



13.0 RESPONSE TO COMMENTS

13.1 CEQA REQUIREMENTS

Before approving a project, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (EIR).

In accordance with Sections 15120 through 15132, and Section 15161 of the *CEQA Guidelines*, the City of Santa Clarita has prepared an EIR for the Soledad Village project (SCH #2005041100). The Response to Comments section, combined with the Draft EIR, comprise the Final EIR.

The following is an excerpt from the *CEQA Guidelines*, Section 15132, Contents of Final Environmental Impact Report:

The Final EIR shall consist of:

- (a) *The Draft EIR or a version of the draft.*
- (b) *Comments and recommendations received on the Draft EIR either verbatim or in summary.*
- (c) *A list of persons, organizations and public agencies commenting on the Draft EIR.*
- (d) *The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) *Any other information added by the Lead Agency.*

This Response to Comments section includes all of the above-required components and shall be attached to the Final EIR.

13.2 PUBLIC REVIEW PROCESS – DRAFT EIR

The Draft EIR was circulated for review and comment to the public, agencies, and organizations. The Draft EIR was also circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research. A notice of availability was placed in The Signal. The 45-day public review period ran from November 3, 2005 to December 19, 2005. Comments received during the 45-day public review period have been incorporated into this section.

During the public review period, the public and local and State agencies submitted comments on the Draft EIR. During the public review period, seven written comment letters on the Draft EIR were received.



13.3 FINAL EIR

The Final EIR allows the public and Lead Agency an opportunity to review revisions to the Draft EIR, the responses to comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support a decision on the proposed project.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the *CEQA Guidelines*:

- ♦ *That the Final EIR has been completed in compliance with CEQA;*
- ♦ *That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and*
- ♦ *That the Final EIR reflects the Lead Agency's independent judgment and analysis.*

Additionally, pursuant to Section 15093(b) of the *CEQA Guidelines*, when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must submit in writing its reasons for supporting the approved action. This Statement of Overriding Considerations is supported by substantial information in the record, which includes the Final EIR. Since the proposed project would result in significant, unavoidable impacts, the Lead Agency would be required to adopt a Statement of Overriding Considerations if it approves the proposed project.

These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate Findings document. Both the Final EIR and the Findings will be submitted to the Lead Agency for consideration of the proposed project.

13.4 WRITTEN COMMENT LETTERS AND RESPONSES

- A. Terry Roberts, Director, State of California Governor's Office of Planning and Research – State Clearinghouse and Planning Unit
- B. Cheryl J. Powell, IGR/CEQA Branch Chief, State of California Department of Transportation – District 7, Regional Planning
- C. Dean Edwards, Regional Planning Assistant II, Los Angeles County Department of Regional Planning
- D. Elizabeth A. Cheadle, Chairperson, Santa Monica Mountains Conservancy
- E. David Solow, Chief Executive Officer, Southern California Regional Rail Authority – Metrolink



*Soledad Village
Environmental Impact Report*

- F. Brian Wallace, Associate Regional Planner – Intergovernmental Review, Southern California Association of Governments
- G. Leon Worden, Santa Clarita Valley Historical Society



Arnold
Schwarzenegger
Governor

LETTER A

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

December 20, 2005

Jason Mikaelian
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Subject: Soledad Townhomes
SCH#: 2005041100

Dear Jason Mikaelian:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 19, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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CITY OF SANTA CLARITA

**Document Details Report
State Clearinghouse Data Base**

SCH# 2005041100
Project Title Soledad Townhomes
Lead Agency Santa Clarita, City of

Type EIR Draft EIR
Description Development of a 30-acre site with 437 for-sale multiple-family dwelling units, a maximum of 8,000 square feet of commercial uses, associated private recreation uses and on-site private circulation.

Lead Agency Contact

Name Jason Mikaelian
Agency City of Santa Clarita
Phone (661) 255-4330 **Fax**
email
Address 23920 Valencia Boulevard, Suite 300
City Santa Clarita **State** CA **Zip** 91355

Project Location

County Los Angeles
City Santa Clarita
Region
Cross Streets Soledad Canyon Road / Bouquet Canyon Road / Golden Valley Road
Parcel No. 2849-0027-001, 002, 003, 004; 2849-001-029
Township **Range** **Section** **Base**

Proximity to:

Highways 5, 14
Airports
Railways Metrolink, Southern Pacific RR
Waterways Santa Clara River
Schools > 5 school sites
Land Use Commercial Office (CO) with Valley Concept Center (VCC) Overlay.
Z: Commercial Office-Planned Development Overlay (CO)

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Department of Health Services; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; Santa Monica Mountains Conservancy

Date Received 11/03/2005 **Start of Review** 11/03/2005 **End of Review** 12/19/2005



A. RESPONSES TO COMMENTS FROM TERRY ROBERTS, DIRECTOR, STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH – STATE CLEARINGHOUSE AND PLANNING UNIT; DATED DECEMBER 20, 2005.

- A1. The Commentor acknowledges receipt of the Draft EIR and notes that comments from State agencies will be forwarded to the City of Santa Clarita separately. The Commentor notes that the comments are to be included in the final environmental document. The Final EIR will include Section 13.0, Response to Comments, which incorporates the comments from the agencies responding to the State Clearinghouse, and responses to all environmental issues brought up in the comment letters.

The Commentor notes that the project has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

LETTER B

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 SO. MAIN ST.
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
E-Mail: NersesYerjanian@dot.ca.gov



*Flex your power!
Be energy efficient!*

Mr. Jason Mikaelian
Planning Department
City of Santa Clarita
23920 Valencia Blvd., Suite 300
Santa Clarita, CA. 91355

IGR/CEQA # 051121NY
DEIR/ Soledad Village
LA/14/52.17

November 10, 2005

Dear Mr. Mikaelian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Soledad Village Development (437 Residential Units and 8,000 SF commercial).

As stated in our letter of April 26, 2005, in order to evaluate and assess the impacts of this project on the State transportation system, additional traffic analysis as described in our previous comments are needed.

This letter supplements our earlier correspondence on this project and in the spirit of mutual cooperation through build-out we have the following comments:

Caltrans is a designated Responsible Agency under CEQA on these land-use projects.

In fact, MTA (Metropolitan Transportation Authority) guidelines provide that Caltrans must be consulted in the identification of specific locations to be analyzed on the State highway system.

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CITY OF SANTA CLARITA

Mr. Mikaelian

November 10, 2005

Please reference the Department's **Traffic Impact Study Guideline** on the Internet at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

Please apply the equitable share responsibility formula on page 2 of Appendix B of the guidelines to enable the City to determine the amounts of fees it should consider levying on this project, and any or all of the other projects and proposed development to enable the City to participate in providing a free flowing regional transportation system in its jurisdiction. The City has Caltrans' commitment that it will do everything possible to secure funding for the greater regional or travel through impacts to the SR-14 freeway.

B1

B2

We would like to meet with the City Planning and Transportation staff as well as the developers and their consultants to discuss in detail what improvements or mitigation measures could be achieved following this letter and a comprehensive traffic impact analysis on SR-14 and related ramps. You may contact me at 213-897-3747 at your earliest convenience to schedule a meeting to discuss these issues.

B3

If you have any questions, please call Mr. Yerjanian at (213) 897-6536 and refer to IGR/CEQA # 051121NY.

Sincerely,



Cheryl J. Powell

IGR/CEQA Branch Chief

Transportation Planning Office

District 7

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CITY OF SANTA CLARITA



B. RESPONSES TO COMMENTS FROM CHERYL J. POWELL, IGR/CEQA BRANCH CHIEF, STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION – DISTRICT 7, REGIONAL PLANNING; DATED NOVEMBER 10, 2005.

B1. The Commentor requests utilizing the equitable share responsibility formula on page 2 of Appendix B of the Department’s *Traffic Impact Study Guidelines*. As requested by Caltrans, the following information shows a traffic share formula, which calculates the project share of traffic growth on the freeway mainline pursuant to the Caltrans guidelines. Using data for the project contained in the traffic study, *Table 1, Freeway Traffic Shares*, shows the project’s share as calculated with this formula.

**Table 1
Freeway Traffic Shares**

Location	AM Peak Hour					PM Peak Hour				
	(T) Project	Existing	(T _E) Existing + Approved	(T _B) Long-Range General Plan Buildout	(P) Project Share	(T) Project	Existing	(T _E) Existing + Approved	(T _B) Long-Range General Plan Buildout	(P) Project Share
Northbound										
SR-14 north of Golden Valley	2	2,300	2,760	5,300	0.1%	1	6,880	8,260	15,200	0.0%
SR-14 south of Golden Valley	2	2,370	2,840	4,900	0.1%	11	6,980	8,380	14,600	0.2%
SR-14 south of Placerita Cyn	2	2,470	2,960	5,800	0.1%	11	7,200	8,640	15,600	0.2%
Southbound										
SR-14 north of Golden Valley	0	6,500	7,800	15,200	0.0%	2	3,100	3,720	7,800	0.0%
SR-14 south of Golden Valley	10	6,550	7,860	14,600	0.1%	7	3,150	3,780	7,200	0.2%
SR-14 south of Placerita Cyn	10	6,980	8,380	16,500	0.1%	7	3,410	4,090	8,500	0.2%

Share formula: $P = T / (T_B - T_E)$

P = The equitable share for the proposed project’s traffic impact

T = The vehicle trips generated by the project during the peak hour of adjacent State highway facility in vehicles per hour (veh/hr)

T_B = The forecast traffic volume on an impacted State highway facility at the time of General Plan buildout (e.g. 20 year model or the furthest future date feasible) (veh/hr)

T_E = The traffic volume existing on the impacted State highway facility plus other approved projects that will generate traffic that has yet to be constructed/opened (veh/hr)



The Caltrans guidelines for traffic impact studies include a section on project traffic shares. An introductory statement in the guidelines notes that “the methodology in the guidelines is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of a project’s traffic impact....” In addition, the Caltrans Guidelines do not provide a threshold of significance for evaluating the results of these computations.

In light of this language in the Caltrans Guidelines and lack of significance criteria, the Soledad Village Draft EIR utilized the Congestion Management Program (CMP) for Los Angeles County to quantify the project’s impacts on the CMP highway system, which includes State Route 14 (SR-14) and Interstate 5 (I-5), and the local and regional transportation systems.

Therefore, impacts to the regional transportation system were considered in accordance with the guidelines of the adopted *2004 Congestion Management Program for Los Angeles County* (CMP). The CMP includes by statute a Land Use Analysis program to analyze the impacts of local land use decisions on the regional transportation system, including an estimate of the costs of mitigating those impacts (ref. 2004 CMP Sec. 1.3). Also, as required by statute, the CMP includes all state highways.

The volume of project-generated traffic on the state highway system is below the thresholds established by the CMP (150 a.m. or p.m. peak trips) and does not result in a significant impact to the regional transportation system.

- B2. The Commentor indicates that the City may need to recalculate or establish an additional fee for this purpose. As illustrated above and within the Draft EIR, the Soledad Village project does not result in a significant impact to the state highway system pursuant to the thresholds established by the CMP and, therefore, no mitigation is required.

It should be noted that the City of Santa Clarita will be collecting traffic fees from the proposed project through an established Bridge and Thoroughfare (B&T) District and the County of Los Angeles and the City have an ongoing effort to rebuild and improve the freeway interchanges throughout the Santa Clarita Valley. These projects are largely funded by the B&T districts using fees collected from development projects such as this. The B&T fees have been derived based on the traffic generation of new development and therefore provide a nexus between the project's traffic impacts and the interchange improvements funded by the B&T. This project will be paying over five million dollars into the Bouquet B&T District which will be utilized for identified improvements within that District.

Finally, future project residents will also generate incremental State and Federal gas tax revenue, which would contribute to the funding of future state highway projects.



- B3. The Commentor requests a meeting with City Planning and transportation staff, developers, and their consultants to discuss mitigation measures regarding impacts to SR-14 and related ramps. The City is available to meet with Caltrans to discuss additional improvements and/or mitigation for future development projects within the City. Please contact Mr. Andrew Yi, the City's Traffic Engineer, at 661-255-4326, to schedule this meeting.

LETTER C



Los Angeles County Department of Regional Planning



Planning for the Challenges Ahead

November 22, 2005

James E. Hartl AICP
Director of Planning

Jason Mikaelian
City of Santa Clarita Planning Department
23920 Valencia Blvd., Suite 302
Santa Clarita, CA 91355

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CITY OF SANTA CLARITA

**SUBJECT: Soledad Village (Master Case 05-444)
Draft Environmental Impact Report (EIR)**

Dear Mr. Mikaelian:

Thank you for providing Los Angeles County the opportunity to comment on the Soledad Village Draft EIR. We offer the following comments for your consideration prior to the certification of the EIR.

5.4 Traffic and Circulation

It is the opinion of Los Angeles County that the traffic study area is too small and does not consider the potential impact that the project could have on the regional freeway system. According to the traffic study, the project will produce 240 vehicle trips during the peak morning hours and 370 vehicle trips during the peak afternoon hours. 85 (23%) peak afternoon trips are estimated to be destined west of San Fernando Road / Bouquet Canyon Road and 96 (26%) peak afternoon trips are estimated to be destined east of Golden Valley Road. With an established significance threshold of 50 trips, it is likely that the project could contribute significantly to cumulative impacts to both the I-5 and Antelope Valley freeways located west and east of the project site respectively.

C1

C2

5.8 Water Supply

The EIR states that the project could have a potentially significant impact on water supply and that landscape irrigation will contribute to that impact by requiring an estimated 45 acre feet of water per year. The Guiding Principles of the One Valley One Vision plan for the Santa Clarita Valley states that "new development shall be designed to...reduce natural resource consumption by such techniques as the use of ...recycling of treated wastewater." Although the EIR identifies recycled water as a local source of water and identifies landscape irrigation as a suitable use for this water, it does not include the use of recycled water for landscaping as mitigation to reduce the consumption of water by the project. It is the opinion of Los Angeles County that the use of recycled water for the irrigation of landscaping would be an appropriate mitigation measure for reducing the project's demand on the region's water supply.

C3



Los Angeles County
Department of Regional Planning



Planning for the Challenges Ahead

5.10 Parks and Recreation

James E. Hartl AICP
Director of Planning

Los Angeles County does not concur with the conclusion that residents of the project would not need to use regional parks because the 2.33 acres of open space included in the project would suffice. The project's open space does not offer the same recreational activities and natural amenities that regional parks supply. In addition to miles of scenic open space, Los Angeles County regional parks offer activities such as hiking, boating, fishing and camping. It is foreseeable that residents would indeed utilize Los Angeles County regional parks and their use of the parks could contribute significantly to the cumulative impacts on the County park system.

C4

The County of Los Angeles appreciates the opportunity to provide comments on Soledad Village Draft EIR. If you have any questions, please contact Dean Edwards at (213) 974-6221, Monday through Thursday between 7:30 a.m. and 6:00 p.m. Our offices are closed on Fridays.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING

James E. Hartl, AICP
Director of Planning

Dean Edwards
Regional Planning Assistant II
Impact Analysis Section

JEH:DLK:de



C. RESPONSES TO COMMENTS FROM DEAN EDWARDS, REGIONAL PLANNING ASSISTANT II, LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING; DATED NOVEMBER 22, 2005.

- C1. The Commentor states that the traffic study area is too small and does not consider the potential impact that the project could have on the regional freeway system. The traffic study area for this project was established by the City of Santa Clarita in accordance with its Traffic Guidelines. Traffic impacts to the regional transportation system were considered in accordance with the guidelines of the adopted CMP. The volume of project-generated traffic on the state highway system is below the thresholds established by the CMP and does not result in a significant impact to the regional transportation system.
- C2. The Commentor notes that the project will produce 240 vehicle trips during the peak morning hours and 370 vehicle trips during the peak afternoon hours, which could cumulatively impact both the I-5 and Antelope Valley freeways. As noted above in Response C1, the volume of project-generated traffic on the state highway system is below the thresholds established by the CMP and does not result in a significant impact to the regional transportation system. This is confirmed in Response B1, (refer to Table 1), which indicates that both a.m. and p.m. peak trips on SR-14 are well below CMP thresholds.
- C3. The Commentor suggests utilizing recycled water for irrigation purposes. As stated on pages 5.4-14 and 5.4-16 of the Draft EIR, the water analysis for this project did not assume utilization of recycled water for irrigation purposes. Recycled water is available from two existing Wastewater Reclamation Plants (WRP's), both of which are located west or downstream of the project site. The Castaic Lake Water Agency, in its *2005 Urban Water Management Plan*, identifies a total potential annual recycled water demand that is cost effective to serve of approximately 17,400 acre-feet per year by the year 2030. The proposed recycled water service area encompasses a large portion of CLWA's western service area, of which the Soledad Village project is not a part. In summary, recycled water will play a prominent role in the Valley's future water supply, through its utilization for non-potable purposes on the west side of the Santa Clarita Valley. As stated above, recycled water is not and would not be available for use at the Soledad Village site. Finally, the Draft EIR concluded that there were sufficient water supplies to serve the Soledad Village project.
- C4. The Commentor questions the conclusion that residents of the project would not use the regional parks because the 2.33 acres of open space included in the project would suffice. Page 5.10-17 of the Draft EIR, states that the provision of 2.33 acres of open space would mean that project residents would not, in any appreciable manner, need to use regional parks that are located off-site. The analysis concludes that impacts to regional facilities would be less than significant since City and County regional park and recreational facilities are in place or programmed to adequately serve user needs generated by the proposed project. The analysis does not conclude that project residents would not use regional facilities.



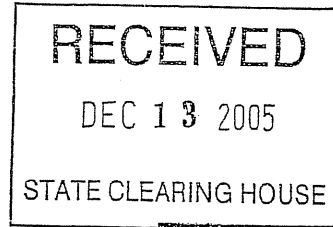
*Soledad Village
Environmental Impact Report*

Finally, the project is required to dedicate land and/or pay park in-lieu (Quimby) fees which serves to mitigate its impact on community and regional parks.

LETTER D

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



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December 5, 2005

Mr. Jason C. Mikaelian, AICP, Associate Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 302
Santa Clarita, California 91355

**Comments on Draft Environmental Impact Report Soledad Village (Newhall Land
and Farming Company), Tentative Tract Map No. 62322
Master Case 05-044 (SCH No. 2005041100)**

Dear Mr. Mikaelian:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Draft Environmental Impact Report (DEIR) for the proposed Soledad Village located on a 30-acre project site between Soledad Canyon Road and the Santa Clara River. The project consists of a 437-unit residential condominium complex, and 8,000 square foot commercial center, associated private recreational areas, and on-site public and private circulation improvements. Requested entitlements include a zone change from CO-PD (Commercial Office-Planned Development) to RMH-PD (Residential Medium High-Planned Development) and CN-PD (Commercial Neighborhood-Planned Development), an associated General Plan Amendment, a Tentative Tract Map to subdivide the property, and a Conditional Use Permit to exceed a building height of 35 feet.

According to the DEIR (p. 3-1), the site has been rough graded pursuant to a recorded parcel map to divide the site into six parcels, for which a Mitigated Negative Declaration was prepared. This approval allowed for the following completed improvements: construction of a new street entrance, grading to recompact unconsolidated soils and create site pads above high water flood levels, buried bank stabilization 40 feet wide and 2,600 feet long along the southern bank of the Santa Clara River, and constructing a trail system along the northern and southern site boundary. Of note, in June 2005, the City Council approved the 695-acre Riverpark project directly across the project site along the northern side of the Santa Clara River (DEIR, p. 3-4).

A major objective of the Conservancy is to maintain the full length of the Santa Clara River as a major functioning ecological feature. Part of this objective requires linking upland

D1

buffer areas to the river. The development pattern of the City of Santa Clarita over the past ten years has shown little, if any, propensity for maintaining connections between upland areas within the City core and the Santa Clara River. The Riverpark and Keystone projects are the closest recent examples of this trend. The Conservancy hopes to forge a new direction with this project. Even narrow semi-suburban wildlife corridors provide value for small predators, their prey, as well as people seeking to move from one natural area to another.

D2

D3

The Santa Clara River is one of the most important natural rivers in southern California from a biological value perspective. The project site is located at the narrowest point in the river. The subject project could result in significant adverse biological impacts by constricting the functional width of the Santa Clara River. The river corridor provides contiguous riparian habitat and serves as a conduit for movement for a breadth of threatened and endangered species. An analysis of an aerial photo of the site and surroundings shows that the site is a chokepoint connecting to open space habitat to the south of the Santa Clara River. (Development along Soledad Canyon Road hinders open space connections to the south, just east and west of the project site.) The DEIR is inadequate, in that it provides no analysis of the impacts on wildlife movement in the river corridor and on habitat connectivity to the south.

D4

D5

D6

D7

D8

If the City does not see the light in keeping the Porta Bella area (to the south) ecologically connected to the Santa Clara River, the Conservancy urges the City to at least provide a maximum size buffer along the river for this project.

D9

The DEIR is inadequate in that it does not clearly define the width of the buffer to the Santa Clara River, nor what uses would occur within that "buffer." The DEIR (p. 5.1-33) states "the proposed development would not limit the function of the Santa Clara river as a wildlife corridor, as no development is proposed within the river channel, and the project design provides an adequate setback from the river channel." The DEIR (p. 5.1-33) also states that "...given the nature of the proposed development and the setback distance from the Santa Clara River, the proposed project would not have an adverse effect on riparian habitat within the Santa Clara River channel." This description is insufficient to conclude that there would be no significant impacts to biological resources, including wildlife movement areas and corridors. These conclusions must be backed up with scientific evidence discussing the typical buffer widths needed to maintain the ecological function of the river. The Final Environmental Impact Report (FEIR) must describe the dimensions of the "setback distance" and the uses in this "adequate buffer." The FEIR must state the range of widths of the buffer between the development areas and the river channel and the

D10

D11

D12

D13

river habitat. Also, the FEIR must define to what extent the fuel modification extends into the river habitat. **D14**

The DEIR is inadequate in that it does not clearly define how much undisturbed open space would be protected as a result of this project, nor does it include a figure showing where that open space would be. The DEIR refers to “[a] total of approximately 2.5 acres of open space” (p. 3-7); 12 acres of landscaped/open space area (p. 5.7-33); and development on 70 percent, or 21 acres, of the approximately 30-acre total site area (p. 5.7-40), which seems to imply there would be 9 acres of open space. According to the Site Plan shown on Exhibit 3-3, perhaps the open space is located at the western edge. The DEIR (p. 5.3-14) references an “open space plan,” but provides no details regarding the contents of that plan and when it will be prepared. **D15**

The DEIR discussion of lighting impacts and mitigation measures is inadequate. The DEIR (p. 5.3-14) states the project site would not impact the proposed residential uses that would be developed as part of Riverpark because it would be located on a hill and buffered by a distance of at least 100 feet due to the Santa Clara River. What about potentially significant adverse lighting impacts to the *adjacent* river corridor and habitat? The vague language in the mitigation measures for lighting impacts does not address these potentially significant impacts. **D16**

We request that you verify the Assessor’s Parcel numbers identified in the Notice of Availability, as they do not appear to match the project boundary shown on Exhibit 3-3. Also, based on our Assessor’s Parcel data provided by the County of Los Angeles and also utilized by the City, it appears that some of the river habitat, possibly composed of Riversidian alluvial fan sage scrub, is included within the site boundary and within the area proposed for development. The FEIR must include an accurate figure with an aerial overlain on the correct parcel boundaries (with each parcel boundary of all parcels for this project shown). The FEIR must include appropriate avoidance and mitigation measures for impacts to this, and any other, sensitive plant community. **D17**
D18

Need for a Meaningful Environmentally Superior Project Alternative

The DEIR provides an inadequate range of alternatives, the descriptions of those alternatives are deficient, and the conclusions are unsupported. The DEIR (p. 6-6) states that the “Reduced Density Alternative” with 118 fewer residential units “would result in slightly greater open space acreage.” However, the DEIR does not state how many more acres would be protected and where would those acres be located. The DEIR (p. 6-8) **D19**

concludes that this alternative “may not be economically feasible,” with no study to support that conclusion. Similarly, the Work-Live Unit Alternative (with 25 fewer residential units) would result in “greater open space acreage” (p. 6-13), but with no quantification of the acreage, nor description of the location. In these two alternatives, one cannot assess whether the potential impacts to wildlife movement would be reduced, but presumably they would not. (The Existing General Plan Alternative would result in a greater intensity of development.)

D19

D20

The Conservancy recommends that the FEIR include a meaningful alternative that attempts to address the potentially significant impacts to the river wildlife corridor, and to north-south wildlife movement across Soledad Canyon Road to the Porta Bella project area. In this alternative, the project should be limited to 250 feet from the edge of the channel bank stabilization. Grading and improvements should be excluded from this 250-foot-buffer, while trails and native habitat restoration should be permitted. If the DEIR claims that this 250-foot-buffer cannot be provided, there must a scientific justification for a smaller buffer. The buffer should be planted with native plants, and public trails provided. (Although trails have been constructed to the north and south according to the DEIR [p. 3-1], the DEIR [for example, Exhibit 3-3, Soledad Village Site Plan] does not provide a zoomed-in figure clearly depicting the location of those trails on the project site.)

D21

Because the project site is a chokepoint connecting to open space habitat to the south of the Santa Clara River, the Conservancy recommends that the western tip of the project site be avoided. The project and DEIR alternatives should provide a minimum 200-foot-wide wildlife corridor on the site to take advantage of the open space associated with the Metrolink facility, just south of Soledad Canyon Road.

D22

Need for Open Space Dedication and Management Funding

A fee title dedication should also be required of the open space onsite, including along the river buffer area, as described in the proposed alternative above. A fee title dedication should be required to be granted to an appropriate agency capable of managing land for resource protection such as the City of Santa Clarita, Santa Clarita Watershed Recreation and Conservation Authority, or Mountains Recreation and Conservation Authority. All fuel modification zones should also have a conservation easement placed over them to prevent future encroachment. Such easements should be in the favor of both the County and the park agency holding title to the open space. Long-term management funding, in the form of a Community Facilities District, should also be required. This is necessary because this project site is located at a narrow point in the river, and as such, protecting this narrow point helps maintain the connectivity along the river.

D23

D24

D25

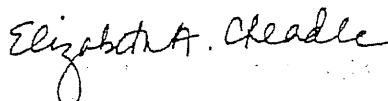
City of Santa Clarita
Soledad Village DEIR Comments
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Page 5

Long-term management of the open space by the homeowners' association (HOA) does not provide the assurance that the open space will be preserved and managed adequately in perpetuity. Homeowners' associations often have multiple objectives that may conflict with and trump the goal of preservation of the biological resources of the site, and the HOA may not have the expertise (e.g., biological) to manage the site.

D26

In summary, the FEIR must correct those DEIR deficiencies, as described above. A meaningful environmentally superior alternative should be presented in the FEIR, and a permanent open space dedication with associated long-term funding should be required. Please direct any questions and future documentation to Judi Tamasi of our staff at the address on this letterhead or by phone at (310) 589-3200 ext. 121.

Sincerely,



ELIZABETH A. CHEADLE
Chairperson



D. RESPONSES TO COMMENTS FROM ELIZABETH A. CHEADLE, CHAIRPERSON, SANTA MONICA MOUNTAINS CONSERVANCY; DATED DECEMBER 5, 2005.

- D1. The Commentor states that an objective of the Conservancy is to maintain the full length of the Santa Clara River as a functioning ecological feature, a part of which is linking upland buffer areas to the River. The project site is currently graded as a part of a previous approval issued by the City in 1992. This approval permitted the site grading, construction of bank stabilization, and the construction of a portion of the Santa Clara River Trail. As such, the tract map or project site contains no biological resources. Additionally, no encroachment into the Santa Clara River or adjacent buffer is proposed by the Soledad Village project. Project improvements would end at the existing Santa Clara River Trail located along the south bank of the Santa Clara River. As such, development of the project site would create no new impacts on, any species listed as candidate, sensitive, or special status, riparian habitat or other sensitive natural community, federally protected wetlands, in any local or regional plans, policies or regulations; movement of any migratory fish or wildlife species or migratory corridors or impeded the use of native wildlife nursery sites; any adopted Habitat Conservation Plan, Natural Community Conservation Plan, Significant Ecological or Natural Areas, or other local or regional plans, policies or regulations.

The *City of Santa Clara General Plan* (refer to Exhibit OS-1, Generalized Vegetation Map) does not identify the project site as containing any biological resources. As indicated above, the project would not have an impact on sensitive biological resources nor encroach into the river or adjacent buffer. However, to fully respond to the comment, the City has included the following discussion for information purposes only. The bank stabilization and trail existing on the Soledad Village site were constructed in accordance with the City's previous approval, which was also consistent with the *Natural River Management Plan* (NRMP). The NRMP and its EIR/EIS was approved by the Army Corps of Engineers (ACOE), the California Department of Fish and Game (CDFG) and the California Regional Water Quality Control Board in November 1998. The NRMP is a long-term, master plan that provides for the construction of various infrastructure improvements (including bank stabilization) on lands adjacent to the Santa Clara River and portions of its two tributaries. More specifically, the NRMP governs a portion of the main-stem of the Santa Clara River from Castaic Creek to one-half mile east of the Los Angeles Department of Water and Power Aqueduct and portions of San Francisquito Creek and the Santa Clara River South Fork. The Soledad Village site is located within the portion of the Santa Clara River governed by the NRMP and its bank stabilization and trail improvements were approved in conjunction with the NRMP.

The NRMP was prepared in response to an ACOE request to prepare a long-range management plan for projects and activities potentially affecting the Santa Clara River and San Francisquito Creek. More specifically, the NRMP, and its certified EIR/EIS, analyzed and mitigated impacts associated with the implementation of various infrastructure improvements (bank stabilization, bridges, utility crossings, storm drain outlets, etc.) along and within portions of the Santa Clara River adjacent



to Newhall Land properties, including the Soledad Village site. The NRMP, and its EIR/EIS are incorporated into this EIR by reference and are available at the City of Santa Clarita, Department of Community Development, Planning Counter, 23920 Valencia Boulevard, Suite 302, Santa Clarita and are incorporated in this EIR by reference.

Buffers were extensively debated during the public process on the NRMP and its EIR/EIS. The result of these discussions (in the approved NRMP) was the pulling back of bank stabilization away from riparian resources and the revegetating of this “buffer” between the top of bank and river. This is exactly what occurred on the Soledad Village site.

In summary, the NRMP will result in an increase of 69 acres of natural riverbed and enhancement of habitat in and adjacent to the riverbed. As a result of compliance with the NRMP, channelization of the River and associated adverse impacts are avoided. Additionally, A Functional Assessment of the Santa Clara River Within and Upstream of the Natural River Management Plan (July 2004) prepared by URS (the “URS Report”) both characterizes and evaluates the quality of wetland and riparian habitats within selected areas covered by the NRMP. The report concluded that when bank stabilization is placed upland from the active channel (buried bank stabilization), floodplain, and terrace geomorphological units of the river, the bank stabilization has less of an impact on the hydrological and ecological functions of the riparian system. The URS report also concluded that bank stabilization that includes native plant restoration allows for increased buffer (such as that already constructed along the Soledad Village site). A copy of this report is incorporated into this EIR by reference and is available at the City of Santa Clarita, Community Development Department, Planning Counter, 23920 Valencia Boulevard, Santa Clarita, CA.

- D2. The Commentor states that the development patterns of the City do not reflect the maintenance of connections of upland connections and the Santa Clara River, indicating that the Riverpark and Keystone projects are recent examples. The City respectfully disagrees with this comment and would advise the Commentor to review the Final EIR for the Riverpark project and the Draft Final EIR for the Keystone Project. Both referenced EIRs are available for review at the City of Santa Clarita, Community Development, Planning Counter, 23920 Valencia Boulevard, Suite 302, Santa Clarita, CA. However, since this comment expresses only the opinions of the Commentor with respect to the merits of the project, and does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. Finally, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- D3. The Commentor states that they hope that a new direction is forged with this project as even narrow corridors provide value to small predators and well as people. Refer to Response D1. The City respectfully disagrees with this comment. However, since the comment expresses only the opinions of the Commentor with respect to the merits of



the project, and does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. Finally, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.

- D4. The Commentor states that the Santa Clara River is an important natural river from a biological perspective in southern California and that the project is located at the narrowest point in the River. There are numerous locations along the Santa Clara River, primarily upstream from the project site where the river corridor is much smaller than that provided adjacent to the project site. For example, approximately one mile upstream from the Soledad Village site the river corridor shrinks to approximately 300 feet in width due to topography and adjacent land uses. The narrowest point of the river corridor along the Soledad Village site is approximately 600 feet and in most areas along the site the river corridor ranges from 700 to 900 feet.
- D5. The Commentor contends that the project could result in significant adverse impacts by constricting the functional width of the Santa Clara River. Refer to Response D1. Additionally, it should be noted that the Final Riverpark EIR, Section 4.2, Floodplain Modifications, concluded that hydraulic changes created by the project would cause no significant on-site or downstream impacts. The approved Riverpark project is located directly north of the project site and contains the portion of the Santa Clara River adjacent to the Soledad Village site. The Riverpark EIR analyzed potential flood and ecological impacts of the project on the portion of the Santa Clara River generally from just east of the future Golden Valley Road bridge to just west of the Bouquet Canyon Road bridge over the Santa Clara River. Existing flood protection improvements, including those along the Soledad Village site, were considered part of the existing condition in the Riverpark EIR. The Riverpark EIR concluded that the implementation of the Riverpark project, combined with the existing flood protection improvements in this part of the Santa Clara River, would not detract from the overall integrity and value of this portion of the Santa Clara River SEA.
- D6. The Commentor states that the river corridor provides contiguous riparian habitat and that it serves as a movement conduit for threatened and endangered species. As discussed in Response D1, buried bank stabilization has been installed on the project site and a revegetated buffer exists between the active river channel and the Soledad Village project. As indicated in Response D1, this existing buffer serves to provide riparian habitat for Santa Clara River species.
- D7. The Commentor states that the project site is a chokepoint connecting to open space habitat south of the Santa Clara River. As discussed in Response D1, buried bank stabilization has been installed on the project site. Additionally, the project site is presently in a fully graded condition. The project site fronts on Soledad Canyon Road, which is the Santa Clara Valley's primary east west corridor. Soledad Canyon Road is designated a major highway by the City and contains a total of six travel lanes. Approximately 55,000 Average Daily Vehicle Trips (ADT's) pass by the Soledad



- Village site. The City's primary Metrolink Station is located approximately one-quarter mile south and west of the Soledad Village site. Given that the project site is presently in a graded condition and fronts onto a heavily used major highway in close proximity to the City's primary Metrolink facility, any assumption that the project site could as a connection to open space areas to the south is not realistic.
- D8. The Commentor states that the Draft EIR is inadequate because it provides no analysis on the impact of wildlife development on the river corridor and habitat connectivity to the south. As noted in Responses D1 and D7, bank stabilization with a revegetated buffer, in accordance with the NRMP, is installed along the Soledad Village site. Finally, as indicated in Response D7, migration across a fully graded site and heavily utilized roadway to open space to the south is highly unlikely.
- D9. The Commentor believes that if the City does not want the Porta Bella project (located to the south of the project site) connected to the Santa Clara River then the City should provide a maximum buffer on the project site. Refer to Responses D1 and D7. The comment expresses only the opinions of the Commentor with respect to the merits of the project, and does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- D10. The Commentor contends that the Draft EIR is inadequate because the document does not clearly define the width of the buffer to the Santa Clara River or what uses would occur within the buffer. Refer to Response D1. Furthermore, a revegetated buffer presently exists along the Soledad Village site. The Soledad Village project proposes no encroachment into this buffer.
- D11. The Commentor states that the description used in the Draft EIR to discuss development setbacks is insufficient to conclude that there would be no significant impacts to biological resources, including wildlife movement areas or corridors. *CEQA Guidelines* Section 15126.2 specifically states that:

An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

As directed by the *CEQA Guidelines*, the Draft EIR analyzes the impacts of the proposed residential project to the existing physical conditions. As previously discussed, the site is currently graded and bank stabilization improvements were previously constructed. The Draft EIR assessed the impacts based on this existing condition.



- D12. The Commentor states that conclusions must be supported with scientific evidence discussing the typical buffer widths needed to maintain the ecological function of the river. Refer to Responses D1, D5, and D7.
- D13. The Commentor states that the Final EIR must describe the dimensions of the setback distance and the uses in this “adequate buffer” and range of widths of the buffer between development and the river channel/habitat. Refer to Responses D1 and D10.
- D14. The Commentor requests that the Final EIR define to what extent fuel modification extends into the river habitat. The Initial Study prepared for the proposed project determined that fire safety was not a potential environmental impact because “no new or substantially increased impact would occur with respect to fire service....” This would include potential fuel modification zones. As indicated in previous responses, a buffer exists between the Soledad Village project and the Santa Clara River. This buffer has been revegetated in conformance with the NRMP and would not be part of any fuel modification zone. The Santa Clara River trail (existing), which includes fencing and landscaped areas, would be sufficient to accommodate fuel modification requirements, to be located between future structures and the existing buffer.
- D15. The Commentor states that the Draft EIR is inadequate, as it does not describe how much undisturbed open space will be protected as a result of the project. The Commentor further provides various citations of “open space” as discussed in the Draft EIR. As previously discussed, the project site is completely graded and there is no undisturbed open space. The open space discussion and the reference to the “open space plan” refers to private recreational and landscaped areas for use by future residents of the project site.
- D16. The Commentor indicated that they believed that the discussion of lighting impacts and mitigation measures are inadequate and questioned the need for lighting protection to the river corridor and habitat. Page 9.2 of the Draft EIR states:

All street, residential and parking lot lighting would be downcast luminaries or direction lighting with light patterns directed away from the Santa Clara River. Additionally, Covenants, Codes and Restrictions (C,C, & R's) would require the exterior lighting within the residential areas to be low voltage.

Additionally, in designing the project, the City and the applicant moved parking areas and streets (areas typically containing more lighting) away from the Santa Clara River corridor, buffering these areas from the Santa Clara River corridor with structures, landscaping and the existing, unlit, Santa Clara River trail.

- D17. City staff has confirmed that the Assessor Parcel Numbers for the project site include APNs 2849-027-001, -002, -003, -004, and 2849-001-029.



- D18. The Commentor notes that Riversidian alluvial fan sage scrub may be contained within some of the river habitat and within the area proposed for development. As discussed in Responses D1 and D7, buried bank stabilization has been installed on the project site. No encroachment into the Santa Clara River or the adjacent buffer is proposed by the Soledad Village project. Additionally, the developable portion of the project site is presently in a fully graded condition. Therefore, the developable portion of the project site does not contain any Riversidian alluvial fan sage scrub.
- D19. The Commentor states that the Draft EIR provides an inadequate range of alternatives, the description of the alternatives are deficient, and the conclusions are unsupported. According to *CEQA Guidelines* Section 15126.6(a):

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternative. An EIR need not consider every conceivable alternative to a project...there is no ironclad rule governing the nature and scope of the alternatives to be discussed other than the rule of reason.

In compliance with *CEQA Guidelines* §15126.6, the Draft EIR has considered a reasonable range of alternatives, which are capable of avoiding or substantially lessening any significant effects of the project. Specifically, Section 6.0, Alternatives to the Proposed Project, includes analysis of four alternatives including; the No Project/No Development Alternative, the Reduced Density Alternative, the Existing General Plan Alternative, and the Work/Live Alternative. These alternatives were considered and reviewed because of their ability to avoid or substantially lessen the following significant impacts associated with the proposed project:

- ♦ Long-Term Cumulative Traffic Impacts;
- ♦ Short-Term Air Quality Construction Impacts (ROC, NO_x, and PM₁₀ emissions);
- ♦ Long-Term Air Quality Operational Impacts (ROC emissions);
- ♦ Long-Term Stationary Source Noise Impacts (Saugus Speedway);
- ♦ Short-Term (Construction) Solid Waste Impacts;
- ♦ Long-term (Operational) Solid Waste Impacts; and
- ♦ Cumulative Impacts Solid Waste Impacts.

CEQA Guidelines Section 15126.6(d) describes how the alternatives are to be evaluated.

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the



proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison.

In compliance with *CEQA Guidelines* Section 15126.6(d), Section 6.0 of the Draft EIR contained sufficient description of the alternatives in order to compare their ability to avoid or substantially lessen the significant impacts associated with the proposed project. In addition, the analysis is summarized in Table 6-2, Comparison of Alternatives, of the Draft EIR, which illustrates that the No Project No Development Alternative, the Reduced Density Alternative, and the Work/Live Alternative would reduce all of the significant impacts associated with the proposed project.

The Commentor notes that the description of the Reduced Density Alternative does not identify where and how many additional acres of open space would be protected under this alternative. As described on page 6-5 of the Draft EIR, the Reduced Density Alternative would develop the same amount of acres with residential and commercial uses, but the density of residential development would be reduced. Therefore, the discussion regarding additional open space, contained on page 6-6 of the Draft EIR, is in regards to aesthetic impacts, which would be reduced due to the lower density. This alternative would result in increased landscaped areas but not undeveloped open space.

The Commentor notes that the Draft EIR concludes that this alternative “may not be economically feasible” with no study to support the conclusion. The City respectfully disagrees with this comment as the Draft EIR indicates that the Reduced Density Alternative would only partially meet the project objectives identified in Section 3.3, Project Objectives, of the Draft EIR.

- D20. The Commentor notes that the same problems exist with the Work/Live Alternative in regards to the lack of identification of the additional open space area. There would be no increase in undeveloped open areas; rather this alternative would include increased landscaped areas.
- D21. The Commentor recommends that the Final EIR include an alternative that addresses the potentially significant impacts to the river wildlife corridor and to the north-south wildlife movement across Soledad Canyon Road to the Porta Bella project area. As discussed in Responses D1, D7, and D9, the proposed project would not result in significant impacts to the river wildlife corridor or to an extremely unlikely north-south wildlife movement across Soledad Canyon Road, through a Metrolink station, across railroad tracks, and through existing commercial/business park uses to the Porta Bella project area. Therefore, an alternative is not required for mitigating those biological impacts, in compliance with *CEQA Guidelines* Section 15126.6(a).
- D22. The Commentor requests that the western tip of the project site not be developed and that a 200-foot wide wildlife corridor should be provided since the project site is a chokepoint connecting to open space habitat to the south. Refer to Responses D1, D7, D9, and D21.



- D23. The Commentor suggests that a fee title dedication should be required of the open space on-site. As indicated above, there will be no undeveloped open space included within the project. The open areas would contain private recreational facilities and landscaped areas, which would be owned by the project's Homeowners Association. The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- D24. The Commentor requests that all fuel modification zones have a conservation easement placed over them to prevent future encroachment. Refer to Response D14.
- D25. The Commentor requests that a long-term management funding program be required. The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- D26. The Commentor notes that the homeowners' association may not preserve and adequately manage the open space areas. Refer to Response D23. The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.



SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY

RECEIVED
PLANNING DIVISION

DEC 06 2005

December 5, 2005

CITY OF SANTA CLARITA

Mr. Jason Mikaelian, Associate Planner
City of Santa Clarita
23920 Valencia Blvd., Suite 302
Santa Clarita, CA 91355

Member Agencies:
Los Angeles County
Metropolitan Transportation
Authority.
Orange County
Transportation Authority.
Riverside County
Transportation Commission.
San Bernardino
Associated Governments.
Ventura County
Transportation Commission.
Ex Officio Members:
Southern California
Association of Governments.
San Diego Association
of Governments.
State of California.

Subject: Southern California Regional Rail Authority (SCRRA) Comments on the Soledad
Village Draft Environmental Impact Report (DEIR) - SCH No. 2005041100

Dear Mr. Mikaelian:

The SCRRA was directly notified of the comment period and appreciated receiving a copy of the material to review. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system, known as Metrolink, on member agency-owned and on private freight railroad rights of way. Additionally, SCRRA provides a range of rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA member agencies are the Los Angeles County Metropolitan Transportation Authority (Metro) – previously referred to as LACMTA, Orange County Transportation Authority (OCTA), San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

This proposed development would be on the north side of Soledad Canyon Road at Gladding Way, just northeast of the Santa Clarita Metrolink Station. Based on the proximity of the commuter rail station to the proposed development, the following recommendations are being conveyed by SCRRA:

1. The proposed development is less than one-quarter mile northeast of the Metrolink station at 22122 Soledad Canyon Road. Our agency believes that a well-planned transit oriented development will take full advantage of the proximity of the Santa Clarita Metrolink Station, resulting in improved mobility for area residents, offer an environmentally friendly commuting option and create a thriving neighborhood. The Santa Clarita Metrolink Station is currently served by 24 weekday trains and 8 trains on Saturday as well as several Santa Clarita Transit routes. Nationwide consumer trends indicate a growing interest in housing within a half-mile of access to passenger rail. SCRRA supports smart growth principles allowing increased rail use, including convenient, direct pedestrian and bicycle access for station area residents. Please ensure that the most convenient access possible between the Metrolink station and the proposed development is achieved through strategically placed egress points and pedestrian paseos

E1

E2

to allow for fast and direct routes to and from the station for new residents and by providing a safe crosswalk across and sidewalk along Soledad Canyon Road. **E2**

2. Thank you for e-mailing SCRRA staff an aerial photo with key landmarks labeled, for better perspective during review of the DEIR. The Final EIR should contain a better map of the proposed development in relation to the nearby roads, intersections, railroad right of way and Metrolink station. **E3**

3. In order to mitigate any increase in traffic congestion that this project may cause to the nearby existing at-grade railroad crossings, construction of this project should not begin until the currently under construction grade separation of Golden Valley Parkway over the railroad corridor is completed and open to traffic. **E4**

If you have any questions regarding these comments please contact Deadra Knox, Strategic Development Planner, at (213) 452-0359 or by e-mail at knoxd@scrta.net.

Sincerely,


David Solow
Chief Executive Officer

cc: Patricia Chen, Metro
Susan Chapman, Metro
Freddy Cheung, UPRR
Rosa Munoz, CPUC
SCRRA Central Files



E. RESPONSES TO COMMENTS FROM DAVID SOLOW, CHIEF EXECUTIVE OFFICER, SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY – METROLINK; DATED DECEMBER 5, 2005.

- E1. The Commentor notes that the project site is located ¼ mile northeast of the Metrolink station. The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- E2. The Commentor requests that the project provide convenient access to the Metrolink station. The proposed project would include development of a pedestrian bridge linking the Santa Clara River trail to the Metrolink Commuter Rail station. The pedestrian bridge would be located immediately west of the project site and would span across Soledad Canyon Road.
- E3. The Commentor acknowledges receipt of an aerial photograph for their review of the Draft EIR and requests that the same photograph be included in the Final EIR. Refer to Exhibit A (Aerial Map) of this document.
- E4. The Commentor notes that construction of the project should not begin until the grade separation of Golden Valley Parkway over the railroad corridor is completed and open to traffic. In January 2006, the grade separation of Golden Valley Road over the railroad and Soledad Canyon Road was completed, as well as the connector street linking Soledad Canyon Road to Golden Valley Road. Therefore, vehicles would be able to travel from Soledad Canyon Road in either direction and travel southbound on Golden Valley Road to connect to Sierra Highway and SR-14.



Source: City of Santa Clarita.

NOT TO SCALE



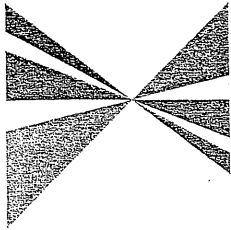
02/06 • JN 10-104142

LETTER F

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PLANNING DIVISION

DEC 15 2005

SOUTHERN CALIFORNIA



ASSOCIATION OF
GOVERNMENTS

December 13, 2005

CITY OF SANTA CLARITA

Mr. Jason C. Mikaelian, AICP
Associate Planner
City of Santa Clarita
23920 Valencia Blvd., Suite 302
Santa Clarita, CA 91355

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818 West Seventh Street
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f (213) 236-1825
www.scag.ca.gov

RE: **SCAG Clearinghouse No. I 20050725 Master Case 05-444 (Soledad Village)**

Dear Mr. Makaeiiian:

Thank you for submitting the **Master Case 05-444 (Soledad Village)** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Master Case 05-444 (Soledad Village)**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **November 1-30, 2005 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1851. Thank you.

Sincerely,

BRIAN WALLACE
Associate Regional Planner
Intergovernmental Review

Officers: President: Toni Young, Port Hueneme •
First Vice President: Yvonne Burke, Los Angeles County •
Second Vice President: Gary Ovitt, San Bernardino County •
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Christine Barnes, La Palma • John Beaman, Brea • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Marilyn Poe, Los Alamitos • Tod Ridgeway, Newport Beach

Riverside County: Jeff Stone, Riverside County •
Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

Ventura County: Judy Mikels, Ventura County •
Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

Doc #115655

F1

F2





F. RESPONSES TO COMMENTS FROM BRIAN WALLACE, ASSOCIATE REGIONAL PLANNER – INTERGOVERNMENTAL REVIEW, SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS; DATED DECEMBER 13, 2005.

- F1. The Commentor reviewed the Draft EIR and determined that it was not a regionally significant project per Southern California Association of Governments (SCAG) Intergovernmental Review (IGR) Criteria and *CEQA Guidelines* (§15206). The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.
- F2. The Commentor notes that a description of the project was published in SCAG's November 1-30, 2005 Intergovernmental Review Clearinghouse Report for public review and comment. The comment does not raise any issue with respect to the contents of the Draft EIR, or any environmental issue regarding the proposed project. However, this comment is acknowledged and will be forwarded to the decision-makers for their consideration. Because the Commentor does not specifically comment on the Draft EIR or raise any other CEQA issue, no further response is necessary.

LETTER G

From: "Jason Mikaelian" <JMIKAELIAN@santa-clarita.com>
To: "Lindsay Anderson" <LANDERSON@rbf.com>
Date: 1/24/2006 2:59:32 PM
Subject: FW: Soledad Village EIR

Forward of email comment from the SCV Historical Society.

-----Original Message-----

From: Leon Worden [mailto:lworden@the-signal.com]
Sent: Thursday, November 10, 2005 12:18 PM
To: Jason Mikaelian
Cc: Lisa Hardy; Paul Brotzman; Donna Yocum; Ostrom, Sue; carol rock; pat@scvhistory.com; Lauffer, Marlee
Subject: Soledad Village EIR

Mr. Jason C. Mikaelian, Associate Planner City of Santa Clarita 23920 W. Valencia Blvd. #302 Santa Clarita CA 91355

Leon Worden
 SCV Historical Society
 c/o The Signal
 24000 Creekside Road
 Santa Clarita CA 91355

November 10, 2005

Re: Master Case 05-444 (Soledad Village) Environmental Impact Report

Dear Mr. Mikaelian:

Please accept this as a response to the EIR for Soledad Village, a proposed 437-home development adjacent to the applicant's Riverpark project.

I guess I'm sorry I did not respond on behalf of the SCV Historical Society to the Initial Study on this project. (I don't remember seeing it, but that's not your problem.) I have two fundamental concerns:

(1) The absence of a Cultural-Paleontological section to the EIR.

If I'm reading it right, the Initial Study identified adverse changes to known historical and archaeological resources in the project area, including, inter alia, the destruction of paleontological resource(s) and the disturbance of human remains. These impacts were determined to be "not significant," and therefore, the determination was made that no further analysis was warranted.

This makes no sense. The potential disturbance of human remains is, in and of itself, a "significant" impact and warrants further analysis and a mitigation plan.

Even if I'm not reading it right, the ACTUAL DISCOVERY of prehistoric



G1

burial site(s) on or near the adjacent Riverpark property warrants a meticulous cultural-paleontological analysis of the Soledad Village site in a thorough and complete Cultural-Paleontological section of the EIR.

G1

(2) The omission of the San Fernando Band of Mission Indians (SFBMI) from the distribution list for project documents.

As the city and the applicant are aware, members of the SFBMI have been determined to be the "most likely descendants" of prehistoric inhabitants of this region. Perhaps the city has consulted with the SFBMI on this project; I wouldn't know, but the documentation does not suggest that it has.

G2

I note your inclusion of the Gabrieleno/Tongva Tribal Council in the distribution list; however, I am familiar with this group in name only, and do not know it to be active in the Santa Clarita Valley. While I am NOT advocating its removal from the list, it does not seem that its inclusion would satisfy the legal requirement of consulting with representatives of the "most likely descendants." The "correct" group is the SFBMI -- the group that the city and the applicant have accepted as the correct Native American group to deal with on the adjacent Riverpark project.

Thank you for your attention to these concerns.

Best wishes,
LEON WORDEN

cc:
Paul Brotzman
Lisa Hardy
Dennis Ostrom, Planning Commission
Marlee Lauffer, Newhall Land
Donna Yocum, SFBMI
Carol Rock, SCVHS
Pat Saletore, SCVHS

CC: "Glenn Adamick" <gadamick@newhall.com>



G. RESPONSES TO COMMENTS FROM LEON WORDEN, SANTA CLARITA VALLEY HISTORICAL SOCIETY; DATED NOVEMBER 10, 2005.

- G1. The Commentor questions why the Draft EIR did not include a cultural-paleontological section given the discovery of prehistoric burial sites on or near the adjacent Riverpark property. The Riverpark and Soledad Village project areas have received a number of archeological evaluations. The first Phase I survey of the area was conducted by Nelson Leonard in 1968, who recorded the village site of CA-LAN-351 on the Riverpark site. This was followed by surveys in 1986, 1990, and 1991, by Louis Tartaglia, Ph.D.; by Greenwood and Associates in 1991; and by W&S Consultants in 1994. No extant archaeological sites were found within the Soledad project area proper. The project site was subsequently graded and covered with fill after the 1994 study. W&S Consultants re-surveyed the Riverpark site in 2001, which confirmed the previous study results. The Soledad project site was not included during the 2001 Riverpark survey because it was a separate application, had already been surveyed (no extant archeological sites), and had since been graded.
- G2. The Commentor notes the omission of the San Bernardino Band of Mission Indians (SFBMI) from the distribution list. The City will add this group to its formal distribution list to ensure that they receive notice on future development applications. It should be noted that three tribal groups participated in the recent fieldwork on CA-LAN-3043, located on the Riverpark site. They included the Native American Heritage Commission, designated the Most Likely Descendant group, the Fernandeno-Tataviam Band of Mission Indian, the California Indian Council, and the Tejon Tribe.



13.5 ERRATA FOR FINAL EIR

The Final EIR will be a revised document that incorporates all of the changes made to the Draft EIR following the public review period. Added or modified text is double underlined (example) while deleted text is struck out (~~example~~).

Mitigation Measure N8 on pages 2-14 and 5.6-17 of the Draft EIR will be revised as follows in the Final EIR.

- N8 Windows with STC-30 or higher shall be required for ~~bedrooms~~ the upper floor windows of the dwelling units located adjacent to Soledad Canyon Road west of Gladding Way ~~where no retaining walls are proposed between residential structures and the Soledad Canyon Road right-of-way.~~

Mitigation Measure N9 on pages 2-14 and 5.6-17 of the Draft EIR will be revised as follows in the Final EIR.

- N9 Windows with STC-32 or higher shall be required for ~~bedrooms~~ the upper floor windows of dwelling units adjacent to Soledad Canyon Road east of Gladding Way.

NOTE: Since preparation of the Draft EIR for the project, the Castaic Lake Water Agency (CLWA), as required by the California Urban Water Management Planning Act (Act), prepared and adopted the *2005 Urban Water Management Plan (2005 UWMP, November 2005)*. As indicated in the *2005 UWMP*, an adequate supply of water is available for all anticipated land uses in the Santa Clarita Valley from 2005 through 2030, the 25-year period covered by the *2005 UWMP*. This assessment includes the water needed to serve the proposed project and all other known proposed cumulative development in the Santa Clarita Valley. Based on the available information, the conclusions presented in the Draft EIR is unchanged – an adequate supply of water is available to serve the proposed Soledad Village project along with all other cumulative development in the Santa Clarita Valley. Therefore, impacts to water resources remain less than significant.

A memorandum, which analyzes project impacts based upon the *2005 UWMP*, is included as Appendix A to this document. The Final EIR will include the revised analysis based upon the *2005 UWMP*, which will also be incorporated in Appendix H of the Final EIR.