lancaster in the Antelope Valley, Santa Clarita, Century City/Westwood, ~~and~~ downtown Los Angeles, Van Nuys, and the Warner Center.

- First sentence in the first full paragraph on page 4-145 of the Initial Study Checklist Question XI.b in Section 4.0, Initial Study Checklist, of the Draft SCEA:

The Project would be immediately adjacent to the future Metrolink Vista Canyon Station and the Vista Canyon Multi-Modal Center, which will include a bus transfer station that will accommodate local routes within the Santa Clarita Valley and regional routes to and from Los Angeles, Century City/Westwood, Antelope Valley, Van Nuys, and the Warner Center.

The checked box on page 4-17 for Initial Study Checklist Question XXI.c in Section 4.0, Initial Study Checklist, of the Draft SCEA has been corrected from “Less Than Significant Impact” to “Less Than Significant Impact With Mitigation” to match the impacts discussion starting on page 4-213 of the Draft SCEA:

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	[]	[x]	[x]	[]

### 3.0 ERRATA AND CLARIFICATIONS

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## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The following environmental mitigation measures identified in **Table 4-1**, Mitigation Monitoring and Reporting Program, were incorporated into the approval for this Project in order to mitigate potentially significant environmental impacts. A completed and signed checklist for each mitigation measure indicates that the mitigation measure has been complied with and implemented and fulfills the City of Santa Clarita’s monitoring requirements with respect to PRC Section 21081.6. The mitigation measures are numbered as presented in the Draft SCEA.

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
<b>AIR QUALITY</b>					
<b>Mitigation Measure AQ-1</b>	<p>The project applicant or contractor shall select equipment during construction to minimize emissions. The Project applicant shall submit a construction management plan to the City of Santa Clarita for review and approval, prior to issuance of any grading and building permits. The construction management plan shall demonstrate that the off-road equipment used on site to construct the project would include the following:</p> <ul style="list-style-type: none"> <li>• All diesel-fueled equipment used during project construction shall be equipped with Tier 4 Final engines. In the event that Tier 4 Final engines are not commercially available, use of alternatively fueled (i.e., non-diesel) equipment or other control technology (i.e., diesel-particulate filters) may suffice, as long as an overall average fleet exhaust PM2.5 emissions reduction of 89 percent below emission levels estimated for the standard fleet mix in the California Emissions Estimator Model can be demonstrated.</li> <li>• Construction equipment staging shall be situated as far from existing residential receptors as possible.</li> <li>• Construction haul routes shall be limited to paved roads and minimize travel adjacent to existing residences.</li> </ul>	Issuance of applicable building permit and field inspection sign-off	City of Santa Clarita Public Works Department/ Development Services Division	Pre-construction and construction phases	

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
<b>BIOLOGICAL RESOURCES</b>					
<b>Mitigation Measure BIO-1</b>	Sixty days prior to grading activities, a qualified biologist shall contact and consult with City staff regarding the timing of preconstruction surveys. In any event, within 30 days prior to grading activities, a qualified biologist shall conduct a survey within appropriate habitat areas to relocate individual coastal whiptail, coast horned lizard, and San Diego black-tailed jackrabbit in order to avoid or minimize take of these sensitive species. Relocation will occur through live capture and release, or in the case of black-tailed jackrabbits, by encouraging the animals to leave the site. Individuals shall be relocated to nearby undisturbed areas with suitable habitat, as identified by the qualified biologist in consultation with City staff. Results of the surveys and relocation efforts shall be provided to the City. Collection and relocation of animals shall only occur with the proper handling permits, as applicable.	Qualified biologist to consult with the City regarding timing of pre-construction surveys; qualified biologist to conduct surveys	City of Santa Clarita Community Development Department/ Planning Division	60 days prior to grading activities; no later than 30 days prior to grading activities	
<b>Mitigation Measure BIO-2</b>	Beginning 30 or more days prior to the removal of any suitable nesting habitat that will occur during the bird breeding and nesting season of February 1 through August 31, the applicant shall arrange for weekly bird surveys to detect the California horned lark or any other nesting bird species protected by the California Fish and Game Code or Migratory Bird Treaty Act, in the habitats to be removed and any other suitable nesting habitat within 300 feet of the construction work areas. The surveys shall be conducted by a qualified biologist using industry-accepted survey protocols. The surveys shall continue on a	Qualified biologist to consult with the City regarding timing of pre-construction surveys; qualified biologist to conduct surveys	City of Santa Clarita Community Development Department/ Planning Division	No later than 30 days prior to grading activities	

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
	<p>weekly basis, with the last survey being conducted no more than 7 days prior to the initiation of any construction work involving vegetation removal and/or within 300 feet of off-site nesting habitat.</p> <p>If an active nest is found, clearing and construction within 300 feet of the nest shall be postponed until the nest is vacated and juveniles have fledged, and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest site shall be established in the field with flagging and stakes or construction fencing.</p> <p>Construction personnel shall be instructed on the ecological sensitivity of the area. Incursion into the protective buffer shall only occur at the discretion of a qualified biologist, and only if monitoring and other protective measures are implemented to ensure that work activities are not affecting the nest. Results of the surveys, including surveys to locate nests, shall be provided to the City. The results shall include a description of any nests located and measures to be implemented to avoid nest sites.</p>				
<b>Mitigation Measure BIO-3</b>	<p>Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources potentially occurring in the Project area. This training will include information about San Diego black-tailed jackrabbit, coastal whiptail, coast horned lizard, California horned lark,</p>	<p>Qualified biologist to conduct training</p>	<p>City of Santa Clarita Community Development Department/ Planning Division</p>	<p>Pre-construction</p>	

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
	<p>loggerhead shrike, as well as other special-status species with potential to occur in the Project area. The specifics of this program shall include identification of special-status species and habitats, a description of the regulatory status and general ecological characteristics of special-status resources, review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area, and all reporting requirements. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special-status species.</p>				
<b>CULTURAL RESOURCES</b>					
<b>Mitigation Measure CUL-1</b>	<p>Prior to the commencement of any construction activities on-site, the applicant shall retain a qualified archaeologist to provide archaeological awareness training at the construction kickoff meeting to ensure proper identification and treatment of inadvertent discoveries. In the event that archaeological resources (e.g., sites, features, artifacts, or fossilized material) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified</p>	<p>Qualified archaeologist to conduct training</p>	<p>City of Santa Clarita Community Development Department/ Planning Division</p>	<p>Pre-construction</p>	

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
	<p>specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted.</p>				
<b>Mitigation Measure CUL-2</b>	<p>Prior to the commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project. The PRIMP shall be consistent with the SVP guidelines and shall outline requirements for preconstruction meeting attendance and worker environmental awareness training; where monitoring is required within the Project area based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods, reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a paleontological monitor shall be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed Mint Canyon Formation materials. In the event that paleontological resources (e.g., fossils) are unearthed</p>	<p>Qualified paleontologist to conduct training</p>	<p>City of Santa Clarita Community Development Department/ Planning Division</p>	<p>Pre-construction</p>	

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
	during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find.				
<b>TRIBAL CULTURAL RESOURCES</b>					
<b>Mitigation Measure TCR-1</b>	The Project shall retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all ground-disturbing activities, including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, backfilling, blasting, stripping topsoil or a similar activity, and any archaeological work conducted during Project construction. If cultural resources are encountered, the Native American monitor shall have the authority to request ground-disturbing activities to cease within 60 feet of discovery to assess and document the potential finds in real time.	Professional native American to observe all ground-disturbing activities	City of Santa Clarita Community Development Department/ Planning Division	During the excavation and grading phases of construction	
<b>Mitigation Measure TCR-2</b>	If significant pre-contact and/or post-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop an Archaeological Treatment Plan (ATP), the drafts of which shall be provided to the Fernandeño Tataviam Band of Mission Indians for review and comments. The ATP shall provide details regarding the	Qualified archaeologist to prepare ATP	City of Santa Clarita Community Development Department/ Planning Division	Upon discovery of resources	



## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

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**Table 4-1  
Mitigation Monitoring and Reporting Program**

Environmental Issue	Mitigation Measure	Method of Review Verification	Responsible Agency	Timing	Status of Implementation
	process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources.				
<b>Mitigation Measure TCR-3</b>	The City and applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any tribal cultural resource encountered during all ground-disturbing activities.	Qualified archaeologist to assist in coordination with the tribe on the disposition and treatment of resources	City of Santa Clarita Community Development Department/ Planning Division	Upon discovery of resources	

## **4.0 MITIGATION MONITORING AND REPORTING PROGRAM**

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