

3.0 COMMENT LETTERS AND RESPONSES

1. COMMENTS RECEIVED ON THE DRAFT VISTA CANYON EIR

State Agencies

- A1 Native American Heritage Commission, October 28, 2010
- A2 Santa Monica Mountains Conservancy, November 8, 2010
- A3 California Department of Public Health, December 2, 2010
- A4 California Regional Water Quality Control Board, Los Angeles Region, December 2, 2010
- A5 California Department of Fish and Game, December 6, 2010
- A6 California Public Utilities Commission, December 1, 2010
- A7 California Office of Planning and Research, December 3, 2010

Public Agencies

- B1 County Sanitation Districts of Los Angeles County, December 2, 2010
- B2 County of Los Angeles Fire Department, November 10, 2010
- B3 County of Los Angeles Department of Public Works, November 17, 2010
- B4 South Coast Air Quality Management District, December 3, 2010
- B5 County of Los Angeles Chief Executive Office, December 3, 2010
- B6 Metrolink, January 19, 2010***

General Public

- C1 WRA Engineering, Inc., October 18, 2010
- C2 WRA Engineering, Inc., Undated
- C3 Carolyn Ingram Seitz & Associates, October 19, 2010
- C4 Carolyn Ingram Seitz & Associates, October 19, 2010
- C5 Sierra Club, November 1, 2010
- C6 Carolyn Ingram Seitz & Associates, November 1, 2010
- C7 Friends of the Santa Clara River, November 9, 2010
- C8 Carmen and Robert Mooney, December 1, 2010
- C9 Kerry M PWR Tabak, December 2, 2010
- C10 Mike Naoum, December 2, 2010
- C11 Suzanne Silva, December 2, 2010
- C12 Robert and Carmen Mooney, December 3, 2010
- C13 Diane Trautman, December 3, 2010
- C14 Richard & Carolyn McCool, December 3, 2010
- C15 Penny Upton, December 3, 2010
- C16 Penny Upton, December 3, 2010
- C17 Liz Smith, December 22, 2010
- C18 Crystal Springs Homeowner's Association, December 31, 2010
- C19 Fair Oaks Ranch Community, January 3, 2011
- C20 Santa Clarita Organization for Planning and the Environment, January 24, 2010***

*** Responses to letters received not included in this transmittal due to lateness of submittal. Responses will be included for City Council review.**

Public Hearings

- D1 Comments Made at the Planning Commission Meeting on October 19, 2010
- D2 Comments Received at the November 2, 2010 Planning Commission Hearing
- D3 Comments Received at the December 21, 2010 Planning Commission Hearing

NATIVE AMERICAN HERITAGE COMMISSION

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e-mail: ds_nahc@pacbell.net



RECEIVED
PLANNING DIVISION

NOV 02 2010

CITY OF SANTA CLARITA

October 28, 2010

Mr. Jeff Hogan

City of Santa Clarita

23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Re: SCH#2008041020 CEQA Notice of Completion: draft Environmental Impact Report and General/Specific Plan amendments, for the Vista Canyon (185-acres) Project and Ancillary Annexation Areas (of 3,065-acres); located on unincorporated land adjacent to the City of Santa Clarita; Los Angeles County, California

Dear Mr. Hogan:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

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The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and several Native American Cultural Resources were not identified within one-half mile of the Area of Potential Effect (APE). It is important to do early consultation with Native American tribes in your area as the best way to avoid unanticipated discoveries once a project is underway and to learn of any sensitive cultural areas. Enclosed are the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.

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Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for

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information on recorded archaeological data. This information is available at the OHP Office in Sacramento (916) 445-7000.

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Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq.*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

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Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

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The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

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CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

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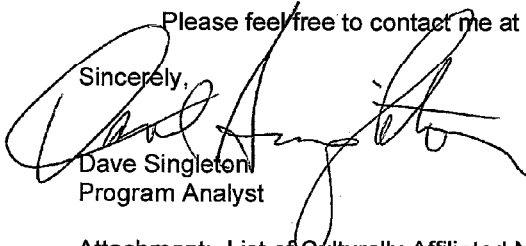
2.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

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Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Culturally Affiliated Native American Contacts

Cc: State Clearinghouse

Native American Contacts
Los Angeles County
October 28, 2010

Charles Cooke
32835 Santiago Road
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(661) 733-1812 - cell
suscol@intox.net

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Fernandeno Tataviam Band of Mission Indians
William Gonzales, Cultural/Environ Depart/Rudy Ortega
601 South Brand Boulevard, Suite 102
San Fernando CA 91340
rortega@tataviam-nsn.us
(818) 837-0794 Office
(818) 837-0796 Fax

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th Street, Rm.
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Chumash
Fernandeno
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Kitanemuk

Chumash
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Tataviam

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
310-570-6567

Kitanemuk & Yowlumne Tejon Indians
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Covina, CA 91722
(626) 339-6785

Yowlumne
Kitanemuk

San Fernando Band of Mission Indians
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(805) 905-1675 - cell

Chumash
Fernandefio
Tataviam
Shoshone Paiute
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2007071039; CEQA notice of Completion; draft Environmental Impact Report (DEIR); General and Specific Plan Amendments for the 185-acre Vista Canyon Project and the 3,065-acres of Ancillary areas to annex to the City of Santa Clarita; Los Angeles County, California.

**LETTER NO. A1. LETTER FROM NATIVE AMERICAN HERITAGE COMMISSION,
OCTOBER 28, 2010**

Response 1

The comment provides factual background information regarding the Native American Heritage Commission's role as a "trustee agency" under the California Environmental Quality Act (CEQA) (see Cal. Code Regs., tit. 14, section 15386) and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment restates information contained in the Draft EIR, provides background information regarding the assessment of impacts to historical and archaeological resources under CEQA, and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comments states that the Native American Heritage Commission performed a Sacred Lands File search for the project site and did not find any Native American cultural resources within one-half mile of the project site. This finding is consistent with W&S Consultants' Phase I and II cultural resource surveys and test excavation reports (September 2008 and March 2009), copies of which are found in Appendix 4.15 of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment states that early consultation with Native American tribes is the best way to avoid unanticipated discoveries of cultural resources. Evidence of early consultation can be found in Appendix 4.18 of the Draft EIR, which includes a signed Memorandum of Agreement (MOA) between the project applicant and the Fernandeno Tatavium Band of Mission Indians. The MOA, among other things, requires that tribal monitors be retained during grading and development of identified portions of the proposed project site. The tribe also will provide principal tribal consultation and monitoring. Finally, the Tribe will also provide special expertise related to Native American heritage and interest and act as the

primary liaison to the Native American community. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment recommends that a Native American monitor or culturally knowledgeable person be employed during the environmental planning processes. Please see **Response 4**, above, with respect to employment of a Native American monitor from the Tatavium Tribe. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment suggests contact with the California Historic Resources Information System of the Office of Historic Research for information on recorded archaeological data. While the City acknowledges and appreciates the recommendation, searches for archaeological data were performed for the Phase I cultural resource study (September 2008) in accordance with state-approved protocol for the preparation of said reports. An archival records search of the study area also was completed by the California State University, Fullerton, Archaeological Information Center. The records search results indicated that the study area has no known sites. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment states that consultation with Native American Tribes and interested Native American individuals should be conducted in compliance with the requirements of various federal regulatory requirements. The referenced consultation requirements apply in the event that a federal agency is funding or permitting a project. The approvals and entitlements sought in this EIR are within the jurisdiction of the City, and not a federal agency. Should federal agency entitlement be required at a later date, all applicable federal consultation requirements would be adhered to. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment provides background information regarding the definition of “environmental justice” in Government Code section 65040.12(e) and does not appear to raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment suggests that lead agencies consider avoiding significant cultural resources that could be affected by a project. In accordance with this direction, the proposed project is designed to avoid and preserve the on-site Mitchell Family cemetery. (See, e.g., Draft EIR, p. 1.0-8.)

The comment also recommends that the EIR discuss the requirements of Public Resources Code section 5097.98 and Health & Safety Code section 7050.5. In response, section 5097.98 is addressed in Mitigation Measure 4.18-4. (See Draft EIR, p. 4.18-23.) Section 7050.5 for the most part echoes and requires compliance with section 5097.98. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment provides factual and legal background information only regarding the confidentiality of records for historic properties of religious and cultural significance, and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 11

The comment outlines the requirements of the *State CEQA Guidelines* relating to Native American consultation and acknowledges agreements with Native Americans to ensure the appropriate treatment of Native American human remains. As indicated above in **Response 4**, the applicant has entered into an agreement with the Fernandeno Tatavium Band of Mission Indians for consultation and monitoring activities. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment cites mandated procedures to be followed in the event of accidental discovery of human remains in any location other than a dedicated cemetery. The Draft EIR includes a mitigation measure that addresses these requirements see Mitigation Measure 4.18-4. (Draft EIR, p. 4.18-23.) If human remains are found, all procedures from Health and Safety Code section 7750.5, Public Resources Code section 5097.9 and *State CEQA Guidelines* section 15064.5(d) will be followed. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

SANTA MONICA MOUNTAINS CONSERVANCY

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November 8, 2010

RECEIVED
PLANNING DIVISION

NOV 19 2010

Jeff Hogan, AICP, Senior Planner
Department of Community Development
23920 Valencia Boulevard, 140
Santa Clarita, California 91355

CITY OF SANTA CLARITA

Comments on Vista Canyon Draft Environmental Impact Report
Master Case No. 07-127, Tentative Tract Map 69164
SCH No. 2007071039

Dear Mr. Hogan:

The Santa Monica Mountains Conservancy's objective with these comments is to shape the proposed project, located in and along the Santa Clara River, to increase the acreage of protected river flood plain, to maintain small pockets of quality upland habitat, and to maintain a functional large mammal habitat linkage between the river and San Gabriel Mountain foothill habitat located to the south.

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The Conservancy submitted NOP comments and pre-Draft Environmental Impact Report (DEIR) comments dated April 27, 2009 and November 23, 2009, respectively. Both those letters are hereby incorporated by reference. Those prior letters contain key points and background that are not repeated in this letter for the sake of brevity.

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Statewide Significance of Santa Clara River and its Adjacent Habitat

The rarest and most ecologically significant land in both the City of Santa Clarita and its sphere of influence is the Santa Clara River and its flood plain terraces. The river and its flood plain terraces are irreplaceable. Together the active river channel and flood plain terrace system, with intermittent upland habitat areas, comprises a resource of State-wide significance.

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Ninety percent of the proposed project is within the boundary of the long-delayed new Los Angeles County Significant Ecological Area (SEA) boundaries (Santa Clara River) for the General Plan Update.

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From a regional planning perspective, the only land uses that must occur on the subject property are the construction of a Metrolink station platform and associated tracks and the

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extension of Lost Canyon Road and Jakes Way to the Vista Canyon Road bridge over the Santa Clara River. Any other commercial or residential land use can be located in numerous other portions of the City or its Sphere of Influence. Nonetheless, the proposed project, and most of the Draft Environmental Impact Report (DEIR) alternatives, leave minimal upland habitat pockets, zero flood plain buffer, and no functional north-south habitat linkage between the river and foothills. To be permanently functional, a crossing is required under the existing and future Metrolink tracks.

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The Conservancy's hope is that the City will require a project that provides all of these missing project design elements. In addition we urge the City to require a design that does not completely surround the proposed oak tree preserve, spade foot toad preserve, and lily preserve with development as with the proposed project.

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Significant Biological Impacts Unavoidable Without Avoidance or Offsite Acquisition

We must challenge the DEIR conclusion that the proposed project, and all of the project alternatives, would not result in unavoidable significant adverse ecological impacts. How can a project that permanently eliminates 117 total acres of open space, 35 acres of indisputable braided river meander area, a unique hill system chocked with sensitive lilies, and imports over 500,000 cubic yards earth in order to elevate the whole project out of mapped flood plain not result in a significant biological impact to the over all habitat capacity of the subject narrow Santa Clara River ecosystem? The potential loss of groundwater recharge surface area could in and of itself be a significant impact.

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The DEIR mitigation strategy is completely based on attempting to enhance the habitat value of the remaining post-construction active river channel which would be hemmed in by buried bank stabilization and be bordered by development and paved recreational pathways. Essentially that strategy first shrinks the available open land by 117 acres and calls for the creation of dozens of acres of multiple habitat types in the now constricted active river channel that is 100 percent Army Corps jurisdiction. The DEIR fails to address the potential 50 year hydrological stability of these restored habitat types. This attempt to concentrate habitat types into a severely reduced onsite area does not constitute adequate mitigation for habitat lost. The context of the habitat is not natural. The indirect impacts of frequent human and domestic animal presence directly adjacent to much of the restored habitat further erodes its ecological value. In no way can ecologically sprucing up the remaining, unbuildable active channel area mitigate for the direct loss of 117 acres and the indirect ecological impact of a major new development being located along 4100 feet of remaining river channel.

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The DEIR mitigation for a host of ecological impacts shall remain inadequate unless significant and related offsite habitat protection is added to the equation, or a significant amount of additional habitat is permanently avoided onsite. We make this assertion about the proposed project and every DEIR alternative. Without requiring such additional mitigation or habitat avoidance, the City would be establishing a baseline that other projects could eliminate equal amounts of habitat of Statewide significance and it would not constitute a significant impact.

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Rather than try to force a flat-land land use of the proposed scale into a dynamic flood plain with locally unique and scenic hill features, we encourage the City to require a project that both retains some of the site's natural topography and leaves the river system some room to be dynamic and thus ecologically richer. The Conservancy's letters to date have explicitly laid out how to achieve these objectives without sacrificing any traffic circulation or major project components. The only way to achieve these objectives is to: 1) pull the development back approximately 250 feet on average from the Army Corps jurisdictional boundary, 2) eliminate all development (except the river trail and interpretation facilities - not including any buildings other than a small public office and a restroom) on the hill system between the river and State Route 14, and 3) leave a broad habitat linkage between the river and land south of the Metrolink tracks with substantial (minimum 50-foot-wide and 12-foot-tall) under-crossing beneath all existing and future tracks.

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The DEIR will remain deficient without a project alternative that provides for some guaranteed form of permanent habitat connectivity to the San Gabriel Mountains foothills and additional protection of upland and flood plain habitat on the order of 40-50 acres. We urge the City to require such an alternative in the Final EIR. By definition EIR alternatives must be feasible.

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Offsite Acquisition for Habitat and Wildlife Corridor Mitigation

Approximately one mile upstream from the proposed project boundary there also is good habitat connectivity between the river and the foothill systems to the south. However, sloughing off a project's habitat connectivity contribution responsibility to other unknown private land interests does not mitigate a potential impact. For one, that set of landowner(s) could fence their land and otherwise create significant wildlife barriers. Secondly, and most immutably, a high speed rail line will require substantial 8-foot-tall fencing.

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To address this issue, it is critical that the City and County be proactive in requiring sufficient wildlife under-crossings wherever possible. The hurdles of getting under-crossings upstream from the project site, without a large development already unearthing the whole

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affected area, are potentially insurmountable. Thus with high speed rail in the equation, the task of maintaining habitat connectivity between the river and adjacent upland habitat will be a difficult challenge both on the subject site and other locations. The seemingly simple solution, in the case of this project, of just preserving a couple of upstream parcels between the river and the National Forest boundary is not that simple. Assuring connectivity for large animal movement under the tracks must be factored into the equation.

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That assurance could take the form of acquiring parcels that comprise a river to National Forest connection with superior conditions that would allow for a future, cost effective railroad track under or over-crossing. To provide those conditions, for a sufficient width, land on both sides of the tracks must be sufficiently low enough or high enough. Given the planning time frame for the high speed rail project, this agency is willing to support taking the risk of requiring an adequate offsite habitat connection in lieu of an onsite connection as described in this letter and in the DEIR. That Conservancy support is completely contingent on the land acquisition being located downstream of the Lang Station Road at-grade river crossing (not substantially impacted by gravel mining) and upstream of the proposed project.

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The offsite acquisition mitigation measure must require the fee simple or conservation easement land acquisition of a topographically suitable land connection from the National Forest to any Army Corps jurisdictional area within the Santa Clara River. Said permanent habitat linkage must have no portion less than 250 feet in width and be recorded by a public agency prior to the issuance of any grading or grubbing permits for the subject project. An analysis of parcel data shows this objective is possible but that the combinations of parcels are not numerous.

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As suggested earlier in this letter, permanent offsite habitat protection is the only way to reduce the biological impacts of both the proposed project, and all the project alternatives, to a less than significant level other than substantially reducing the projects' disturbance footprints. Two mitigation objectives can be achieved with the same parcels by acquiring floodplain and upland that also has important habitat connectivity value.

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Commercial Development on City-owned Open Space and Public Resource Code Section 33207(b)

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We respectfully question why the City is proposing to allow the applicant to do mass grading and commercial development on City-owned parkland in a visually prominent, historically and ecologically valuable area? The Conservancy supports a trail along the river edge in the least ecologically damaging location but opposes the development of this valuable City-owned

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open space for principally commercial development with a minor public interpretation component. The subject area is located within the Conservancy's jurisdiction and appears to be subject to Public Resource Code Section 33207(b). This code section gives the Conservancy first right of refusal of all public lands proposed for disposal. We respectfully request that the Final EIR address the relevancy of Section 33207(b) to the project feasibility and that the City offer the subject lands to the Conservancy pursuant to this section if applicable.

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The only compatible land uses on the subject knoll and plateau (Mitchell Hill) are open space with passive recreation and interpretation facilities. If the portion of the project on the south side of the river is constructed as proposed, this knoll and plateau would represent the only intact upland habitat remaining on the 185-acre property.

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Suggested Combination of Alternative Components for a Biological Avoidance Alternative

No single DEIR alternative includes: 1) a reduction in project footprint in the obvious braided river flood plain, 2) a habitat connection the foothills system on the south side of the railroad tracks, and 3) no commercial development on Mitchell Hill. (There is also no site specific discussion in the DEIR alternative section about avoiding some of the new proposed County Significant Ecological Area.)

We urge the City to require a fully analyzed Final EIR alternative that includes all three of these components. The first component incorporated should be moving the bank stabilization on the south side of the River Corridor back south by at least an average of 100 feet as presented in Alternative 4 - Reduced Development Footprint. Secondly that alternative would include the approximately 10-acre park site green space on the eastern project edge as presented in Alternative 5 - Open Space Corridor Alternative. As stated in the Alternative 5 description, this green space would function as a permanent north-south wildlife corridor. The description of the proposed alternative for the FEIR must state that the park area will remain as unfenced green space in perpetuity. How declaring this park area as a wildlife corridor is premature unless the FEIR includes specific details about which area would have human access facilities and which parts would be restricted to native plants.

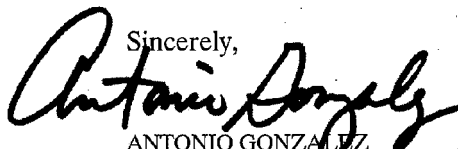
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We concur with including the Alternative 5 component that bisects the proposed park with a gated, paved permanent emergency access road to connect the proposed project to the terminus of Lost Canyon Road.

Diminished Ground Water Recharge Area

Both the proposed project and all of the DEIR development alternatives will eliminate scores of porous 100-year flood plain surface acres. Those acres will be covered with upland soils and compacted to an impermeable 90 percent level of compaction. The groundwater infiltration capacity of the site will be greatly diminished for this reason and because of scores of acres of paving. The combination of existing municipal wells pumping groundwater directly out of the proposed project open space, and this loss of infiltration capacity, paint a poor picture for groundwater quality and quantity within the proposed project area. The FEIR should address if the proposed project and its DEIR development alternatives are designed to be water neutral developments. We encourage the City to require that the onsite treated waste water be required to be at least partially filtered via the reverse osmosis process to ensure that no treated water returned to the aquifer does not meet chloride or other water quality requirements.

Please address any questions and all future documentation to Paul Edelman of our staff at the above letterhead address and by phone at (310) 589-3200 ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson

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**LETTER NO. A2. SANTA MONICA MOUNTAINS CONSERVANCY,
NOVEMBER 8, 2010**

Response 1

This comment is an introduction to comments that follow. It also sets forth the Santa Monica Mountains Conservancy's objectives in submitting the comments, which are acknowledged and included in the record and made available to the decision makers prior to a final decision on the proposed project. No further response is required.

Response 2

The comment refers to prior comment letters, dated April 27 and November 23, 2009, from the Conservancy, and incorporates those letters by reference. The City considered both letters in conjunction with preparation of the Draft EIR for the proposed project. The Conservancy's November 23, 2009 letter is found in Appendix I of the Draft EIR. The April 27, 2009 letter was inadvertently not included in Appendix I of the Draft EIR; however, it has been added to **Appendix F1** of the Final EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment provides factual background information regarding the Santa Clara River including its active river channel, floodplain, and intermittent upland habitat areas, but does not raise an environmental issue concerning the adequacy of the Draft EIR within the meaning of CEQA. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment states that 90 percent of the project site is located within the County's proposed SEA boundary of the draft General Plan Update. While the comment is noted, the consistency of a project with a draft plan, such as the draft One Valley One Vision plan (i.e., the County's draft General Plan Update), need not be evaluated because such a plan is not legally applicable to the proposed project. (See, e.g., *Chaparral Greens v. City of Chula Vista* [1996] 50 Cal.App. 4th 1134, 1145, fn. 2; see also Cal. Code Regs., tit. 14, section 15125, subd. (d) [requiring EIRs to discuss any inconsistencies between a proposed project and applicable plans].) Additionally, although the project site currently is located within the unincorporated territory of Los Angeles County, the project contemplates annexation to the City of Santa Clarita. Therefore, the Draft EIR correctly utilized the City's existing SEA boundary to guide the analysis

provided in Section 4.20, Santa Clara River Corridor Analysis. (See, e.g., *Sierra Club v. City of Orange* (2008) 163 Cal.App. 4th 523, 543-544 [finding that an EIR was not required to conduct traffic analysis pursuant to county standards because project proposed annexation into city; therefore, city standards were applicable].) Nonetheless, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment states that, from a “regional planning perspective, the only land uses that must occur on the subject property are the construction of a Metrolink station platform and associated tracks and the extension of Los Canyon Road and Jakes Way to the Vista Canyon Road bridge over the Santa Clara River.” The comment further states that the other proposed residential and non-residential land uses can be located elsewhere in the City or its Sphere of Influence.

The comment does not raise an issue that appears to relate to any physical effect of the proposed project on the environment. Instead, the comment focuses on whether it constitutes wise policy to allow the proposed development at the proposed location. Suffice it to say that the infill nature of the proposed project, coupled with its introduction of additional employment, recreational, and retail opportunities to the eastern side of the Santa Clarita Valley is considered a regional benefit of the proposed project.

Also, as discussed in the Draft EIR, Section 6.0, Project Alternatives, alternative sites of generally the same size within or directly adjacent to the City in the eastern Santa Clarita Valley “do not exist, are presently being utilized for other purposes, or are the subject of other development proposals.” (Draft EIR, p. 6.0-54.) Further, potential alternative sites that provide access to similar infrastructure and alternative transit are located beyond existing urbanized areas and may be growth inducing. (*Ibid.*) In addition, as required by CEQA, the Draft EIR, Section 6.0, Project Alternatives, evaluated six on-site alternatives, which were selected in response to identified significant impacts of the proposed project, the basic project objectives, and other information obtained during the City's EIR scoping process. The alternatives included a “No Project” alternative and four “build” alternatives (Alternatives 2-6), all of which provided a reasonable range of development alternatives to ensure informed decision making. Based on the analysis presented in the Draft EIR, including the alternatives assessment, and because no data, documentation, or other information was provided to support the comment (see Pub. Resources Code, section 21153, subd. (c)), no further response can be provided or is required. Nonetheless, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment states that the proposed project, and most of the alternatives, “leave minimal upland habitat pockets, zero flood plain buffer, and no functional north-south habitat linkage.”

As to the adequacy of the “habitat pockets,” the Draft EIR, Section 4.6, Biological Resources, analyzed potential impacts to habitat/vegetation communities and found as follows:

- **Coast Live Oak Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (Draft EIR, p. 4.6-67.)
- **Cottonwood Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*)
- **Big Sagebrush Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-67 to -68.)
- **California Sagebrush - California Buckwheat Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-68.)
- **Chamise Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Elderberry Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Riparian Scrub:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-68 to -69.)
- **Mixed Native And Non-Native Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-69.)
- **Mulefat Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Alkali Rye Series:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-69 to -70.)
- **Saltgrass:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-70.)
- **Alluvial Scrub:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*)
- **Non-Native Annual Grassland-Ruderal Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Yerba Santa Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-71.)

In summary then, there is no evidence that the proposed project would significantly and unavoidably impact sensitive biological resources through the removal of “upland habitat pockets.”

As to the adequacy of a “floodplain buffer,” impacts to the Santa Clara River's hydrology were analyzed in the Draft EIR, Section 4.2, Flood, and determined to be less than significant with adoption of the recommended mitigation measures. As to a buffer, the project site would be raised and elevated so that the developed elevation would be above the FEMA 100-year elevation. (Draft EIR, p. 4.2-55.) Buried soil cement bank stabilization would be constructed on the north and south margins of the River Corridor to prevent erosion and contain floodwaters during a Capital Flood discharge. (*Ibid.*) There is no evidence that the buffer provided by the bank stabilization and elevated development pad would not be adequate, particularly due to existing project site conditions.

As evaluated in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, p. 4.20-22, the reach of the Santa Clara River that traverses through the project site is dry except after periods of heavy rainfall, generally occurring in the winter months; as a result, the section of the River within the project site is not suitable habitat for the unarmored threespine stickleback (stickleback) or other aquatic or semi-aquatic species. (See also, Draft EIR, Appendix 4.6 [Biological Assessment, 2008, Ex. L, p. 1].) The active River channel varies; however, based on modeling, the width of flow in the active River channel varies “between 20 and 60 feet, which generally corresponds to a 2-year storm event. The modeling also shows several braids with flows during a 2-year storm event. For purposes of this analysis, the Santa Clara River channel, or active channel, is defined as this 20- to 60-foot-wide braided channel.” (Draft EIR, Section 4.20, p. 4.20-22.)

In addition, in the post-project condition, the reach of the Santa Clara River within the project site would retain an average width of approximately 775 feet, which would represent a much wider width when compared to areas immediately upstream and downstream of the project site. (For reference, please see **Appendix F2** in the Final EIR.) This post-project condition would constitute an adequate buffer or setback from the active River channel through the project site.

There also is no evidence presented that a further “buffer” or setback is needed in this segment of the Santa Clara River. As shown in the Draft EIR, Section 2.0, Environmental Setting, p. 2.0-4, the project site is disturbed by existing and historical land uses. Figures 2.0-1 through 2.0-7 of the Draft EIR depict the existing disturbed condition of the project site. In addition, Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR, p. 4.20-24, states that “[r]ecent activities including dumping, off-road vehicle activity, and utility construction/maintenance, have significantly disturbed remaining vegetation communities on site and have resulted in a complex mix of native and non-native vegetation types or

disturbed land.”¹ Figure 4.20-4 and Figures 4.20-5a through 4.20-5f of the Draft EIR provide representative photographs of the disturbed areas within the project reach of the Santa Clara River. Based on existing site conditions, the post-project width of the River reach through the project (approximately 775 feet), and the relatively dry conditions of the river reach through the project site during average and dry years, there is no need for a further buffer or setback from the relatively sparse native and non-native vegetation situated within the project reach of the Santa Clara River.

Finally, as to the requested north/south habitat linkage, in a December 21, 2010 Staff Report, City staff recommended that the proposed project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. At the December 21, 2010 public hearing, the Planning Commission directed that this modification be made to the proposed project. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres, and allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. More specifically, the modified Oak Park would provide a minimum animal corridor width of approximately 400 feet, which is consistent with the 300 to 400 feet width previously reported in the Draft EIR. (Draft EIR, p. 4.6-75.) As discussed in Forde Biological Consultants' *Species Movement: Vista Canyon Ranch, Los Angeles County, California* (Species Movement Report; July 27, 2009), a copy of which is included in Appendix 4.6 of the Draft EIR, a north/south corridor width of approximately 300-400 feet could accommodate movement of the species expected to traverse the project site. (See Appendix 4.6, Species Movement Report, p. 9; see also Draft EIR, p. 4.6-21 [discussing the range of opinions regarding specific corridor widths that are required to facilitate wildlife movement].) It also should be noted that this proposed project modification is one of the design changes included in Alternative 5 (Open Space Corridor) of the Draft EIR. In addition, City staff recommended this project modification include a condition of approval requiring the applicant to retain a qualified biologist to prepare an animal movement/corridor plan, which would include corridor design, specifications for an undercrossing under Lost Canyon Road, and plant materials for the corridor. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment expresses support for a project that provides upland habitat pockets, a floodplain buffer, and a north/south animal movement corridor. The comment also encourages the City to require a project design that does not completely surround the proposed oak tree preserve and, spadefoot toad and lily

¹ See also Draft EIR, Appendix 4.6, *California Rapid Assessment Methodology Report, Vista Canyon Ranch Property* (CRAM Report), Dudek (February 2009), for additional site photographs of the representative conditions within selected areas of the project site.

preserves with development. Please see **Response 6**, above, which confirms that the proposed project does not significantly impact sensitive habitat, floodplain buffers, or north/south animal movement. As for the location of the referenced preserves, they are illustrated in Figure 1.0-32, Mitigation Areas, of the Draft EIR. As discussed in the *Slender Mariposa Lily Mitigation and Monitoring Plan for the Vista Canyon Project* (Lily Plan; June 2009) and *Western Spadefoot Toad Habitat Enhancement and Monitoring Plan* (Toad Plan; June 2009), copies of which are included in Appendix 4.6 of the Draft EIR, the proposed preserve locations are expected to be successful and contain adaptive management provisions to ensure success. (See, e.g., Appendix 4.6 (Lily Plan), p. 2; *id.* (Toad Plan), p. 3.) Additionally, as discussed in the Draft EIR, Section 4.6, Biological Resources, the proposed 2-acre oak tree preserve would contribute to the successful mitigation of oak impacts. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment questions the Draft EIR's conclusion that the proposed project and all of the project alternatives would not significantly impact biological resources. No data, documentation, or other information is provided with the comment to support the comment challenging the Draft EIR's findings and conclusions (see Pub. Resources Code, section 21153, subd. (c)). This issue also was studied at length in the Draft EIR, Section 4.6, Biological Resources, and Section 4.20, Santa Clara River Corridor **Analysis**. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. Suffice it to say, however, that the analysis provided was based on a thorough literature and database review, the results of numerous biological assessments specifically prepared for the proposed project, and extensive field surveys undertaken by qualified biologists. (Draft EIR, pp. 4.6-1 to -5, and 4.20-2 to -4.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment states that the potential loss of groundwater recharge surface area could be significant. No data, documentation, or other information is provided with the comment to support the statement (see Pub. Resources Code, section 21153, subd. (c)). However, this issue, specifically the proposed project's impacts on groundwater recharge, was assessed in the Draft EIR, Section 4.8, Water Service. The project's groundwater recharge impacts were considered on pages 4.8-109 through -110. That analysis provided:

The supplying of water to the project also would not interfere substantially with groundwater recharge, because the best available evidence shows that no adverse impacts to the recharge of the basin have occurred due to the existing or projected use of local groundwater supplies, consistent with the CLWA/purveyor groundwater operating plan for the basin (see Draft EIR **Appendix 4.8** [2005 Basin Yield Report and 2009 Basin

Yield Update]). In addition, based on the memorandum prepared by CH2MHill (*Effect of Urbanization on Aquifer Recharge in the Santa Clarita Valley*, February 22, 2004; Draft EIR **Appendix 4.8**), no significant project-specific or cumulative impacts would occur to the groundwater basin with respect to aquifer recharge. This is because urbanization in the Santa Clarita Valley has been accompanied by long-term stability in pumping and groundwater levels, and the addition of imported SWP water to the valley, which together have not reduced recharge to groundwater, nor depleted the amount of groundwater in storage within the local groundwater basin. This finding is supported by the *2009 Basin Yield Update*, which modeled infiltration from irrigation (from urban and agricultural lands), precipitation, and streamflows (stormwater and WRP discharges).

(Draft EIR, p. 4.8-109.) The Draft EIR also determined that the following three factors would serve to counter the typical impact of urbanization on groundwater recharge: (1) the post-project increase in clear-flow stormwater runoff volume to the Santa Clara River, whose porous nature allows for significant infiltration; (2) the post-project increase in the area of irrigated landscaping; and, (3) the inclusion of percolation ponds associated with the Vista Canyon Water Reclamation Plant (WRP). (*Ibid.*) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment states the Draft EIR's mitigation strategy is based on the enhancement of habitat value in a post-development condition. The comment characterizes the EIR's mitigation strategy as reducing "the available open land by 117 acres" and calling for the "creation of dozens of acres of multiple habitat types" in a "constructed active river channel" that is within the U.S. Army Corps of Engineers' jurisdiction.

As stated in the Draft EIR:

Based on the overall analysis, the project proposes to restore and enhance existing jurisdictional areas on site. Specifically, the riparian vegetation communities proposed to be restored and enhanced are alluvial scrub and riparian scrub in temporary impact areas within the active river channel, and Great Basin sage scrub on the channel banks of the River Corridor. In addition, the functions and values of the riparian vegetation communities to be restored and enhanced are the same as those vegetation communities that would be impacted by the proposed project. Those functions and values to be established include suitable breeding, foraging, and nesting habitat for avian, aquatic, and terrestrial animal species. Also, the areas would function to promote nutrient cycling, nutrient and compound uptake, organic carbon export, and to be hydraulically compatible with the surrounding stream system. Further, the areas would function to maintain the use of the Santa Clara River as a major east-west open space/wildlife movement corridor.

(Draft EIR, p. 4.20-50.) Also, the basis for the comment's statement that the proposed project would eliminate 117 acres of open land is not correct. As illustrated in the Draft EIR, Table 1.0-2, Vista Canyon Statistical Summary by Planning Area, the total project site is 185.3 acres. Of that total, 74.5 acres would comprise the River Corridor, thereby leaving a balance of 110.8 acres of residential, mixed use, and other (e.g., WRP; streets; community garden, park, open space) uses. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment states that the Draft EIR “fails to address the potential 50 year hydrological stability” of the restored and enhanced habitat types. First, it is not clear from the comment what is meant by the “potential 50 year hydrological stability” of restored habitat types within the project site. However, the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, p. 4.20-53, summarized findings from a technical report relative to the fluvial characteristics and long-term stability of the reach of the Santa Clara River through the project site. Based on that analysis, the EIR concluded that there was no apparent change in trend between the pre- and post-project condition to the fluvial mechanics of the river reach within the project site; and, thus, there would be no significant pattern or trend related to the aggradation or degradation in the River Corridor. Specifically, the Draft EIR, p. 4.20-53-54, stated:

In addition to the above, this EIR evaluated potential impacts due to bank hardening resulting from the buried bank stabilization component of the proposed project (see this EIR, **Section 4.2, Flood** and **Appendix 4.2** [*PACE Flood Technical Report, 2009*]). Specifically, the fluvial analysis conducted as part of the PACE Flood Technical Report, 2009, has provided an evaluation of the existing and proposed fluvial characteristics and long-term stability of the reach of the Santa Clara River Corridor between the Sand Canyon Road Bridge over the Santa Clara River and the SR-14 Bridge over the Santa Clara River. This reach includes the project site. The analysis evaluated whether the proposed project features (buried bank stabilization, storm drain outlets, Vista Canyon Road Bridge, etc.) along and within the River Corridor would potentially modify the fluvial mechanics of the River and subsequently impact the biota habitat within the River Corridor through modifications to the riverbed. This analysis concluded that there is no apparent change in trend between the pre- and post-project condition to the fluvial mechanics of this reach of the River Corridor and, consequently, there would be no significant impacts. In summary, the project would not result in a new significant pattern or trend related to aggradation or degradation in the River Corridor that could substantially change or alter the habitat characteristics of the River Corridor.

In addition, the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, p. 4.20-54, summarized other findings in the EIR relative to the River Corridor in its post-project condition relative to the hydrology within the river reach through the project site:

Additionally, as indicated in this EIR, **Section 4.2 (Flood)**, no significant increases in velocity, erosion, or water surface elevation would occur in the River Corridor post-project; and, therefore, within the SEA boundary, the riparian/riverine vegetation communities and any aquatic or semi-aquatic species that may be present during infrequent winter storms would not be significantly impacted.

In summary, the project's proposed development design is considered highly compatible with the sensitive biotic resources present within the existing boundary of the Santa Clara River SEA for the following reasons: (a) the project proposes to set aside appropriate and sufficient undisturbed jurisdictional habitat areas within the existing boundary of the SEA; (b) the project proposes to retain the active river channel portion of the SEA in a largely natural state; (c) a relatively small amount of jurisdictional habitat would be impacted by the project within the SEA, and the impacted acreage areas would be mitigated; (d) the River Corridor would still be sufficiently wide to accommodate the County's Capital Flood and still retain jurisdictional habitat (approximately 775 feet in width); and (e) winter storm runoff would still continue to open its own channels through the riverine vegetation, flowing in a natural manner and preserving the meandering characteristics of the streambed.

The comment also states that frequent human and domestic animal presence will impair the ecological value of the post-project, enhanced, and restored habitat. However, as discussed in Section 4.6, Biological Resources, of the Draft EIR, adoption of Mitigation Measures 4.6-8 through 4.6-12 would reduce potentially significant indirect impacts attributable to increased human and domestic animal presence to a level below significant, thereby ensuring the viability of the enhanced and restored habitat. (Draft EIR, pp. 4.6-76 to -77.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment states that the Draft EIR's mitigation framework for impacts to ecological resources "shall remain inadequate unless significant and related off-site habitat protection is added to the equation," or additional, on-site habitat is permanently avoided. No data, documentation, or other information is provided to support the comment (see Pub. Resources Code, section 21153, subd. (c)). Nonetheless, since release of the Draft EIR and in responses to comments, Mitigation Measure 4.20-1 has been revised to provide for compensatory, off-site mitigation (new text is shown in underline):

- 4.20-1** The project applicant shall implement the *Wetlands Plan, 2009*, in order to:
- (a) Satisfy the mitigation requirements of local, state, and federal agencies for wetland and riparian habitat;
 - (b) Create or restore riparian and riverine vegetation communities suitable for nesting, foraging, and breeding by native animal species;
 - (c) Create or restore vegetation communities to be compatible with the fluvial morphology and hydrology of the stream channel corridor;
 - (d) Create or restore vegetation communities to be consistent with adjacent, existing riparian vegetation communities; and
 - (e) Create or restore vegetation communities to be self-sustaining and functional beyond the maintenance and monitoring period.

In implementing the *Wetlands Plan, 2009*, the applicant shall implement the maintenance activities during the specified monitoring, the monitoring plan for the mitigation areas, the reporting requirements, and the contingency measures specified in that plan. The applicant also must satisfy the performance standards and success criteria set forth in that plan. The maintenance and monitoring will be subject to approval of the City's Community Development Department.

In conjunction with implementation of the *Wetlands Plan, 2009*, permanent impacts within the California Department of Fish and Game's jurisdictional delineation limits shall be restored with similar habitat at the rate of 1 acre replaced for 1 acre lost.

This commitment represents a 1:1 ratio for the mitigation of permanent impacts. (See Draft EIR, Table 4.20-4, Jurisdictional Habitats and Impacts.) Because the project site's existing condition is highly disturbed (see, e.g., Draft EIR Figure 4.20-5), off-site compensatory mitigation, if provided, should be set at a 1:1 ratio. As discussed in the Draft EIR, recent activities, including dumping, off-road vehicle activity, and utility construction/maintenance, have significantly disturbed the remaining, on-site vegetation communities and have resulted in a complex mix of native and non-native vegetation types or disturbed land. (*Ibid.*, at p. 4.20-24.) In other words, the existing environmental condition of the site, from which the project's impacts are assessed, is impaired which supports the City's determination that a 1:1 ratio is appropriate for CEQA purposes. Nonetheless, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 13

The comment requests that the proposed project be modified so as to: (1) pull back development by approximately 250 feet from the U.S. Army Corps of Engineers jurisdictional limits; (2) eliminate all development on PA-4 (except for the trails and interpretation facilities); and, (3) provide a north/south

animal movement corridor. While the comment's preferred project is noted, it bears mentioning that the analysis presented in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, concluded that the proposed project's impacts to the River Corridor would be reduced to a level below significant with adoption of the recommended mitigation. Also, **Appendix F2** of the Final EIR, which compares the width of the Santa Clara River throughout the project site with the River width at other locations, illustrates that the average width of the River through the project site is 775 feet. In comparison, the width of the River at three off-site locations (i.e., 460, 570 and 600 feet) was well below the proposed project's 775 feet width. Therefore, the project's proposed development pull-back from the River Corridor is considerably greater in width when compared to existing development immediately upstream and downstream of the project site. In addition, no data, documentation, or other information (see Pub. Resources Code, section 21153, subd. (c)), is presented in the comment indicating that the proposed development footprint needs be pulled back further by approximately 250 feet in order to avoid significant environmental impacts. Please also see **Response 6**, above, for information regarding the modification of the proposed project to incorporate a north/south animal movement corridor. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 14

The comment states that the Draft EIR will “remain deficient” without a project alternative that provides for a guaranteed form of habitat connectivity to the San Gabriel Mountains foothills, and an additional 40-50 acres of protected upland and floodplain habitat. No data, documentation, or information is provided in the comment to support this statement (see Pub. Resources Code, section 21153, subd. (c)). Please see **Response 6**, above, for information regarding the modification of the proposed project to incorporate a north/south animal movement corridor. The Draft EIR also already contains Alternative 4 (Reduced Development Footprint), which is responsive to this comment. Additionally, Alternative 5, the Open Space Corridor Alternative, in the Draft EIR, Section 6.0 provides a comparable north/south animal movement corridor through the eastern portion of the project site. Finally, as discussed in the Draft EIR, Sections 4.6 and 4.20, the proposed project would not significantly impact upland and floodplain habitat. As such, there is no basis to require the provision of 40-50 acres of additional habitat. Nonetheless, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 15

The comment provides factual background information regarding the habitat connectivity located approximately 1 mile upstream from the project site, but does not raise an environmental issue concerning the adequacy of the Draft EIR within the meaning of CEQA. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Because the comment does not raise an environmental issue, no further response is required.

Response 16

The comment requests that the City and County be proactive in requiring sufficient wildlife undercrossings. In the December 21, 2010 Staff Report submitted to the Planning Commission on the proposed project, City staff recommended that, as a condition of project approval, the applicant be required to retain a qualified biologist to prepare an animal movement/corridor plan to address corridor design, specifications for an undercrossing under Lost Canyon Road, and plant materials for the corridor. (See also, Draft EIR, p. 4.6-22 [“An acceptable crossing under Lost Canyon Road should be incorporated into the corridor to provide direct access to the Santa Clara River.”]; see also *id.* at p. 4.20-57.) At the December 21, 2010 public hearing, the Planning Commission directed that this modification to the project be made. This condition of approval is responsive to the comment's request. As it relates to an undercrossing under the Metrolink railroad tracks, the Draft EIR and Species Movement Report, 2009, concluded that the tracks do not pose a barrier to animal movement. This is further supported by the fact that existing animal movement has been documented across the tracks. Therefore, an undercrossing under the railroad tracks is not warranted. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 17

The comment requests assurances that connectivity for large animal movement, in the event that California's High Speed Rail is constructed, will be provided. The comment expresses support for “requiring an adequate off-site habitat connection in lieu of an on-site connection.” First, at the December 21, 2010 public hearing, the Planning Commission directed a north/south animal movement corridor as part of the required project modifications. Second, it bears mentioning that any future High Speed Rail project would be subject to its own environmental review and permitting process in order to ensure that the north/south movement corridor created by this project is not significantly impacted. That analysis would be required to consider wildlife movement corridors and potential implications to habitat connectivity. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 18

The comment suggests numerous specifications to govern the acquisition of off-site mitigation areas. Please see **Response 12**, above, for information responsive to the addition of compensatory, off-site habitat to the project's mitigation schematic. In addition, the applicant would comply with all requirements, if any, of the California Department of Fish and Game and U.S. Army Corps of Engineers regarding the provision of off-site mitigation areas in conjunction with the federal and state permits contemplated for the project should the City certify the EIR and provide local approvals for the proposed project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 19

The comment reiterates the suggestion that the project either provide permanent, off-site habitat protection or reduce the development footprint. Please see **Response 12**, above, for responsive information. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 20

The comment requests information on “why the City is proposing to allow the applicant to do mass grading and commercial development on City-owned parkland in a visually prominent, historically and ecologically valuable area.” To be clear, the land proposed for development and described by the comment as “City-owned parkland” is not currently designed or operating as public parkland. Instead, the site consists of disturbed, vacant land. Also, to the extent the comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project; however, because the comment does not raise an environmental issue, no further response is required. Nonetheless, suffice it to say that infill attributes of the proposed project, coupled with its introduction of additional employment, recreational, and retail opportunities to the eastern side of the Santa Clarita Valley, is considered a regional benefit.

Response 21

The comment expresses support for the development of trails along the edge of the Santa Clara River, but opposes the development of PA-4 with a “principally commercial development with a minor public interpretation component.” The comment is noted, and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the

comment does not raise an environmental issue concerning the content or adequacy of the Draft EIR, no further response is required.

Response 22

The comment states that the City-owned parkland is within the commenter's jurisdiction and appears to be subject to Public Resources Code section 33207, subdivision (b). Therefore, the comment requests that the Final EIR address the applicability of section 33207.

Public Resources Code section 33207, subdivision (b), states:

The conservancy shall have the first right of refusal on any property within the zone presently owned by a public agency and scheduled for disposal as excess lands, except where such lands are designated for acquisition as a park or recreation area by a federal, state, or local agency. The conservancy shall have the right to acquire such lands at the disposing agency's purchase price plus any administrative and management costs incurred by the disposing agency. The disposing agency shall have the right of first refusal to reacquire property which was acquired by the conservancy pursuant to this division at the price paid by the conservancy before any administrative costs incurred by the conservancy when the land is not to be used for the purposes of this division and is to be sold by the Real Estate Services Division of the Department of General Services.

As discussed in the Draft EIR, the project applicant currently owns or controls approximately 142 acres of the 185-acre site. (Draft EIR, p. 1.0-2.) The City owns the remaining 43 acres. (*Ibid.*) The applicant proposes to purchase a discrete portion of the City's property (approximately 12 acres), as noted in the comment, primarily for the installation of buried bank stabilization and roadway improvements. These 12 acres have not been identified by the City as excess/surplus land within the meaning of Public Resources Code section 33207. Moreover, the applicant would dedicate most of this property (approximately 7 of the 12 acres) back to the City. (*Ibid.*) This land swap, of sorts, ultimately would result in 74.5 acres of the River Corridor being under City ownership. (*Ibid.*, at p. 1.0-29.) Additional project features, such as the proposed Oak Park, also would be dedicated to the City. (See, e.g., *id.* at p. 1.0-23.)

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 23

The comment states that the only compatible land uses within PA-4, see Draft EIR Figure 1.0-6d, is open space, with passive recreation and interpretation facilities. The comment further opines that, if the portion of the project site south of the Santa Clara River is developed as proposed, PA-4 would represent "the only intact upland habitat" remaining on the project site.

The comment does not provide any basis for limiting PA-4's land use to open space, with ancillary passive recreation and interpretation facilities. Instead, as noted in **Response 22**, above, the project site currently is designated for business park uses in the City's General Plan. As discussed in **Response 6**, above, the proposed project would not result in significant wildlife habitat impacts. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 24

The comment requests that the Final EIR analyze an alternative that: (1) pushes back the bank stabilization on the south side of the River Corridor by at least an average of 100 feet (as currently provided in Alternative 4); (2) includes an approximately 10-acre park site on the eastern edge to facilitate a north/south animal movement corridor (as currently provided in Alternative 5); and, (3) eliminates development on PA-4.

To preface, as provided by *State CEQA Guidelines* section 15126.6, subdivision (a): "An EIR shall describe a range of reasonable alternatives to the project...which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...An EIR need not consider every conceivable alternative to a project." Here, the Draft EIR, Section 6.0, Project Alternatives, considered a reasonable range of six alternatives, including the CEQA-mandated No Project Alternative.

In addition, as stated above, *State CEQA Guidelines* section 15126.6, subdivision (a) requires lead agencies to study alternatives that "avoid or substantially lessen" a project's significant impacts. Here, the proposed project would result in significant and unavoidable impacts to traffic, air quality, noise, and solid waste. The comment's recommended alternative would not avoid or substantially lessen impacts to any of these environmental categories. Therefore, there is no CEQA requirement to conduct a detailed review of the recommended alternative.

It also bears reiterating that, as discussed in **Response 6**, above, at the December 21, 2010 public hearing, the Planning Commission directed that the proposed project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres and, as requested by the comment, allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. This modification to the proposed project is responsive to the second component of the comment's requested hybrid alternative.

The comment also states that there is no discussion in the Draft EIR, Section 6.0, about the avoidance of the County's proposed SEA boundary in the draft One Valley One Vision plan. Please see **Response 4**, above, for information regarding the inapplicability of draft planning documents and the processing of this project through the City (not the County). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 25

The comment states that the proposed project and the alternatives will “eliminate scores of porous 100-year flood plain surface areas,” thereby “greatly” diminishing the groundwater infiltration capacity of the site. No data or other information is provided to support the comment. First, please see **Response 9**, above, for information responsive to this comment that also supports the finding that the proposed project would not adversely impact groundwater recharge.

The comment also requests that the Final EIR address whether the proposed project and the alternatives are designed to be “water neutral.” As discussed in the Draft EIR, Section 4.8, Water Service: “Based on information presented in this EIR, an adequate supply of water is available to serve the Vista Canyon project, and the project would not create, or contribute to, any significant project-specific or cumulative water supply impacts in the Santa Clarita Valley.” (Draft EIR, p. 4.8-1.) As an adequate water supply is available to serve the proposed project, there is no need for the project to be “water neutral.” Nonetheless, it should be noted that the proposed project would include the use of drought-tolerant and native landscaping to reduce water use. Additionally, the project includes a WRP, which would provide recycled water for on-site use, and result in an excess recycled water supply of 311 acre-feet per year (afy), which ultimately would be made available to other areas in the eastern Santa Clarita Valley as part of CLWA's recycled water system. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 26

The comment encourages the City to require that wastewater treated at the proposed, on-site WRP “be at least partially filtered via the reverse osmosis process” to ensure compliance with all water quality requirements, and specifically chloride requirements.

The proposed WRP's impacts on water quality requirements, including chloride levels, were assessed in the Draft EIR, Section 4.8.1, Water Quality. (See, e.g., Draft EIR, p. 4.8.1-115 to -127 [finding groundwater quality impacts attributable to percolation of excess recycled water at the WRP to be less than significant].) Specific to the WRP's effluent, the Draft EIR determined that, while chloride concentration levels may increase, the predicted concentration would remain below the benchmark water quality

objectives. (*Ibid.*, at p. 4.8.1-120; see also Table 4.8.1-27, Estimated Average Annual Volume and Concentration of Percolated Water [predicted average annual concentration of chloride attributable to the project's recycled water and stormwater is less than the Basin Plan's groundwater quality objective].) The Draft EIR also discussed the use of the Alternative Water Resources Management (AWRM) program as a basis for a future salt/nutrient management plan for the Santa Clara River watershed, and the project's participation in, and fair share implementation cost payment to, the AWRM. (*Ibid.*, at p. 4.8.1-122 to -124.) The Draft EIR concluded that with the project's participation in the AWRM, through annexation of the site into the Santa Clarita Valley Sanitation District, percolation of recycled water and stormwater from the proposed project would not result in a violation of the groundwater quality standards for chloride. (*Ibid.*, at p. 4.8.1-124.)

In summary, there is no evidence that the proposed WRP would result in significant water quality impacts; therefore, it is not necessary to employ a reverse osmosis process, as requested by the comment. Nonetheless, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 27

The comment requests that any questions and all future documentation be directed to Paul Edelman. The comment is noted. No further response is required given that the comment does not address or question the content or adequacy of the Draft EIR.



State of California—Health and Human Services Agency
California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

RECEIVED
DEC 02 2010
STATE CLEARING HOUSE

December 2, 2010

City of Santa Clarita
Attn: Jeff Hogan, AICP
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

RE: City of Santa Clarita – Vista Canyon and Ancillary Annexation Area (Fair Oaks Ranch, Sand Canyon, and Jakes Way) Draft EIR, SCH #2007071039

Dear Mr. Hogan:

Thank you for the opportunity to review the above mentioned document. The California Department of Public Health (CDPH), Division of Drinking Water and Environmental Management is responsible for issuing water supply permits administered under the Safe Drinking Water Program. A project triggers a permit if it includes changes to the water supply, storage, treatment of drinking water, or consolidation of one or more public water systems; this project **will not** require a Water Supply Permit from CDPH.

1

The project entails development of a recreational area and transportation station, construction of a water reclamation plant and bridge crossing over the Santa Clara River; as well, the County of Los Angeles will annex multiple properties to the City of Santa Clarita. CDPH would like to provide comments pertaining to the water reclamation plant.

2

- The plant needs to be permitted by the Los Angeles Regional Water Quality Control Board (Board), and the plant design should be submitted to CDPH for review and comment;
- recommendations from the CDPH review will be incorporated into the Board's permit;
- and the time spent by the CDPH 's staff will be billed by hour to the project proponent.

Please contact Cliff Tien-Tsu Cheng, Associate Sanitary Engineer at the CDPH Angeles District Office, at (818) 551-2023 or email to cliff.cheng@cdph.ca.gov if you have any questions regarding CDPH's role in the proposed project. If you have any questions about this letter, please call me at (916) 449-5285 or email to jefferv.werth@cdph.ca.gov.

3

Sincerely,

Jeffery Werth
CDPH Environmental Review Unit

Cc: CDPH Angeles District Office
State Clearinghouse

Division of Drinking Water and Environmental Management
P.O. Box 997377, MS 7400, 1616 Capitol Avenue, 2nd Floor, Sacramento, CA 95899-7377
(916) 449-5577 (916) 449-5575 Fax
Internet Address: www.cdph.ca.gov

**LETTER NO. A3. LETTER FROM STATE OF CALIFORNIA, DEPARTMENT OF
PUBLIC HEALTH, DATED DECEMBER 2, 2010**

Response 1

The comment provides factual background information only, states that the proposed project will not require a water supply permit from the California Department of Public Health (CDPH), and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment restates information contained in the Draft EIR regarding the project description, and provides the following three observations/requests: (1) the proposed water reclamation plant (WRP) will need to be permitted by the Los Angeles Regional Water Quality Control Board (LARWQCB), with review and comment on the WRP's design from CDPH; (2) a recommendation that CDPH's review be incorporated into the LARWQCB's permit; and, (3) a recommendation that time spent by CDPH staff reviewing the WRP be billed by the hour to the project applicant. This information is consistent with the information provided in the Draft EIR. (See, e.g., Draft EIR, p. 4.21-5 [“Additional permits and approvals for the proposed WRP would need to be issued by the Los Angeles Regional Water Quality Control Board, and the State and County Departments of Public Health.”].) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment, which provides contact information should the City have any questions regarding the letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



California Regional Water Quality Control Board
Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles

Arnold Schwarzenegger
Governor

December 2, 2010

Mr. Jeff Hogan, Senior Planner
City of Santa Clarita/Community Development Department
23920 Valencia Boulevard, Suite 302
Santa Clarita, CA 91355

COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR VISTA CANYON PROJECT
LOCATED IN THE COUNTY OF LOS ANGELES IN THE SOUTHWEST INTERSECTION OF
SAND CANYON ROAD AND STATE ROUTE 14

Dear Mr. Hogan:

On October 26, 2010, the Los Angeles Regional Water Quality Control Board (Regional Board) received a copy of the draft Environmental Impact Report (EIR) for the Vista Canyon Project, which is approximately 185-acre project site, comprised primarily of vacant and undeveloped land.

1

Regional Board staff reviewed section 4.8.1 Water Quality of the draft EIR. The Regional Board staff concurs with the findings in the EIR that the project would generate pollutants of urban residential and commercial areas during construction and even when the project is built out and occupied. The primary pollutants of concern will include total suspended solids, nutrients, trace metals, chloride, pathogen, petroleum hydrocarbons, pesticides, trash and debris, methylene blue activated substances, cyanides, and bioaccumulation. After reviewing the facts presented in the draft EIR, Regional Board staff agrees with the conclusion that the impact to groundwater by the project would be less than significant. However, Regional Board staff believes that the less than significant impact to groundwater by the project would be achieved if the project applicant complies with all the Regional Board's program's requirements.

2

Vista Canyon Project is subject to Waste Discharge Requirements (WDR) and Water Recycling Requirements (WRR) for its wastewater treatment plant. The project applicant must be aware that the State Water Quality Control Board has a Recycled Water Policy. This Regional Board is working on a Salt and Nutrient Management Plan for the Los Angeles Region and we encourage the project applicants to participate in the workshops related to the Salt and Nutrient Management Plan. The project lies in the Upper Santa Clarita Basin and the Regional Board coordinator for that area is Dr. Yanje Chu at (213) 576-6681.

3

The project applicants should also be aware that the WDR and WRR should be submitted at least 120 days before the planned discharge. For information regarding WDR and WRR, please contact Dr. Rebecca Chou, Chief of Groundwater Permitting and Land Disposal Section at (213) 576-6618. For all Stormwater related permits including construction permits, please contact Mr. Ejigu Solomon, Chief of the Stormwater Compliance and Enforcement Unit at (213) 620-2237.

4

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Jeff Hogan
City of Santa Clarita /Community Development Department

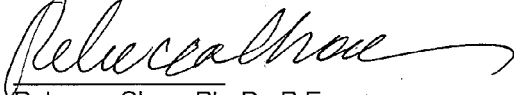
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December 2, 2010

Should you have any questions regarding this letter, please contact Project Manager, Ms. Dionisia Rodriguez at (213) 620-6122 or me at (213) 576-6618.

5

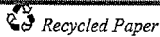
Sincerely,



Rebecca Chou, Ph. D., P.E.
Chief, Groundwater Permitting and Land Disposal Section

Cc: Mr. Dexter Wilson, Dexter Wilson Engineering, Inc.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

LETTER NO. A4. LETTER FROM CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION, DATED DECEMBER 2, 2010

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment restates information contained in the Draft EIR, expresses the concurrence of the Los Angeles Regional Water Quality Control Board (LARWQCB) with various conclusions presented in the Draft EIR, and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment provides factual background information regarding the State Water Quality Control Board's Recycled Water Policy (which is discussed in the Draft EIR on pages 4.8.1-53 to -54), encourages the project applicant to participate in workshops for LARWQCB's developing Salt and Nutrient Management Plan (which is referenced in the Draft EIR on pages 4.8.1-123 to -124), and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment provides background information regarding the Waste Discharge Requirements and Water Recycling Requirements (which also are discussed in Section 4.8.1, Water Quality, of the Draft EIR), and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 5

The comment, which provides contact information should the City have any questions regarding the letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME

ARNOLD SCHWARZENEGGER, Governor
JOHN McCAMMAN, Director



South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
http://www.dfg.ca.gov

December 6, 2010

Mr. Jeff Hogan
City of Santa Clarita
23920 Valencia Blvd. Suite 300
Santa Clarita, CA 91355
Fax #: (661) 286-4007

**Subject: Draft Environmental Impact Report for the Vista Canyon Ranch Project,
SCH 2007071039, Los Angeles County**

Dear Mr. Hogan:

The Department of Fish and Game (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Vista Canyon Ranch Project, Santa Clarita, California. The project site is located in unincorporated Los Angeles County, directly adjacent to the City of Santa Clarita, and in the Santa Clarita Valley Planning area. The project proposes to develop the approximately 185-acre Vista Canyon project site. The land uses proposed include 1,117 dwelling units, and up to 950,000 square feet of commercial and medical office, retail, theater, restaurant, and hotel uses within four Planning Areas. The project also includes approximately 18 acres of parks/recreation facilities, including the Oak Park, Town Green, Community Garden, River Education/Community Center, private recreation facilities, and project trails.

1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under the California Environmental Quality Act (CEQA), Section 15381 over those aspects of the proposed project that come under the purview of Fish and Game Code Section 1600 *et seq.* regarding impacts to streams and lakes.

2

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the City of Santa Clarita to minimize impacts to fish and wildlife resources with a focus on these stressors. Please let Department staff know if you would like a copy of the plan to review.

3

The Department appreciates the thorough biological assessments that were conducted for this project that allow well-planned mitigation measures to be developed. The Department in general concurs with biological mitigation measures 4.6-1 through 4.6-48, including consultation with the Department regarding preparing a Streambed Alteration Agreement with the following recommendations:

4

Conserving California's Wildlife Since 1870

- As discussed in the Species Movement Appendix, the proposed project includes Oak Park, which is to be located near the east side of the project site. The Department recommends that the function of the park include wildlife movement opportunities. Oak Park should be at or near 600 feet in width, and should include appropriate habitat types (oak woodland, coastal sage, and grassland).
- The Department recommends that all sightings of sensitive species related to the biological assessment of this project be entered in to the California Natural Diversity Database.
- The Department recommends that if there is a zero tolerance for rodent burrows on the created river stabilization banks, that an Integrated Pest Management Plan be developed and implemented.
 - Biological Mitigation Measure 4.6-6: The Department recommends that the consulting biologists work with Department staff to determine timing of preconstruction surveys and release locations of species as needed.
 - Biological Mitigation Measure 4.6-13: The Department recommends that only native plants be included in the landscaping plan to conserve water use and facilitate native wildlife use along the edge of the development.
 - Biological Mitigation Measure 4.6-16: The Department recommends including in the measure that lighting adjacent to the river, park and mitigation areas be shielded or shut off after nightfall.
- Western Spadefoot Toad (WST) Conservation Plan:
 1. The Department appreciates the time and effort that has been taken to assess WST in the project area and develop the WST Conservation Plan. The Department recommends that the pond creation should be implemented as soon as possible so salvage efforts can begin and continue over an extended period of time; that salvage techniques and timing should be pro-active and include early mitigation pond creation to relocate any tadpoles or egg masses; and that the use of pitfall trap arrays around all ponded areas after each rainfall event should be used to capture adults for salvage operations.
 2. The Department recommends that our biological staff be included in future WST Conservation Plan revisions.
- Lily Conservation Plan: Slender maniposa lily, *Calochortus clavatus* var. *gracilis*, (Lily) occurs on the site and has a California Rare Plant Rank of 1B.2. A conservation plan has been developed to guide mitigation for impacts to Lily. The Department recommends multiple sites be used for restoration to increase the probability of successful establishment of viable populations and to have the restoration sites protected from future development and place them under a conservation easement or restrictive covenant.
 - The Department recommends that a set back be included in the project to sustain the current and natural functions of the river. Encroachment on the river will require the proposed bank stabilization, which then requires maintenance, repairs, and therefore, more impacts to the river channel. This project is permanently impacting over 17 acres of Department jurisdiction and over 12 acres of temporary impacts. The Department recommends that the project not expand beyond the current banks. The project will also be impacting the floodplain and alluvial sage scrub habitats which are becoming rare in this area and depend on periodic flooding. A soil cement levee is proposed for the project which allows the banks to be backfilled with native material and planted and is a better alternative than rock rip rap, or concrete banks. However, there are several instances, even along the Santa Clara River where soil cement levees have failed. By setting the project back, the bank protection would be more effective and experience less stress from the river flows, and would require less maintenance and repair in the future.

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• The Department is currently working with the project proponent on the conceptual mitigation and monitoring plan for jurisdictional impacts under a Lake and Streambed Alteration Agreement (LSA). These issues will be further addressed during the LSA development. However, the Department would like to address some key issues related to the mitigation component of this conceptual plan.

1. The plan shows the restoration of the temporary impacted areas with the appropriate vegetation types. The river in this area is mostly a dry and dynamic system and does not support extensive vegetation growth, therefore planting extensive vegetation beyond the temporary impact areas is not recommended as it will experience stress from high flows and by looking at reference reaches up and downstream of the project site, the dry, sand substrate, and minimal vegetation growth is considered natural habitat for the river in this area.

2. The project will permanently impact over 17 acres of Department jurisdictional stream areas. Impacts such as these would typically have about 50 acres compensatory mitigation, which should include significant creation and/or restoration components to off-set the permanent loss of streambed habitat. The plan should address these types of mitigation.

3. The plan proposes to off-set permanent impacts by removal of small amounts of existing non-native vegetation within the main channel and removal of a wire revetment fence. These activities are considered enhancement activities and will serve as a partial mitigation requirement from the permanent impacts of the project.

4. The Department recommends that off-site mitigation become a component of the plan and that preservation, restoration, or both occur at an off-site location to off-set the permanent impacts to Department jurisdictional areas. The Department will not accept the proposed plan's proposal of mitigation activities as addressed in Table 2 of the plan, which addresses enhancement and restoration activities only. This table also details that 59.1 acres of habitat within the main and active channel of the river will be "enhanced" in order to off-set permanent impacts. As mentioned, enhancement and restoration opportunities for jurisdictional impacts are limited within the current property boundaries for reasons mentioned above are not suitable mitigation proposals for permanent impact areas.

14

Thank you for this opportunity to provide comments. Please contact Mr. Dan Blankenship, Staff Environmental Scientist, at (661) 259-3750 if you should have any questions and for further coordination on the proposed project.

15

Sincerely,

Helen R. Birss

for

Edmund J. Pert
Regional Manager
South Coast Region

cc: Department of Fish and Game
Helen Birss, Los Alamitos
Terri Dickerson, Laguna Niguel
Betty Courtney, Newhall
Jeff Humble, Ventura

State Clearinghouse, Sacramento

**LETTER NO. A5. CALIFORNIA DEPARTMENT OF FISH AND GAME,
DECEMBER 6, 2010**

Response 1

The comment restates information contained in the Draft EIR, specifically information relating to the project description, and does not raise an environmental issue concerning the adequacy of the Draft EIR within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment is an introduction to comments that follow, and specifies that the subsequent comments have been prepared based on the California Department of Fish and Game's (CDFG) role as a trustee and responsible agency under CEQA. This approach is consistent with information presented in the Draft EIR, Section 1.0, Project Description, which disclosed that CDFG is a Responsible Agency for the proposed project. (Draft EIR, p. 1.0-2.) Similarly, Section 15386, subdivision (a), of the *State CEQA Guidelines* provides that CDFG is a trustee agency "with regard to the fish and wildlife of the state, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department." The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment refers to *California Wildlife: Conservation Challenges – California's Wildlife Action Plan* (Action Plan), prepared by the U.C. David Wildlife Health Center for CDFG in 2007, for background information regarding the stressors affecting wildlife and wildlife habitat in the vicinity of the project site. (This publication, which is incorporated by reference and available for public review and inspection at the two locations identified on page I-8 of the Draft EIR, also is available online at <http://www.dfg.ca.gov/wildlife/wap/report.html>.)

Based on the Action Plan, and as noted in the comment, the project site lies within the South Coast Region and is subject to the following stressors: (i) growth and development; (ii) water management conflicts and degradation of aquatic ecosystems; (iii) invasive species; (iv) altered fire regimes; and, (v) recreational pressures. The impacts of each of these stressors on the environment were evaluated throughout the Draft EIR. For example, water management conflicts were assessed in Section 4.8, Water Services; the potential for degradation of aquatic ecosystems was evaluated in Section 4.20, Santa Clara River Corridor Analysis; the presence of invasive species was considered in Section 4.6, Biological

Resources; wildfire hazards were analyzed in Section 4.13, Fire Services; and, recreational pressures were assessed in Section 4.12, Parks and Recreation. That being said, the City appreciates CDFG's provision of this informational guidance document and looks forward to working with CDFG to plan for and manage wildlife resources within the CDFG's jurisdiction. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment expresses appreciation for the “thorough biological assessments” that were conducted for the proposed project, and general concurrence with Mitigation Measures 4.6-1 through 4.6-48. The comment also serves as an introduction to comments that follow with specific recommendations regarding the project's mitigation strategy. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment recommends that the proposed Oak Park, which is located in PA-3, include wildlife movement opportunities, be at or near 600 feet in width, and include appropriate habitat types (e.g., oak woodland, coastal sage, and grassland).

To preface, in a December 21, 2010 Staff Report, City staff recommended that the proposed project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. At the December 21, 2010 public hearing, the Planning Commission directed that this project modification be made. The elimination of development in this area would increase the size of the Oak Park from 7 to 10 acres and, as requested by the comment, allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. More specifically, the modified Oak Park would provide a minimum animal corridor width of approximately 400 feet; which is consistent with the 300 to 400 feet width previously reported in the Draft EIR. (Draft EIR, p. 4.6-75.) As discussed in Forde Biological Consultants' *Species Movement: Vista Canyon Ranch, Los Angeles County, California* (Species Movement Report; July 27, 2009), a copy of which is included in Appendix 4.6 of the Draft EIR, a corridor width of approximately 300-400 feet could accommodate movement of the species expected to traverse the project site. (See Appendix 4.6, Species Movement Report, p. 9; see also Draft EIR, p. 4.6-21 [discussing the range of opinions regarding specific corridor widths that are required to facilitate wildlife movement].)

With respect to the habitat types proposed for Oak Park, a 2-acre portion of the site would be provided for up to 100 mitigation-related oak trees of the following varieties: evergreen Coast Live Oak (*Quercus agrifolia*) and deciduous Valley Oak (*Quercus lobata*). (Draft EIR, p. 1.0-75.) The Species Movement

Report also recommended that Oak Park include appropriate habitat types, defined in that report to include oak woodland, coastal sage and grassland. (Appendix 4.6, Species Movement Report, p. 10.) In the December 21, 2010 Staff Report, City staff also recommended that, as a condition of project approval, the applicant be required to retain a qualified biologist to prepare an animal movement/corridor plan to address corridor design, specifications for an undercrossing under Lost Canyon Road, and plant materials for the corridor. At the December 21, 2010 public hearing, the Planning Commission directed that this project modification be made. This condition of approval would ensure that appropriate habitat types are provided throughout the north/south animal movement corridor, as requested by the comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment recommends that all sightings of sensitive species related to the biological assessment undertaken for the proposed project be recorded in the California Natural Diversity Database (CNDD).

By way of background, the goal of the CNDD is to provide current information regarding the status and locations of rare plants and animals in California. (For additional information, please see <http://www.dfg.ca.gov/biogeodata/cnddb/>.) The May 2010 update of the CNDD was relied on in the preparation of Section 4.6, Biological Resources, of the Draft EIR. (Draft EIR, p. 4.6-1.) The City appreciates the comment's recommendation and will continue to encourage the retained biologists to submit pertinent information for inclusion in the CNDD. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment recommends that an Integrated Pest Management Plan be developed "if there is a zero tolerance for rodent burrows on the created river stabilization banks." First, the City appreciates CDFG's input; however, in consultation with the project's biologists, it is not considered feasible or practicable to require "zero tolerance for rodent burrows" on the buried bank stabilization areas of the proposed project. However, the City is willing to include the following mitigation measure to the proposed project:

4.6-49 An integrated pest management plan that addresses the use of pesticides (including rodenticides and insecticides) on site within the River Corridor, including buried bank stabilization areas, will be prepared prior to the issuance of building permits for the initial tract map. The plan will implement appropriate Best Management Practices to avoid and minimize adverse effects on the natural environment, including vegetation communities, special-status species, species without special status, and associated habitats, including prey and food resources (*e.g.*, insects, small mammals, seeds). Potential management practices include cultural (*e.g.*, planting pest-free stock plants),

mechanical (e.g., weeding, trapping), and biological controls (e.g., natural predators or competitors of pest species, insect growth regulators, natural pheromones, or biopesticides), and the judicious use of chemical controls, as appropriate (e.g., targeted spraying versus broadcast applications). The plan will establish management thresholds (i.e., not all incidences of a pest require management); prescribe monitoring to determine when management thresholds have been exceeded; and identify the most appropriate and efficient control method that avoids and minimizes risks to natural resources. Preparation of the CC&Rs for each tract map shall include language that prohibits the use of anticoagulant rodenticides in the project site.

Through this mitigation measure, pesticides would be controlled through the integrated pest management plan. Implementation of the plan would allow species to persist after development in the River Corridor, including the buried bank stabilization areas.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment recommends that Mitigation Measure 4.6-6 be revised to require the qualified biologist to coordinate with CDFG staff when assessing the timing of pre-construction surveys and release locations of species, as needed. In response to this comment, Mitigation Measure 4.6-6 has been revised as follows, with additions shown in underline and deletions in ~~strikeout~~:

4.6-6 Sixty~~Thirty~~ days prior to grading activities, a qualified biologist shall contact CDFG and consult with CDFG staff regarding the timing of pre-construction surveys. In any event, no later than 30 days prior to grading activities, a qualified biologist shall conduct a survey within appropriate habitat areas to capture and relocate individual silvery legless lizard, coastal western whiptail, rosy boa, San Diego banded gecko, San Bernardino ringneck snake, coast horned lizard, coast patch-nosed snake, and San Diego black-tailed jackrabbit in order to avoid or minimize take of these sensitive species. Individuals shall be relocated to nearby undisturbed areas with suitable habitat, as identified by the qualified biologist in consultation with CDFG staff. Results of the surveys and relocation efforts shall be provided to the City with a copy to CDFG. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment recommends that Mitigation Measure 4.6-13 be revised to prohibit the use of non-native plants in the landscaping plan in order to conserve water use and facilitate native wildlife use along the edge of the development. In response, please note that Mitigation Measure 4.8-2, included in the Draft

EIR, Section 4.8, Water Service, requires that all landscape concept plans include a palette rich in drought-tolerant and native plants. (See Draft EIR, p. 4.8-125.) As such, the comment's recommendation already would be implemented through Mitigation Measure 4.8-2; therefore, Mitigation Measure 4.6-13 need not be revised.

Relatedly, Figure 1.0-34, Vista Canyon Conceptual Landscape Plan, in the Draft EIR lists the concept plant schedule throughout the project site. The conceptual plan "focuses primarily on the use of native and drought tolerant tree and plant species to create a natural and vibrant environment. All plant species listed, both native and non-native, have been chosen due to their ability to thrive in the Santa Clarita climate and their potential to add complexity and texture to the open space/landscape areas within the Specific Plan. Plants listed that are non-native or drought-tolerant would be used sparingly and only in areas that require their unique properties such as bio-swales, rain gardens, northern building exposures, and commercial high use areas." (Vista Canyon Specific Plan (October 2010), p. 77.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment recommends that Mitigation Measure 4.6-16 be revised to require that lighting adjacent to the Santa Clara River, Oak Park, and designated mitigation areas be shielded or shut off after nightfall. In response to this comment, Mitigation Measure 4.6-16 has been revised as follows, with additions shown in underline:

4.6-16 All bridge, street, residential, and parking lot lighting shall be downcast luminaries or directional lighting with light patterns directed away from the River Corridor. Similarly, all lighting immediately adjacent to the Santa Clara River, Oak Park, and designated mitigation areas for biological resources shall be shielded. CC&Rs shall require that exterior lighting within the residential areas adjacent to the River Corridor be limited to low luminosity and/or shielded.

Please also see Mitigation Measures 4.16-3 and 4.16-4 in the Draft EIR, Section 4.16, Visual Resources, which require that all outdoor lighting along the project site boundary consist of low-intensity downlights *or* be equipped with a screening device, and that all such lighted be projected downwards to minimize light spillover and glare. Mitigation Measure 4.6-16, in combination with Mitigation Measures 4.16-3 and 4.16-4, ensure that sensitive biological resources would not be adversely impacted by the project's light sources. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment addresses Mitigation Measure 4.6-5, which requires implementation of Compliance Biology's *Western Spadefoot Toad Habitat Enhancement and Monitoring Plan* (Toad Plan; June 2009), a copy of which is included in Appendix 4.6 of the Draft EIR. The comment recommends that: (1) pond creation be implemented as soon as possible; (2) salvage techniques and timing be pro-active and include early mitigation pond creation; (3) pitfall trap arrays be used around all ponded areas after each rainfall event; and, (4) CDFG staff be included in any future revisions to the Toad Plan.

As discussed in the Draft EIR, while the western spadefoot toad is not listed under either the federal or state Endangered Species Acts, CDFG considers it a species of special concern. (See, e.g., Draft EIR, p. 4.20-40.) Additionally, while the toad was present in low numbers of the site, the project would significantly impact this species absent mitigation. (*Ibid.*, at p. 4.20-75 to -76.) Accordingly, implementation of the Toad Plan is recommended to reduce impacts to a level below significant. (*Ibid.*, at p. 4.20-76.)

With respect to the comment's requests that pond creation be implemented as soon as possible, Mitigation Measure 4.6-5 requires that the Toad Plan be implemented *prior* to issuance of a grading permit. This ensures that the mitigation is completed in advance of site disturbance and before any development activities. With the plan in place, no further measures are needed, because impacts to the western spadefoot toad would be reduced to less than significant under CEQA.

Finally, in response to the comment's request that CDFG staff be included in any future revisions to the Toad Plan, Mitigation Measure 4.6-5 has been revised as follows, with additions shown in underline:

4.6-5 Prior to issuance of a grading permit, the applicant shall employ a qualified biologist to implement the *Spadefoot Plan, 2009*, with review and oversight provided by the City Planning Department. Any substantive revisions to or deviations from the *Spadefoot Plan, 2009*, shall be provided to CDFG for consideration and input.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment recommends that multiple sites be utilized to assist in the restoration of slender mariposa lily and that such sites be protected from future development through the use of a conservation easement or restrictive covenant.

As noted in the comment, Dudek prepared the *Slender Mariposa Lily Mitigation and Monitoring Plan for the Vista Canyon Project* (Lily Plan; June 2009), a copy of which is located in Appendix 4.6 of the Draft EIR. The Lily Plan outlines implementation guidelines for the salvage, relocation, maintenance, and monitoring of slender mariposa lily, with the ultimate goal of successfully reestablishing the lily at an “appropriate/compatible on-site receptor site, where the plants can successfully exist and can be afforded protection in perpetuity.” (Lily Plan, p. 1.) In summary, the Lily Plan provides as follows:

Implementation of the proposed project will impact a small knoll containing slender mariposa lily. Proposed mitigation for direct impacts to slender mariposa lily will include a combination of bulb and seed salvage. The Mitigation Plan proposes salvage and translocation of bulbs and seed from within the disturbance area (Figure 3) to an appropriate receptor site within the Vista Canyon property where they can be preserved in perpetuity (Figure 4). A compensation ratio of 1:1 is recommended by the California Department of Fish and Game (CDFG).

(*Ibid.*) Although the Lily Plan only identifies one receptor site, whereas the comment requests multiple sites, Dudek expects the relocation effort to be a success in light of the fact that the salvage and receptor sites are in close proximity and contain similar vegetation types and topographic features. (*Ibid.*, at p. 2.) Further, the Lily Plan utilizes an adaptive management approach, “wherein corrective measures will be implemented during the 5-year monitoring period if problems affecting the survival and/or successful establishment of slender mariposa lily are detected.” (*Ibid.*, at p. 12.) However based on this comment, Dudek will investigate the potential of updating the Lily Plan to incorporate mitigation at more than one on-site location. Potential areas could include the mitigation site in the Oak Park or other locations potentially suitable for lily mitigation.

As to the comment's recommendation that the receptor site be protected from future development and placed under a conservation easement or restrictive covenant, the Lily Plan notes that the receptor site “will be protected and situated in designated open space.” (*Ibid.*, at p. 13.) Therefore, it is not necessary to require a conservation easement or restrictive covenant.

In summary, the Lily Plan would reduce potentially significant impacts to the slender mariposa lily to a level below significant, and no revisions to Mitigation Measure 4.6-1 are required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 13

The comment recommends that the project not expand beyond the current banks of the Santa Clara River and that a “setback be included...to sustain the current and natural functions of the river.” In response, the environmental impacts of the project's current proposed configuration were assessed throughout the

Draft EIR. For example, Section 4.20, Santa Clara River Corridor Analysis, presented a detailed assessment of the project's impacts to federally protected wetlands, riparian habitat and other sensitive natural habitat communities, the movement of any native wildlife, and the designated significant ecological area. Based on that analysis, there would be no significant unavoidable impacts to the section of the Santa Clara River Corridor located within the project reach. Second, the project site's existing condition and the sufficiency of the post-project setback from the active River channel are evaluated further in **Response 6**, to the letter from Santa Monica Mountains Conservancy, dated November 8, 2010. Please see this additional evaluation.

Additionally, the Draft EIR, Section 6.0, Project Alternatives, contains the "No Project" alternative and two other alternatives (Alternatives 4 and 5), which would decrease the total development footprint when compared to the proposed project. The decreased development footprint would reduce impacts to sensitive biological resources within the project site. In addition, Alternative 4 (Reduced Development Footprint) would increase the width of the River Corridor, resulting in less impacts to sensitive biological resources when compared to the proposed project (see, in particular, Section 6.0, Project Description, pp. 6.0-29 (Biological Resources analysis) and 6.0-33 (River Corridor analysis). As a result, the Draft EIR has presented the decision makers with an alternative that, if implemented, would set back the buried bank stabilization on the south side of the River Corridor by an average of 100 feet in comparison to the proposed project. The alternative also would lengthen the proposed Vista Canyon Road Bridge from 650 to 800 feet.

The comment does not raise any specific issue regarding the content or adequacy of the Draft EIR's analysis; and, therefore, no more specific response can be provided or is required.

Additionally, it bears noting that the Draft EIR, Section 6.0, Project Alternatives, of the Draft EIR considered an alternative that would relocate the buried bank stabilization on the south side of the River Corridor by an average of 100 feet. While Alternative 4 (the Reduced Development Footprint Alternative) was determined to be environmentally superior to the proposed project, it would not fully achieve all of the project objectives. (See Draft EIR, pp. 6.0-25 to -35.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 14

The comment states that CDFG currently is working with the project applicant to develop a conceptual mitigation and monitoring plan in connection with the applicant's request for a Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code section 1602. Accordingly, the comment presents a discrete series of recommendations regarding the project's *Conceptual Wetlands*

Mitigation & Monitoring Plan: Vista Canyon, Los Angeles County, California (Wetlands Plan; May 2009), implementation of which is required by Mitigation Measure 4.20-1 in the Draft EIR. (For a copy of the Wetlands Plan, please see Appendix 4.6 of the Draft EIR.)

Although the comment notes that the Wetlands Plan “shows the restoration of temporary impacted areas with the appropriate vegetation types,” the comment opines that, because the project would permanently impact over 17 acres of CDFG's jurisdictional stream areas, “[i]mpacts such as these would typically have about 50 acres of compensatory mitigation.” The comment also states that CDFG will not accept the Wetlands Plan's proposed mitigation, which relies on restoration and enhancement activities. The comment states that enhancement and restoration activities are not appropriate mitigation for permanent impacts to jurisdictional areas. Accordingly, the comment requests that the Wetlands Plan address compensatory, off-site mitigation.

To preface, the referenced Wetlands Plan is discussed at length in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis. As discussed in that section, for example:

The *Wetlands Plan, 2009*, has addressed the on-site restoration and enhancement of both Corps and CDFG jurisdictional riparian/riverine vegetation communities as mitigation for project impacts to jurisdictional wetland and riparian habitats. ... Riparian scrub and alluvial scrub are proposed in the channel bottom and Great Basin sage scrub is proposed on the buried bank slopes. ... Mitigation credit for enhancement is usually calculated by determining the amount of enhancement area that will undergo enhancement activities, such as invasive plant removal. For this project, the enhancement area is very sparsely vegetated, and presence of invasive plant species is relatively low. However, the *Wetlands Plan, 2009*, proposes to also enhance the channel by removing the existing old rail and wire revetment structures ...

Restoration and enhancement areas would be riparian and riverine open areas under the jurisdiction of the Corps and CDFG. These mitigation areas would function as riparian vegetation communities, and be part of the dynamic fluvial process of the stream system. There would be no public access to, or use of, the mitigation areas. The DPW may require a flood control maintenance easement in some areas along the buried bank protection to inspect and maintain the public drain system (outlets and bank protection integrity). If required, the limits of the wetland mitigation areas would be established outside of the flood control maintenance easement. In addition, based on the *Wetlands Plan, 2009*, the restoration and enhancement areas are expected to be successful for the following reasons:

The Santa Clara River is subject to high-velocity storm flows during the rainy season and subsurface low flows in the dry season. The plant species to be used in the mitigation areas are native species that already occur on the project site and are adapted to these dynamic conditions. Furthermore, the vegetation communities proposed for restoration are the same as those that already occur on site.

To address the anticipated highly dynamic fluvial conditions associated with the Santa Clara River, the vegetation communities to be restored will be located in hydrologically compatible locations, with sparse riparian scrub designed for areas expected to have high velocity flows, and alluvial scrub designed for areas expected to receive less frequent storm flows. Velocity profiles prepared by PACE Engineering for the Vista Canyon Ranch EIR Flood Technical Report (2009) were reviewed to determine the most appropriate locations for the riparian vegetation communities.

Control of invasive plant species in the habitat enhancement areas is expected to require a long-term commitment, as the invasive species present are tenacious and difficult to control. The enhancement areas will be maintained for the duration of the five-year maintenance and monitoring period so multiple follow-up visits will occur to address recurrence of invasive plant species. The suppression of invasive weeds over the extended maintenance period will allow native vegetation to become better established throughout the area because there will be less competition for water and nutrients. (Dudek Wetlands Plan, 2009, p. 17.)

To ensure that the restoration and enhancement areas within the project site develop as intended and meet the success criteria required by the Corps and CDFG, the 5-year maintenance and monitoring program also would be implemented. The maintenance would include best management, trash removal, and irrigation maintenance. The monitoring would include construction/installation monitoring, plant establishment, performance standards, and success criteria.

The *Wetlands Plan, 2009*, also contains provisions to avoid impacts to existing nesting birds and special status reptiles (e.g., coast horned lizard). Specifically, this plan requires that pre-construction nesting bird surveys be conducted by qualified biologists and that nest sites be flagged/fenced and a buffer zone established. In addition, construction activities would be postponed in the buffer zone around the nest site until the young have fledged. Depending on proposed activities, the monitoring biologists also may establish additional setbacks and exclusionary fencing to ensure that nesting birds are not disturbed. In addition, the plan requires that the qualified biologist relocate any special-status reptiles that may be present in the project work area to areas outside the area of impact. No public access would be provided to the mitigation areas, which would be fenced and posted.

(Draft EIR, p. 4.20-51 to -53.) In response to this comment and in furtherance of the applicant's desire to effectively collaborate with CDFG on this issue, Mitigation Measure 4.20-1 has been revised to provide for compensatory, off-site mitigation at a ratio of 1:1 (new text is shown in underline):

- 4.20-1** The project applicant shall implement the *Wetlands Plan, 2009*, in order to:
- (a) Satisfy the mitigation requirements of local, state, and federal agencies for wetland and riparian habitat;
 - (b) Create or restore riparian and riverine vegetation communities suitable for nesting, foraging, and breeding by native animal species;

- (c) Create or restore vegetation communities to be compatible with the fluvial morphology and hydrology of the stream channel corridor;
- (d) Create or restore vegetation communities to be consistent with adjacent, existing riparian vegetation communities; and
- (e) Create or restore vegetation communities to be self-sustaining and functional beyond the maintenance and monitoring period.

In implementing the *Wetlands Plan, 2009*, the applicant shall implement the maintenance activities during the specified monitoring, the monitoring plan for the mitigation areas, the reporting requirements, and the contingency measures specified in that plan. The applicant also must satisfy the performance standards and success criteria set forth in that plan. The maintenance and monitoring will be subject to approval of the City's Community Development Department.

In conjunction with implementation of the *Wetlands Plan, 2009*, permanent impacts within the California Department of Fish and Game's jurisdictional delineation limits shall be restored with similar habitat at the rate of 1 acre replaced for 1 acre lost.

This commitment represents a 1:1 ratio for the mitigation of permanent impacts. (See Draft EIR, Table 4.20-4, Jurisdictional Habitats and Impacts.) Because the project site's existing condition is highly disturbed (see, e.g., Draft EIR Figure 4.20-5), off-site compensatory mitigation, if provided, should not be set at the suggested 3:1 mitigation ratio. Such mitigation ratio, instead, is better suited for the compensation of pristine, riparian habitat along rivers or riparian tributaries. In contrast, the existing reach of the Santa Clara River within the project boundary is mostly dry and does not support extensive vegetation growth, including riparian habitat. In addition, as discussed in the Draft EIR, recent activities, including dumping, off-road vehicle activity, and utility construction/maintenance, have significantly disturbed the remaining, on-site vegetation communities and have resulted in a complex mix of native and non-native vegetation types or disturbed land. (*Ibid.*, at p. 4.20-24.) These factors justify the City's use of a 1:1 mitigation ratio for CEQA purposes. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 15

The City acknowledges CDFG's input and comments. The comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

PUBLIC UTILITIES COMMISSION

320 West 4th Street, Suite 500
Los Angeles, CA 90013
(213) 576-7077



RECEIVED
PLANNING DIVISION

DEC 06 2010

CITY OF SANTA CLARITA

December 1, 2010

Jeff Hogan, AICP
Planning Department
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Re: SCH# 2007071039; Vista Canyon and Ancillary Annexation Area Draft EIR

Dear Mr. Hogan:

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

1

The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the Draft Environmental Impact Report (DEIR) from the State Clearinghouse for the Vista Canyon and Ancillary Annexation Area (Fair Oaks Ranch, Sand Canyon, and Jakes Way). Review of your DEIR indicates plans to construct a City/Metrolink Transit Center at the southern boundary of the proposed development area.

2

RCES recommends that any development adjacent to or near railroad right-of-way is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

3

Traffic studies should address traffic increase impacts over affected crossings and associated proposed mitigation measures. Specifically, the City should work with the Southern California Regional Rail Authority and RCES Staff when designing the proposed Metrolink Commuter Train Station. Any new proposed crossings will require Commission approval.

4

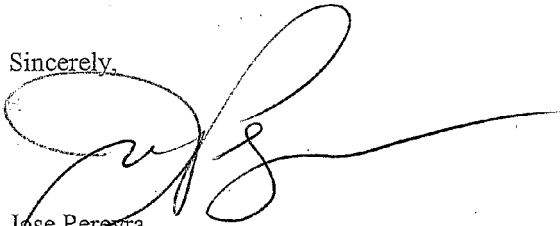
Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way.

5

If you have any questions, please contact me at 213-576-7083 or at jfp@cpuc.ca.gov.

6

Sincerely,



Jose Pereyra
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

**LETTER NO. A6. LETTER FROM CALIFORNIA PUBLIC UTILITIES COMMISSION,
DATED DECEMBER 1, 2010**

Response 1

The comment provides factual background information regarding the Public Utilities Commission's jurisdiction relative to highway-rail crossings and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment restates information contained in the Draft EIR (specifically, the proposal to construct a Metrolink Station) and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment states that the Commission's Rail Crossings Engineering Section (RCES) recommends that any development adjacent to or near rail lines consider safety of the rail corridor. The Vista Canyon project does not propose the development of any highway-rail crossings; therefore, there would be no impacts to railroad right-of-way. Instead, pedestrians would have access to the trains by way of rail access platforms. Rail lines would be fenced to control rail access points. (See also Draft EIR, pp. 1.0-53 to -54.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment indicates that the traffic study should address additional traffic increase impacts over affected crossings. As discussed in Section 1.0, Project Description, of the Vista Canyon Draft EIR:

The Specific Plan's transit component is intended to create a variety of alternatives to the use of automobiles. The project proposes relocation of the Via Princessa Metrolink Station to the Vista Canyon project site as part of this 'Transit Oriented Community.' This would be accomplished by providing the land and partnering with the City and Metrolink on facilities needed for the City/Metrolink transit center, located north of the existing Metrolink rail line along the Specific Plan's southern boundary in PA-2. The transit center would consist of a Metrolink passenger rail station and a City transit station.

The Metrolink station component of the center would include construction of the platforms and accessory station improvements within the Metrolink right-of-way, including: construction of approximately 3,500 feet of a second main line; new turnout and a new signal; construction of approximately 1,000 linear feet of intertrack fencing; and, associated grading. The station will likely be constructed in two phases with the first phase including construction of the north platform, portions of the second main line, and adjacent surface parking. The second phase would include construction of the south platform, the pedestrian overpass and undercrossing and the adjacent parking structure and bus-transfer station.

At buildout, the Specific Plan would include one 4-story, 5-level parking structure, providing 750 parking spaces, which would be utilized for transit users during Metrolink's hours of operation and be part of the shared parking pool for PA-2 during evening and weekend hours. The parking structure also would include restroom facilities and a security/waiting room. Vehicular access to the Metrolink station would be from Vista Canyon Road and the Specific Plan's "Main Street" (Vista Square Drive). In addition, a pedestrian overpass from the third level of the parking structure to the north platform and a pedestrian underpass to the south platform would be constructed.

The City's transit station component of the center would include a bus transfer facility, similar to the station currently operated by the City at McBean Parkway and Valencia Boulevard. The bus transfer facility would consist of seven bus bays arranged around a loop road with covered passenger shelters. Vehicular access to the transit station is the same as the access to the Metrolink station.

(Draft EIR, p. 1.0-53.) While the proposed Metrolink Station would be able to accommodate more riders than the existing Via Princessa station, no vehicles would cross the rails as a part of the project. The Draft EIR also acknowledges that various aspects of the Metrolink Station would require the approval of the Southern California Regional Rail Authority, Metrolink, and Metropolitan Transit Authority. (Draft EIR, p. 1.0-17.) Lastly, Section 4.3, Traffic and Access, takes into consideration traffic associated with the Metrolink Station, indicating that approximately 1,430 automobile trips to/from the Station would occur on a daily basis. (Draft EIR, p. 4.3-39.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment suggests various mitigation measures that would be appropriate for impacts to roadway/rail crossings. However, as discussed in **Response 3**, above, no vehicles would cross the rails at the project site. Furthermore, security fencing would be provided to direct travelers using the rail lines to the appropriate access point. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment, which provides contact information should the City have any questions regarding the letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



Arnold Schwarzenegger
Governor

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



Cathleen Cox
Acting Director

December 3, 2010

RECEIVED
PLANNING DIVISION

DEC 14 2010

CITY OF SANTA CLARITA

Jeff Hogan
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Subject: Vista Canyon and Ancillary Annexation Areas (Fair Oaks Ranch, Sand Canyon, and Jakes Way)
SCH#: 2007071039

Dear Jeff Hogan:

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 2, 2010, 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."

1

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,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007071039
Project Title Vista Canyon and Ancillary Annexation Areas (Fair Oaks Ranch, Sand Canyon, and Jakes Way)
Lead Agency Santa Clarita, City of

Type EIR Draft EIR

Description The project site is mostly undeveloped and located in an unincorporated portion of the County of Los Angeles. A single family residence and outside storage yard presently is located on a portion of the project site. The applicant is requesting approval to amend the City of Santa Clarita Plan, and to pre-zone the project site Specific Plan (SP) and annex approximately 185 acres of land into the City of Santa Clarita (City). The applicant also is requesting approval of a Tentative Tract Map, Conditional Use Permit (CUP), and Oak Tree Permit to allow for the construction of a mixed-use/transit-oriented development consisting of 1,117 residential dwelling units and up to 950,000 square feet of commercial, retail, theater, and hotel uses within four Planning Areas on site. A residential overlay over the corporate office lots would permit the conversion of 250,000 square feet of office floor area to 233 multi-family residential units, resulting in a project mix of 1,350 residential units and 700,000 square feet of commercial floor area.

Lead Agency Contact

Name Jeff Hogan
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
Lat / Long
Cross Streets Southwest of Sand Canyon Road and State Route 14
Parcel No. 2840-005-057, 058; 2840-006-007, 270; 2840-002-270, 271 thru 274, 901; 2840-004-017, 021, 036
Township **Range** **Section** **Base**

Proximity to:

Highways SR-14
Airports
Railways Metrolink
Waterways Santa Clara River
Schools Sulphur Springs ESD, Fair Oaks Ranch ES, Pine Crest
Land Use Vista Canyon: Undeveloped/ Agricultural and Manufacturing (A1/M1)/ Business Park (BP)
 Fair Oaks Ranch: Mostly developed/Residential Estate (RE), Residential Moderate (RM), Business Park (BP), Community Commercial Office (CO)
 Jakes Way: Mostly developed/Residential Moderate (RM) and Business park (BP)
 San Canyon: Mostly developed/Residential Estate (RE) and Business Park (BP)

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

Noté: Blanks in data fields result from insufficient information provided by lead agency.

**Document Details Report
State Clearinghouse Data Base**

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

Date Received 10/19/2010 **Start of Review** 10/19/2010 **End of Review** 12/02/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

**LETTER NO. A7. LETTER FROM CALIFORNIA GOVERNOR'S OFFICE OF
PLANNING AND RESEARCH, DATED DECEMBER 3, 2010**

Response 1

The comment provides factual background information regarding the state agencies that received a copy of the Draft EIR from the State Clearinghouse and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

December 2, 2010

File No: SCV-00.04-00

RECEIVED
PLANNING DIVISION

DEC 06 2010

CITY OF SANTA CLARITA

Mr. Jeff Hogan, AICP, Senior Planner
City of Santa Clarita
Community Development Department
23920 Valencia Boulevard, Suite 302.
Santa Clarita, CA 91355

Dear Mr. Hogan:

The Vista Canyon Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on October 20, 2010. We offer the following comments and revisions on the DEIR:

- 1. Previous comments submitted by the Districts in correspondence dated October 12, 2010 (copy enclosed), still apply to the subject project with the following updated information.
2. The Vista Canyon Project Area and portions of the Ancillary Annexation Area are outside the jurisdictional boundaries of the Districts and will require annexation into the Santa Clarita Valley Sanitation District before sewerage service can be provided to the proposed development. Please refer to item no.1 of the enclosure for more information regarding the annexation process.
3. The expected average wastewater flow from the project site is 395,411 gallons per day.
4. The Santa Clarita Valley Sanitation District (District) has pursued a program of wastewater reclamation and reuse in the Santa Clarita Valley since the first wastewater treatment facility began operation in 1962. The District's two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, provide tertiary treatment that produces recycled water suitable for a wide range of reuse applications, including those mentioned in the DEIR. The local water purveyor, Castaic Lake Water Agency (CLWA), is responsible for providing recycled water to end users via a recycled water distribution system. Recycled water from the Valencia WRP or Saugus WRP could be used to meet the project's non-potable water demands if the recycled water distribution system were expanded into the vicinity of the Vista Canyon Ranch project.

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Doc #: 1752065.1

Recycled Paper

Mr. Jeff Hogan

-2-

December 2, 2010

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

5

Very truly yours,

Stephen R. Maguin



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

c: D. Zondervan

Doc #: 1752065.1



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

October 12, 2010

File No: SCV-00.00-00

RECEIVED
PLANNING DIVISION

OCT 14 2010

CITY OF SANTA CLARITA

Mr. Jeff Hogan, AICP, Senior Planner
Department of Community Development
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Dear Mr. Hogan:

Vista Canyon and Ancillary Annexation Areas
(Fair Oaks Ranch, Sand Canyon, and Jakes Way), Master Case No. 07-127

This is in reply to your notice, which was received by the County Sanitation Districts of Los Angeles County (Districts) on September 16, 2010. The proposed development is located within the jurisdictional boundaries of the Santa Clarita Valley Sanitation District. We offer the following comments regarding sewerage service:

1. The Vista Canyon Project Area and portions of the Ancillary Annexation Area are outside the jurisdictional boundaries of the Districts and will require annexation into the Santa Clarita Valley Sanitation District before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fees sheets, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Kitt at extension 2708.
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to either or both the Districts' Soledad Canyon Trunk Sewer, Sections 1, 2, 3, and 4, located in a right-of-way north of the Santa Clara River and approximately 500 feet east of the terminus Highway Avenue, or the Soledad Canyon Trunk Sewer, Section 5, located in Soledad Canyon Road at Lost Canyon Road. The 15-inch to 18-inch diameter Soledad Canyon Trunk Sewer, Sections 1, 2, 3, and 4 Trunk Sewer has a design capacity of 3.3 million gallons per day (mgd) and conveyed a peak flow of 3 mgd when last measured in 2008. The 18-inch diameter Soledad Canyon Trunk Sewer, Section 5, has a design capacity of 5.7 mgd and conveyed a peak flow of 2.9 mgd when last measured in 2008.
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 design capacity of 28.1 mgd and currently processes an average flow of 20.3 mgd.

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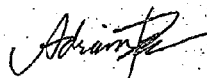


4. In order to estimate the volume of wastewater the project will generate, a copy of the Districts' average wastewater generation factors is available on line. Go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2.
5. The Districts are authorized by the California Health and Safety Code, to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' 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 CAA. All expansions of Districts' 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 Districts' 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

c: D. Kitt

Doc #: 1711316.1

**LETTER NO. B1. LETTER FROM COUNTY SANITATION DISTRICTS OF
LOS ANGELES COUNTY, DATED DECEMBER 2, 2010**

Response 1

This comment is an introduction to comments that follow, and references the County Sanitation Districts' October 12, 2010 letter comment letter on the proposed project. No further response is required.

Response 2

The comment states that the proposed project and portions of the AAA are located outside of the jurisdictional boundaries of the Districts and will require annexation prior to sewerage service. The comment correctly notes that the project site is not located within its jurisdictional boundaries. (See Draft EIR, pp. 1.0-70, 4.21-1 to -2, -5.) Nonetheless, it should be noted that the proposed project would annex into the District. The project also includes a wastewater reclamation plant (WRP), which would be owned and operated by the City of Santa Clarita and recycle up to 395,411 gallons per day (gpd) of wastewater using Los Angeles County Sanitation Districts (LACSD) demand factors (the applicant is estimating that the project will generate a lower amount of wastewater of 214,265 gpd which is based upon lower water usage. The proposed WRP would be designed as a scalping plant and would not treat solids; any solids generated by the proposed project would be discharged to the existing sewer and treated at the existing Valencia WRP. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment restates information contained in the Draft EIR, specifically noting that, based on the Santa Clarita Valley Sanitation District's flow generation factors, the proposed project would generate a worst-case average total of 395,411 gpd of wastewater. (Draft EIR, p. 4.21-7.) The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment provides background information regarding the Santa Clarita Valley Sanitation District's wastewater reclamation program. Of note, recycled water produced by the proposed, on-site Vista Canyon WRP would be delivered to the Castaic Lake Water Agency for distribution both within and ultimately outside of the project boundary. (Draft EIR, pp. 1.0-70 to -71.) Therefore, it will not be necessary to secure recycled water from the Valencia or Saugus WRPs, as proposed by the comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 5

The comment, which provides contact information should the City have any questions regarding the letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

RECEIVED

NOV 22 2010

COMMUNITY DEVELOPMENT
CITY OF SANTA CLARITA

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

November 10, 2010

Jeff Hogan, Senior Planner
City of Santa Clarita
Community Development Department
23920 Valencia Blvd.
Santa Clarita, CA 91355

Dear Mr. Hogan:

NOTICE OF AVAILABILITY/DRAFT ENVIRONMENTAL IMPACT REPORT, CLEARINGHOUSE
NO. 2007071039, MASTER CASE #07-127, PRE-ZONE/ZONE CHANGE 07-001A, ANNEXATION
#07002A, SPECIFIC PLAN #07-001, TENTATIVE TRACT MAP 69164, CONDITION USE PERMIT,
07-009, OAK TREE PERMIT 07-019, THE VISTA CANYON PROJECT, SANTA CLARITA (FFER
#201000207)

The Notice of Availability/Draft Environmental Impact Report 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. The following are their comments:

PLANNING DIVISION:

The Planning Division has the following corrections and updates for the Draft EIR:

4.13 Fire Services - Summary

- 1. Paragraph 1 should be corrected to state that there are "13 Fire Stations with 11 engine
companies" that serve the Santa Clarita Valley. (Note: The correction that "13 Fire Stations
and 11 engine companies serve the Santa Clarita Valley" should be corrected throughout the
Draft EIR).

Existing Conditions - Fire Protection Services

- 2. Paragraph 1 should be corrected to state that there are "64 Fire Fighters on duty every day".

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

Table listing various cities and areas served by the fire department, including Agoura Hills, Azusa, Baldwin Park, Bell Gardens, Bellflower, Bradbury, Calabasas, Carson, Cerritos, Claremont, Commerce, Covina, Cudahy, Diamond Bar, Duarte, El Monte, Gardena, Glendora, Hawaiian Gardens, Hawthorne, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Canada-Flintridge, La Habra, La Mirada, La Puente, Lakewood, Lancaster, Lawndale, Lomita, Lynwood, 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, Walnut, West Hollywood, Westlake Village, and Whittier.

Table 4.13-1

3. Table 4.13-1 has been corrected as follows: The map incorrectly depicts Fire Station 123 as Fire Station 132. The map should be corrected to depict that Fire Station 132 is located at 29310 Sand Canyon Road, Santa Clarita, CA 91387 (TBG 4462 D-7).

Station	Location
Fire Station 73*	24875 N. San Fernando Road Newhall, CA 91321
Fire Station 76**	27223 Henry Mayo Drive Valencia, CA 91355
Fire Station 81	8710 W. Sierra Highway Agua Dulce, CA 91350
Fire Station 104 (Temporary)	26201 Golden Valley Road Santa Clarita, CA 91359
Fire Station 107*	18239 W. Soledad Canyon Canyon Country, CA 91351
Fire Station 108 (New station opened 11/1/2008)	28799 N. Rock Canyon Drive Santa Clarita, CA 91390
Fire Station 111*	26829 Seco Canyon Road Saugus, CA 91350
Fire Station 123	26321 N. Sand Canyon Road Canyon Country, CA 91387
Fire Station 124*	25870 Hemingway Avenue Stevenson Ranch, CA 91381
Fire Station 126	26320 Citrus Street Santa Clarita, CA 91355
Fire Station 132 (Temporary)	29310 Sand Canyon Road Santa Clarita, CA 91387
Fire Station 149*	31770 Ridge Route Castaic, CA 91384
Fire Station 156 (Temporary)	24525 Copper Hill Drive Valencia, CA 91354

* = Paramedic Units
 ** = Hazardous Materials Task Force

4. Paragraph 8 is ambiguous and should be revised to state, "The Los Angeles County Fire Department has a Developer Fee Program in effect in the project area. As part of the program, the Fire Department annually prepares a Developer Fee Detailed Fire Station Plan that is used for the planning of Fire Stations in the high-growth urban expansion areas of the County. Developer fees from new developments are collected at the time building permits are issued, and are used to fund land acquisition, new fire station facilities, and equipment as detailed in the Fire Station plan. Increases in staffing would be funded by property tax revenue that would be generated by the project. For the Santa Clarita Valley, the current

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developer fee amount is \$0.9927. Application of the developer fees and property tax revenue generated by new development help ensure adequate fire service levels for future developments.”

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LAND DEVELOPMENT UNIT:

Access Requirements:

1. Due to the size of the proposed development; multiple means of access is required.
2. Access to be provided as noted on the tentative tract map.
3. Access shall comply with Section 503 of the Fire Code, which requires all weather access. All weather access may require paving.
4. Fire Department Access shall be extended to within 150 feet distance of any exterior portion of all structures. Onsite vehicular is required for any building exceeding 150 feet from the public street.
5. Where driveways extend further than 150 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.
6. Private driveways shall be indicated on the final map as “Private Driveway and Fire Lane” with the widths clearly depicted and shall be maintained in accordance with the Fire Code. All required fire hydrants shall be installed, tested and accepted prior to construction.
7. Vehicular access must be provided and maintained serviceable throughout construction to all required fire hydrants.
8. For buildings that are less than three stories and/or less than 35 feet in height, provide a minimum unobstructive driveway width of 26 feet, clear-to-sky, to be posted “No Parking – Fire Lane”.
9. For buildings that are more than three stories and/or 35 feet or greater, provide a minimum unobstructive driveway width of 28 feet, clear-to-sky, to be posted “No Parking – Fire Lane”. The center line of the access roadway shall be located parallel to and within 30 feet of the exterior wall on at least one side of each proposed building.
10. For each proposed building in Planning Area’s 1 & 2, access is required to within 150 feet of all exterior portions of the building with a minimum unobstructive driveway width of 28 feet, clear-to sky, to be posted “No Parking – Fire Lane”.

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11. The center-line of the access roadway shall be located parallel to and within 30 feet of the exterior wall on at least one side of each proposed building.
12. For streets or driveways separated by an island, provide a minimum unobstructive driveway width of 20 feet, clear-to-sky, to be posted "No Parking – Fire Lane". This includes the eastern connection to Lost Canyon Road.
13. The Fire Department turnarounds shall be clearly identified, to be posted "No Parking – Fire Lane".
14. Additional access issues will be addressed with the submittal of the revised plans and during building plan check.
15. Provide Fire Department or City approved street signs and building access numbers prior to occupancy.

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Water System Requirements

16. Provide water mains, fire hydrants and fire flows as required by the County of Los Angeles Fire Department, for all land shown on map, which shall be recorded.
17. The Fire Flow Requirement for Planning Area 1 is 3500 gallons per minute at 20 pounds per square inch for three hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater.
18. The Fire Flow Requirement for Planning Area 2 is 3500 gallons per minute at 20 pounds per square inch for three hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater.
19. The Fire Flow Requirement for Planning Area 3A and 3B is 2500 gallons per minute at 20 pounds per square inch for two hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater. The exact fire flow, with a possible flow reduction, will be determined during the building plan.
20. The Fire Flow Requirement for Planning Area 3C and 3D is 1500 gallons per minute at 20 pounds per square inch for two hours.
21. The Fire Flow Requirement for Planning Area 4 is 2500 gallons per minute at 20 pounds per square inch for two hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater. The exact fire flow, with a possible flow reduction, will be determined.
22. The required fire flow for private on-site hydrants is 2500 gallons per minute at 20 pounds per square inch. Each private on-site hydrant must be capable of flowing 1250 gallons per minute at 20 pounds per square inch with two hydrants flowing simultaneously, one of which must be the furthest from the public water source.

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23. Install 59 public fire hydrants. The location for the onsite fire hydrants will be determined during building plan check.
24. All hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal. All on-site hydrants shall be installed a minimum of 25 feet from a structure or protected by a two (2) hour rated firewall.
25. All required fire hydrants shall be installed, tested and accepted or bonded for prior to Final Map approval.

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Additional Information

26. This property is located within the area described by the Fire Department as "Very High Fire Hazard Severity Zone" (formerly Fire Zone 4). A "Fuel Modification Plan" shall be submitted and approved prior to final map clearance. Please contact the Fuel Modification Unit, Fire Station #32, 605 North Angeleno Avenue, Azusa, CA 91702-2904, phone (626) 969-5205, for details.

7

Submittal Requirements

27. Submit a minimum of four (4) copies of the water plans indicating the public fire hydrants to be installed to the Fire Department's Land Development Unit for review.
28. Any changes to the tentative tract map shall be submitted to the Fire Department's Land Development Unit for review.
29. The building construction plans shall be submitted to the Fire Department's Engineering Unit – Santa Clarita, (661) 286-8821.
30. The contact person for the Los Angeles County Fire Department, Land Development Unit, Fire Prevention Engineering Assistant is Wally Collins. Assistant Collins may be contacted at (323) 890-4243 or (661) 949-6319.

8

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. Please comply with Fuel Modification requirements indicated in the Land Development Unit's response, item #26.

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Jeff Hogan, Senior Planner
November 10, 2010
Page 6

HEALTH HAZARDOUS MATERIALS DIVISION:


1. The proposed project has areas of environmental concerns due to past site activities. As proposed in the Phase I Study, certain areas of the site require soil samplings and analysis. It is also requested that a soil gas study be conducted at these potentially contaminated areas, including the former underground and aboveground storage tank areas. The laboratory volatile organic compounds detection limits should be less than the associated California Human Health Screening Levels (CHHSL's). If the preliminary soil gas or soil sampling identifies any contaminant above the background concentration, the responsible party is requested to mitigate the contamination under oversight of a local or State agency prior to grading or construction activities.

11

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

12

Very truly yours,



For JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj

**LETTER NO. B2. LETTER FROM COUNTY OF LOS ANGELES FIRE DEPARTMENT,
NOVEMBER 10, 2010**

Response 1

The comment first notes that the Draft EIR has been reviewed by various divisions and units within the County of Los Angeles Fire Department (Fire Department). The comment then states that Section 4.13, Fire Services, should be corrected to state that there are 13 fire stations with 11 engine companies," in lieu of the 14 fire stations with 12 engine companies referenced in the Draft EIR. (See, e.g., Draft EIR, p. 4.13-1.) The requested correction has been made on pages 4.13-1 and -2 of Section 4.13. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text revisions. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment states that Section 4.13, Fire Services, should be corrected to state that 64 firefighters are on duty every day, in lieu of the 67 firefighters referenced in the Draft EIR. (See Draft EIR, p. 4.13-2.) The requested correction has been made on page 4.13-2 of Section 4.13. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment proposes several changes to Table 4.13-1, Los Angeles County Fire Stations Serving the Santa Clarita Valley Area, and requests that Figure 4.13-1, Fire Station Locations, be revised to provide the correct location and designation for Fire Station 123. The requested corrections to Section 4.13 have been made. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text and graphic revisions. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment states that Section, 4.13, Fire Services be updated on pages 4.13-5 and 6 to clarify the Developer Fee Program in effect in the project area. The requested clarification to Section 4.13 has been made. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment provides a list of fire access requirements for project development. As noted in the Draft EIR, all applicable fire code and ordinance requirements for access would need to be met by the proposed project. (Draft EIR, p. 4.13-1.) Further, Mitigation Measures 4.13-6 through 4.13-10 in the Draft EIR address various access requirements that are similar to (but not always the same as) those identified in the comment. Therefore, the referenced mitigation measures have been revised to be consistent with the access requirements outlined in the comment. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages,**" for the actual text revisions. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment provides a list of water system requirements for project development. As noted in the Draft EIR, all applicable fire code and ordinance requirements for water mains, fire hydrants, and water fire flows would need to be met by the proposed project. (Draft EIR, p. 4.13-1.) Accordingly, the Draft EIR conservatively assumed that the Fire Department would require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a 5-hour duration (Draft EIR, p. 4.13-7), even though the comment identifies less rigorous fire flow requirements. Further, Mitigation Measures 4.13-3 and 4.13-5 in the Draft EIR include water system requirements that are similar to, but not the same as, the water system requirements outlined in the comment. Therefore, the Draft EIR mitigation measures addressing water system requirements have been revised to be consistent with those outlined in the comment. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages,**" for the actual text revisions. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment states that a Fuel Modification Plan be submitted and approved by the Fire Department prior to final map clearance. Mitigation Measure 4.13-2 has been revised to reflect Fire Department's suggested approval timing. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages,**" for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment provides background information regarding the Fire Department's submittal requirements (e.g., number of copies of water plans; submittal of construction plans) and does not raise an environmental issue within the meaning of CEQA. The City appreciates the Fire Department's provision

of this information, which will be utilized by the project applicant should the project be approved. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 9

The comment provides factual background information regarding the responsibilities of the Fire Department's Forestry Division and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 10

The comment requests that the project comply with the Fuel Modification Plan submittal requirements addressed in **Response 7**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment expresses concern regarding the soil gas levels associated with the former underground and aboveground storage tanks located on the project site. Section 4.15, Human-Made Hazards, of the Draft EIR concluded that the two, on-site underground storage tanks (USTs) were removed in accordance with applicable standards, and site development would not result in a significant impact. (Draft EIR, p. 4.15-17.) Similarly, the two, on-site aboveground storage tanks were used for fuel and water; no evidence of past use at the project site or leakage was visible during the site reconnaissance. (Draft EIR, p. 4.15-3.) Therefore, mitigation measures requiring soil gas studies are not required. That being said, Mitigation Measure 4.15-1 requires that areas of the project site be sampled for the presence of metals, total petroleum hydrocarbons, volatile organic carbons and pesticides prior to grading. (Draft EIR, p. 4.15-19.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment, which provides contact information should the City have any questions regarding the letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



GAIL FARBER, Director

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (626) 458-5100 http://dpw.lacounty.gov

RECEIVED NOV 22 2010 COMMUNITY DEVELOPMENT CITY OF SANTA CLARITA ADDRESS ALL CORRESPONDENCE TO: P.O. BOX 1460 ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE: LD-1

November 17, 2010

Mr. Jason Tajima County of Los Angeles Chief Executive Office Office of Unincorporated Area Services 500 West Temple Street, Room 723 Los Angeles, CA 90012

Dear Mr. Tajima:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) VISTA CANYON SPECIFIC PLAN CITY OF SANTA CLARITA

As requested, we reviewed the DEIR for the Vista Canyon Specific Plan area. The project will annex 185 acres of land into the City of Santa Clarita and proposes the construction of mixed-use/transit-orientated development consisting of 1,117 residential dwelling units and up to 950,000 square feet of commercial, retail, theater, and hotel uses within four planning areas.

1

The following comments are for your consideration and relate to the environmental document only:

Services-Sewer

- 1. The Environmental Impact Report should discuss the collection and disposal of the additional wastewater that would be generated by the proposed project, especially its potential impact on the available capacity in the existing local sewer lines for both peak-dry and wet-weather flows pursuant with the Statewide General Waste Discharge Requirements (Order No. 2006-0003).
2. The County of Los Angeles Department of Public Works' Consolidated Sewer Maintenance District maintains the local sewers within the project area. Therefore, any new sewer construction projects within the project area are required to comply with the Public Works' sewer design standards.

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Mr. Jason Tajima
November 17, 2010
Page 2

If you have any questions regarding the services-sewer comments, please contact Ms. May Hong at (626) 458-3388 or by e-mail at mahong@dpw.lacounty.gov.

4

Other-Environmental Safety

We recommend updating Section 4.9, Solid Waste Disposal, with 2008 disposal data from our latest Annual Report for the Los Angeles County Countywide Siting Element rather than presenting 2006 disposal data. The 2008 Annual Report is available on line at: <http://dpw.lacounty.gov/swims/Upload/2008%20AR%20FINAL.pdf>.

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If you have any questions regarding the environmental safety comment, please contact Mr. Corey Mayne at (626) 458-3524 or by e-mail at cmayne@dpw.lacounty.gov.

6

Traffic/Access Section

The Traffic and Access Section of the DEIR is incomplete and must be revised to address the comments below. Based on these revisions, additional comments may be forthcoming after subsequent review.

Canyon Park Boulevard at Jakes Way

7

The Final Transportation Impact Study indicates the intersection is expected to operate at Level of Service D for the Interim Plus Project Conditions during the a.m. and p.m. peak hours. However, this intersection is not identified as an impacted intersection in Table 17. The DEIR shall recommend mitigation measures to reduce the project's impact to a less than significant level.

Placerita Canyon Road at State Route-14 Northbound Ramps

8

The Final Transportation Impact Study indicates the project is expected to result in a significant impact at the intersection. This unmitigated impact shall be properly described in the project's revised Environmental Impact Report.

If you have any questions regarding the traffic/access comments, please contact Mr. Jacques M. Gilbert of Public Works' Traffic and Lighting Division, Traffic Studies Section, at (626) 300-4794 or by e-mail at jgilbert@dpw.lacounty.gov.

9

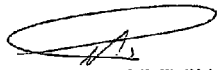
Mr. Jason Tajima
November 17, 2010
Page 3

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or by e-mail at tduong@dpw.lacounty.gov.

10

Very truly yours,

GAIL FARBER
Director of Public Works


for ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

JY:ca
P:\dpublicEQ\A\CDM\CITY OF SANTA CLARITA-VISTA CANYON SPECIFIC PLAN_DEIR.doc

cc: Department of Regional Planning (Hsiao-Ching Chen)
City of Santa Clarita (Jeff Hogan)

**LETTER NO. B3. LETTER FROM COUNTY OF LOS ANGELES DEPARTMENT OF
PUBLIC WORKS, NOVEMBER 17, 2010**

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment states that the EIR should discuss the collection and disposal of wastewater, and address capacity issues associated with the Statewide General Waste Discharge Requirements (Order No. 2006-0003). As discussed in Section 4.21, Wastewater Disposal, the proposed project includes a wastewater reclamation plant (WRP), which would be owned and operated by the City of Santa Clarita and recycle up to 395,411 gallons per day (gpd) of wastewater. The proposed WRP would be designed as a scalping plant and would not treat solids; any solids generated by the proposed project would be discharged to the existing sewer and treated at the existing Valencia WRP. Mitigation Measure 4.21-3 requires that: "All facilities of the sanitary sewer system, including the siphon, will be designed and constructed for maintenance by the City of Santa Clarita in accordance with the applicable manuals, criteria, and requirements." (Draft EIR, p. 4.21-9.) The proposed project evaluated its potential impact on existing sewers in the *Vista Canyon Sewer Area Study* dated August 6, 2009. The City of Santa Clarita reviewed the study and approved it in January 2011. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment indicated that new sewer construction projects must comply with the County of Los Angeles Department of Public Works' (DPW) sewer design Mitigation Measure 4.22-3 requires that: All facilities of the sanitary sewer system, including the siphon, will be designed and constructed for maintenance by the City of Santa Clarita in accordance with the applicable manuals, criteria, and requirements." The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment, which provides contact information should the City have any questions regarding the sewer services comments, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response 5

The comment suggests that Section 4.9, Solid Waste Disposal, be updated to reflect the disposal data from the 2008 *Annual Report for the Los Angeles County Countywide Integrated Waste Management Plan*, October 2009. Pages 4.9-15 and -16 of Section 4.9 have been updated with the 2008 disposal data. Please see the portion of the Vista Canyon Final EIR entitled, “**Revised Draft EIR Pages,**” for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment, which provides contact information should the City have any questions regarding the solid waste disposal comments, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response 7

This commenter suggests that the Transportation Impact Study and related Draft EIR should have identified a significant impact at the Canyon Park Boulevard/Jakes Way intersection, and should have recommended mitigation.

The Transportation Impact Study and Draft EIR did not report a significant impact at the Canyon Park Boulevard/Jakes Way intersection because the intersection would operate at an acceptable LOS C when the entire AM and PM peak hour periods are considered, which is the period the City of Santa Clarita uses to evaluate intersection LOS.

The intersection currently is situated in unincorporated Los Angeles County, although it would be annexed into the City of Santa Clarita with approval of the proposed project and the ancillary annexations. Table 17 in the Transportation Impact Study, and corresponding Draft EIR Table 4.3-11, depict the LOS conditions at the intersection based on a Peak Hour Factor (PHF) 15-minute analysis. However, as shown in the table below, when the entire peak hour is considered, which is the period the City of Santa Clarita utilizes to evaluate intersection operations, the intersection would operate at LOS C. (See, Final EIR **Appendix F4**, Memorandum, Canyon Park Boulevard/Jakes Way Intersection, Fehr & Peers, January 21, 2011, for technical calculations.)

Table
Interim Plus Project Traffic Operations at Canyon Park Boulevard/Jakes Way Intersection

Intersection	Average Delay – Level of Service during AM (PM) Peak Hour	
	Entire Peak Hour	Busiest 15-Minutes of Peak Hour
Canyon Park Boulevard/Jakes Way	22 – C (25 – C)	33 – D (33 – D)

This result is consistent with the analysis of other unsignalized intersections in the Draft EIR. See, for example, Draft EIR p. 4.3-16, in which conditions at the Sand Canyon Road/Lost Canyon Road intersection, an unsignalized intersection located within Santa Clarita, are reported on an hourly basis. Accordingly, the Transportation Impact Study and Draft EIR correctly reported that the project would not result in a significant impact at the intersection.

This conclusion is further justified by examining conditions at the intersection. Projected traffic volumes under project buildout/interim conditions do not satisfy the peak hour traffic volume warrant for consideration of a traffic signal. Additionally, the majority of project trips at this intersection are added to the southbound left-turn movement, and the resulting PM peak hour volume can be accommodated within the 100 feet of storage that is provided. The fact that no physical improvements are needed at the intersection further substantiates the conclusion reached in the Transportation Impact Study and Draft EIR.

Response 8

This commenter states that the final Transportation Impact Study indicates the project is expected to result in a significant impact at the Placerita Canyon Road/SR 14 NB Ramps intersection and, therefore, mitigation should be included. However, as explained below, the proposed project would not result in a significant impact at the intersection and, therefore, no mitigation is required.

Table 17 in the Transportation Impact Study lists the intersection operations under project buildout/interim conditions. The table notes in bold font those intersections that would operate at unacceptable levels under “with project” conditions. Included within the bolded intersections are three intersections that would operate at unacceptable levels although the project would *not* cause a significant impact at the intersections. The three intersections are intersection 20 (Soledad Canyon Road/Bouquet Canyon Road), intersection 22 (Placerita Canyon Road/SR-14 SB Ramps), and intersection 23 (Placerita Canyon Road/SR 14 NB Ramps).

Specific to the comment and intersection 23, the impact would not be significant (based on the significance criteria) because the proposed project would not use 2 percent or more of the intersection's capacity. As shown in the Transportation Impact Study of the Draft EIR, the proposed project would cause the intersection capacity utilization to increase by 0.8 percent during the AM peak hour and by 0.2 percent during the PM peak hour. Therefore, the conclusion of a non-significant impact is correct and no mitigation is required.

Relatedly, Draft EIR Table 4.3-11, Intersection Operations - 2015 Conditions, incorrectly identifies the three intersections (Intersections 20, 22, and 23) as "significant impacts." However, the Draft EIR text correctly omits the three intersections from the list of significant impacts. (See Draft EIR, pp. 4.3-57 to 4.3-58.) The Final EIR includes the necessary revisions to Table 4.3-11.

Response 9

The comment, which provides contact information should the City have any questions regarding the traffic/access comments, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Response 10

The comment, which provides contact information should the City have any questions regarding the comment letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: DECEMBER 3, 2010

December 3, 2010

Mr. Jeff Hogan, AICP, Senior Planner, jhogan@santa-clarita.com
Community Development Department
City of Santa Clarita
23920 Valencia Boulevard, Suite 302
Santa Clarita, CA 91355

Draft Environmental Impact Report (Draft EIR) for the Proposed Vista Canyon Project (SCH #2007071039)

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

1

In the project description, the lead agency includes proposed construction of a mixed-use development consisting of 1,117 residential units, up to 950,000 square feet of commercial, retail, theater, and hotel uses within four planning areas on a 185 acre site. An additional residential overlay would permit conversion of 250,000 square feet of office floor area to 233 multi-family residential units, resulting in a total mix of 1,350 residential units and 700,000 square feet of commercial floor area. The proposed project would also include up to 1.7 million cubic yards of remedial grading; 590,000 cubic yards or cut; 830,000 cubic yards of fill; and a total project soil import up to 500,000 cubic yards to accommodate development within the site.

2

AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the extensive grading activities for this project. Additional mitigation measures that might reduce these emissions are described in the detailed comments attached to this letter.

3

Mr. Jeff Hogan, AICP,
Senior Planner

2

December 3, 2010

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

4

Sincerely,



Ian MacMillan

Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

LAC101020-06
Control Number

Construction Mitigation Measures

1. Because the lead agency has determined that construction phase emissions for oxides of nitrogen (NOx), particulate matter (PM10 and PM2.5, fugitive dust), and volatile organic compounds (VOCs) exceed the established significance thresholds, the SCAQMD recommends the following additions to the mitigation measures listed starting on page 4.4-35 to further to reduce NOx, PM10, PM2.5, and VOC emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html:

Recommended additions:

NOx

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.; and
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
 - April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

5

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

PM10/PM2.5

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Pave road and road shoulders;
- Replace ground cover in disturbed areas as quickly as possible;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

6

VOC

7

Mr. Jeff Hogan, AICP,
Senior Planner

5

December 3, 2010

- Use coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Require the use of pre-painted construction materials, and
- Contractors shall use varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

7

LETTER NO. B4. LETTER FROM SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, DECEMBER 3, 2010

Response 1

This comment is an introduction to comments that follow, and does not raise any specific issue regarding the analysis presented in the Draft EIR; therefore, no further response can be provided or is required. Nonetheless, the City appreciates the comment, which will be made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment restates information contained in the Draft EIR regarding the project description and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment states that South Coast Air Quality Management District (SCAQMD) staff is concerned that all feasible mitigation measures have not been considered in order to reduce the significant emissions associated with the extensive grading activities for this project. The comment recommends that specific additional mitigation measures, identified and addressed in **Comments 5, 6, and 7** below, be incorporated. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment requests that, pursuant to Public Resources Code section 21092.5, written responses to these comments be provided to the SCAQMD prior to certification of the Final EIR. The City acknowledges this comment and intends to provide all public agencies with responses to their comments in accordance with CEQA's requirements. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment states that the lead agency has determined that construction-related emissions for nitrogen oxides (NO_x), particulate matter (PM₁₀ and PM_{2.5}, fugitive dust), and volatile organic compounds (VOCs) exceed the established significance thresholds. The comment recommends that additional mitigation measures be included to further reduce NO_x emissions, if applicable and feasible. The following provides

a list of the recommended mitigation measures to reduce NO_x emissions and discusses the applicability and feasibility of each measure.

Recommended Measure

- Prohibit vehicle and engine idling in excess of 5 minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449.

Applicability and Feasibility

The portion of this measure recommending a 5-minute idling limit is already included in the Draft EIR as Mitigation Measure 4.4-1. (Draft EIR, p. 4.4-57.) This measure will be revised as follows in the Final EIR to include the additional recommendation of ensuring that all off-road equipment is compliant with California Air Resources Board's (CARB's) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449:

- 4.4-1** The project applicant shall prepare a Construction Traffic Emission Management Plan to minimize emissions from vehicles including, but not limited to, scheduling truck deliveries to avoid peak hour traffic conditions, consolidating truck deliveries, ~~and~~ prohibiting truck idling in excess of 5 minutes, and ensuring that all off-road equipment is compliant with the CARB's in-use off-road diesel vehicle regulation and SCAQMD Rule 2449.

Recommended Measure

- Use electricity from power poles rather than temporary diesel or gasoline power generators.

Applicability and Feasibility

This measure is already included in the Draft EIR as Mitigation Measure 4.4-5. (Draft EIR, p. 4.4-58.) Because this measure is already included in the Draft EIR, no changes are necessary with respect to this measure.

Recommended Measure

- Configure construction parking to minimize traffic interference.

Applicability and Feasibility

This measure was not explicitly included in the Draft EIR, but is intended to be contained within Mitigation Measure 4.4-1 in the Draft EIR. (Draft EIR, p. 4.4-57.) However, as this measure is applicable and feasible, it will be included in the Final EIR as Mitigation Measure 4.4-6:

4.4-6 The project contractor shall configure construction parking to minimize traffic interference.

Recommended Measure

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.

Applicability and Feasibility

This measure was not explicitly included in the Draft EIR, but is intended to be contained within Mitigation Measure 4.4-1 in the Draft EIR. (Draft EIR, p. 4.4-57.) However, as this measure is applicable and feasible, it will be included in the Final EIR as Mitigation Measure 4.4-7:

4.4-7 The project contractor shall provide temporary traffic controls, such as a flag person, during all phases of construction to maintain smooth traffic flow.

Recommended Measure

- Provide dedicated turn lanes for movement of construction trucks and equipment on and off site.

Applicability and Feasibility

This measure was not explicitly included in the Draft EIR, but is intended to be contained within Mitigation Measure 4.4-1 in the Draft EIR. However, as this measure is applicable and feasible, it will be included in the Final EIR as Mitigation Measure 4.4-8:

4.4-8 The project contractor shall coordinate with the City to provide temporary dedicated turn lanes for movement of construction trucks and equipment on and off site, to satisfaction of the City.

Recommended Measure

- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.

Applicability and Feasibility

This measure was not explicitly included in the Draft EIR, but is intended to be contained within Mitigation Measure 4.4-1 in the Draft EIR. (Draft EIR, p. 4.4-57.) However, as this measure is applicable and feasible, it will be included in the Final EIR as Mitigation Measure 4.4-9:

4.4-9 The project contractor shall schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable.

Recommended Measure

- Reroute construction trucks away from congested streets or sensitive receptor areas.

Applicability and Feasibility

This measure was not explicitly included in the Draft EIR, but is intended to be contained within Mitigation Measure 4.4-1 in the Draft EIR. (Draft EIR, p. 4.4-57.) However, as this measure is applicable and feasible, it will be included in the Final EIR as Mitigation Measure 4.4-10:

- 4.4-10** The project contractor shall coordinate with the City to reroute construction trucks away from congested streets or sensitive receptor areas.

Recommended Measure

- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

Applicability and Feasibility

This measure is already included in the Draft EIR as Mitigation Measure 4.4-3. (Draft EIR, p. 4.4-57.) Because this measure is already included in the Draft EIR, no changes are necessary with respect to this measure.

Recommended Measure

- Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet U.S. Environmental Protection Agency (EPA) Tier 2 or higher emissions standards according to the following:
 - April 1, 2010 to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - January 1, 2012 to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emissions standards, where available. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization or each applicable unit of equipment.

Applicability and Feasibility

Portions of this measure are included in the Draft EIR as Mitigation Measures 4.4-6 and 4.4-7. (Draft EIR, p. 4.4-58.) However, this recommended measure provides additional requirements that are applicable and feasible, with the exception of the requirement to use engines certified to the Tier 4 standard. Engines certified to the Tier 4 standard were required to be commercially available starting January 1, 2011; however, not enough time has elapsed to allow construction contractors to incorporate these new engines into their fleets. Therefore, this measure will be included in the Final EIR as Mitigation Measure 4.4-11, which will replace Mitigation Measures 4.4-6 and 4.4-7 in the Draft EIR but will be amended to states that compliance with the Tier 4 standard will be subject to the availability of the engines in construction fleets.

~~4.4-6~~ — ~~The project applicant shall require on site off road construction equipment to meet U.S. EPA Tier 2 emissions standards at a minimum. This requirement will apply to any piece of equipment that is expected to operate on site more than 15 days.~~

~~4.4-7~~ — ~~For equipment not covered by mitigation measure 4.4-6 above, the project applicant shall evaluate the potential for reducing exhaust emissions from on road and off road construction equipment, and implement such measures. Control technologies to be considered may include particulate traps and filters, selective catalytic reduction, oxidation catalysts, air enhancement technologies, and the use of alternatively (non diesel) fueled engines. Considerations will include commercial availability of appropriate CARB verified technologies.~~

4.4-11 The project applicant and contractor shall require all on-site construction equipment to meet U.S. EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010 to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- January 1, 2012 to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emissions standards, subject to the availability of the engines in construction fleets. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization or each applicable unit of equipment.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Comment 6

The comment recommends that additional mitigation measures be included to further reduce PM₁₀ and PM_{2.5} emissions, if applicable and feasible. The following provides a list of the recommended mitigation measures and discusses the applicability and feasibility of the measures.

Recommended Measures

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Pave road and road shoulders;
- Replace ground cover in disturbed areas as quickly as possible;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.

Applicability and Feasibility

The recommended measures are generally applicable and feasible, and will be included in the Final EIR as Mitigation Measure 4.4-12:

4.4-12 During the construction phase, the project contractor shall:

- Require the installation of wheel washers where vehicles enter and exit the construction site onto paved roads, or wash off trucks or any equipment prior to each time they leave the site;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered;
- Pave road and road shoulders when feasible;
- Replace ground cover in disturbed areas as quickly as possible;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity, including resolution of issues related to PM₁₀ generation.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Comment 7

The comment recommends that additional mitigation measures be included to further reduce VOC emissions, if applicable and feasible. The following provides a list of the recommended mitigation measures to reduce VOC emissions and discusses the applicability and feasibility of the measures.

Recommended Measures

- Use coatings and solvents with a VOC content lower than required under Rule 1113;
- Construction/build with materials that do not require painting;
- Require the use of pre-painted construction materials; and

- Contractors shall use varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

Applicability and Feasibility

The recommended measures are generally applicable and feasible, and will be included in the Final EIR as Mitigation Measure 4.4-13:

4.4-13 The project contractor shall:

- Require the use of coatings and solvents with a VOC content lower than required under SCAQMD Rule 1113 based on the commercial availability of such products as per the list of manufacturers and suppliers on the SCAQMD's website "Painter's Guide to Clean Air" (<http://www.aqmd.gov/prdas/brochures/paintguide.html>);
- Construct/build with materials that do not require painting to the extent feasible;
- Require the use of pre-painted construction materials to the extent feasible; and
- Require the use of varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles
CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

Board of Supervisors
GLORIA MOLINA
First District
MARK RIDLEY-THOMAS
Second District
ZEV YAROSLAVSKY
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

December 3, 2010

Mr. Jeff Hogan, AICP
Senior Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355

Dear Mr. Hogan:

**CITY OF SANTA CLARITA
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR VISTA CANYON SPECIFIC PLAN AND ANCILLARY ANNEXATION AREAS**

The County of Los Angeles has prepared comments on the City of Santa Clarita's Draft Environmental Impact Report (DEIR) for Vista Canyon and Ancillary Annexation Areas. The DEIR evaluates the impacts of a proposed project consisting of the annexation of 185 acres of land into the City of Santa Clarita and the construction of mixed-use/transit-oriented development consisting of 1,117 residential dwelling units and up to 950,000 square feet of commercial, retail, theater, and hotel uses within four planning areas. The DEIR also evaluates an annexation, General Plan amendment, and prezone of the additional areas of Fair Oaks Ranch, Sand Canyon, and Jakes Way between Sand Canyon and Golden Valley Ranch.

1

Included in this letter are comments on the DEIR on behalf of the County Chief Executive Office and Departments of Regional Planning (DRP), Public Works (DPW), Sheriff, Parks and Recreation (DPR), Public Library, Public Health (DPH), and the County of Los Angeles Consolidated Fire Protection District (CFPD).

2

Chief Executive Office

Annexation Boundaries

A small piece of land appears to be missing from the proposed annexation areas depicted on the DEIR's Vista Canyon project map (Figure 1.0-4), and Ancillary Annexation Areas map (Figure 4.24-1). The missing piece of land runs along the Santa Clara River trail adjacent to the northern boundary of the Vista Canyon Ranch project.

3

"To Enrich Lives Through Effective And Caring Service"

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Intra-County Correspondence Sent Electronically Only*

Los Angeles County Board of Supervisors Policy

The County is obligated to review each annexation proposal in accordance with the Los Angeles County Board of Supervisors Policy 3.095 – “City Annexations and Spheres of Influence” (Attachment 1). The Policy includes conditions and guidance for determining the fiscal, geographic, environmental, social, and operational impacts on affected unincorporated communities and the County of Los Angeles, as well as determining any recommended mitigations.

4

Department of Regional Planning (DRP)

Santa Clara River Significant Ecological Area (SEA)

The boundary for the Santa Clara River SEA depicted in Figure 4.20-2 of the DEIR is inaccurate and has been reduced in size. The Federal Emergency Management Agency (FEMA) floodplain boundary has been used as the SEA boundary and labeled “SEA/FEMA 100-year Boundary” in Figure 4.20-2 as well. The existing SEA boundary found in the County’s General Plan and the Santa Clarita Valley Area Plan should be used in the DEIR analysis (Attachment II).

5

The proposed SEA boundary in the County and City’s One Valley One Vision (OVOV) planning documents reduces the SEA overlay in the southwest corner of the site where the vegetation is greatly disturbed, but expands the boundary to the north, south, and east portions of the Vista Canyon site. In addition, a north-south movement linkage that links the Santa Clara River with the Angeles National Forest is depicted as part of the proposed SEA boundary. The Species Movement Report 2009, referenced in the DEIR, identified bobcats, deer, coyotes, raccoons, skunks, and jackrabbits among the animals known to use this north-south linkage.

6

The Species Movement Report 2009 also points out that regional wildlife corridors have been identified several miles from the Vista Canyon site; however, this north-south linkage serves local movement and is extremely important to maintain for those species that are unable to traverse such long distances or steep terrain. The DEIR concludes that the loss of this north-south movement linkage is less than significant because the regional linkages would be more appropriate for regional north-south animal movement and that encouraging animal movement through the project site in a north-south corridor would increase opportunities for detrimental interactions with people and pets. The DEIR also states that potential future development south of the project site could also impair or eliminate the viability of this movement corridor.

7

Wildlife movement between the Santa Clara River and the Angeles National Forest in this area should not be eliminated due to the potential of future development, nor should the only wildlife movement linkages be regional. The project should retain the north-south linkage.

8

In addition, elimination of this north-south linkage would conflict with the Burden of Proof listed below for a SEA Conditional Use Permit (CUP) in the County permitting process. It is unlikely that Condition No. 3 of the CUP Burden of Proof would be met without mitigation or modification to the Vista Canyon project design.

SEA-CUP Burden of Proof:

1. The requested development is designed to be highly compatible with the biotic resources present, including the setting aside of appropriate and sufficient undisturbed areas;
2. The requested development is designed to maintain water bodies, watercourses, and their tributaries in a natural state;
3. The requested development is designed so that wildlife movement corridors or migratory paths are left in an undisturbed and natural state;
4. The requested development retains sufficient natural vegetative cover and/or open spaces to buffer critical resource areas from said requested development;
5. Where necessary, fences or walls are provided to buffer important habitat areas from development; and
6. Roads and utilities serving the proposed development are located and designed so as not to conflict with critical resources, habitat areas or migratory paths.

9

Land Use

Both the City and County encourage the use of the Specific Plan process to prepare comprehensive master plans for developments, particularly in mixed-use developments where pedestrian-oriented neighborhoods are desired. The decision on a Specific Plan project is made based on its own merits, including conformance with applicable policies of the City's General Plan or the County's Area Plan.

10

Based on a review of the draft One Valley One Vision Plan (OVOV), the goals and policies of the Vista Canyon Specific Plan are consistent with the goals and policies of the OVOV Land Use Element (Attachment III). While the Vista Canyon Specific Plan is not consistent with the draft OVOV land use designations of Residential 5 (H5) and Open Space – Water (OS-W), consistency can be achieved by including a plan amendment to the Land Use Policy Map in the Specific Plan process. Thus, the County concludes that the Vista Canyon Specific Plan is consistent with the goals and policies of the OVOV Land Use Element and can be entirely consistent with OVOV with a plan amendment.

11

The City and County have agreed that this project would not be shown on the Land Use Policy Map or reflected in the City's General Plan or the County's Area Plan until such time the Vista Canyon Specific Plan and any accompanying plan amendment reviews are completed.

Regional Housing Needs Assessment (RHNA)

The DEIR does not discuss the transfer of RHNA units from the County to the City. The total RHNA number allocated to the proposed Vista Canyon and ancillary annexation areas is estimated to be 1,275 (Attachment IV). Pursuant to the Los Angeles County Board of Supervisors Policy 3.095 "City Annexations and Spheres of Influence", the County will oppose annexations that do not accept the transfer of RHNA units from the County to the City associated with the annexation.

12

Department of Public Works (DPW)

Services – Sewer

The DEIR should discuss the collection and disposal of the additional wastewater that would be generated by the proposed project, especially the potential impact on the available capacity in the existing local sewer lines for both peak-dry and wet-weather flows, pursuant to the Statewide General Waste Discharge Requirements (Order No. 2006-0003).

13

In addition, DPW, Consolidated Sewer Maintenance District maintains the local sewers within the project area. Therefore, any new sewer construction projects within the project area are required to comply with the DPW sewer design standards. Inquiries about sewer design standards can be made by calling the DPW, Consolidated Sewer Maintenance Division at (626) 300-3399.

14

Other-Environmental Safety

Section 4.9 "Solid Waste Disposal" of the DEIR should be updated with the 2008 disposal data from DPW's latest Summary Plan and Siting Element of the Countywide Integrated Waste Management Plan Annual Report rather than the 2006 disposal data currently listed. The 2008 Annual Report is available at: <http://dpw.lacounty.gov/swims/Upload/2008%20AR%20FINAL.pdf>

15

Traffic/Access Section

Section 4.3 "Traffic and Access" of the DEIR is incomplete and needs to be revised to address the comments below. Based on these revisions, additional comments may be forthcoming after subsequent review.

16

1. Canyon Park Boulevard at Jakes Way -- The Final Transportation Impact Study indicates the intersection is expected to operate at Level of Service D for the Interim Plus Project Conditions during the a.m. and p.m. peak hours. However, this intersection is not identified as an impacted intersection in Table 17. The DEIR should include mitigation measures to reduce the project's impact to a less than significant level.
2. Placerita Canyon Road at State Route-14 Northbound Ramps -- The Final Transportation Impact Study indicates the project is expected to result in a significant impact at the intersection. This unmitigated impact should be properly described in the DEIR.

17

Sheriff

The DEIR should state that if annexed, the Vista Canyon and ancillary annexation areas would no longer receive traffic enforcement services from the California Highway Patrol and that these responsibilities would shift to the Sheriff's Department. If annexed, the City's contract with the Sheriff would need to account for traffic enforcement and accident investigation, as well as, any law enforcement services at Fair Oaks Park, which will be transferred to the City.

18

The last sentence of the first paragraph of Section 4.14-1 "Summary" that states that "CHP protection service in the City of Santa Clarita is considered adequate" should be removed because the CHP does not provide service to the City of Santa Clarita. In addition, the third paragraph of Section 4.14-1 which begins "The proposed project also would increase demands for CHP services in the project area..." should also be removed from the DEIR because the CHP would not be providing services within the project area.

19

Department of Parks and Recreation (DPR)

The Project Description/Ancillary Annexation Area in Section 4.24 of the DEIR should also be included as a part of the Project Description in Section 1.0. The proposed project has two parts: 1) development and annexation of Vista Canyon, and 2) annexation of the surrounding areas (Fair Oaks Ranch, Jake's Way, and the Sand Canyon area). Therefore, the Project Description in Section 1.0 should provide accurate information of the project details.

20

The 185-acre Vista Canyon project site does not contain any County parks. However, Fair Oaks Ranch in the proposed annexation areas surrounding the project site contains Fair Oaks Park, a County park. DPR does not support any annexation unless the City agrees to assume ownership and responsibility for any County community parks concurrently with the annexation.

21

Prior to processing this proposed annexation, the City must also assume ownership and responsibility of three County parks located in previously annexed areas: 1) Chesebrough, 2) Northbridge, and 3) Summerhill. The City annexed the territories but did not accept the three County parks located within these areas which are currently operated and maintained by DPR without the benefit of tax revenue from the annexed areas to provide park programs and maintenance services.

22

Also, a non-negotiable condition of the transfer of County parks to the City, to comply with California State Government Code Section 25550.5, is that all residents of the County shall have equal access regardless of whether or not they reside in the City.

23

Public Library

As of July 1, 2011, the County's information in Section 4.11 "Library Services" of the DEIR will no longer apply. On August 24, 2010, the Santa Clarita City Council voted to leave the County of Los Angeles Public Library system on July 1, 2011, and sign a five-year agreement with a private, for-profit company to operate the three libraries located within the City of Santa Clarita – Canyon Country Jo Anne Darcy Library, Newhall Library, and Valencia Library. If the proposed annexation is approved, the Public Library will no longer be responsible for providing library services to the Vista Canyon residents. In addition, the Public Library will no longer receive its dedicated share of property tax revenues and voter-approved special tax revenues collected from the properties in the subject area.

24

Department of Public Health (DPH)

The DEIR should incorporate the following mitigation measure:

Prior to the issuance of any building permits and the use or installation of any recycled water infrastructure, plans must be submitted to the State of California Department of Public Health and to the County Department of Public Health-Environmental Health Division for review and approval.

25

County of Los Angeles Consolidated Fire Protection District (CFPD)

Planning Division

The first paragraph of Section 4.13.1 "Fire Services – Summary" and elsewhere in the DEIR should be corrected to state that there are "13 Fire Stations with 11 engine companies" that serve the Santa Clarita Valley.

26

The first paragraph of Section 4.13.3a "Fire Services – Existing Conditions, Fire Protection Services" should be corrected to state that there are "64 firefighters on duty every day".

27

The map in Figure 4.13-1 incorrectly depicts Fire Station 123 as Fire Station 132. The map should be corrected to depict that Fire Station 132 is located at 29310 Sand Canyon Road, Santa Clarita, CA 91387 (TBG 4462 D-7).

28

Table 4.13-1 should be corrected as follows:

STATION	LOCATION
Fire Station 73*	24875 N. San Fernando Road Newhall, CA 91321
Fire Station 76**	27223 Henry Mayo Drive Valencia, CA 91355
Fire Station 81	8710 W. Sierra Highway Agua Dulce, CA 91350
Fire Station 104 (Temporary)	26201 Golden Valley Road Santa Clarita, CA 91359
Fire Station 107*	18239 W. Soledad Canyon Canyon Country, CA 91351
Fire Station 108 (New station opened 11/1/2008)	28799 N. Rock Canyon Drive Santa Clarita, CA 91390
Fire Station 111*	26829 Seco Canyon Road Saugus, CA 91350

29

Fire Station 123	26321 N. Sand Canyon Road Canyon Country, CA 91387
Fire Station 124*	25870 Hemingway Avenue Stevenson Ranch, CA 91381
Fire Station 126	26320 Citrus Street Santa Clarita, CA 91355
Fire Station 132 (Temporary)	29310 Sand Canyon Road Santa Clarita, CA 91387
Fire Station 149*	31770 Ridge Route Castaic, CA 91384
Fire Station 156 (Temporary)	24525 Copper Hill Drive Valencia, CA 91354

* = Paramedic Units
 ** = Hazardous Materials Task Force

29

The eighth paragraph of Section 4.13.3a is ambiguous and should be revised to state: "The Los Angeles County Fire Department has a Developer Fee Program in effect in the project area. As part of the program, the Fire Department annually prepares a Developer Fee Detailed Fire Station Plan that is used for the planning of Fire Stations in the high-growth urban expansion areas of the County. Developer fees from new developments are collected at the time building permits are issued, and are used to fund land acquisition, new fire station facilities, and equipment as detailed in the Fire Station plan. Increases in staffing would be funded by property tax revenue that would be generated by the project. For the Santa Clarita Valley, the current developer fee amount is \$0.9927 per square foot. Application of the developer fees and property tax revenue generated by new development help to ensure adequate fire service levels for future developments."

30

Land Development Unit

The project must ensure that it meets the following Fire Department access requirements:

1. Due to the size of the proposed development; multiple means of access are required.
2. Access to be provided as noted on the tentative tract map.
3. Access shall comply with Section 503 of the Fire Code, which requires all weather access. All weather access may require paving.

31

4. Fire Department Access shall be extended to within 150 feet distance of any exterior portion of all structures. Onsite vehicular access is required for any building exceeding 150 feet from the public street.
5. Where driveways extend further than 150 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.
6. Private driveways shall be indicated on the final map as "Private Driveway and Fire Lane" with the widths clearly depicted and shall be maintained in accordance with the Fire Code. All required fire hydrants shall be installed, tested and accepted prior to construction.
7. Vehicular access must be provided and maintained serviceable throughout construction to all required fire hydrants.
8. For buildings that are less than three stories and/or less than 35 feet in height, provide a minimum unobstructed driveway width of 26 feet, clear-to-sky, to be posted "No Parking – Fire Lane".
9. For buildings that are more than three stories and/or 35 feet or greater, provide a minimum unobstructed driveway width of 28 feet, clear-to-sky, to be posted "No Parking – Fire Lane". The center line of the access roadway shall be located parallel to and within 30 feet of the exterior wall on at least one side of each proposed building.
10. For each proposed building in Planning Area's 1 and 2, access is required to within 150 feet of all exterior portions of the building with a minimum unobstructed driveway width of 28 feet, clear-to sky, to be posted "No Parking – Fire Lane".
11. The center-line of the access roadway shall be located parallel to and within 30 feet of the exterior wall on at least one side of each proposed building.
12. For streets or driveways separated by an island, provide a minimum unobstructed driveway width of 20 feet, clear-to-sky, to be posted "No Parking – Fire Lane". This includes the eastern connection to Lost Canyon Road.
13. The Fire Department turnarounds shall be clearly identified, to be posted "No Parking – Fire Lane".

14. Additional access issues will be addressed with the submittal of the revised plans and during building plan check.
15. Provide Fire Department or City approved street signs and building access numbers prior to occupancy.

31

The project must also ensure that it meets the following Fire Department water system requirements:

1. Provide water mains, fire hydrants and fire flows as required by the County of Los Angeles Fire Department, for all land shown on map, which shall be recorded.
2. The Fire Flow Requirement for Planning Area 1 is 3,500 gallons per minute at 20 pounds per square inch for three hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater.
3. The Fire Flow Requirement for Planning Area 2 is 3500 gallons per minute at 20 pounds per square inch for three hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater.
4. The Fire Flow Requirement for Planning Area 3A and 3B is 2,500 gallons per minute at 20 pounds per square inch for two hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater. The exact fire flow, with a possible flow reduction, will be determined during the building plan.
5. The Fire Flow Requirement for Planning Area 3C and 3D is 1,500 gallons per minute at 20 pounds per square inch for two hours.
6. The Fire Flow Requirement for Planning Area 4 is 2,500 gallons per minute at 20 pounds per square inch for two hours. All proposed structures and buildings are required to be fully fire sprinklered and have a minimum of Type V-1 hour construction or greater. The exact fire flow, with a possible flow reduction, will be determined.

32

7. The required fire flow for private on-site hydrants is 2,500 gallons per minute at 20 pounds per square inch. Each private on-site hydrant must be capable of flowing 1,250 gallons per minute at 20 pounds per square inch with two hydrants flowing simultaneously, one of which must be the furthest from the public water source.
8. Install 59 public fire hydrants. The location for the onsite fire hydrants will be determined during building plan check.
9. All hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current American Water Works Association standard C503 or approved equal. All on-site hydrants shall be installed a minimum of 25 feet from a structure or protected by a two (2) hour rated firewall.
10. All required fire hydrants shall be installed, tested and accepted or bonded for prior to Final Map approval.

32

This property is located within the area described by the Fire Department as "Very High Fire Hazard Severity Zone" (formerly Fire Zone 4). A "Fuel Modification Plan" must also be submitted and approved prior to final map clearance.

33

Among the submittal requirements for plans include: a minimum of four copies of the water plans indicating the public fire hydrants to be installed must be submitted to the Fire Department's Land Development Unit for review; any changes to the tentative tract map shall be submitted to the Fire Department's Land Development Unit for review; the building construction plans shall be submitted to the Fire Department's Engineering Unit – North Region Santa Clarita Office at 23757 Valencia Boulevard, Valencia, CA 91355 for review and approval.

34

Health Hazardous Materials Division

The proposed project has areas of environmental concerns due to past site activities. As proposed in the Phase I Study, certain areas of the site require soil samplings and analysis. A soil gas study should also be conducted at these potentially contaminated areas, including the former underground and above-ground storage tank areas. The laboratory volatile organic compounds detection limits should be less than the associated California Human Health Screening Levels (CHHSL's). If the preliminary soil gas or soil sampling identifies any contaminant above the background concentration, the responsible party is required to mitigate the contamination under oversight of a local or State agency prior to grading or construction activities.

35

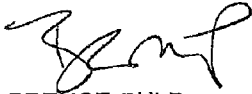
Mr. Jeff Hogan
December 3, 2010
Page 12

If you have any questions, please contact Dorothea Park at (213) 974-4283 or via e-mail at dpark@ceo.lacounty.gov.

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Sincerely,

WILLIAM T FUJIOKA
Chief Executive Officer



BRENCE CULP
Chief Deputy, Chief Executive Officer

WTF:BC:DSP
MJS:JT:acn

Attachments (4)

- c: Supervisor Michael D. Antonovich, Fifth Supervisorial District
- Sheriff Leroy D. Baca
- P. Michael Freeman, Fire Chief
- Margaret Donnellan Todd, County Librarian
- Russ Guiney, Director of Parks and Recreation
- Richard J. Bruckner, Director of Planning
- Dr. Jonathan E. Fielding, Director and Health Officer of Public Health
- Gail Farber, Director of Public Works

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WILLIAM T FUJIOKA
Chief Executive Officer

County of Los Angeles
CHIEF EXECUTIVE OFFICE

713 KENNETH HAHN HALL OF ADMINISTRATION
LOS ANGELES, CALIFORNIA 90012
(213) 874-1101
<http://cao.lacounty.gov>

December 4, 2007

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Board of Supervisors
GLORIA MOLINA
First District

YVONNE B. BURKE
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

Dear Supervisors:

**AMENDMENT TO THE CITY ANNEXATIONS AND
SPHERES OF INFLUENCE POLICY (POLICY NO. 3.095)
(ALL SUPERVISORIAL DISTRICTS)
(3 VOTES)**

IT IS RECOMMENDED THAT YOUR BOARD:

1. Approve the amendment to the City Annexations and Spheres of Influence Policy that is intended to guide the County's review and response to annexation and sphere of influence proposals pursued by cities.
2. Instruct the Chief Executive Officer and other County departments, as appropriate, to implement the amended Board Policy effective immediately.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Your Board adopted the Policy on May 13, 2003 with a Sunset Review Date of May 13, 2007. During the sunset review process, it was determined that amendments were necessary to provide further guidance to the Chief Executive Office (CEO) and County departments when negotiating proposed city annexation and sphere of influence proposals.

Implementation of the amended Policy is contingent upon your Board's approval.

"To Enrich Lives Through Effective And Caring Service"

The amendments provide additional guidelines related to the following Sections of the Policy:

Section B. 3: Regional Housing Needs Assessments Allocations

This Policy amendment will allow the County to negotiate agreements with any city proposing to annex unincorporated territory to transfer Regional Housing Needs Assessments (RHNA) allocations from the County to the annexing city. Currently, transfers of housing units to annexing cities are not part of the annexation process. Therefore, annexations occur without the corresponding transfer of the County's share of housing units to the annexing city and the County is still responsible for the planning of such housing units. By formalizing a process by which such transfers are negotiated concurrently with city annexations, the County's responsibility for its fair share of housing units will be more accurately reflected. The amended Policy will also allow the County to oppose an annexation if a city does not accept the RHNA allocation of housing units associated with the land area to be annexed by the city.

Section B. 5: Annexations that Conflict with the County's Land Use Policy

This Policy amendment allows the County to oppose annexations that would result in patterns of development that conflict with the County's land use plans and policies and/or would negatively impact adjacent unincorporated areas.

Section C. 2: Unincorporated Area Islands Annexations

This Policy amendment will preclude a city from annexing only part of an unincorporated area island, if such an annexation would make it difficult for the County to provide services to the remaining area. Further, partial annexation of an "unincorporated island" may create illogical boundaries and may further fragment an unincorporated community or area.

Implementation of Strategic Plan Goals

The Countywide Strategic Plan directs that we provide Organizational Effectiveness (Goal 3) by appropriately evaluating city annexations. In addition, this action is consistent with Fiscal Responsibility (Goal 4) by providing opportunities to maximize the long-term fiscal benefits to the County.

The Honorable Board of Supervisors
December 4, 2007
Page 3

FISCAL IMPACT/FINANCING

Adoption of the amended Policy will not have a direct fiscal impact on current services; however, implementation of the amended Policy will help ensure the County considers opportunities to maximize the potential long-term benefits of annexation and minimize the operational and fiscal impact inherent in certain annexation proposals. Since the amended Policy will also allow the County to transfer an appropriate share of the RHNA allocations to an annexing city, the Department of Regional Planning would not have to expend staffing resources to plan for the housing capacity that would be transferred to an annexing city.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Your Board established the current Policy in May 2003 to provide: (1) a process for the review and consideration of proposed annexation and sphere of influence proposals; (2) guidance to County staff in the evaluation of these proposals; and (3) opportunities to negotiate with each city to determine the fiscal, social, geographic, environmental, operational, and land use impacts on affected unincorporated communities and the County of Los Angeles.

Cities within the County were given an opportunity to provide input on the amended Policy during the review process. The draft amended Policy was provided to the Councils of Governments (COGs) representing various cities in the County and individually to cities that are not represented by a COG. Only the San Gabriel Valley COG and the City of Los Angeles provided input. Based upon the input from both the City of Los Angeles and the San Gabriel Valley COG, the proposed amendments were further refined to address both agencies' concerns with the proposed amendments.

As required by your Board, County policy revisions other than an extension of the Sunset Review Date must be presented to, and approved by the Audit Committee. The CEO presented the Policy amendments to the Audit Committee and received final approval on September 20, 2007.

The amended Policy was reviewed by County Counsel.

The Honorable Board of Supervisors
December 4, 2007
Page 4

IMPACT ON CURRENT SERVICES (OR PROJECTS)

Approval of the amended Policy will not have a direct impact on current services. However, implementation of the proposed amended Policy will help ensure that the County: (1) appropriately evaluates city annexations to determine the fiscal, social, geographic, environmental, and land use impacts to affected unincorporated communities and the County; and (2) consider opportunities to maximize the potential long-term benefits of annexations and minimize negative impacts to the County and its residents.

CONCLUSION

Adoption of the amended Policy by your Board will provide further guidance on city annexation and sphere of influence proposals.

Upon adoption of the amended Policy, the CEO will provide a copy to each city in the County.

Respectfully submitted,



WILLIAM T FUJIOKA
Chief Executive Officer

WTF:LS:DSP
MJS:os

Attachment (1)

c: County Counsel
Auditor-Controller
Director of Regional Planning

120407_CEO_Amendment City Annexations & Spheres of Influence.doc



Los Angeles County
BOARD OF SUPERVISORS POLICY MANUAL

Policy #:	Title:	Effective Date:
3.095	City Annexations and Spheres of Influence	05/13/03

PURPOSE

Establish policies for the review and consideration of city annexation proposals and for the establishment and updating of city spheres of influence by the Local Agency Formation Commission, which determine where future annexations are likely to occur.

The County of Los Angeles supports the concept that urbanizing areas should have the option to attain municipal status through annexation, if so desired by area residents and not in conflict with County interests. Recognize that Los Angeles County is generally an urban county with a diverse population and a variety of communities, lifestyles and interests, and that unincorporated area residents may also chose to remain unincorporated under County government and not become part of a city.

In recognition of the population diversity and variation between unincorporated communities, the County will review and evaluate each city annexation proposal or sphere of influence amendment on a case-by-case basis and negotiate with each city in good faith as needed, under the guidance of this policy to determine its fiscal, social, geographic, environmental and/or operational impacts on the affected unincorporated community(s) and the County of Los Angeles. Furthermore, it is County policy to provide assistance to residents of unincorporated areas in determining their preferred government structure alternatives.

Finally, while many unincorporated communities reflect distinct, mature, and cohesive identities; other areas are characterized as "islands" created as a result of historical incorporations and annexations. Providing municipal services may involve sending County staff across neighboring cities to respond to community needs. Ensuring the most cost-effective and responsive services to these areas may involve exploring such vehicles as contracts with surrounding/neighborng cities or expanding County services via contract to address the needs of a larger area.

REFERENCE

Government Code Section 56000, et seq., Revenue and Taxation Code Section 99

POLICY

Background:

- A. There are three general categories of local government services:
1. Regional Services are services provided by the County at a standard level to all County residents and properties. Regional services include public health, welfare and social service programs, the criminal justice system, property assessment, tax collection, voter registration and many others.
 2. Basic Services are available countywide but are provided by cities, either directly or through contract, within their corporate boundaries, and by the County in unincorporated areas. Basic services include law enforcement, road maintenance, animal control, land use planning, zoning and building inspection and others. Although service levels may differ between jurisdictions, all cities and the County provide at least a basic level of these services.
 3. Extended Services may be either additional, non-basic types of services or a higher level of a basic service. Extended services are provided either by cities or special districts. The County generally does not provide extended services out of general tax revenue, but can administer dependent taxing districts (e.g., assessment and benefit districts) to support extended services.
- B. Traditionally, cities have been incorporated, or their boundaries expanded, to encompass additional areas because residents and/or property owners have desired improved, extended services.
- C. Pursuant to State Revenue and Taxation Code Section 99, the County Board of Supervisors is responsible for negotiating property tax exchange resolutions with any city proposing to annex unincorporated territory. The County may also enter into a master property tax exchange agreement with other local agencies within the County to provide for a formula for determining property tax exchanges.
- D. Heretofore, the Los Angeles County Board of Supervisors has not adopted a formal policy regarding city annexations. Nor has the Board adopted a master property tax exchange formula. However, an informal formula negotiated by the Chief Executive Office and the Los Angeles League of Cities has been historically used.

Policies:

A. General Policies

1. The County encourages development of unincorporated areas in a manner that permits their assimilation into adjacent cities, should area residents desire annexation.
2. The County supports revenue allocations that equitably reflect the County's regional responsibilities, as well as the responsibilities of the County, cities and special districts for basic and extended services.
3. In implementing this Policy, the County may encourage or discourage all or a part of specific annexations or spheres of influence proposals based upon the impact on an unincorporated community's sense of identity, revenue base, land use planning and pattern of development, and/or impact on County-initiated programs to improve services and infrastructure in the area, so as to avoid premature annexations that may prejudice more favorable long-term government structures.
4. The County Board of Supervisors supports the concept of providing positive options to residents of unincorporated communities who desire a higher level of service, but prefer to remain unincorporated. Such options may include the use of assessment districts, the County budget process, local revitalization programs, contracts with neighboring cities, special planning standards or other mechanisms, as needed, subject to Board approval, and in most cases, subject to the approval of the affected communities.
5. Based upon the above policies, the County Board of Supervisors has determined that it is in the best interest of the County's unincorporated communities to review annexation proposals on a case-by-case basis rather than to adopt master agreements or formulas relating to the allocation and/or exchange of revenues between the County and affected cities.

B. Annexation Policies

1. The County will oppose annexations that carve up or fragment an unincorporated community that has a strong sense of identity.
2. The County will oppose annexations of commercial or industrial areas that have a significant negative impact on the County's provision of services, unless the annexing city provides financial or other mitigation satisfactory to the County.

3. The County will seek to negotiate agreements with any city proposing to annex unincorporated territory to appropriately transfer Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA) allocations from the unincorporated area to an annexing city. The County will oppose annexations with any city that does not accept the SCAG RHNA allocation associated with the land area to be annexed.
4. Annexations that include areas where the County has established revitalization efforts and/or has committed significant resources for the benefit of the unincorporated community will be reviewed to determine the impact on the County program(s) and may be opposed if the annexation will adversely impact the County program(s).
5. The County may oppose annexations that would result in patterns of development that conflict with the County's land use plans and policies and/or would negatively impact (as defined for each specific annexation) adjacent unincorporated areas.
6. The County will review annexation proposals to ensure that streets or other County local facilities that serve the annexing area are included so that the city assumes responsibility for maintaining these public facilities. When streets are the demarcation between jurisdictions, the City boundary should be to the centerline of the streets that form the boundary of their jurisdiction.
7. The cumulative impact of past city annexations on the County generally, and the affected unincorporated community specifically, will be considered by the Board of Supervisors.
8. The Board of Supervisors requests that any city initiating an annexation demonstrate support for the annexation by the affected landowners for uninhabited territory or registered voters for inhabited territory.

C. Unincorporated "Islands" Policies

1. The Board of Supervisors directs its staff to develop and maintain an inventory of unincorporated islands in urbanized areas that do not include residents or businesses, but consist of County roads, streets, flood channels or other public purpose lands and facilities. These island areas should be considered for annexation to adjacent cities.
2. The County will oppose annexations that involve only part of an unincorporated area island, if such an annexation would make it financially difficult for County departments to provide services to the remaining area. In addition, in order to create logical boundaries and improve service delivery

to certain unincorporated area islands, the County will work with residents, property owners and the community to explore appropriate island annexation strategies for these areas.

3. The County will periodically conduct "make-buy-sell-annex" assessments regarding the most cost-effective, responsive and community-desired manner in which municipal services are delivered to unincorporated "island" communities.
4. These assessments will examine whether services could be provided more effectively by neighboring cities via contracts with the County or if County services could be expanded to other surrounding communities to achieve economies of scale. Formal annexation to a neighboring city will also be reviewed where relevant.
5. The desires and preferences of the residents of the affected "island" community will be a guiding factor in developing recommendations. As appropriate, residents will be provided with service comparison and related information regarding the potential annexation to a neighboring city.

D. Sphere of Influence Policies

1. The County Board of Supervisors supports the intent of Government Code Section 56425, *et seq.*, and will work with LAFCO and all of the cities of the County to review and update city spheres of influence according to its provisions which provide a process for negotiating agreements between the County and each city on sphere updates.
2. The County will include the above-stated policies as a component of the negotiating process for spheres of influence and may oppose any sphere of influence proposal that is inconsistent with those policies.

RESPONSIBLE DEPARTMENT

Chief Executive Office

DATE ISSUED/SUNSET DATE

Issue Date: May 13, 2003
Revised 8/20/07:mjs

Sunset Date: 5/10/2011

Existing SEA in County General Plan and Proposed SEA in OVOV



Land Use Element of the Updated County Area Plan	
Policy LU-1.1.5: Increase infill development and re-use of underutilized sites within and adjacent to developed urban areas to achieve maximum benefit from existing infrastructure and minimize loss of open space, through redesignation of vacant sites for higher density and mixed use, where appropriate.	Consistent: The Vista Canyon project site is adjacent to a developed urban area (Fair Oaks Ranch) and will benefit from existing infrastructure that serves the area, such as Jake's Way and Lost Canyon Road.
Policy LU-1.2.12: In the Fair Oaks community, facilitate location of commercial and community services in proximity to residences to serve local needs.	Consistent: The Vista Canyon project site is adjacent to Fair Oaks Ranch and will provide commercial and community services in proximity to existing residents in that community.
Policy LU-1.2.13: Encourage use of the Specific Plan process to plan for cohesive, vibrant, pedestrian-oriented communities with mixed uses, access to public transit, and opportunities for living and working within the same community.	Consistent: The Vista Canyon project will use the Specific Plan process to plan for a cohesive, vibrant, and pedestrian-oriented community with mixed uses, access to public transit, and opportunities for living and working within the community. The project includes a mix of residential, office, hotel, and retail uses. The project will have access to Metrolink public transit through construction of a new train station within the community. In addition, a bus transfer station will be provided. Since the project includes a mix of residential, office, hotel, and retail uses, there will be opportunities for people to live and work within the Vista Canyon community.
Policy LU-2.3.4: Adequate public spaces and amenities shall be provided in a mixed use development to support both commercial and residential uses, including but not limited to plazas, landscaped walkways, village greens, and greenbelts.	Consistent: The Vista Canyon project will include public spaces and amenities that will support the mix of residential, office, hotel, and retail uses.
Policy LU-2.3.5: Mixed use developments shall be designed to create a pedestrian-scale environment through appropriate street and sidewalk widths, block lengths, relationship of buildings to streets, and use of public spaces.	Consistent: The Vista Canyon project has been designed to create a pedestrian-scale environment. The street and sidewalk widths will allow for pedestrian activity. Most of the streets are in a "gridiron" pattern and the block lengths are relatively short, which will also allow for pedestrian activity. Many of the buildings will be oriented to the street. Public spaces will be provided throughout the project.
Policy LU-2.3.6: Provide parking alternatives in mixed use developments, including subterranean parking and structured parking, to limit the amount of surface area devoted to vehicle storage.	Consistent: The Vista Canyon project includes structured parking, which will limit the amount of surface area devoted to vehicle storage.

<p>Policy LU-3.1.2: Provide a mix of housing types within neighborhoods that accommodates households with varied income levels.</p>	<p><u>Consistent:</u> The Vista Canyon project includes a mix of residential uses, including single-family and multi-family dwellings, which will accommodate households with varied income levels.</p>
<p>Policy LU-5.2.1: Designate higher-density residential uses in areas served by public transit and a full range of support services.</p>	<p><u>Consistent:</u> The Vista Canyon project will have access to Metrolink public transit through construction of a new train station within the community. In addition, a bus transfer station will be provided.</p>
<p>Policy LU-5.2.4: Encourage transit-oriented development (TOD) through designation of land uses that allow compact, mixed-use development in proximity to rail stations and multi-modal transit facilities, in conformance with applicable policies</p>	<p><u>Consistent:</u> The Vista Canyon project will have access to Metrolink public transit through construction of a new train station within the community. In addition, a bus transfer station will be provided.</p>

DRAFT
Draft RHNA Calculations for Proposed Annexations - City of Santa Clarita
Vista Canyon & Ancillary Annexation Area

	Area	SCAG HH 2005	SCAG HH 2014	Increment of Growth
Census Tract 9108.09 (unincorporated only)	924.63	80.00 households	142.00 households	
Annexed area	56.64	4.90 households	8.70 households	3.80
Census Tract 9200.37 (unincorporated only)	150.40	1577.00 households	2410.00 households	
Annexed area	149.13	1563.66 households	2389.61 households	825.95
Census Tract 9200.41 (unincorporated only)	298.90	5.00 households	16.00 households	
Annexed area	279.50	4.68 households	14.96 households	10.29
Census Tract 9200.42 (unincorporated only)	165.06	557.00 households	835.00 households	
Annexed area	154.85	522.54 households	783.34 households	260.80
Census Tract 9200.43 (unincorporated only)	2778.11	219.00 households	426.00 households	
Annexed area	1685.43	132.86 households	258.45 households	125.58
Census Tract 9302.00 (unincorporated only)	74594.84	223.00 households	354.00 households	
Annexed area	898.74	2.69 households	4.27 households	1.58

ADJUSTMENTS

Increment of growth for study area		1228.00
Vacant unit estimate*	3.50%	42.98
Replacement unit estimate**	0.35%	4.30
Total		1275.28 UNITS

RHNA Allocation By Income Level

Very Low (25.2% of allocation)	321 units
Lower (15.9 % of allocation)	203 units
Moderate (17.2% of allocation)	219 units
Above Moderate (41.7% of allocation)	532 units
TOTAL	1275 units

Prepared by the Housing Section
 Los Angeles County Department of Regional Planning
 11/9/2010

*As used in SCAG's RHNA methodology
 **Replacement factor for the North LA County subregion

LETTER NO. B5. LETTER FROM COUNTY OF LOS ANGELES CHIEF EXECUTIVE OFFICER, DECEMBER 3, 2010

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

This comment is an introduction to comments that follow. No further response is required.

Response 3

The comment is noted. This area has been added to the Ancillary Annexation Area.

Response 4

The comment provides factual background information regarding the County's review of annexation proposals and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 5

The comment states that the boundary used for the Santa Clara River SEA, as depicted in the Draft EIR, Figure 4.20-2, Limits of the Santa Clara River Study Reach, of the Draft EIR, is inaccurate. The comment states that the SEA boundary depicted in the County's existing General Plan and the Santa Clarita Valley Area Plan should be used instead.

To preface, the SEA boundary depicted in Figure 4.20-2 of the Draft EIR are based on the City's adopted SEA boundaries, which differ from those adopted by the County. More specifically, Figure 4.20-2, consistent with City policy, reflects that the existing FEMA 100-year floodplain elevation line is co-terminus with the City's existing SEA overlay within the project site. (See Draft EIR, p. 4.20-25; see also City-certified Riverpark Draft Environmental Impact Report (State Clearinghouse No. 2002091081; March 2004), prepared by Impact Sciences, Inc., p. 4.6-47.) The existing SEA boundary depicted in Figure 4.20-2 of the Draft EIR also is consistent with Exhibit OS-2 of the City's Open Space and Conservation Element Amendment (Conservation Element; February 23, 1999).

By way of background, SEA 23 (the Santa Clara River SEA) was designated in the County's 1980 General Plan Conservation and Open Space Element. (A copy of the County's 1980 General Plan is available at <http://planning.lacounty.gov/generalplan>.) The County's Conservation and Open Space Element's intent,

however, was not to “preclude reasonable use of private property in these areas, but to ensure that where development takes place, identified natural resources are protected.” (General Plan, p. II-36.) Similarly, the Los Angeles County Code (County Code) states: “It is not the purpose to preclude development within these areas but to ensure, to the extent possible, that such development maintains and where possible enhances the remaining biotic resources of the significant ecological areas.” (County Code, section 22.56.215.B.1.) Moreover, the Santa Clarita Valley Area Plan confirms that “[f]uture additions and deletions to identify [SEAs] may be appropriate based on updated, more detailed biotic surveys.” (Area Plan, p. 41.)

Based on the above documents discussed in the prior paragraph, all of which are incorporated by reference and available for public review and inspection at the two locations identified on page I-8 of the Draft EIR, compatible development within SEAs is permitted after evaluation of biological resources and project design. For example, the County Code confirms that development is permissible if:

[T]he requested development is designed to be highly compatible with the biotic resources present, including the setting aside of appropriate and sufficient undisturbed areas. (County Code, section 22.56.215.2.a.)

[T]he requested development is designed so that wildlife movement corridors are left in an undisturbed and natural state. (County Code, section 22.56.215.2.c.)

As discussed at length in the Draft EIR, the project site is located within the City's existing boundary of SEA 23. SEA 23 was designated primarily to protect habitat for the unarmored threespine stickleback (UTS), an endangered species. (See, e.g., City's Conservation Element, p. OS-5; see also Draft EIR, p. 4.20-6.) UTS require clear, free-flowing, perennial streams with associated pools. (*Ibid.*) However, the Santa Clara River is mostly dry, except after seasonal storm events, and UTS were not detected on the project site. (See, e.g., Draft EIR, p. 4.20-40.) Further, detailed biota surveys were completed for the proposed project, and these surveys showed that the City's SEA boundary, which was based on FEMA's 100-year floodplain elevation, does not correspond to the sensitive riparian and jurisdictional resources on the project site. (See Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, for a detailed assessment of the project's impacts on SEA 23.) Therefore, the project proposes to amend the City's General Plan by adjusting the existing SEA boundary to correspond to the area designated as open space within the Santa Clara River Corridor, which also corresponds to the location of the sensitive on-site biological species. (See, e.g., Draft EIR, pp. 1.0-15, 4.20-6.)

In closing, although the project site currently is located within the unincorporated territory of Los Angeles County, the project contemplates annexation to the City of Santa Clarita. Accordingly, the EIR correctly utilized the City's existing standards, policies, and criteria to assess project impacts. (See, e.g.,

Sierra Club v. City of Orange (2008) 163 Cal.App. 4th 523, 543-544 [finding that an EIR was not required to conduct traffic analysis pursuant to County standards because project proposed annexation into City; therefore, City standards were applicable].) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment states that the City's and County's draft One Valley One Vision (OVOV) plan proposes to modify the SEA boundary as it pertains to the project site. Specifically, the comment states that draft OVOV plan would reduce the SEA overlay in the southwest corner of the project site, but expand the boundary to the north, south and east portions of the project site.

While the comment is noted, the consistency of a project with draft plans, such as the draft OVOV plan, need not be evaluated because such plans are not yet legally applicable to the proposed project. (See, e.g., *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App. 4th 1134, 1145, fn. 2; see also Cal. Code Regs., tit. 14, Section 15125, subd. (d) [requiring EIRs to discuss any inconsistencies between a proposed project and applicable plans].) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment states that the proposed SEA boundary depicted in the draft OVOV plan includes a north-south movement linkage that links the Santa Clara River with the Angeles National Forest. The comment then restates information contained in the Draft EIR, including Forde Biological Consultants' *Species Movement: Vista Canyon Ranch, Los Angeles County, California* (Species Movement Report; July 27, 2009), a copy of which is included in Appendix 4.6 of the Draft EIR.

As indicated in the comment, the proposed north-south movement linkage identified in the draft OVOV plan was addressed in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis:

A north/south animal movement corridor is presently shown as part of a proposed SEA 23 expansion associated with the City and County's General Plan Updates (One Valley, One Vision). Therefore, the *Species Movement Report, 2009*, also evaluated the need for a north/south species movement area through a portion of the proposed project. The *Species Movement Report, 2009*, indicated that setting aside space to preserve a north/south movement of species may not provide significant benefit to wildlife as it would increase opportunities for detrimental interactions with people and pets both on and off the site because the project site is generally surrounded by existing development. It further stated that it may be preferable to concentrate corridor enhancement along the Santa Clara River as presently proposed by the project. As presently designed, the project does not include an area for north/south animal movement.

However, the *Species Movement Report, 2009*, has indicated that black-tailed jackrabbit, deer, raccoon, skunk, bobcat and coyote currently move north from the River Corridor to the project site and subsequently to rural and undeveloped properties south of the eastern portion of the project site, eventually reaching the Angeles National Forest. The *Species Movement Report, 2009*, also has indicated that if land were to be set aside as a north/south movement corridor through the project site it should be located on the east side of the proposed project. The east side of the project site is directly bounded on the south by the Metrolink right-of-way (which does not impair animal movement) and a commercial horse ranch. The more developed portions of the commercial horse ranch property would impair animal movement to the south. Consequently, the *Species Movement Report, 2009*, has indicated that there is an area east of the developed portion of the commercial horse ranch that is wide enough and contains sufficient cover to accommodate animal movement south from the project site.

In conclusion, the *Species Movement Report, 2009*, has indicated that there are more appropriate locations for regional north/south animal movement, including the San Gabriel/Castaic Connector, which is located east of the project site. Furthermore, it has indicated that encouraging animal movement through the project site in a north/south corridor would increase opportunities for detrimental interactions with people and pets and that future development south of the project site could impair or eliminate the viability of this movement corridor. In light of these facts and additional findings contained in the *Species Movement Report, 2009*, the fact that the current project design does not provide for a north/south movement corridor is not considered a significant impact under this criterion.

Incorporation of a north/south movement corridor on the east side of the project site (at a minimum width of 300 feet) would eliminate 26 single-family residential lots located adjacent to the project's eastern boundary, and an acceptable crossing under Lost Canyon Road would have to be incorporated into this north-south corridor in order to provide direct access to the Santa Clara River.

(Draft EIR, pp. 4.20-56 to -57.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment states that the proposed project should retain the north-south linkage between the Santa Clara River and Angeles National Forest.

In a December 21, 2010 Staff Report submitted to the Planning Commission regarding the proposed project, City staff recommended that the project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. At the December 21, 2010 public hearing, the Planning Commission directed that this project modification be made. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres and, as requested by the comment, allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara

River through the project site to undeveloped land to the south. More specifically, the modified Oak Park would provide a minimum animal corridor width of approximately 400 feet, which is consistent with the 300 to 400 feet width previously reported in the Draft EIR. (Draft EIR, p. 4.6-75.) As discussed in the *Species Movement Report*, a corridor width of approximately 300-400 feet could accommodate movement of the species expected to traverse the project site. (See Draft EIR, Appendix 4.6, Species Movement Report, p. 9; see also Draft EIR, p. 4.6-21 [discussing the range of opinions regarding specific corridor widths that are required to facilitate wildlife movement].) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment opines that elimination of the north-south animal movement corridor would conflict with the Burden of Proof, specifically Condition No. 3, required for the issuance of a SEA Conditional Use Permit (CUP) in the County permitting process.

As previously mentioned in **Response 5** above, the proposed project contemplates annexation to the City of Santa Clarita. Accordingly, Section 4.20 of the Draft EIR analyzed the project's consistency with the City's SEA development standards/compatibility criteria. (See Draft EIR, pp. 4.20-46 to -47 [identifying the City's standards].) That being said, the referenced County Condition No. 3 is virtually identical to compatibility criterion (c) identified in the Santa Clarita Municipal Code, section 17.15.020(K)(1)(2): "The development shall be designed so that wildlife movement corridors (migratory paths) are left in an undisturbed and natural state."

As discussed in the Draft EIR, Section 4.20, the project's proposed development would satisfy this criterion because, after project implementation, the Santa Clara River Corridor would continue to function as an east-west wildlife movement corridor. (Draft EIR, p. 4.20-56.) The Draft EIR also disclosed that:

In addition, based on the *Species Movement Report, 2009*, post-project, species presently can and would be able post-project to negotiate the length of the river, moving east or west, and eventually reach the Angeles National Forest and other open space surrounding the City of Santa Clarita. Further, the proposed Vista Canyon Road Bridge would be sufficiently high so as to allow the continued use of the Santa Clara River for wildlife movement east-west along and within the River Corridor; and lighting controls on the proposed bridge would be implemented to ensure that the SEA would continue to function as a wildlife movement corridor. According to the *Species Movement Report, 2009* (p. 7.), '[t]he value of the Santa Clara River is clear; species can move the entire length of the river and some terrestrial species would only be precluded from doing so during infrequent major storm events.'

(*Ibid.*) Additionally, as discussed in **Response 8** above, the proposed project also would preserve and enhance a north-south animal movement linkage, thereby alleviating the comment's concerns regarding the project's consistency with the applicable SEA development standards/compatibility criteria. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment states that the County encourages the use of the Specific Plan process and does not appear to raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 11

The comment states that the proposed project is consistent with the goals and policies of the draft One Valley One Vision (OVOV) Plan. The comment further notes that the County and City have agreed that the proposed Vista Canyon project will not be illustrated on the draft OVOV Land Use Policy Map or Plan until review of the project is completed. While the comment is noted, the consistency of a project with draft plans, such as the draft OVOV plan, need not be evaluated because such plans are not yet legally applicable to a project. (See, e.g., *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App. 4th 1134, 1145, fn. 2; see also Cal. Code Regs., tit. 14, Section 15125, subd. (d) [requiring EIRs to discuss any inconsistencies between a proposed project and *applicable* plans].) That being said, a consistency assessment of the project with the proposed OVOV Plan is contained in Appendix 4.7 of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 13

Please see **Response 2** to Comment Letter B3. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 14

Please see **Response 3** to Comment Letter B3. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 15

Please see **Response 5** to Comment Letter B3. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 16

This commenter suggests that the Transportation Impact Study and related Draft EIR should have identified a significant impact at the Canyon Park Boulevard/Jakes Way intersection, and should have recommended mitigation.

The Transportation Impact Study and Draft EIR did not report a significant impact at the Canyon Park Boulevard/Jakes Way intersection because the intersection would operate at an acceptable LOS C when the entire AM and PM peak hour periods are considered, which is the period the City of Santa Clarita uses to evaluate intersection LOS.

The intersection currently is situated in unincorporated Los Angeles County, although it would be annexed into the City of Santa Clarita with approval of the proposed project and the ancillary annexations. Table 17 in the Transportation Impact Study, and corresponding Draft EIR Table 4.3-11, depict the LOS conditions at the intersection based on a Peak Hour Factor (PHF) 15-minute analysis. However, as shown in the table below, when the entire peak hour is considered, which is the period the City of Santa Clarita utilizes to evaluate intersection operations, the intersection would operate at LOS C. (See, Final EIR Appendix F4, Memorandum, Canyon Park Boulevard/Jakes Way Intersection, Fehr & Peers, January 21, 2011, for technical calculations.)

Table
Interim Plus Project Traffic Operations at Canyon Park Boulevard/Jakes Way Intersection

Intersection	Average Delay – Level of Service during AM (PM) Peak Hour	
	Entire Peak Hour	Busiest 15-Minutes of Peak Hour
Canyon Park Boulevard/Jakes Way	22 – C (25 – C)	33 – D (33 – D)

This result is consistent with the analysis of other unsignalized intersections in the Draft EIR. See, for example, Draft EIR p. 4.3-16, in which conditions at the Sand Canyon Road/Lost Canyon Road intersection, an unsignalized intersection located within Santa Clarita, are reported on an hourly basis. Accordingly, the Transportation Impact Study and Draft EIR correctly reported that the project would not result in a significant impact at the intersection.

This conclusion is further justified by examining conditions at the intersection. Projected traffic volumes under project buildout/interim conditions do not satisfy the peak hour traffic volume warrant for consideration of a traffic signal. Additionally, the majority of project trips at this intersection are added to the southbound left-turn movement, and the resulting PM peak hour volume can be accommodated within the 100 feet of storage that is provided. The fact that no physical improvements are needed at the intersection further substantiates the conclusion reached in the Transportation Impact Study and Draft EIR.

Response 17

This commenter states that the final Transportation Impact Study indicates the project is expected to result in a significant impact at the Placerita Canyon Road/SR 14 NB Ramps intersection and, therefore, mitigation should be included. However, as explained below, the proposed project would not result in a significant impact at the intersection and, therefore, no mitigation is required.

Table 17 in the Transportation Impact Study lists the intersection operations under project buildout/interim conditions. The table notes in bold font those intersections that would operate at unacceptable levels under “with project” conditions. Included within the bolded intersections are three intersections that would operate at unacceptable levels although the project would *not* cause a significant impact at the intersections. The three intersections are intersection 20 (Soledad Canyon Road/Bouquet Canyon Road), intersection 22 (Placerita Canyon Road/SR-14 SB Ramps), and intersection 23 (Placerita Canyon Road/SR 14 NB Ramps).

Specific to the comment and intersection 23, the impact would not be significant (based on the significance criteria) because the proposed project would not use 2 percent or more of the intersection’s capacity. As shown in the Traffic Impact Study of the Draft EIR to the Transportation Impact Study, the proposed project would cause the intersection capacity utilization to increase by 0.8 percent during the AM peak hour and by 0.2 percent during the PM peak hour. Therefore, the conclusion of a non-significant impact is correct and no mitigation is required.

Relatedly, Draft EIR Table 4.3-11, Intersection Operations - 2015 Conditions, incorrectly identifies the three intersections (Intersections 20, 22, and 23) as “significant impacts.” However, the Draft EIR text

correctly omits the three intersections from the list of significant impacts. (See Draft EIR, pp. 4.3-57 to 4.3-58.) The Final EIR includes the necessary revisions to Table 4.3-11.

Response 18

The comment clarifies that if the Vista Canyon project site and AAA are annexed to the City, vehicle related law enforcement responsibilities would transfer from the California Highway Patrol (CHP) to the Los Angeles County Sheriff's Department (Sheriff's Department). Sections 4.14, Sheriff Services, and Section 4.24, Ancillary Annexation Area, have been revised to clarify that the Sheriff's Department, and not CHP, would be responsible for the provision of these law enforcement services. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 19

The comment provides clarification regarding CHP's responsibilities within the City of Santa Clarita. Section 4.14, Sheriff Services, has been revised to reflect that CHP would not provide traffic enforcement services to the proposed project upon annexation to the City. Please see the portion of the Vista Canyon Final EIR entitled, "**Revised Draft EIR Pages**," for the actual text revision. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 20

The comment requests that additional information regarding the AAA be included in Section 1.0, Project Description. The City believes that the description of the AAA included in Section 1.0, Project Description, is adequate for purposes of CEQA. (See, e.g., Draft EIR, pp. 1.0-4, -13 to -14.) This discussion also specifically refers the reader to Section 4.24, Ancillary Annexation Area, of the Draft EIR for further information regarding the AAA and the environmental impacts attributable to annexation of the AAA. Consequently, no changes to Section 1.0, Project Description are required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 21

The comment states that the County will only support the annexation of the Fair Oaks Ranch community if the City agrees to assume ownership and responsibility for an existing park located in Fair Oaks Ranch. The City will assume ownership of and responsibility for Fair Oaks Park. The comment will be included

as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 22

The comment raises economic, social or political issues that do not appear to relate to any physical effect of the proposed project on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 23

The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 24

The comment states that the information contained in Section 4.11, Library Services, of the Draft EIR concerning County libraries will no longer apply as of July 1, 2011, because the City voted to leave the County's Public Library System and transfer operational responsibilities for the Canyon Country Jo Anne Darcy Library, Newhall Library and Valencia Library to the City. This comment is correct and is noted in Section 4.11, Library Services, which states: "*Effective July 1, 2011, the City of Santa of Santa Clarita will assume operation of the three libraries within the City.*" (Draft EIR, p. 4.11-1.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 25

The comment suggests that a mitigation measure be incorporated to ensure that permits for water infrastructure are secured. While the City does not object to the general parameters of the recommended measure, the timing is not appropriate. Specifically, while the comment suggests that the plans be submitted for review and approval prior to the issuance of building permits, the City believes that the approval should occur prior to the issuance of an occupancy permit. Therefore, the following additional mitigation measure has been added to Section 4.21, Wastewater Disposal:

4.21-8 Prior to issuance of the first occupancy permit and the use or installation of any recycled water infrastructure, plans must be submitted to the State of California Department of

Public Health and County Department of Public Health-Environmental Health Division
for review and approval.

Response 26

Please see **Response 1** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 27

Please see **Response 2** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 28

Please see **Response 3** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 29

Please see **Response 3** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 30

Please see **Response 4** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 31

Please see **Response 5** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 32

Please see **Response 6** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 33

Please see **Response 7** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 34

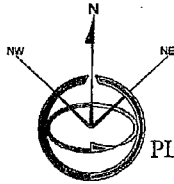
Please see **Response 8** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 35

Please see **Response 11** to Comment Letter B2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 36

The comment, which provides contact information should the City have any questions regarding the comment letter, is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



WRA Engineering, Inc.
William Rose & Associates, Inc.
LAND DEVELOPMENT CONSULTANTS
PLANNING • CIVIL ENGINEERING • SURVEYING
Founder: G. William Rose - 1975

Members of the Santa Clarita Planning Commission,
Jeff Hogan, AICP, Senior Planner
Lisa M. Webber, AICP, Planning Manager
23920 Valencia Blvd.
Santa Clarita, CA 91355

October, 18, 2010

Subject: Master Case No. 07-127, Annexation 07-002A & B, Pre-Zone/Zone Change 07-001A & B, General Plan Amendment 07-001A & B, Specific Plan 07-001, Tentative tract map 69164, CUP 07-009, Oak Tree Permit 07-019, EIR SCH No. 2007071039

Members of the Planning Commission, Mr. Hogan and Ms. Webber,

On behalf of our Client Mr. Palo Plesnik, for whom we are processing a 4 lot Parcel Map application with LA County for property within the proposed Annexation area, we would like to request that Mr. Plesnik be allowed to continue processing his map and that his 20.33 acre property not be re-zoned as National Forest, Open Space (NF, OS) or that his property be excluded from the proposed annexation..

Property Location: APN 2848-012-050. The property fronts on Placerita Canyon Road, is on the south side of the road and is generally located west of Sand Canyon Rd.

Property and Project Description: The existing vacant parcel is 20.33 acres and is zoned A-2-2 which allows single family homes on 2-acre minimum lots. The property has existing single family homes adjacent to it on three-sides. The parcel map we are currently processing for our Client has 4 parcels, ranging in size from 5 acres to 5.12 acres.

1

Mr. Plesnik began processing his parcel map in 2007 and has a substantial amount of time and money invested for design, reports and maps prepared by engineers, geologists, arborists etc. as well as tens of thousands of dollars invested in fees paid to LA County for subdivision, environmental, oak tree, hillside and other required reviews. It is our understanding that the zoning for the property directly across Placerita Canyon adjacent to this property is proposed to be Residential Estate (RE). Mr. Plesnik's proposed parcel map is consistent with this zoning and the adjacent development.

For these reasons, please allow Mr. Plesnik to proceed with his parcel map, or exclude his property from the annexation being considered.

Thank you for your time.
Colleen T. Doan, WRA Engineering Inc.

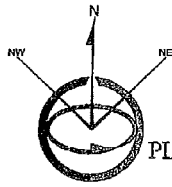
P.O. BOX 801627
SANTA CLARITA, CA 91380-1627
TEL: 661.295.3590
FAX: 661.294.1245

349 0517
ee1

LETTER NO. C1. LETTER FROM WRA ENGINEERING, INC., OCTOBER 18, 2010

Response 1

The comment provides factual background information, requests that a specified property owner be permitted to continue processing a parcel map or that his property be excluded from the proposed annexation, and does not raise an environmental issue within the meaning of CEQA. However, this property has since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.



WRA Engineering, Inc.
William Rose & Associates, Inc.
LAND DEVELOPMENT CONSULTANTS
PLANNING • CIVIL ENGINEERING • SURVEYING
Founder: G. William Rose - 1975

Members of the Santa Clarita Planning Commission
Jeff Hogan, AICP, Senior Planner
Lisa Webber, AICP, Planning Manager
23920 Valencia Blvd.
Santa Clarita, CA 91355

Subject: Master case No. 07-127, Annexation 07-002A & B, pre-Zone/Zone Change 07-001A, CUP 07-009, Oak-tree permit 07-019, EIR SCH No. 2007071039

Members of the Planning Commission, Mr. Hogan and Ms. Webber,

On behalf of our Client, Mr. Palo Plesnik, for whom we are currently processing a 4 lot Parcel map application with L.A. County for property within the proposed annexation area (APN 2848-012-050), we requested in writing at the last Planning Commission meeting that our Client be allowed to proceed with his parcel map, or be excluded from the proposed annexation.

The biggest concern is that as part of the annexation, our Client's property would also receive a zone change from the current A-2-2 zoning to National Forest-Open Space. This could negatively effect his pending land subdivision and 6 years of effort and expense.

Staff stated at the October 19, 2010 Planning Commission meeting that they would be working with the property owners who had concerns. The staff report from this Planning Commission meeting states that staff will **continue** to work with concerned property owners. Our most current concern is that no such work has yet begun. The only contact in response to our letter and phone calls was a call from staff yesterday letting us know that it was not necessary to attend tonight's meeting.

During this phone call I explained that as a Planner for public and private sectors over the last 28 years, it was not clear to me upon reading the notice whether or not my Client's property was included and it was **definitely** unclear as to the intended zone change and its effects on my Client's pending subdivision. **Given that I am asking that a few meetings be held to more clearly inform property owners within the annexation area of the consequences of the annexation on their properties.** On behalf of our Client and those citizens who may not have understood the notice they received and in the spirit of transparency and due diligence to inform the public, I ask that at least one meeting be organized and held on this topic prior to the next Planning Commission meeting on this item.

Thank you in advance for honoring this request,
Colleen T. Doan, WRA Engineering Inc.

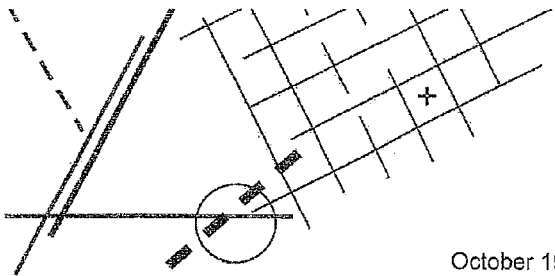
P.O. BOX 801627
SANTA CLARITA, CA 91380-1627
TEL: 661.295.3590
FAX: 661.294.1245

1

LETTER NO. C2. LETTER FROM WRA ENGINEERING, INC., UNDATED

Response 1

The comment provides factual background information, requests that an additional informational meeting be held with property owners located in the AAA, and does not raise an environmental issue within the meaning of CEQA. However, this property has since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.



Carolyn Ingram Seitz & Associates

October 19, 2010

Honorable Planning Commissioners
CITY OF SANTA CLARITA
23920 Valencia Boulevard
Santa Clarita, California 91355

RE: PROTEST OF INCLUSION IN PROPOSED ANNEXATION
REQUEST TO BE EXCLUDED FROM ANNEXATION
SAND CANYON AREA 1 – MASTER CASE NO. 07-127
25933 and 25975 SAND CANYON ROAD

Honorable Planning Commissioners:

I am a planning and zoning consultant representing Frank and Vera Vacek, and Derek Hunt, owners of approximately 400 acres of property identified as follows:

- APN 2848 011 014 59.09 acres RPD
- APN 2848 013 014 50.49 acres A1-2
- APN 2848 013 016 40.00 acres A2-5
- APN 2848 013 017 28.36 acres RPD
- APN 2848 013 018 101.00 acres RPD
- APN 2848 014 016 40.00 acres RPD
- APN 2848 014 017 80.00 acres A2-5

1

These properties bear street addresses 25933 and 25975 Sand Canyon Road.

On behalf of the property owners, I respectfully request that these properties be removed from consideration for annexation into the City of Santa Clarita and for that reason, we protest the inclusion or all or any part of any properties owned by this family proposed for inclusion in the annexation referenced for this area.

If you have questions, comments or concerns about this request, please feel free to contact me.

Thank you for your consideration.

Sincerely,

Carolyn Ingram Seitz
CAROLYN INGRAM SEITZ

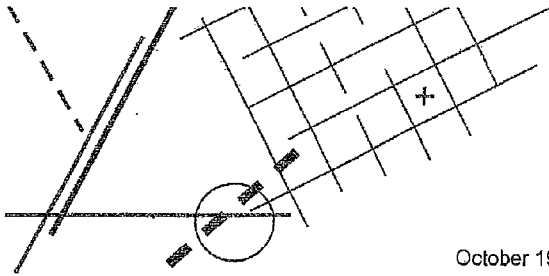
CIS/dbm
cc: Frank and Vera Vacek
Derek Hunt

Governmental Consulting Services / Planning & Zoning / Public Relations / Mediation
P.O. Box 265 / Altadena, CA 91003-0265 / Tel: (626) 345-1233 / Fax: (626) 345-1255 / E-mail: CMSeitz@mindspring.com

**LETTER NO. C3. LETTER FROM CAROLYN INGRAM SEITZ & ASSOCIATES,
OCTOBER 19, 2010**

Response 1

The comment provides factual background information, objects to the inclusion of specified properties within the AAA, and does not raise an environmental issue within the meaning of CEQA. However, it should be noted that the referenced properties have since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.



Carolyn Ingram Seitz
& Associates

October 19, 2010

Honorable Planning Commissioners
CITY OF SANTA CLARITA
23920 Valencia Boulevard
Santa Clarita, California 91355

RE: PROTEST OF INCLUSION IN PROPOSED ANNEXATION
REQUEST TO BE EXCLUDED FROM ANNEXATION
SAND CANYON AREA I – MASTER CASE NO. 07-127
16030, 16040, 16032 PLACERITA CANYON ROAD

Honorable Planning Commissioners:

I am a planning and zoning consultant representing Steve and Diane Arklin, The Steve & Diane Arklin Family Trust, Rancho Deluxe, Back 40 LLC and Back 70 LLC, comprising approximately 125 acres of property identified as follows:

APN	2848 011 011	24.83 acres
APN	2848 011 012	15.17 acres
APN	2848 011 013	30.91 acres
APN	2848 012 032	4.20 acres
APN	2848 012 042	30.65 acres
APN	2848 012 069	3.50 acres
APN	2848 012 077	3.49 acres
APN	2848 012 066	3.49 acres
APN	2848 035 004	1.67 acres
APN	2848 035 005	1.74 acres
APN	8950 999 579	5.00 acres

1

These properties bear street addresses 16030, 16040 and 16032 Placerita Canyon Road.

On behalf of the property owners, I respectfully request that these properties be removed from consideration for annexation into the City of Santa Clarita and for that reason we protest the inclusion or all or any part of any properties owned by this family proposed for inclusion in the annexation referenced for this area.

If you have questions, comments or concerns about this request, please feel free to contact me.

Thank you for your consideration.

Sincerely,

Carolyn Ingram Seitz
CAROLYN INGRAM SEITZ

CIS/dbm
cc: Steve and Diane Arklin

Governmental Consulting Services / Planning & Zoning / Public Relations / Mediation

P.O. Box 265 / Altadena, CA 91003-0265 / Tel: (626) 345-1233 / Fax: (626) 345-1255 / E-mail: CMSeitz@mindspring.com

**LETTER NO. C4. LETTER FROM CAROLYN INGRAM SEITZ & ASSOCIATES,
OCTOBER 19, 2010**

Response 1

The comment provides factual background information, objects to the inclusion of specified properties within the AAA, and does not raise an environmental issue within the meaning of CEQA. However, these properties have since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

3435 Wilshire Boulevard
Suite 320
Los Angeles, CA 90010-1904



(213) 387-6528 phone
(213) 387-5383 fax
www.sierraclub.org

November 1, 2010

Jeff Hogan
AICP Senior Planner
City of Santa Clarita
Community Development Department
23920 Valencia Blvd.
Santa Clarita, California
93155

Vista Canyon Ranch LLC

Recharge areas should be mapped and they should not be allowed to build in those areas (open pavers should be used instead). Should be "water neutral" development.

1

They should approve only at the county level (700 units) and not build in the County Designated SEA. The whole reason they want to annex this is so they can build units in the SEA. Because of this I suggest that we oppose annexation and request that the project be built in the county with the lower unit number.

2

The package sanitation plant should be reverse osmosis to reduce the chlorides in the Santa Clara River.

3

COMMENTS

As both residents of the Santa Clarita Valley and members of the Sierra Club, we are extremely concerned about the ramifications of the "Vista Ranch Project." The proposed build-out of 1350 residential lots plus commercial space within the city of Santa Clarita is shocking when one considers the economic, environmental, and societal pressures of the times. The proposed Vista Ranch project will substantially degrade the quality of the environment in northern Los Angeles County.

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A recent trend of development corporations consists of creating new developments in the midst of our most beautiful remaining open spaces. The proposed Vista Ranch development area is one of these open spaces. It is situated in the heart of the city of Santa Clarita Valley in and around the Santa Clara River. The time has come to question

not only CAN we develop this area, but SHOULD we develop this area. We believe the Santa Clara River should remain a natural river, and that the fringe area should remain a vital recharge resource for the local aquifers.

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• Infrastructure

Foreclosures, bankruptcies, and losses of adequately paying jobs have resulted in a surplus of unoccupied homes. Many new homes and small businesses in the Santa Clarita Valley remain uncompleted and/or empty because of the recession, a sick economy, state and federal deficits, and a long-term lack of demand for more new homes. California has the worse debt and economy of any state in the country. Citizens have lost much income and savings over the last year and this project may soon be asking them to spend and buy in an isolated, over saturated area.

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Due to the troubling economic times, many schools in the Santa Clarita Valley have had extremely detrimental budget cuts coming from both the state and federal government. This has meant that local school districts have had to halt the building of new schools, increase class-sizes, and have either pink-slipped and or let-go of qualified teachers. How would a new development of over a thousand new homes make any of these problems better?

• Biology

Vista Ranch is in the Santa Clara River floodway and flood fringe. We are concerned that the channeling this development entails would increase the flow rate, as well as removing the habitat and foraging grounds of wildlife. The development appears to bring in a huge amount of dirt fill (500,000 cubic yards) to increase the height of the lot. This makes no sense and will worsen air quality (truck trips to bring in the fill). We are also concerned about further narrowing of the river along either side of the proposed bridge. This has been a problem before on numerous other developments and it is surprising to see it being proposed here. We also project that the animals that transition through the area (looking for food and water, etc.) will be negatively impacted. If allowed to be built, this project would compromise the natural and necessary wildlife corridors. It would also destroy portions of an irreplaceable eco-region.

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• Traffic

People inhabiting the homes potentially created by the Vista Ranch Development will, for the most part, probably have employment at well paying jobs in distant cities. Each day many thousands of workers and their automobiles will be leaving or returning to the town from these cities. This proposed development will bring thousands of additional car trips a day onto our freeways and surface streets and increase air pollution which is already some of the worst in the nation. Despite the claims of local developers to the contrary, most people who buy homes in these types of proposed developments will simply not be able to work and live in the same community. Jobs in the service sector of

12

local small towns will not yield sufficiently high salaries and wages to meet monthly house payments and other necessary costs. All highways leading to big cities offering high wages will become more crowded with automobiles than they are at present. Traffic on surface streets and along Highway 14, and along Sierra Highway could become literally unbearable. Although mass transit appears to be a solution, the relocation of the Metrolink Station has its own problems. The southern access to the proposed site of the Metrolink station appears to necessitate local riders to travel through residential areas and could add to traffic at an existing railroad crossing. How would this be more convenient than the already efficient and easily accessible Via Princessa site? In addition, access to the site from the east, from people traveling west on Highway 14 would be via substandard on- and off-ramps at Sand Canyon, as well as over an unimproved bridge from Sand Canyon. New homes are not the answer to the needs and wishes of the people living in Santa Clarita Valley and neighboring areas. Traffic congestion is a major concern of the residents of the surrounding areas.

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- Air Quality

Another serious concern with the project is the substantial effect the proposed development would have on the worsening air quality that we have in our area. It is obvious that the cumulative air pollutant emissions in the area would contribute to the degradation of local and regional air quality. The Santa Clarita Valley already has some of the worst air quality in the nation. Katherine Squires, a local teacher, sees the effects of poor air quality on the children in her Canyon Country classroom. Each year she sees more and more students who suffer from asthma. The SCV already exceeds Federal air pollution standards for particulate matter generated from dust and diesel pollution. We insist the AQMD standard of 150 feet buffer zone between highways or railroad tracks and residential units be followed.

16

In addition, there would be long term effects resulting from the additional traffic on our local roads and freeways. Climatologists agree that greenhouse gases are causing global warming and even the Supreme Court, in its decision several months ago, said that EPA must address Carbon Dioxide as a pollutant.

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- Green Building Standards

The Sierra Club requests that green building standards be included as conditions of any approval that might be considered.

18

- Water Resources

This project is currently in the jurisdiction of the County of Los Angeles and does not lie within the borders of the City of Santa Clarita. The current designation for this project in the County of Los Angeles would allow far fewer units than that contemplated in the City of Santa Clarita's proposal. Further, the City proposes a general plan amendment for this project that was not proposed at the time of the 2005 Urban Water Management Plan

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(UWMP). Therefore this project could not have been considered in the 2005 Urban Water Management Plan.

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In addition, it is not appropriate to depend on the 2005 Urban Water Management Plan as CLWA and the Santa Clarita Water Div. are well-aware that it is outdated and no longer accurate. Events rendering inaccurate the 2005 Plan include but are not limited to several biological opinions and court decisions acting upon those opinions that reduce water supplied from the Sacramento Delta through the state water project. CLWA is also well-aware that the "State Water Reliability Report 2009" recently released by the Dept. of Water Resources and hereby incorporated by reference, reduces that average deliverable percentage of state water entitlement to 60%.

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Additionally, a settlement agreement reached as a result of litigation over inaccuracies in the 2005 Plan, i.e. quantifying the conservation figures, indicated lower water savings than anticipated.

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Water Quality

CLWA is well aware that 11,000 AF of water was not produced in 2010 from the Saugus Aquifer, nor could it have been due to the removal of several pumps from service due to ammonium perchlorate pollution. While, as of last month, the facilities for this clean up project appear to be complete, the water produced has still not been approved for potable use by the Dept. of Health Services. In addition to this fact, CLWA should also disclose that it will probably be required to blend the water produced from this clean-up project with potable water before it is served to customers to ensure that any contamination is well below the health MCL for this contaminate. Due to these inaccuracies and disclosure failures, the summary for production from the Saugus Aquifer is not correct.

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Further, the Santa Clarita area is currently out of compliance for chlorides released to the Santa Clara River. The high level of chloride in the effluent releases to the Santa Clara River is due in large part to the level of chlorides in the imported water that must be used to serve this project. Currently Santa Clarita residents are being asked to bear the cost of the sewer improvements needed to correct this problem through an increase in their sewer fees. We assert that the Agency must increase its water connection fee to cover the cost of cleaning up the chlorides in its imported water, thus abiding by its own mandate to not place the cost of new development on existing residents.

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Overdraft of the Santa Clara River Alluvium

Although the WSA states that 35,000 AF of water is available from the alluvial aquifer, we note that amount is yet another increase from the prior finding of a safe yield only 32,000 AF. The rationalization for once again allowing additional water to be pumped from the River is that the western portion of the basin is receiving increased tertiary treated water from the Sanitation plant and increasing re-charge in that area. However it is NOT increasing re-charge in this eastern upper reach of the river.

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Sierra Club comments5

In fact, well water pumps have periodically gone dry in the eastern reaches of the river. Increased pumping in this area may jeopardize existing well production currently serving thousands of residents as well as small well production by individual homeowners in the area.

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An analysis of available water supply specific to the eastern Santa Clara River should be made prior to any approval of this WSA.

27

Recommendations

We concur with the Retail Water Committee's recommendation that conservation measures should be included in any approval for a WSA. These measures should be spelled out and include a requirement for the use of drought tolerant landscaping throughout the project.

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But we urge you to go further. Other areas are now requiring water-neutral development. We believe that such a requirement can and should be placed on this project.

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Last, this project is in a prime re-charge area for the Santa Clara River and in a portion of the river particularly vulnerable to over-pumping. The Agency should require an analysis of the areas where the most beneficial recharge can occur. Then it should require permeable pavement, bioswails and/or cisterns throughout those project areas to ensure that storm water is captured and used to re-charge the alluvium.

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CONCLUSION

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The Sierra Club is concerned that if the proposed Vista Ranch Development Plan is implemented, the entire region in the heart of the Santa Clara Valley will continue to become nearly continuous urban and suburban development. The water situation would become more serious. Furthermore, many of the values of southern California will be forever lost (scenic open spaces, habitat for wildlife, and an un-channeled Santa Clara River). The Vista Ranch Development Plan could set in place a dangerous precedent. The National Sierra Club has a policy against urban sprawl projects such as this one due to their unsustainability and wasteful use of resources. It is very concerning to see proposed development occurring in the Santa Clara River. We ask that if the development is approved that the floodway be protected. Overall, we know that this project is another example of too much density in the wrong area--much like: Las Lomas, Lyons Ranch, North Newhall Redevelopment and the Calgrove Corridor. This proposed development is poorly planned and would have detrimental long-term effects to the surrounding areas.

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We feel that recharge areas should be mapped and there should not be build-out in those areas (open pavers should be used instead). This development should also be a "water neutral" development.

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Sierra Club comments⁶

We also feel that this should be approved only at the county level (700 units) and not within the County Designated SEA. We oppose annexation of this area and request that the project be built in the county with the lower unit number.

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Additionally, the package sanitation plant should be reverse osmosis to reduce the chlorides in the Santa Clara River.

42

We are asking for a 60 day extension of the comment period and NO APPROVAL until an Army Corps 404 permit is granted. It seems this is being rushed through before OVOV.

43

Sincerely,

Katherine Squires
Conservation Chair, Santa Clarita Group

LETTER NO. C5. LETTER FROM SIERRA CLUB, DATED NOVEMBER 1, 2010

Response 1

The comment requests that groundwater recharge areas be mapped and that development, other than open pavers, be prohibited in those areas. The comment also requests that the project be “water neutral.”

The proposed project's impacts on water services were assessed in Section 4.8, Water Service, of the Draft EIR. The project's groundwater recharge impacts specifically were considered on pages 4.8-109 through 4.8-110. That analysis concluded:

The supplying of water to the project also would not interfere substantially with groundwater recharge, because the best available evidence shows that no adverse impacts to the recharge of the basin have occurred due to the existing or projected use of local groundwater supplies, consistent with the CLWA/purveyor groundwater operating plan for the basin (see Draft EIR **Appendix 4.8** [2005 Basin Yield Report and 2009 Basin Yield Update]). In addition, based on the memorandum prepared by CH2MHill (*Effect of Urbanization on Aquifer Recharge in the Santa Clarita Valley*, February 22, 2004; Draft EIR **Appendix 4.8**), no significant project-specific or cumulative impacts would occur to the groundwater basin with respect to aquifer recharge. This is because urbanization in the Santa Clarita Valley has been accompanied by long-term stability in pumping and groundwater levels, and the addition of imported SWP water to the valley, which together have not reduced recharge to groundwater, nor depleted the amount of groundwater in storage within the local groundwater basin. This finding is supported by the 2009 Basin Yield Update, which modeled infiltration from irrigation (from urban and agricultural lands), precipitation, and streamflows (stormwater and WRP discharges).

(Draft EIR, p. 4.8-109.) The Draft EIR also determined that the following three factors would serve to counter the typical impact of urbanization on groundwater recharge: (1) the post-project increase in clear-flow stormwater runoff volume to the Santa Clara River, whose porous nature (i.e., alluvial soils) allows for significant infiltration; (2) the post-project increase in the area of irrigated landscaping; and, (3) the inclusion of percolation ponds associated with the Vista Canyon Water Reclamation Plant (WRP). (*Ibid.*) The Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, also has noted that in the post-project condition, the reach of the Santa Clara River within the project site would still retain an average width of approximately 775 feet. (Draft EIR, p. 4.20-22.) Therefore, as stated in Section 4.20, the project would retain the active river channel portion of the existing SEA in a largely natural state; and the River Corridor would still be sufficiently wide to accommodate the County's Capital Flood and retain jurisdictional habitat. (Draft EIR, p. 4.20-54.) As stated above, this River Corridor area is comprised of alluvial soils, which allows for significant infiltration. (For information regarding the subsurface conditions of the project site, please refer to Section 4.1, Geotechnical Hazards, of the Draft EIR, p. 4.1-1-4.1-6.) In light of Section 4.8's determination that the proposed project would not adversely impact

groundwater recharge, there is no need to map on-site recharge areas and prohibit development in such areas.

In response to the comment requesting that the project be “water neutral,” the Draft EIR, Section 4.8, Water Service, addressed the adequacy of the water supplies to serve the proposed project. As discussed in the Draft EIR, Section 4.8, Water Service:

Based on information presented in this EIR, an adequate supply of water is available to serve the Vista Canyon project, and the project would not create, or contribute to, any significant project-specific or cumulative water supply impacts in the Santa Clarita Valley.

(Draft EIR, p. 4.8-1.) As an adequate water supply is available to serve the proposed project, there is no need for the project to be “water neutral.” Nonetheless, it should be noted that the proposed project would include the use of drought-tolerant and native landscaping to reduce water use. Additionally, the project includes a WRP, which would provide recycled water for on-site use, and result in an excess recycled water supply of 311 afy, which ultimately would be made available to other areas in the eastern Santa Clarita Valley as part of CLWA's recycled water system.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment expresses support for Alternative 2, the Proposed County Land Use Designation Alternative, analyzed in Section 6.0, Project Alternatives, of the Draft EIR. The comment also expresses opposition to the City's proposed annexation, which the comment states is being requested so that development can occur within SEA 23.

The comment's support for Alternative 2 is noted. As to the comment's opinion regarding the applicant's request for annexation into the City, it should be noted that neither the City nor the County of Los Angeles preclude development within SEA 23. For example, and by way of background, SEA 23 (the Santa Clara River SEA) was designated in the 1980 General Plan's Conservation and Open Space Element. (A copy of the County's 1980 General Plan is available at <http://planning.lacounty.gov/generalplan>.) The Conservation and Open Space Element's intent, however, was not to “preclude reasonable use of private property in these areas, but to ensure that where development takes place, identified natural resources are protected.” (General Plan, p. II-36.) Similarly, the Los Angeles County Code (County Code) states: “[i]t is not the purpose to preclude development within these areas but to ensure, to the extent possible, that such development maintains and where possible enhances the remaining biotic resources of the

significant ecological areas.” (County Code, §22.56.215.B.1.) Moreover, the Santa Clarita Valley Area Plan confirms that “[f]uture additions *and deletions* to identify [SEAs] may be appropriate based on updated, more detailed biotic surveys.” (Area Plan, p. 41; italics added.)

It also bears noting that the County's and City's compatibility criteria/development standards for SEAs are virtually identical; therefore, there is no inherent advantage to pursuing development in the City versus the County when it comes to SEA 23. (Compare page 3 of **Comment Letter No. B5** (County of Los Angeles) with section 17.15.050(K)(1)(2) of the Santa Clarita Municipal Code, which is excerpted on page 4.20-47 of the Draft EIR.) The Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, presented a detailed assessment of the project's consistency with the City's compatibility criteria and determined that the project would satisfy City standards. (See Draft EIR, pp. 4.20-48 through -59.) As the project would satisfy City standards, the project also likely would satisfy County standards because those standards are virtually identical to the City standards. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment requests that the proposed Vista Canyon WRP utilize reverse osmosis in order to reduce chloride levels in the Santa Clara River.

To preface, the proposed project's impacts on chloride levels were assessed in the Draft EIR, Section 4.8.1, Water Quality. The Draft EIR determined that, while annual chloride load and concentration are predicted to increase under post-project conditions, the “concentration increase is minimal and the load increase is caused by the predicted increase in runoff volume.” (Draft EIR, p. 4.8.1-99.) Further, the Draft EIR determined that the post-development project runoff would be “well below” the Santa Clara River Reach 7 Basin Plan water quality objective and the total maximum daily load (TMDL) waste load allocation for Santa Clara River Reach 5. (*Ibid.*) Accordingly, the Draft EIR concluded that “[b]ased on the comprehensive site design, source control, and treatment control strategy, and comparison with benchmark receiving water criteria and in-stream monitoring data, the project would not have significant water quality impacts resulting from chloride” under CEQA. (*Ibid.*, p. 4.8.1-100.)

Specific to the WRP's effluent, the Draft EIR determined that, while chloride concentration levels may increase, the predicted concentration would remain below the benchmark water quality objectives. (*Ibid.*, p. 4.8.1-120; see also Table 4.8.1-27, Estimated Average Annual Volume and Concentration of Percolated Water [predicted average annual concentration of chloride attributable to the project's recycled water and stormwater is less than the Basin Plan's groundwater quality objective].) The Draft EIR also discussed the use of the AWRM program as a basis for a future salt/nutrient management plan for the Santa Clara River

watershed, and the project's participation in, and fair share implementation cost payment to, the AWRM. (*Ibid.*, p. 4.8.1-122 to -124.) The Draft EIR concluded that with the project's participation in the AWRM, through annexation of the site into the Santa Clarita Valley Sanitation District, percolation of recycled water and stormwater from the proposed project would not result in a violation of the groundwater quality standards for chloride. (*Ibid.*, p. 4.8.1-124.)

In summary, there is no evidence that the proposed project, including the proposed WRP, would significantly impact chloride concentrations in the Santa Clara River under CEQA; therefore, it is not necessary to employ a reverse osmosis process, as requested by the comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment expresses the opinions of the commenter and generally touches upon environmental issues that received extensive analysis in the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise a specific environmental issue concerning the content or adequacy of the Draft EIR, no further response is required.

Response 5

The comment raises economic, social, or political issues that do not concern the content or adequacy of the Draft EIR. That being said, with respect to the comment's expressed concerns regarding local school districts, as discussed in Section 4.10, Education, of the Draft EIR, the project applicant has entered into school facilities mitigation agreements with both the Sulphur Springs District and Hart District. With implementation of those agreements, impacts to school facilities would be less than significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment expresses concern that the "channeling" entailed by the proposed project would increase the flow rate within the Santa Clara River. This issue, namely the project's potential impact on the hydrologic regime of the Santa Clara River, was assessed in Section 4.2, Flood, of the Draft EIR. The flood analysis concluded that, with adoption of the recommended mitigation measures, the project's hydrologic impacts would not be significant. In addition, specific to the proposed changes in flow rate or velocity within the Santa Clara River, Section 4.2, Flood, evaluated such issues in Table 4.2-6. This table, p. 4.2-42, provides a summary of floodplain acreage in the reach of the Santa Clara River within the project site

where drainage facility-related increases or decreases in velocities in excess of 4 feet per second (fps) would occur. The use of this rate was identified in Section 4.2, as important because “minimal loss of vegetation would occur where velocity remains less than 4 fps.” (*Ibid.*) The EIR disclosed that there were increases in velocity greater than 4 fps within the project reach of the River Corridor, resulting in a potential for erosion. However, the EIR also disclosed that:

[A]ll of the changes resulting from the project are minor, localized, and not significant to the River Corridor as a whole. Furthermore, project increases in velocity would be mitigated by installation of buried soil cement along the River Corridor. Based on the above, no significant impacts to the River's fluvial or vegetation area would occur as a result of the proposed project flood protection improvements.

Note also Section 4.2's evaluation of changes to water surface elevation resulting from the proposed project's flood protection improvements within the project reach of the River Corridor, and the findings that minor increases in water surface elevation would be infrequent, localized, and not result in significant impacts. (Draft EIR, Section 4.2, Flood, p. 4.2-50-4.2-52.)

As the comment does not raise any specific issue regarding that the adequacy of the Draft EIR's analysis, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment expresses concern that the “channeling” entailed by the proposed project would remove the habitat and foraging grounds of wildlife. First, the Draft EIR, Section 4.2, Flood, evaluated the project's proposed impacts due to the floodplain modifications (i.e., buried bank stabilization, storm drain outlets/energy dissipaters, Vista Canyon Road Bridge, etc.), and found that such impacts would not result in substantial or harmful increases in erosion to existing vegetation within the project reach of the River Corridor. (Draft EIR, Section 4.2, Flood, p. 4.2-42-4.2-62.)

In addition, this issue, namely the proposed project's impact on wildlife habitat, was assessed in Section 4.6, Biological Resources, of the Draft EIR. Specifically, as illustrated in Table 4.6-5, Vista Canyon Habitat Acreages and Impacts, the “principal direct impact of the proposed project is to convert 117 acres of the project site (about 64 percent) from an undeveloped to a developed condition.” (Draft EIR, p. 4.6-66.) In summary, the Draft EIR found:

- **Coast Live Oak Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (Draft EIR, p. 4.6-67.)
- **Cottonwood Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*)

- **Big Sagebrush Associations:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-67 to -68.)
- **California Sagebrush - California Buckwheat Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-68.)
- **Chamise Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Elderberry Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Riparian Scrub:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-68 to -69.)
- **Mixed Native And Non-Native Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-69.)
- **Mulefat Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Alkali Rye Series:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*, at pp. 4.6-69 to -70.)
- **Saltgrass:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-70.)
- **Alluvial Scrub:** Impacts to this vegetation community would be reduced to a less than significant level with mitigation. (*Ibid.*)
- **Non-Native Annual Grassland-Ruderal Series:** Impacts to this vegetation community would not be significant. (*Ibid.*)
- **Yerba Santa Series:** Impacts to this vegetation community would not be significant. (*Ibid.*, at p. 4.6-71.)
- **Disturbed:** Impacts to this vegetation community would not be significant. (*Ibid.*)

In summary, and in response to the comment, the proposed project would not significantly impact wildlife through the removal of habitat and foraging grounds. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment opines that the proposed project “appears to bring in a huge amount of dirt fill (500,000 cubic yards) to increase the height of the lot.” The proposed project's grading plan is discussed in Section 1.0, Project Description, of the Draft EIR, and illustrated in Figure 1.0-39, Conceptual Grading Plan. As correctly noted by the comment, “approximately 500,000 cy of soil would be imported to the site.” (Draft EIR, p. 1.0-76.) The grading plan calls for this quantity of imported soil based on the overall plan to raise portions of the project site to an elevation above the existing FEMA maximum flooding elevation. (See,

e.g., Draft EIR, p. 4.2-1.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment states that importing 500,000 cy of soil to the project site “makes no sense and will worsen air quality.” The comment's opinion that the soil import “makes no sense” makes it difficult to provide a comprehensive response; however, suffice it to say that Section 4.4, Air Quality, of the Draft EIR considered the impacts of the soil import. (See Draft EIR, pp. 4.4-34 to -39.) Specifically, in assessing the construction-related impacts of the proposed project, the air quality analysis took into account a number of variables, including the grading amounts and soil hauling amounts. (*Ibid.*, at p. 3.4-35.) Based on the considered variables, the maximum construction emissions for buildout of the proposed project would exceed SCAQMD's thresholds for VOCs, NO_x, PM₁₀, and PM_{2.5}; therefore, construction-related air quality impacts would be potentially significant. (*Ibid.*, at p. 3.4-39.) Although feasible mitigation measures were recommended in Section 4.4 (see Draft EIR, pp. 4.4-54 through -58), the project's construction-related emissions of VOCs, NO_x, PM₁₀, and PM_{2.5} were found to be significant and unavoidable. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment expresses concern regarding the “further narrowing” of the Santa Clara River along either side of the proposed bridge, observing that this has “been a problem before on numerous other developments.” In response, please see **Appendix F2** of the Final EIR, which compares the width of the Santa Clara River throughout the project site with the River width at other locations upstream and downstream of the project site. As illustrated in that figure, the average width of the River through the project site is 775 feet, with the width at the proposed bridge approximately 650 feet. In comparison, the width of the River at three off-site locations (i.e., 460, 570 and 600 feet) was well below the proposed project's 775 feet width. Similarly, the following bridges have River widths noticeably more narrow than that proposed by the project:

- Whites Canyon: 530 feet
- Soledad Canyon Road: 400 feet
- Sierra Highway: 350 feet
- Antelope Valley Freeway: 430 feet
- Sand Canyon Road; 350 feet

The comment does not identify any specific significant environmental adverse impact associated with the River width contemplated by the proposed project, the impacts of which were analyzed in Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR; therefore, no more specific of a response can be provided. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment states that animals that “transition” through the project site will be negatively impacted by the proposed project, and that wildlife corridors will be compromised. This issue, namely the proposed project's impact on wildlife movement corridors, was assessed in the Draft EIR, Section 4.6, Biological Resources, and Section 4.20, Santa Clara River Corridor Analysis. That analysis concluded that the project would not adversely affect wildlife movement corridors for the following reasons:

[A]fter project implementation, the River Corridor would continue to function as an east-west wildlife movement corridor, in part, because it would preserve and enhance a River Corridor width that averages 775 feet. In addition, based on the *Species Movement Report, 2009*, post-project, species presently can and would be able post-project to negotiate the length of the river, moving east or west, and eventually reach the Angeles National Forest and other open space surrounding the City of Santa Clarita. Further, the proposed Vista Canyon Road Bridge would be sufficiently high so as to allow the continued use of the Santa Clara River for wildlife movement east-west along and within the River Corridor; and lighting controls on the proposed bridge would be implemented to ensure that the SEA would continue to function as a wildlife movement corridor. According to the *Species Movement Report, 2009* (p. 7.), '[t]he value of the Santa Clara River is clear; species can move the entire length of the river and some terrestrial species would only be precluded from doing so during infrequent major storm events.'

(Draft EIR, p. 4.20-56; see also *id.* at p. 4.6-75 [“The project proposes to maintain, restore, and enhance the River Corridor within the project site; and, therefore, the existing east-west River Corridor wildlife movement area would not be significantly impacted due to project implementation.”].)

Additionally, in a December 21, 2010 staff report submitted to the Planning Commission regarding the proposed project, City staff recommended that the project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres, and allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. More specifically, the modified Oak Park would provide a minimum animal corridor width of approximately 400 feet. In addition, at the December 21, 2010 public hearing, the Planning Commission directed that this project modification be made.

As discussed in Forde Biological Consultants' *Species Movement: Vista Canyon Ranch, Los Angeles County, California* (Species Movement Report; July 27, 2009), a copy of which is included in Appendix 4.6 of the Draft EIR, a corridor width of approximately 300-400 feet could accommodate movement of the species expected to traverse the project site. (See Appendix 4.6, Species Movement Report, p. 9; see also Draft EIR, p. 4.6-75 to -76 [“While the preclusion of a northerly movement corridor within the project is not considered a significant impact, primarily due to constraints associated with the project site being surrounding [sic] by existing and potential future development, the *Species Movement Report, 2009*, indicates that an approximate 300 to 400-foot-wide northerly movement corridor along the east side of the project site could provide for north-south movement of species.”].)

In short, there is no evidence that the project would significantly impact wildlife corridors; instead, the project would preserve and enhance such corridors. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment addresses a general subject area, impacts to transportation infrastructure and traffic, which received extensive analysis in Section 4.3, Traffic and Access, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 13

The comment states that the relocation of the existing Metrolink Station would require local riders to travel through residential areas to access the southern station platform and may increase traffic at an existing railroad crossing. This statement is not correct. Primary access to the Vista Canyon Metrolink Station would be from Lost Canyon Road (a major highway) and Vista Canyon Road (a limited secondary highway) via Soledad Canyon Road (a major highway), not residential collector roadways. Further, the comment provides no supporting documentation for the statement that the relocation of the Metrolink Station would add traffic at an existing railroad crossing. It should be noted that Lost Canyon Road through Fair Oaks Ranch includes a bridge over the railroad right-of-way (this crossing is not at-grade). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 14

The comment states that access to the proposed Metrolink Station would be via substandard SR-14 ramps, as well as over an unimproved bridge. Please see Response 13 above and Mitigation Measures

4.3-1, 4.3-2 and 4.3-4 in Section 4.3, which address improvements to SR-14 ramps. Also, the Sand Canyon Bridge is not unimproved; it is simply not built out to its full width. Notably, the proposed project would not require expansion of the Sand Canyon Bridge. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 15

The comment expresses opinions, which will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue concerning the adequacy or content of the Draft EIR, no further response can be provided or is required.

Response 16

The comment expresses concerns with the impacts of the proposed project on air quality, as well as impacts to the health of local residents. The comment also states that the project should maintain a 150 foot buffer zone from the highway and railroad tracks and residential units, citing unspecified standards of the South Coast Air Quality Management District (SCAQMD). Section 4.4, Air Quality, of the Draft EIR assesses the construction and operational air quality impacts resulting from the proposed project. Specifically, page 4.4-1 acknowledges the project's impacts on air quality: *“Construction emissions would exceed the South Coast Air Quality Management District’s (SCAQMD) significance thresholds for VOCs and NO_x, and would exceed localized significance thresholds for nitrogen dioxide (NO₂), PM_{2.5} and PM₁₀. Operational emissions would exceed SCAQMD significance thresholds for VOC, NO_x, CO, and PM₁₀. The project also would result in regional emission levels that are cumulatively considerable for VOCs, NO_x, CO, PM_{2.5}, and PM₁₀. Mitigation measures are provided to reduce the level of emissions and associated potential impacts. Nonetheless, impacts would be significant and unavoidable.”* Of note, the SCAQMD does not have a regulatory standard that requires a setback of 150 feet from highways or railroad tracks. Finally, in 2004, the SCAQMD provided an expanded air quality analysis of the Santa Clarita Valley subregion. The Santa Clarita Valley Subregional Analysis indicated that the Santa Clarita Valley “is a relatively small contributor to the total emissions of the key pollutants” in both Los Angeles County and the South Coast Air Basin. Emissions occurring in the Santa Clarita Valley typically comprise less than 3 percent of the County and 2 percent of the South Coast Air Basin, based on 2002 emission inventory data. While the Santa Clarita Valley contributes a small amount of pollutants to the region, it experiences disproportionately high concentrations of ozone and particulate matter. The subregional analysis stated that “overwhelming contribution of pollution transport to the Santa Clarita Valley comes from the San Fernando Valley and metropolitan Los Angeles.”

The comment will be included as part of the and made available to the decision makers prior to a final decision on the proposed project.

Response 17

The comment addresses a general subject area, global climate change and greenhouse gases, which received extensive analysis in Section 4.22, Global Climate Change, of the Draft EIR. The comment does not raise any specific issue regarding the adequacy of that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 18

The comment requests that green building standards be incorporated as a condition as of approval. While the Draft EIR does not address conditions of approval, the EIR does identify the green design features of the proposed project in Table 4.6, Compatibility with California Attorney General GHG (greenhouse gas) Emission Reduction Strategies, and Table 4.22-7, Compatibility with Climate Action Team GHG Emission Reduction Strategies. Please also see Appendix 2.0-2 to the Draft Vista Canyon Specific Plan (October 2010), which contains the Vista Canyon Sustainability Plan. Pages 9 through 14 of the Sustainability Plan outline design features specific to the proposed Vista Canyon project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 19

The comment states that the project alternative under the existing County land use designation would allow for fewer units than requested by the proposed project. The comment is correct. As noted in Section 1.0, Project Description: "Under the existing County light industrial zoning designation of M-1.5 and taking into account parking and landscaping requirements, the industrial zoned portion of the project site could be developed with approximately 1.0 million square feet of light industrial use. The agricultural and residential zoned portions of the project site could be developed with approximately 170 single-family residential units." (Draft EIR, p. 1.0-9.)

The comment further states that the 2005 Urban Water Management Plan (UWMP) could not have taken the proposed project into consideration as the project's General Plan Amendment (GPA) request had not been submitted. As stated in Draft EIR, Section 4.8, Water Service, pages 4.8-11 and 4.8-12, the project site is entirely within CLWA's service area and the service area of the Santa Clarita Water Division of CLWA (SCWD). As stated in the Draft EIR:

CLWA Santa Clarita Water Division (SCWD) service area includes portions of the City of Santa Clarita and unincorporated portions of Los Angeles County in the communities of Canyon Country, Newhall, and Saugus. SCWD supplies water from local groundwater and CLWA imported water. SCWD is owned by CLWA, and its service area includes the project site. As a result, SCWD is the retail water purveyor for the project. **Figure 4.8-2, Santa Clarita Water Division Service Area**, illustrates the CLWA and Santa Clarita Water Division service area.

While the proposed project was not fully contemplated at the time the 2005 UWMP was prepared, the Draft EIR demonstrates that an adequate supply of water is available for the entire project in each scenario analyzed in the EIR. As shown in the Draft EIR, page 4.8-1, the proposed Project's potable water demand is approximately 497 acre-feet per year (afy), or 529 afy with implementation of the residential overlay option. Table 4.8-18, Projected Average/Normal Year Supplies and Demands, Table 4.8-19, Projected Single-Dry Year Supplies and Demands, Table 4.8-20, Projected Multiple-Dry Year Supplies and Demands, and Table 4.8-22, Scenario 2: Santa Clarita Valley 2030 Build-Out Scenario Water Demand and Supply, all show that an adequate supply of water is available to meet the demands of the proposed project. This information is also consistent with the finding of the water supply assessment (WSA) prepared by the water purveyor for the project. As presented in the Draft EIR, page 4.8-116:

the SCWD prepared a Vista Canyon WSA (2010) for the proposed project. The WSA is found in **Appendix 4.8**. Based on the information in this WSA, SCWD concludes there will be a sufficient water supply available at the time the project is ready for occupancy to meet the needs of the project, in addition to existing and other planned future uses in the Santa Clarita Valley.

Based on the information presented in the project's WSA and the Draft EIR, impacts associated with supplying the proposed Project with an adequate water supply are less than significant.

Response 20

The comment states that it is not appropriate to depend on the 2005 UWMP because it is outdated. The City is aware that CLWA is currently updating the UWMP. However, until such time that CLWA and the retail purveyors complete the updated UWMP, the 2005 UWMP is indeed one of the documents that should be relied upon. Please also see Section 4.8, Water Service, which addresses the effect of various biological opinions and court decisions on water supply. (See Draft EIR, pp. 4.3-63 to -68.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 21

The comment states that the State Water Reliability Report 2009 reduces the percentage of state water delivery to 60 percent. Please see **Response 20**, above. In addition, the City concurs that the 2009 DWR Reliability Report provides that the reliability of the SWP in normal/average years is approximately 60 percent. The reliability of the SWP is described in detail in the Draft EIR, **Section 4.8, Water Service**. Please see the Draft EIR, pages 4.8-58 through 4.8-63. As stated in the Draft EIR, beginning on page 4.8-61,

The 2009 report shows a corresponding value of 60 percent (2485 taf). The 2007 report projects an annual average of 66 to 69 percent (2725-2850 taf) for the future condition, whereas the updated report has 60 percent.

The 2009 DWR Delivery Reliability Report (August 2010) included the information presented in Table 4.8-9, Average And Dry Period SWP Table A Deliveries From The Delta Under Current Conditions, and **Table 4.8-10, Average And Dry Period SWP Table A Deliveries From The Delta Under Future Conditions**, below, which provide average and dry period estimated deliveries for current conditions (2009) and future conditions (2029), and compares those figures to those in the 2007 DWR Delivery Reliability Report.

As shown, under the updated Future Conditions (2029), average SWP delivery amounts may decrease from 6 to 9 percent of maximum Table A Amounts as compared to earlier estimates in the 2007 DWR Delivery Reliability Report. This decrease in reliability results in an estimated average delivery of 60 percent versus 66 percent to 69 percent as identified in the 2007 DWR Delivery Reliability Report).

The Draft EIR then provided the following related analysis:

**Table 4.8-9
Average and Dry Period SWP Table A Deliveries from The Delta Under Current Conditions**

SWP Table A Delivery from the Delta (in percent of maximum Table A ¹)						
Study of Current Conditions	Long-term Average ²	Single dry-year (1977)	2-year drought (1976–1977)	4-year drought (1931–1934)	6-year drought (1987–1992)	6-year drought (1929–1934)
2007 DWR Delivery Reliability Report, Study 2007	63%	6%	34%	35%	35%	34%
2009 DWR Delivery Reliability Report, 2009 Studies ³	60%	7%	36%	34%	35%	34%

Notes:

¹ Maximum Table A Amount is 4,133 thousand acre-feet/year.

² 1922–2003 for Update with 2007 and 2009 studies.

³ Values reflect averaging annual deliveries from the two scenarios of Old and Middle River flow targets described in the 2009 DWR Delivery Reliability Report.

Source: 2009 DWR Delivery Reliability Report.

Applying the 60 percent figure to CLWA's Table A Amount of 95,200 acre-feet, results in approximately 57,100 acre-feet expected under average Future Conditions (2029) according to the 2009 DWR Delivery Reliability Report. This is compared to the 77 percent, or 73,300 acre-feet, included in the water supply planning in the 2005 UWMP in 2030 in an average year.

Table 4.8-10
Average and Dry Period SWP Table A Deliveries From The Delta Under Future Conditions

SWP Table A Delivery from the Delta (in percent of maximum Table A ¹)						
Study of Future Conditions	Long-term Average ²	Single dry-year (1977)	2-year drought (1976–1977)	4-year drought (1931–1934)	6-year drought (1987–1992)	6-year drought (1929–1934)
2007 DWR Delivery Reliability Report, Study 2027	66–69%	7%	26–27%	32–37%	33–35%	33–36%
2009 DWR Delivery Reliability Report, Study 2029 ³	60%	11%	38%	35%	32%	36%

Notes:

¹ Maximum Table A Amount is 4,133 thousand acre-feet/year.

² 1922–2003 for 2007 and 2009 DWR Delivery Reliability Reports with 2027 and 2029 studies.

³ Range in values reflects four modified scenarios of climate change: annual Table A deliveries were first interpolated between full 2050 level and no climate change scenarios, then averaged over the two scenarios of Old and Middle River flow targets.

Source: 2009 DWR Delivery Reliability Report, August 2010.

Response 22

The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA over the adequacy or content of the Draft EIR. Nonetheless, this response will endeavor to address the comment.

The comment appears to question the reliance on a 10 percent reduction in water demand during dry years as demonstrated in the 2005 UWMP and the Draft EIR. The City believes reliance on this level of conservation is appropriate. As stated in the Draft EIR (pages 4.8-93 and 4.8-95), the source for the 10 percent figure is the adopted 2005 UWMP, which was approved by the California Department of Water Resources and is cited as a reference in the Draft EIR. Please see the 2005 UWMP, page 2-1, and Chapter 7, which describes the basis for this figure being the application of water Demand Management Measures (DMMs) and the Best Management Practices (BMPs) implemented by CLWA as a part of water conservation programs. The litigation referenced in this comment filed by the Friends of the Santa Clara River and others is discussed in the Draft EIR as it related to the projections of water demand. As stated on page 4.8-10 and 4.8-11 of the Draft EIR:

CLWA and the local retail purveyors have evaluated the long-term water needs (water demand) within its service area based on applicable county and city plans and has compared these needs against existing and potential water supplies. In addition, the 2005 UWMP was prepared by CLWA and the local retail purveyors to address water supply and demand forecasts for the CLWA service area (over a 25-year horizon [2005-2030]).⁵ CLWA estimated future water demands, retail district-by-retail district. These demand projections are presented in the report entitled, *Data Document, Proposed 2008 Facility Capacity Fees*, Castaic Lake Water Agency, November 12, 2008 (2008 Data Document). Although information in the 2005 UWMP and the 2008 Data Document was considered, this EIR does not rely solely on that information, and an independent analysis and determination of water-related impacts was carried out in this EIR for the proposed project.

The associated footnote 5 on the same Draft EIR page provides:

On February 25, 2006, a lawsuit challenging the 2005 UWMP was filed by California Water Impact Network and Friends of the Santa Clara River alleging that the plan violated the UWMP Act because it overstated availability of local groundwater and SWP supplies and it will allegedly facilitate unsustainable urban development resulting in harm to the Santa Clara River and its habitat (*California Water Impact Network, et al. v. Castaic Lake Water Agency, et al.*, Los Angeles County Superior Court No. BS103295). CLWA and other named parties opposed the litigation challenge. On August 3, 2007, after a hearing, the trial court rejected the litigation challenge to the 2005 UWMP. In that decision, the trial court concluded that substantial evidence supported the determination that the 41,000 afy transfer “remains a valid and reliable water source.” Relying upon the evidence presented in the 2005 UWMP and record, the trial court identified the following evidence supporting the validity of the transfer: (a) it was completed in 1999 and DWR has allocated and annually delivered the water in accordance with the completed transfer; (b) the Court of Appeal held that the only defect in the 1999 CLWA EIR was that it tiered from the Monterey Agreement EIR, which was later decertified, and that defect was remedied by CLWA’s preparation of the 2004 EIR that did not tier from the Monterey Agreement EIR; (c) the Monterey Settlement Agreement expressly authorizes operation of the SWP in accordance with the Monterey Amendments, which facilitated the 41,000 afy transfer; (d) Courts of Appeal have refused to enjoin the 41,000 afy transfer; and (e) the DWR/CLWA contract encompassing the transfer remains in full force and effect, and no court has ever questioned the validity of the contract, or enjoined the use of this portion of CLWA’s SWP Table A supplies. The trial court decision was the subject of an appeal; however, the parties have settled and the appeal was dismissed in October 2008. Thus, the 2005 UWMP remains valid and is no longer subject to any litigation.

Based on this information and the information presented in the Draft EIR, the water demand projections as presented in the Draft EIR and project WSA are accurate for planning purposes. (this response also incorporates by reference the 2005 UWMP.)

Response 23

The comment claims that the summary of water production from the Saugus Formation is not correct. This comment is responded to below.

The first part of the comment states that 11,000 af of water was not produced in 2010 from the Saugus Formation due to perchlorate contamination. This comment is consistent with the information presented in Draft EIR, Section 4.8, Water Service. As a result of the diversity of water supplies in the Santa Clarita Valley, this water was not needed in 2010. In future years, both the groundwater supply and the means to pump over 11,000 AF per year from the Saugus Formation will be available. As presented in the Draft EIR:

Alluvial Aquifer

For municipal water supply, with existing wells and pumps, the three retail water purveyors with Alluvial wells (NCWD, SCWD, and VWC) have a combined pumping capacity from active wells (not contaminated by perchlorate) of 38,600 afy. Alluvial pumping capacity from all the active municipal supply wells is summarized in **Table 4.8-5, Pumping Rates Simulated for Individual Alluvial Aquifer Wells under the 2008 Groundwater Operating Plan**. The locations of the various municipal Alluvial wells throughout the Basin are illustrated on **Figure 4.8-4, Municipal Alluvial Well Locations; Santa Clara River Valley, East Groundwater Subbasin**. As indicated, the pumping capacity of the SCWD Stadium well (deactivated due to the perchlorate contamination), representing another 800 afy of pumping capacity, has been transferred to the Valley Center well. (Page 4.8-33 and 4.8-34)

The purveyors' response plan also addressed the impacted Alluvial production well owned by SCWD (Stadium Well), which was shut down due to the detection of perchlorate in 2002. In response, SCWD recently drilled a replacement well (Valley Center Well) to the east, north-northeast of the former Whittaker-Bermite site. The Valley Center Well also is part the Valley's active municipal groundwater source capability.

As discussed below, the long-term plan includes the CLWA groundwater containment, treatment, and restoration project to prevent further downstream migration of perchlorate, the treatment of water extracted as part of that containment process, and the recovery of lost local groundwater production from the Saugus Formation." (Draft EIR, page 4.8-36.)

Saugus Formation

"For municipal water supply with existing wells, the three retail water purveyors with Saugus wells (NCWD, SCWD, and VWC) have a combined pumping capacity from active wells (accounting for those contaminated by perchlorate) of 12,485 afy in non-drought years, and up to 34,977 afy by the third year of a three-year drought. Saugus pumping capacity from all the active municipal supply wells is summarized in **Table 4.8-**

6, Pumping Rates Simulated for Individual Saugus Formation Wells under the 2008 Groundwater Operating Plan, and the locations of the various active municipal Saugus wells are illustrated on **Figure 4.8-5, Saugus Well Locations; Santa Clara River Valley, East Groundwater Subbasin**. These capacities do not include the four Saugus wells contaminated by perchlorate, although they indirectly reflect the capacity of one of the contaminated wells, VWC's Well 157, which has been sealed and abandoned, and replaced by VWC's Well 206 in a non-impacted part of the Basin.

(Draft EIR, page 4.8-38.) Further, the Draft EIR summarized the ongoing groundwater modeling being conducted to examine the impact of perchlorate contamination and treatment on the groundwater basin. As indicated in the Draft EIR, on pages 4.8-38 and 4.8-39:

The historical record shows fairly low annual pumping in most years, with one four-year period of increased pumping up to about 15,000 afy that produced no long-term depletion of the substantial groundwater storage in the Saugus. Those empirical observations have now been substantially strengthened by the development and application of the numerical groundwater flow model, which has been used to examine aquifer response to the operating plan for pumping from both the Alluvium and the Saugus and also to examine the effectiveness of pumping for both contaminant extraction and control of contaminant migration within the Saugus Formation. The latter aspects of Saugus pumping are discussed in further detail in the *2009 Basin Yield Update* (see, Draft EIR **Appendix 4.8**).

To examine the yield of the Saugus Formation or, its sustainability on a renewable basis, the groundwater flow model was used to examine long-term projected response to pumping from both the Alluvium and the Saugus over the 78-year period of hydrologic conditions using alternating wet and dry periods as have historically occurred. The pumping simulated in the model was in accordance with the operating plan for the Basin. For the Saugus, simulated pumpage included the planned restoration of recent historic pumping from the perchlorate-impacted wells. In addition to assessing the overall recharge of the Saugus, pumping was analyzed to assess the effectiveness of controlling the migration of perchlorate by extracting and treating contaminated water close to the source of contamination.

As described in the Draft EIR, groundwater can be produced locally at sufficient capacities to meet the planned uses of the Alluvial Aquifer and the Saugus Formation. As stated in the Draft EIR:

In terms of adequacy and availability, the combined active Alluvial groundwater source capacity of municipal wells is approximately 38,600 afy. This is more than sufficient to meet the municipal, or urban, component of groundwater supply from the Alluvium.

(Draft EIR, page 4.8-34.)

In terms of adequacy and availability, the combined active Saugus groundwater source capacity of municipal wells of up to 19,125 afy, is more than sufficient to meet the planned use of Saugus groundwater in normal years of 7,500 to 15,000 afy. This currently

active capacity is more than sufficient to meet water demands, in combination with other sources, if both of the next two years are dry. At that time, the combination of currently active capacity and restored impacted capacity, through a combination of treatment at two of the impacted wells and replacement well construction, will provide sufficient total Saugus capacity to meet the planned use of Saugus groundwater during multiple dry years of 35,000 acre-feet, if the third year is also a dry year.

(Draft EIR, page 4.8-38.) The comment also states that the treated water has not been approved for potable uses by the Department of Health Services. This comment is incorrect. The California Department of Public Health permit to use the treated water from the perchlorate treatment plant in the drinking water supply was issued on December 30, 2010. Delivery of the perchlorate plant treated water into CLWA's drinking water transmission system began on January 25, 2011.

Lastly, the comment states that the treated water would have to be blended to ensure that perchlorate levels are below the MCL (less than 4 ppb). This comment is incorrect. Once treated at the plant, all of the perchlorate from the local groundwater is treated and the remaining levels are "non-detect" (too small to be measured) and well below the MCL. Therefore, no blending is needed to reduce perchlorate levels after treatment.

Response 24

The comment raises economic, social or political issues; specifically, the comment requests that CLWA increase its water connection fee to cover the cost of managing chlorides in the Santa Clara River. The comment also incorrectly suggests that the project will rely exclusively on imported water; as discussed in Section 4.8, however, the project's potable water demand would be met through the use of groundwater from the Alluvial aquifer and Saugus Formation, as well as imported State Water Project water. (Draft EIR, p. 4.8-1.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 25

This comment states that the 35,000 af of water shown as available from the Alluvial aquifer in the Draft EIR is "yet another increase from the prior finding of a safe yield" of only 32,000. This comment also states that the "rationalization for once again allowing additional water to be pumped from the River" is that the western portion of the groundwater basin is receiving treated wastewater from the Valencia Water Reclamation Plant (WRP). This comment is correct in that the amount of water available from the Alluvial aquifer is shown in the Draft EIR as 35,000 af, not 32,000 af. While the groundwater basin does benefit from the importation of state water project (SWP) and non-SWP water into the Santa Clarita Valley, and by a portion of that water's treatment at the Saugus and Valencia WRPs after use, the primary

source of the water within the basin is from the infiltration of rainfall over the Santa Clara River watershed within and up stream of the Santa Clarita Valley. The characteristics of the groundwater basin are described in Draft EIR Section 4.8, Water Service, pages 4.8-13 through 4.8-55.

The short and long-term yields of both the Alluvial aquifer and Saugus Formation are not based on “rationalizations,” but on substantial amounts of study over a number of years regarding the characteristics of the groundwater basin. As summarized in the Draft EIR, Section 4.8, Water Service, (pages 4.8-22 through 4.8-24):

Groundwater Operating Plan – Based on the 2009 Water Report (May 2010), the groundwater component of overall water supply in the Santa Clarita Valley derives from a groundwater operating plan developed by CLWA and the local retail purveyors over the past 20 years to meet water requirements (municipal, agricultural, small domestic), while maintaining the Basin in a sustainable condition (i.e., no long-term depletion of groundwater or interrelated surface water). This operating plan also addresses groundwater contamination issues in the Basin, all consistent with both the GWMP and the MOU described above. This operating plan is based on the concept that pumping can vary from year to-year to allow increased groundwater use in dry periods and increased recharge during wet periods, and to collectively assure that the Basin is adequately replenished through various wet/dry cycles. As described in the GWMP and the MOU, the operating yield concept has been quantified as ranges of annual pumping volumes.

The ongoing work of the MOU has produced two important reports. The first report, dated April 2004, documents the development and calibration of the groundwater flow model for the Santa Clarita Valley. The second report, dated August 2005, presents the modeling analysis of the CLWA/retail water purveyor groundwater-operating plan for the valley, and concludes that the plan will not cause detrimental short or long-term effects to the groundwater and surface water resources in the valley and, therefore, the plan is a reliable, sustainable component of water supply for the valley. The analysis of sustainability for groundwater and interrelated surface water is described further in Appendix C to the 2005 UWMP (see, Draft EIR **Appendix 4.8**).

The groundwater operating plan, summarized in **Table 4.8-2, Groundwater Operating Plan for the Santa Clarita Valley**, is further described below. The operating plan addresses both the Alluvium and Saugus Formation.

Table 4.8-2
Groundwater Operating Plan for the Santa Clarita Valley

Aquifer	Groundwater Production (af)			
	Normal Years	Dry Year 1	Dry Year 2	Dry Year 3
Alluvium	30,000 to 40,000	30,000 to 35,000	30,000 to 35,000	30,000 to 35,000
Saugus	7,500 to 15,000	15,000 to 25,000	21,000 to 25,000	21,000 to 35,000
Total	37,500 to 55,000	45,000 to 60,000	51,000 to 60,000	51,000 to 70,000

Source: 2005 UWMP, 2009 Water Report (May 2010), and 2009 Basin Yield Update. See Draft EIR **Appendix 4.8** for copies of these reports.

Alluvium – A portion of the project’s water demands would be met by using groundwater produced from the Alluvial aquifer in Los Angeles County, which would be delivered to the site by SCWD. The project’s potable water demand is estimated to be 303 afy.

As stated in the 2005 UWMP, 2009 Water Report, the 2009 Basin Yield Update, and the Vista Canyon WSA (2010), the operating plan for the Alluvial aquifer involves pumping from the Alluvial aquifer in a given year, based on local hydrologic conditions in the eastern Santa Clara River watershed. Pumping ranges between 30,000 and 40,000 afy during normal/average and above-normal rainfall years. However, due to hydrogeologic constraints in the eastern part of the Basin, pumping is reduced to between 30,000 and 35,000 afy following multiple locally dry years.

Saugus Formation – The Saugus Formation is not identified as a likely source of supply for the project. However, the operating plan for Saugus pumping is presented as additional information regarding the Basin.

As stated in the 2005 UWMP, 2009 Water Report, and the 2009 Basin Yield Update, pumping from the Saugus Formation in a given year is tied directly to the availability of other water supplies, particularly from the SWP. During average year conditions within the SWP system, Saugus pumping ranges between 7,500 and 15,000 afy. Planned dry-year pumping from the Saugus Formation ranges between 15,000 and 25,000 afy during a drought year and can increase to between 21,000 and 25,000 afy if SWP deliveries are reduced for two consecutive years and between 21,000 and 35,000 afy if SWP deliveries are reduced for three consecutive years. Such pumping would be followed by periods of reduced (average-year) pumping, at rates between 7,500 and 15,000 afy, to further enhance the effectiveness of natural recharge processes that would cause groundwater levels and storage volumes to recover after the higher pumping during dry years.”

Response 26

Please see **Response 25** above for information responsive to this comment. The operating plan for the Santa Clarita Valley, and the groundwater modeling conducted to assess the impact of that operating plan, takes into consideration the characteristics of the entire groundwater basin, including the eastern portion. The constraints that exist in the basin, including those found in the eastern portion of the basin, are documented in the Draft EIR. As summarized in the Draft EIR, pages 4.8-20-4.8-22:

(4) 2009 Basin Yield Update

In April 2009, the purveyors [Footnote Omitted] in Santa Clarita Valley determined that an updated analysis was needed to further assess groundwater development potential and possible augmentation of the groundwater operating plan, partly in preparation for the next UWMP in 2010, and in part because of recent events that are expected to impact the future reliability of the principal supplemental water supply for Santa Clarita Valley (i.e., from the State Water Project). The document entitled, *Analysis of Groundwater Supplies and Groundwater Basin Yield Upper Santa Clara River Groundwater Basin, East*

Subbasin was published in August 2009 (2009 Basin Yield Update) and is included in Draft EIR **Appendix 4.8** along with its appendix material and references. A summary of that report is provided below.

The primary objective of the updated analysis of groundwater basin yield in the Santa Clarita Valley was to evaluate the planned utilization of groundwater by the Santa Clarita Valley purveyors, while considering potential impacts on traditional supplemental water supplies from the State Water Project, and recognizing ongoing pumping by others for agricultural and other private water supply. *This objective also included the sustainability of the groundwater resources and the physical ability to extract groundwater at desired rates.*

...

Based on the 2009 Basin Yield Update, the 2008 Operating Plan will not cause detrimental short- or long-term effects to the groundwater and surface water resources in the Valley; and, therefore, is sustainable. Consistent with actual operating experience and empirical observations of historical basin response to groundwater pumping, the 2008 Operating Plan can be expected to have local difficulty, in the Alluvium at the eastern end of the basin during locally dry periods, with achievement of all the Alluvial pumping in the 2008 Operating Plan. This condition is particularly evident if several decades of predominantly below-normal rainfall years were to occur in the future such as occurred during much of the five decades from the mid-1920s through the mid-1970s. In other words, while the basin as a whole can sustain the pumping encompassed in the 2008 Operating Plan, local conditions in the Alluvium in the eastern end of the basin can be expected to repeat historical groundwater level declines during dry periods, necessitating a reduction in desired Alluvial aquifer pumping due to decreased well yield and associated actual pumping capacity. The modeling analysis conducted to date suggests that those reductions in pumping from the Alluvial aquifer can be made up by an equivalent amount of increased pumping in other parts of the basin without disrupting basinwide sustainability or local pumping capacity in those other areas. For the Saugus Formation, the modeling analysis indicates that this aquifer can sustain the pumping from this unit that is encompassed in the 2008 Operating Plan.

Simulation of the 2008 Operating Plan with pumping redistribution indicates that westerly redistribution of 1,600 afy of Alluvial pumping from the eastern end of the basin would help, but not eliminate, the lack of achievability. The residual unachievable pumping in the east end of the basin, about 4,500 afy, could be redistributed to other areas of the basin with minimal impact on groundwater levels. In this case, total Alluvial pumping in the basin could remain near the upper end of the 2008 Operating Plan range of 30,000 to 35,000 afy. Conversely, absent any additional efforts to redistribute pumping, the total Alluvial pumping capacity during extended dry periods would likely fall toward the lower end of the 2008 Operating Plan range (toward 30,000 afy).” (*Emphasis added.*)

Response 27

The comment suggests that an analysis of available water supply specific to the eastern Santa Clara River should be made prior to the approval of the project's Water Supply Assessment (WSA). The project, however, is only required to provide a WSA for proposed uses on the project site. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 28

The comment concurs with the Retail Water Committee's recommendation that conservation mitigation measures be included in any approval of the WSA. While the comment is noted, the City has no approval authority over the WSA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 29

The comment urges the City to require the proposed project to be water neutral. Please see **Response 1**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 30

This comment states that the Agency, and presumably the Draft EIR, should require an analysis of the areas where the most beneficial recharge can occur. The topic of groundwater recharge was addressed in the Draft EIR. In Section 4.8, Water Service, pages 4.8-21 and 4.8-22, when summarizing technical studies performed in the groundwater basin, including the east end, the Draft EIR stated:

A third objective was to consider potential augmentation of basin yield via potential artificial groundwater recharge using storm water runoff in selected areas of the basin as planned by the Los Angeles County Flood Control District.

The 2009 Basin Yield Update analyzed, with the numerical groundwater flow model for the basin, two groundwater operating plans: (1) a 2008 Operating Plan to reflect currently envisioned pumping rates and distribution throughout the Valley, including fluctuations through wet/normal and dry years, to achieve a desired amount of water supply that, in combination with anticipated supplemental water supplies, can meet existing and projected water requirements in the Valley; (2) Potential Operating Plan that envisions potentially increased utilization of groundwater during both wet/normal and dry years. The 2008 Operating Plan is presented and addressed in this EIR because it is relied upon to determine the sustainability of the basin groundwater in meeting the future needs of the proposed project and other future land uses. *[Footnote Omitted]*

Based on the 2009 Basin Yield Update, the 2008 Operating Plan will not cause detrimental short- or long-term effects to the groundwater and surface water resources in the Valley; and, therefore, is sustainable. Consistent with actual operating experience and empirical observations of historical basin response to groundwater pumping, the 2008 Operating Plan can be expected to have local difficulty, in the Alluvium at the eastern end of the basin during locally dry periods, with achievement of all the Alluvial pumping in the 2008 Operating Plan. This condition is particularly evident if several decades of predominantly below-normal rainfall years were to occur in the future such as occurred during much of the five decades from the mid-1920s through the mid-1970s. In other words, while the basin as a whole can sustain the pumping encompassed in the 2008 Operating Plan, local conditions in the Alluvium in the eastern end of the basin can be expected to repeat historical groundwater level declines during dry periods, necessitating a reduction in desired Alluvial aquifer pumping due to decreased well yield and associated actual pumping capacity. The modeling analysis conducted to date suggests that those reductions in pumping from the Alluvial aquifer can be made up by an equivalent amount of increased pumping in other parts of the basin without disrupting basin-wide sustainability or local pumping capacity in those other areas. For the Saugus Formation, the modeling analysis indicates that this aquifer can sustain the pumping from this unit that is encompassed in the 2008 Operating Plan.

Simulation of the 2008 Operating Plan with pumping redistribution indicates that westerly redistribution of 1,600 afy of Alluvial pumping from the eastern end of the basin would help, but not eliminate, the lack of achievability. The residual unachievable pumping in the east end of the basin, about 4,500 afy, could be redistributed to other areas of the basin with minimal impact on groundwater levels. In this case, total Alluvial pumping in the basin could remain near the upper end of the 2008 Operating Plan range of 30,000 to 35,000 afy. Conversely, absent any additional efforts to redistribute pumping, the total Alluvial pumping capacity during extended dry periods would likely fall toward the lower end of the 2008 Operating Plan range (toward 30,000 afy). *The 2009 Basin Yield Update also assessed the runoff conservation/groundwater recharge projects planned by the Los Angeles County Flood Control District, and determined that the projects are unlikely to provide any substantial recharge that does not already occur in the basin. Additionally, the 2009 Basin Yield Update concluded that these proposed projects are mostly located in areas of the basin where the Alluvial aquifer is of insufficient thickness and storage (and, thus is not developed for water supply), or where the Alluvial aquifer already fully recharges when stream flows are naturally present. (Emphasis added.)*

As to the suggested mitigation measures presented in this comment, such measures are not required because impacts to water resources resulting from the proposed Project are less than significant. The City appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed project.

Response 31

The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 32

The comment addresses a general subject area, impacts to water supply, which received extensive analysis in Section 4.8, Water Service, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 33

The comment states that the values of Southern California would be lost with development of the project site. The comment only expresses the opinions of the commenter. It also bears noting that the project site has been subject to dumping, off-road vehicle activity and utility construction/maintenance, all of which have significantly disturbed the on-site vegetation. (See, e.g., Draft EIR, p. 4.20-24.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 34

The comment indicates, without identifying any specific basis, that the proposed Vista Canyon project could set in place a dangerous precedent. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 35

The comment states that the Sierra Club has a policy against urban sprawl projects. The proposed project, however, is a transit-oriented development that is surrounded on all sides by existing development and infrastructure, and incorporates higher densities, a walkable community, a multi-modal train and bus facility. Consequently, the City does not consider this project to constitute urban sprawl. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 36

The comment requests that, if the project is approved, the floodway be “protected.” Please see Appendix 4.2 of the Draft EIR, which includes a letter from the Federal Emergency Management Agency (FEMA) stating that the proposed project meets the minimum floodplain criteria of the National Flood

Insurance Program. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 37

The comment states that this project is poorly planned, in the wrong location, and will have detrimental long-term effects to surrounding areas. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 38

The commenter suggests that recharge areas be mapped and that open pavers should be used in the recharge areas. Please see **Response 1**, above, for information responsive to the mapping request. Also, Section 4.8.1 describes the permeable pavement usage as one of resources utilized to treat water quality from the project:

Permeable Pavement: Permeable pavements contain small voids that allow water to pass through to a stone base. They come in a variety of forms; they may be a modular paving system (concrete pavers, grass-pave, or gravel-pave) or poured in place solutions (porous concrete, permeable asphalt). All permeable pavements include an aggregate reservoir to retain and infiltrate water. An overflow pipe is generally installed near the top of this aggregate layer to ensure that water does not pond on the surface of the pavement. While conventional pavement result in increased rates and volumes of surface runoff, permeable pavements, when properly constructed and maintained, allow some of the stormwater to percolate through the pavement and enter the soil below. A conceptual illustration of a permeable pavement installation is shown in Figure 5-7 of the May 2010 Geosyntec report in **Appendix 4.8**.

(Draft EIR, pp. 4.8.1-80 to -81.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 39

The commenter states that the project should be water neutral. Please see **Response 1**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 40

The comment requests that the project be approved for only 700 units and not be built within the County's designated SEA. The comment only expresses the opinions of the commenter. The comment

will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 41

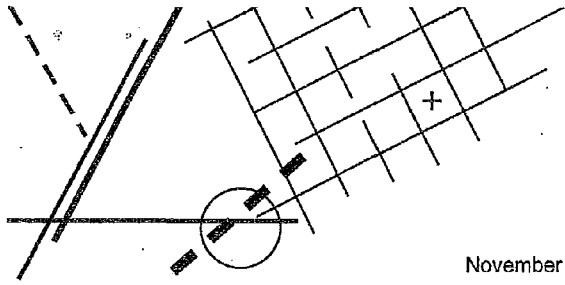
The comment expresses opposition to the proposed annexation and requests that the project be built at the density allowed within the County. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 42

The comment requests that the proposed WRP be reverse osmosis to reduce the chlorides in the Santa Clara River. Please see **Response 3**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 43

The comment asks for a 60-day extension to the comment period and that a determination on the project not be given until a Section 404 permit is issued by the U.S. Army Corps of Engineers. The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA, and no basis for an extension has been provided. Additionally, there is no legal requirement that the City refrain from taking action on the project until a Section 404 permit is secured. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



Carolyn Ingram Seitz
& Associates

November 1, 2010

Honorable Planning Commissioners
CITY OF SANTA CLARITA
23920 Valencia Boulevard
Santa Clarita, California 91355

RE: PROTEST OF PROPOSED ANNEXATION and REQUEST TO BE EXCLUDED
SAND CANYON AREA I – MASTER CASE NO. 07-127
25933 & 25975 SAND CANYON RD; 16030, 16032 & 16034 PLACERITA CANYON RD

Honorable Planning Commissioners:

As you are aware, I am a planning and zoning consultant representing Frank and Vera Vacek, and Derek Hunt, owners of approximately 400 acres, and Steve and Diana Arklin, owners of approximately 125 acres, collectively identified as follows:

APN 2848 011 014	59.09 acres	APN 2848 011 011	24.83 acres	APN 2848 012 066	3.49 acres
APN 2848 013 014	50.49 acres	APN 2848 011 012	15.17 acres	APN 2848 035 004	1.67 acres
APN 2848 013 016	40.00 acres	APN 2848 011 013	30.91 acres	APN 2848 035 005	1.74 acres
APN 2848 013 017	28.36 acres	APN 2848 012 032	4.20 acres	APN 8950 999 579	5.00 acres
APN 2848 013 018	101.00 acres	APN 2848 012 042	30.65 acres		
APN 2848 014 016	40.00 acres	APN 2848 012 069	3.50 acres		
APN 2848 014 017	80.00 acres	APN 2848 012 077	3.49 acres		

These properties bear street addresses 25933 and 25975 Sand Canyon Road.

At the Planning Commission meeting of October 19, 2010, I made a request that the subject properties be withdrawn from the proposal annexation known as Sand Canyon Area I. I also provided a letter affirming that request.

In a subsequent conversation with Patrick Leclair from the City's Planning Department, on October 21 and again on October 25th, followed by an email to Patrick affirming our request that these properties be excluded, we suggested meeting with the Director of Community Development and/or the Planning Manager, but have had no response with respect to either request. While staff offered to answer any questions, no responses have been provided, leaving my clients with the impression that the City has no intention of dealing with them in good faith.

A copy of my email to Patrick dated October 25th is attached.

We again renew our protest of the annexation and demand that these properties be excluded forthwith.

Thank you for your consideration.

Sincerely,

Carolyn Ingram Seitz
CAROLYN INGRAM SEITZ

CIS/dbm

cc: Frank & Vera Vacek; Derek Hunt
Steve & Diana Arklin

1

Governmental Consulting Services / Planning & Zoning / Public Relations / Mediation

P.O. Box 265 / Altadena, CA 91003-0265 / Tel: (626) 345-1233 / Fax: (626) 345-1255 / E-mail: CMSeitz@mindspring.com

**LETTER NO. C6. LETTER FROM CAROLYN INGRAM SEITZ & ASSOCIATES,
NOVEMBER 1, 2010**

Response 1

The comment provides factual background information, objects to the inclusion of specified properties within the AAA, and does not raise an environmental issue within the meaning of CEQA. Of note, the specified properties have since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.



Friends of the Santa Clara River
660 Randy Drive, Newbury Park, California 91320-3036 • (805) 498-4323

November 9, 2010

Mr. Jeff Hogan, Senior Planner
City of Santa Clarita
Community Development Department
23920 Valencia Blvd, Suite 302
Santa Clarita, CA 91355

Board of Directors

Ron Bottorff
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Ginnie Bottorff
Secretary

Affiliated Organizations

California Native Plant Society
L.A./Santa Monica Mountains Chapter

Santa Clarita Organization for Planning the Environment (SCOPE)

Sierra Club
Angeles Chapter
Los Padres Chapter

Surfrider Foundation

Audubon Society
Ventura Chapter

Ventura County Environmental Coalition

Re: Vista Canyon Project Draft Environmental Impact Report

Dear Mr. Hogan,

Friends of the Santa Clara River submits the following comments on the subject project. Because of the impacts of this project to biological and other areas along the Santa Clara River, we request a 30-day extension of the comment period to January 3, 2011.

1

Significant floodplain and wetlands losses are associated with this project, and are, as usual, mitigated to a "level less than significant". We note, however, that recent studies have shown that wetlands mitigation is not working. A recent report (Reference 1: Ambrose, et.al., UCLA, August, 2006) studied 129 wetlands mitigation projects and found that "despite relatively high permit compliance, the vast majority of mitigation sites were not optimally functioning wetlands...In comparison to reference sites, only 19% of the mitigation files were classified as optimal, with just over half sub-optimal and approximately one-quarter marginal to poor." Given the high reliance placed on wetlands mitigation to offset project impacts, we must conclude that wetlands loss, in general, is not being adequately mitigated. This issue must be addressed in the mitigation plan.

2

The project establishes inadequate buffer areas between development and the river's riparian corridor. Reference 2: "Buffer Zones for Ecological Reserves in California: Replacing Guesswork with Science" by Kelly and Rotenberry, considers needed width, or buffer, for ecological reserves such as SEA 23. Several potential impact vectors are listed, including: (1) introduction of alien predators (particularly domestic cats and dogs), (2) increased nighttime illumination, (3) trespass, including pedestrian, equestrian, and off-road vehicles, (4) introduction of wildlife competitors, (5) pollution, and (6) disease transmission from domestic animals to wildlife. Buffer widths should be no smaller than 200 feet. A study by Stanford's Department of Biological Studies (Reference 3: Rottenborn, Stephen C., "Predicting impacts of urbanization on riparian bird communities) shows that the placement of urban uses in the vicinity of riparian zones has substantial impacts on riparian bird communities out to a distance of 1500 feet.

3

The project as designed usurps far too much of the Santa Clara River floodplain. Usurping the floodplain of a river can have serious immediate and long-term repercussions on the hydrology of the river and on channel morphology, both upstream and downstream. Long-term impacts could include structural flood control measures of

4

unknown magnitude which could be required in the future. Much more floodplain avoidance could be and should be incorporated into the project design.

4

The unprecedented growth in the upper Santa Clara River over the last few decades has caused an array of cumulative impacts to flora and fauna of the River corridor. Encroachment by development into the River floodplain and terrace lands has resulted in habitat loss and fragmentation and will inevitably be followed by a decline in species and loss of biological diversity. These cumulative impacts are not adequately addressed in the DEIR. We especially object to the use of the entire area of the watershed in evaluating cumulative impacts. It may be true that projects in the Santa Clarita area occupy only 4% of this vast, 1620-square-mile watershed. However, the cumulative impacts that must be analyzed are those impacts to the riparian zone and uplands of the Santa Clara River, a vastly smaller region. The Santa Clara is the last major natural river remaining in Southern California, a region has already lost all but 3-5% of its pre-settlement riparian woodlands. The DEIR must reexamine cumulative impacts of Santa Clarita area projects as they affect the riparian zone.

5

No approval for the Vista Canyon Project should be forthcoming until the DEIR is revised to account for the impacts discussed above. Cumulative impacts, in particular must be analyzed, understood and mitigated. Friends Incorporate by reference the comments of Heal the Bay, Ventura Coastkeeper, Sierra Club, Santa Clarita Organization for Planning and the Environment (SCOPE), and the Center for Biological Diversity.

6

7

8

Thank you for your consideration of these comments.

Sincerely,



Ron Bottorff, Chair

References

1. Ambrose, R. F. et. al. *An Evaluation of Compensatory Mitigation Projects Permitted Under the Clean Water Act Section 401 by the Los Angeles Regional Quality Control Board, 1991-2002.* Department of Environmental Health Sciences, University of California, Los Angeles, December 2004.

2. Kelly, Patrick J. and Rotenberry, John T., *Buffer Zones for Ecological Reserves in California: Replacing Guesswork with Science*, in "Interface Between Ecology and Land Development in California". Southern California Academy of Sciences Symposium Proceedings: 1993.

3. Rottenborn, Stephen C., *Predicting the impacts of urbanization on riparian bird communities.* In *Biological Conservation*, v. 88, n.3, June, 1999, pages 289-299.

LETTER NO. C7. FRIENDS OF THE SANTA CLARA RIVER, NOVEMBER 9, 2010

Response 1

The comment requests that the comment period be extended by 30 days in light of the proposed project's impacts to biological resources and the Santa Clara River. However, the comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Moreover, in support of the extension request, the comment refers to two subject areas that received extensive analysis in Section 4.6, Biological Resources, and Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR. The comment does not identify any specific issue relating to that analysis; therefore, no more specific of a response can be provided. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment has referenced a report by Ambrose, et al., entitled, "An Evaluation of Compensatory Mitigation Projects Permitted Under the Clean Water Act section 401 by the Los Angeles Regional Water Quality Control Board, 1991–2002" December 2004, as evidence that wetlands mitigation "is not working" and that the proposed project is not adequately mitigating impacts to wetlands.

In the referenced study, which is incorporated by reference and available for public review at the two locations identified on page I-8 of the Draft EIR, Ambrose, et al., evaluated compliance and wetland conditions of selected compensatory wetland mitigation projects permitted under section 401 of the Clean Water Act by the California State Water Quality Control Board between 1991 and 2002. The study specifically assessed 143 permit files from throughout California; 129 sites were visited to assess on-site compliance with permit conditions, and 14 permit files were evaluated for compliance only. Ambrose, et al., through application of the "California Rapid Assessment Method" (CRAM), found that mitigation sites taken together exhibit an increase in riparian vegetation and were moderately successful in meeting mitigation plan and wetland permit requirements, and concluded that "permittees are, for the most part, meeting their mitigation obligations." (Ambrose, et al., p. iv.) However, the study also concluded that there was an overall loss of wetland function because the mitigation plans/permits did not adequately address functional values. Therefore, the study found that mitigation requirements are not achieving the goal of section 401 because wetland functions (landscape context, hydrology, abiotic structure, and biotic structure) and overall services (flood water storage, flood energy dissipation, biogeochemistry, sediment accumulation, wildlife habitat, and aquatic habitat) are not adequately addressed in the permit conditions. It is important to understand, however, that the study does not say that preserving functions and services is technically infeasible or impractical; rather, the permitting agencies, in coordination with

permittees, must improve upon the setting of standard and special permit conditions that result in the preservation of wetland functions and services.

As part of the project planning effort, a qualified environmental consultant (Dudek) evaluated existing functions and values of the on-site jurisdictional areas, using the most current version of the CRAM for wetlands, as described in the Dudek CRAM Report, 2009 (see Draft EIR, Appendix 4.6). (Note that Dudek's use of the CRAM for the on-site wetlands assessment is similar to the diagnostic tool used by Ambrose, et al., in his report referenced above.) As stated in the EIR, Section 4.20, Santa Clara River Corridor Analysis, p. 4.20-34, the Dudek CRAM Report evaluated the existing wetlands and riparian habitat within the project area against the achievable wetlands functions/values after implementation of the project's development design. (See also, Draft EIR, Section 4.20, pp. 4.20-34-4.20-36.)

To ensure that wetland mitigation is adequate to offset impacts, Dudek also prepared a Conceptual Wetlands Mitigation and Monitoring Plan (Wetlands Plan; May 2009), a copy of which is found in Appendix 4.6 of the Draft EIR. Compliance with the Wetlands Plan is required by various mitigation measures, including Mitigation Measures 4.6-2, 4.6-14, and 4.20-1. Further, the Wetlands Plan is subject to the approval of the California Department of Fish and Game (CDFG), Los Angeles Regional Water Quality Control Board, and U.S. Army Corps of Engineers.

The Wetlands Plan is discussed at length in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis. As discussed in that section, the primary goals of the Wetlands Plan are to:

- (a) Satisfy the mitigation requirements of local, state, and federal agencies for wetland and riparian habitat;
- (b) Create or restore riparian and riverine vegetation communities suitable for nesting, foraging, and breeding by native animal species;
- (c) Create or restore vegetation communities to be compatible with the fluvial morphology and hydrology of the stream channel corridor;
- (d) Create or restore vegetation communities to be consistent with adjacent, existing riparian vegetation communities; and,
- (e) Create or restore vegetation communities to be self-sustaining and functional beyond the maintenance and monitoring period.

(Draft EIR, p. 4.20-55.) Accordingly, the Wetlands Plan provides for restoration via revegetation of temporary impact areas following construction of buried bank stabilization on the north and south margins of the Santa Clara River. (Draft EIR, Appendix 4.6 (Wetlands Plan), p. v.) Additionally, the entire Santa Clara Riverbed and slopes for the buried bank stabilization would be subject to enhancement

activities. (*Ibid.*) The Wetlands Plan would require the removal of existing flood revetment structures, and the control of invasive plant species. (*Ibid.*, p. vi.) As illustrated in Table 2, Mitigation Acreage, of the Wetlands Plan, approximately 59.1 acres of riparian scrub would be enhanced, and approximately 16.0 acres of alluvial scrub, riparian scrub, and great basin sage scrub would be restored. (*Ibid.*, p. 16.) (For further responsive information concerning the results of the post-project CRAM analysis and the associated Wetlands Plan, please see the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, pp. 4.20-48-4.20-54.)

Additionally, in response to a comment received from CDFG and in furtherance of the applicant's desire to effectively collaborate with CDFG on this issue, Mitigation Measure 4.20-1 has been revised to provide for compensatory, off-site mitigation. This commitment represents a 1:1 ratio for the mitigation of permanent impacts. (See Draft EIR, Table 4.20-4, Jurisdictional Habitats and Impacts.)

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment references two reports, "Buffer Zones for Ecological Reserves in California: Replacing Guesswork with Science," by Kelly and Rotenberry, 1993, and "Predicting Impacts of Urbanization on Riparian Bird Communities," by Rottenborn, 1999, as evidence that the proposed project establishes inadequate buffer areas between the proposed development and the Santa Clara River's riparian corridor.

In the first referenced study, a copy of which is incorporated by reference and available for public review at the two locations identified on page I-8 of the Draft EIR, Kelly and Rotenberry recommend a scientifically based buffer analysis to develop a "buffering protocol," including:

1. Identification and ranking (if possible) of those external forces likely to impact the sensitive population(s) or community (communities) in question.
2. An empirical non-specific approach: censusing sensitive species at set distances from reserve boundaries, under varying impact conditions, to estimate penetration and impact of negative external forces of the protected population(s).
3. Mechanistic hypothesis testing; study of the most significant forces (e.g., alien predators or competitors, trespass, runoff, light, noise, vibration, etc.) to quantify impacts.
4. Adoption of mitigation management practices that maximize buffering but minimize future costs. Public policies affecting conservation programs are subject to sudden change, so it is important to minimize reliance on the future availability of funding for management.

(Kelly and Rotenberry, p. 91.) This “buffering protocol” demonstrates that the intent of the study was to provide an objective method for identifying the appropriate buffers for a particular reserve relative to its species populations and vegetation community characteristics. As noted in the comment, the report also identified several potential indirect impacts, which should be taken into account in developing sufficient buffer areas between development and riparian corridors.

Consistent with the Kelly and Rotenberry report (1993), the Draft EIR, Section 4.6, Biological Resources, pp. 4.6-76-4.6-79, analyzed several of the indirect impacts on biological resources that would occur within the River Corridor habitat areas after completion of the proposed project. Those indirect impacts to biological resources included increased human and domestic animal presence in the River Corridor area; increase in populations of non-native plant and animal species; increased light and glare; and construction activities. After analyzing each of the identified indirect impacts, Section 4.6 identified several mitigation measures to offset such impacts. Section 4.6 also found that, with implementation of such mitigation measures, the identified indirect impacts would be reduced to less than significant. (Please refer to Section 4.6, pp. 4.6-83-4.6-85, for a description of the mitigation measures identified to reduce such indirect impacts – see, specifically, Mitigation Measures 4.6-8 through 4.6-33.)

The comment indicates that Rottenborn (1999) showed that urbanization effects on riparian bird communities can extend up to 500 meters (1,500 feet). On that basis, the comment suggests that this finding shows the inadequacy of the project's interface with the on-site River Corridor.

Consistent with Rottenborn (1999), the Draft EIR, Section 4.6, Biological Resources, pp. 4.6-74-4.6-75, analyzed impacts of the proposed project on special-status wildlife species. Section 4.6 also identified mitigation measures to minimize direct impacts to individual special-status wildlife and their nesting or denning sites during construction phase of the project; see, specifically, Mitigation Measures 4.6-2 through 4.6-7. (For further responsive information regarding the project's interface with the on-site River Corridor, please see **Response 6** to the letter from Santa Monica Mountains Conservancy, dated November 8, 2010.)

It also should be noted that a minimum 100 feet of high-quality upland habitat from the edge of riparian habitat is recommended by CDFG's (Northern California-North Coast [Region 1]) 2001 buffer criteria for avoiding significant impacts to riparian species and habitats adjacent to urban development. (A copy of CDFG's 2001 criteria is included in **Appendix F3** of the Final EIR.) In developing the buffer criteria, CDFG stated that “[d]epartment biologists have relied on scientific research and literature and professional experience to develop the following recommendations to protect the public's fish, wildlife and native plant resources.” For example, CDFG recommends a 75-foot buffer from the outside edge of the riparian habitat for the Sacramento River, a 50-foot buffer for main tributaries, and a 25-foot buffer for secondary

tributaries. CDFG also stated that “[i]f development restrictions related to mandatory requirements do not allow a project to completely avoid the area of the buffer zone outside the riparian vegetation, the project proponent may average the setback distance along the riparian habitat for the length of the project.” Therefore, there is flexibility in the minimum buffer width as long as the average width criteria are met.

The above analysis of buffers focuses on flowing riverine habitats and relatively pristine riparian tributaries where such setbacks are appropriate to minimize indirect impacts, or edge effects, resulting from proposed development. At this project site, however, impacts to the Santa Clara River, habitat, and hydrology were analyzed in the Draft EIR, Section 4.2, Flood, and determined to be less than significant with adoption of the recommended mitigation measures. As to a buffer, the project site would be raised and elevated so that the developed elevation would be above the FEMA 100-year elevation. (Draft EIR, p. 4.2-55.) Buried soil cement bank stabilization would be constructed on the north and south margins of the River Corridor to prevent erosion and contain floodwaters during a Capital Flood discharge. (*Ibid.*) There is no evidence that the buffer provided by the bank stabilization and elevated development pad would not be adequate, particularly due to existing project site conditions.

As evaluated in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, p. 4.20-22, the reach of the Santa Clara River that traverses through the project site is dry except after periods of heavy rainfall, generally occurring in the winter months; as a result, the section of the River within the project site is not suitable habitat for the unarmored threespine stickleback (stickleback) or other aquatic or semi-aquatic species. (See also, Draft EIR, Appendix 4.6 [Biological Assessment, 2008, Ex. L, p. 1].) The active River channel varies, however, based on modeling, the width of flow in the active River channel is “between 20 and 60 feet, which generally corresponds to a 2-year storm event. The modeling also shows several braids with flows during a 2-year storm event. For purposes of this analysis, the Santa Clara River channel, or active channel, is defined as this 20- to 60-foot-wide braided channel.” (Draft EIR, Section 4.20, p. 4.20-22.)

In the post-project condition, the reach of the Santa Clara River within the project site would retain an average width of approximately 775 feet, which would represent a much wider width when compared to areas immediately upstream and downstream of the project site. (For reference, please see **Appendix F2** in the Final EIR.) This post-project condition would constitute an adequate buffer or setback from the active River channel through the project site.

There also is no evidence presented that a further “buffer” or setback is needed in this particular segment of the Santa Clara River. The Draft EIR, Section 4.6, Biological Resources, p. 4.6-6, described the existing vegetation conditions within the project site, noting the site's existing disturbed conditions:

Most of the project site lies primarily on flat terraces above the active channel of the Santa Clara River. Historical impacts, along with the cumulative effects of more recent activities, including dumping, off-road vehicle activity (not sanctioned by the current owners of the property), and utility construction/maintenance, have significantly disturbed the remaining vegetation communities, and have resulted in a complex mix of native and non-native vegetation types on the project site.

Figures 2.0-1 through 2.0-7 of the Draft EIR depict the existing disturbed condition of the project site. Figure 4.20-4 and Figures 4.20-5a through 4.20-5f also provide representative photographs of the disturbed areas within the project reach of the Santa Clara River. Based on existing site conditions, the post-project width of the project reach through the River Corridor (approximately 775 feet), and the relatively dry conditions of the river reach through the project site during average and dry years, there is no need for a further buffer or setback from the relatively sparse native and non-native vegetation situated within the project reach of the Santa Clara River.

Taking into account the unique conditions within the project reach of the River Corridor, for purposes of the proposed project, the EIR's analysis of that reach focused on preserving a viable east-west animal movement corridor along the Santa Clara River. Therefore, the project was designed to preserve and enhance the River Corridor, which is approximately 775 feet wide in the post-project condition. (Draft EIR, p. 4.20-22.) As discussed in Section 4.6, Biological Resources, “the project proposes to maintain, restore, and enhance the River Corridor within the project site; and, therefore, the existing east-west River Corridor wildlife movement area would not be significantly impacted due to project implementation.” (*Ibid.*, p. 4.6-75; see also *Ibid.*, pp. 4.20-36 to -38, and -56 to -57.)

Further, as the active River channel varies between just 20 and 60 feet during a 2-year flood event, an extensive setback area exists between the active River channel and the proposed development. (*Ibid.*) These setback distances ensure that wildlife will have adequate movement areas under post-project conditions.

Additional evidence supporting the post-project viability of the River Corridor is provided by the results of Dudek's CRAM Report. CRAM attributes include buffer and landscape concepts, with a specific submetric assigned to average buffer width. (Draft EIR, Appendix 4.6 (CRAM Report), p. 2; see also Draft EIR, p. 4.20-35.) As explained in the CRAM Report:

The average width of the buffer adjoining the AA [Assessment Area] is estimated by averaging the lengths of eight straight lines drawn at regular intervals around the AA

from its perimeter outward to the nearest non-buffer land cover or 250 meters, whichever is first encountered. It is assumed that the functions of the buffer do not increase significantly beyond an average width of about 250 meters. The maximum buffer width is therefore 250 meters. The minimum buffer width is 5 meters, and the minimum length of buffer along the perimeter of the AA is also 5 meters. Any area that is less than 5 meters wide and 5 meters long is assumed to be too small to provide buffer functions.

(*Ibid.*, p. A-2.) The average buffer width in the project's three assessment areas considered in the CRAM Report is 25 meters (~82 feet), 250 meters (~820 feet), and 176 meters (~577 feet). (*Ibid.*, Appendix B, CRAM Metric Field Worksheets.) More importantly, perhaps, is the CRAM Report's determination that the post-project conditions would be more favorable than the pre-project conditions, and "result in a regional increase of jurisdiction resource functions and provide for an ecologically meaningful resource to existing riparian resources associated with" the reach of the Santa Clara River in the project site. (Draft EIR, p. 4.20-59; see also *Ibid.*, pp. 4.20-59 to -64.)

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment states that the project "usurps far too much of the Santa Clara River floodplain," and should incorporate additional floodplain avoidance into the project's design to avoid impacts to upstream and downstream River hydrology.

Section 4.2, Flood, of the Draft EIR addressed the potential hydrologic impacts of the proposed project. The analysis presented in that section primarily was based on two technical reports contained in Appendix 4.2 of the Draft EIR: Pacific Advanced Civil Engineering's *Vista Canyon VTTM #69164 Santa Clara River Bank Protection Draft EIR Flood Technical Report* (Flood Technical Report; 2009), and Alliance Land Planning and Engineering, Inc.'s *Drainage Concept/SUSMP Vista Canyon* (2010). As discussed in that section, the proposed project would not result in significant impacts to flood events, localized erosion, localized increased sedimentation, discharge rates, water surface elevations, fluvial mechanics, and surface water flows.

Similarly, Section 4.20, Santa Clara River Corridor Analysis, addressed the predicted post-project hydraulic conditions. Based on the fluvial analysis conducted as part of the Flood Technical Report, the proposed project would not change the fluvial mechanics of the reach of the River Corridor between the Sand Canyon Road Bridge and SR-14 Bridge. (Draft EIR, p. 4.20-67.) The proposed project also would not significantly alter the existing drainage patterns, and overall discharge to the Santa Clara River under

pre- and post-project conditions would be the same. (*Ibid.*) Finally, changes to river velocities and water surface elevation would not be significant. (*Ibid.*, p. 4.20-68.)

In summary, the Draft EIR determined that the proposed project would not significantly impact the River's hydrology; accordingly, there is no need to incorporate additional floodplain avoidance into the project under CEQA. (Please also refer to **Response 6** to the letter from Santa Monica Mountains Conservancy, dated November 8, 2010, for further responsive information.) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment objects to the use of the entire Santa Clara River watershed for purposes of evaluating the project's cumulative impacts. The comment instead asserts that cumulative impacts must be assessed on the basis of the riparian zone and uplands of the Santa Clara River.

As first discussed in the Draft EIR, Section 3.0, Cumulative Impact Analysis Methodology, the potential for cumulative effects to biological resources can occur regionally, particularly when sensitive resources that occur over a large regional context are involved. (Draft EIR, p. 3.0-6.) Therefore, as addressed in Section 4.6, Biological Resources:

This EIR has used a combination of both the 'list' and the 'plan' methods of discussing significant cumulative impacts associated with the proposed project. The 'list' method has focused on related cumulative projects within both the City of Santa Clarita and the unincorporated area of the County of Los Angeles. This area is considered reasonable for a project the size of Vista Canyon because it encompasses a geographic area that includes both incorporated and unincorporated areas within 12 miles of the project. This area is considered reasonably broad to encompass cumulative development within the overall project vicinity.

In addition, because the list approach provides project-specific location, size, and acreage data, but does not necessarily specify the cumulative project impacts to sensitive biological resources, this EIR has relied on a watershed plan that has assessed the cumulative impacts of development on biological resources, as well as ecological functions and processes, within the Santa Clara River Watershed ('SCRW' or 'watershed'). Specifically, this EIR's cumulative impacts assessment has utilized the *Santa Clara River Watershed Study* (*Watershed Study* or Dudek 2007), as copy of which is provided in **Appendix 4.4** of this Draft EIR. The *Watershed Study* utilized more extensive lists of past, present, and reasonably foreseeable cumulative projects within the SCRW than is shown on the lists of City/County projects cited in this EIR. As a result, the *Watershed Study* is necessarily a broader cumulative impacts assessment on biological resources in both the project vicinity and the region.

(*Ibid.*, p. 4.6-92.) In light of the project's ability to mitigate all potentially significant impacts to biological resources to a level below significant, the analysis concluded that the project would not result in cumulatively considerable impacts to biological resources. (*Ibid.*, p. 4.6-109.) This conclusion was buttressed by the finding that the project site constitutes a very small proportion of the overall watershed, and the proposed site development would not significantly contribute to the overall development in the watershed or to the amount of development permitted by current land use classifications. (*Ibid.*)

As to the comment's focus on the Santa Clara River's riparian resources, the Santa Clara River Watershed Study (Watershed Study) identified the major vegetation communities and land cover types in the watershed. (Draft EIR, Appendix 4.4 [Watershed Study], pp. 15-17.) The Watershed Study defined the riparian/wetland category as containing the following vegetation communities and land cover types: mulefat scrub; permanently flooded lacustrine habitat; Southern coast like oak riparian forest; Southern cottonwood/willow riparian forest; Southern sycamore/alder riparian woodland; and, Southern willow scrub. (*Ibid.*, pp. 15-16.) The riparian/wetland category totals 14,283 acres, or approximately 1.4 percent of the total watershed. Approximately 3,802 acres (27 percent) of this total area is classified for development, whereas 10,481 acres (73 percent) is classified as open space. (*Ibid.*, p. 16; see also *Ibid.*, p. 24.) Table 12 in the Watershed Study also summarized the impacts of planned and approved projects in the City of Santa Clarita and Los Angeles County on vegetation communities and land cover types. (*Ibid.*, p. 45-48.) The riparian/wetland category was found to be least impacted, with just 869 acres (6 percent) of the total 14,283 acres encompassed by planned and approved projects. (*Ibid.*, p. 45.)

In light of the above, the Watershed Study concluded that the riparian/wetland category is "still relatively common in the watershed and would remain relatively common due to the substantial set-aside of existing public lands and open space in and adjacent to" the watershed. (*Ibid.*, p. 89.) The Watershed Study further concluded that, although 27 percent of the studied riparian/wetland area is classified for development, such resources would be regulated by federal and state agencies and impacts would be mitigated. (*Ibid.*, p. 91.) This conclusion also was reached in light of evidence that newer and better technologies are being employed to protect and restore waters and wetlands, such that wetland and riparian functions and values in the watershed likely will be enhanced in the future. (*Ibid.*, pp. 92-93.)

As the Watershed Study supports the determination that riparian and wetland resources are being protected throughout the watershed, and as the project's impacts to biological resources would be reduced to a level below significant, substantial evidence supports the Draft EIR's determination that the project's impacts would not be cumulatively considerable. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 7

The comment states that cumulative impacts must be analyzed, understood and mitigated. The City believes that all cumulative impacts have been addressed within Section 4.0, Environmental Impacts Analysis. Please also see **Response 5**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment incorporates by reference the project-related comments of other environmental organizations, specifically Heal the Bay, Ventura Coastkeeper, Sierra Club, Santa Clarita Organization for Planning and the Environment, and the Center for Biological Diversity. The comment is noted, and will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Jeff Hogan

From: Robert Mooney [cmdmooney@earthlink.net]
Sent: Wednesday, December 01, 2010 8:54 PM
To: Maggi Sanchez; Julie Skinner; Jeff Hogan
Subject: Vista Canyon Project Draft EIR Comment& Public Hearing Time Frames

Ms. Sanchez, Ms. Skinner & Mr. Hogan,

(To the attention of the Santa Clarita City Planning Commissioners and the Santa Clarita City Council):

We wish to request an extension for comments re the Draft EIR for Vista Canyon Project and also to request an extension for the project's Public Hearings.

1

We feel a three month extension for the EIR comments, to approximately March 3, 2011 and a similar three month extension for Public Hearing(s) to approximately March 21, 2011 is a reasonable request.

The EIR DVD we received contains thousands of pages and many are of a highly technical nature. It is an extremely time consuming process to look through this voluminous document and try to make some common sense decisions about what is being read.

2

We are concerned that sufficient notification to residents in the Sand Canyon area re the proposed options to the intersection of Sand and Lost Canyon has been given. There are also other projects that have been proposed for the East end of Lost Canyon Road that are not included in the cumulative impacts section of the EIR.

3

There is a sign to notify people of the project which is at the West end of the paved section of Lost Canyon Road. Almost no one drives to this point as is is a dirt road leading to only a few ranches. If the intent is to notify those residents who will be impacted then we suggest the sign should be at the intersection of Lost and Sand Canyon roads. This will allow for those living on the East end of Lost Canyon and those living up Sand Canyon to see the sign.

4

We live directly to the East of this project, on LaVeda Avenue, and it is going to have a very substantial impact, for a number of years, on our lives. Our request seems to us to be quite reasonable under the circumstances.

5

These are some of our concerns and your assistance in forwarding copies of this email to the appropriate members of the Planning Commission and the members of the City Council is greatly appreciated.

Best Regards,

Carmen and Robert Mooney

LETTER NO. C8. LETTER FROM ROBERT MOONEY, DECEMBER 1, 2010

Response 1

The comment requests that the comment period and public hearing schedule be extended by three months in light of the size of the Draft EIR. However, the comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment expresses concern regarding whether Sand Canyon residents received sufficient notification of the proposed project, and the City's consideration of intersection design options at Lost Canyon Road/Sand Canyon Road. By way of background, the project applicant has had over 50 community meetings on the project. These meetings have included multiple presentations to the La Veda Homeowners Association, Fair Oaks Ranch Homeowners Association, Sand Canyon Property Owners Association and Board, Canyon Country Advisory Committee, as well as numerous meetings with homeowners and community members in the Sand Canyon and Canyon Country area. The project applicant also contacted and met with each of the property owners at the intersection of Lost Canyon Road/Sand Canyon Road to discuss the four potential improvement options for this intersection and the impact of each on the their respective properties.

The project applicant has also met on several times with the Sulphur Springs School District in regards to the proposed improvements on Lost Canyon Road and other project-related items. The applicant and City staff have also reached out to Pinecrest School over the last six months. Only recently did a representative from Pinecrest School contact the applicant. The representative asked several questions about the project and schedule, and indicated that there would be no need for a presentation from the applicant at this point.

In addition to the public scoping meeting and three EIR Notices of Preparation, the City sent a public hearing notice to over 4,300 property owners in the Sand Canyon, Fair Oaks Ranch and Jakes Way areas. Eleven public hearing signs were placed on the property and in the Jakes Way, Sand Canyon and Fair Oaks Ranch areas (three signs were placed on the Vista Canyon project site). A larger than normal public hearing notice was also placed in the Santa Clarita Signal. In conclusion, the public outreach and noticing

associated with this project have been very extensive. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment indicates that there are other projects located at the east end of Lost Canyon Road that have been excluded from the cumulative impact analysis in the Draft EIR. As explained below, the traffic impact analysis did consider future development, both in assessing potential impacts and proposing appropriate mitigation.

As required by CEQA, the cumulative conditions analysis assumed reasonable and foreseeable land uses in the study area. This includes additional residential development on Lost Canyon Road east of Sand Canyon Road. This is illustrated by a comparison of the existing and project buildout/interim no project peak hour turning movement volumes at the Lost Canyon Road/Sand Canyon Road intersection, which confirms that additional background trips (i.e., trips not related to Vista Canyon) are using the easterly segment of Lost Canyon Road. (See Draft EIR Table 4.3-11; Traffic Study Table 17.) These additional trips are associated with new residential developments in that area such as the Mancara project. These trips are reflected in the analysis of the Lost Canyon Road/Sand Canyon Road intersection and in the evaluation of proposed mitigation measures.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment requests that a notification sign be placed at the intersection of Lost Canyon Road/Sand Canyon Road. Please see **Response 2**, above, for information regarding the public outreach and notification efforts utilized in connection with this project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 5

The comment notes that the commenter lives on La Veda Avenue, and anticipates being substantially impacted by the proposed project. Please note that in a December 21, 2010 Staff Report submitted to the Planning Commission regarding the proposed project, City staff recommended that the project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. At the December 21, 2010 public hearing, the Planning Commission directed that this modification to the

project be made. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres and allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. Additionally, the Planning Commission directed City staff to add conditions of approval requiring the project applicant to minimize potential dust and vibration impacts associated with project related construction to the existing La Veda neighborhood. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Jeff Hogan

Subject: FW: Draft EIR comment period extension and better communication

From: Tabak, Kerry M PWR [mailto:Kerry.Tabak@pwr.utc.com]
Sent: Thursday, December 02, 2010 10:23 AM
To: Maggi Sanchez; Julie Skinner
Cc: Jeff Hogan
Subject: Draft EIR comment period extension and better communication

Santa Clarita City Planning Commissioners,

It has recently been brought to my attention that the Draft EIR (Vista Ranch Development in East Canyon Country) comment period is ending tomorrow. This EIR is rather large and the impact will affect me directly due to the fact that I live on La Veda Ave. I have somehow been left off of any communications regarding this project and have not had enough time to review it. In the future I would like to be included in any/all correspondence relating to this project. (My address will be listed below)

1

I am asking for the comment period to be extended an additional 90 days past the Dec.3, 2010 deadline. In addition, the Public Hearing should also be left open for 90 days past the Dec 21, 2010 scheduled meeting.

2

In talking with many of my neighbors in the Sand Cyn area, most have not even heard about this project. I think that better communication should be arranged by the city to notify those of us who will be directly affected by the traffic problems, overcrowding, construction items, etc.

3

I do believe that there are additional projects that are also being proposed at the east end of Lost Cyn Road that were not included in the cumulative impacts report in the EIR. This will also considerably impact the intersection of Sand Cyn and Lost Cyn, which is the intersection closed to my home.

4

Thank you in advance for your co-operation with these efforts and I hope to hear back from you in a timely manner.

5

Kerry Tabak
28140 La Veda Ave.
Santa Clarita CA 91387

12/10/2010

LETTER NO. C9. LETTER FROM KERRY TABAK, DECEMBER 2, 2010

Response 1

The comment requests that the commenter be included in any future mailings relating to the proposed project. The comment is noted and the City has added the commenter to its mailing list. Please also see **Response 2** to Comment Letter C8 for information regarding the public outreach and notification efforts utilized in connection with this project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment requests that the comment period and public hearing schedule be extended by 90 days. The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment requests that the City endeavor to better notify residents who will be directly affected by the proposed project. Please see **Response 1**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment indicates that there are other projects located at the east end of Lost Canyon Road that have been excluded from the cumulative impact analysis in the Draft EIR. As explained below, the traffic impact analysis did consider future development, both in assessing potential impacts and proposing appropriate mitigation.

As required by CEQA, the cumulative conditions analysis assumed reasonable and foreseeable land uses in the study area. This includes additional residential development on Lost Canyon Road east of Sand Canyon Road. This is illustrated by a comparison of the existing and project buildout/interim no project peak hour turning movement volumes at the Lost Canyon Road/Sand Canyon Road intersection, which

confirms that additional background trips (i.e., trips not related to Vista Canyon) are using the easterly segment of Lost Canyon Road. (See Draft EIR Table 4.3-11; Traffic Study Table 17.) These additional trips are associated with new residential developments in that area such as the Mancara project. These trips are reflected in the analysis of the Lost Canyon Road/Sand Canyon Road intersection and in the evaluation of proposed mitigation measures. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Jeff Hogan

From: M naoum [mikenoum@prodigy.net]
Sent: Thursday, December 02, 2010 12:35 PM
To: Jeff Hogan
Subject: Vista Canyon Ranch Comments

Dear Jeff:

I have the following concerns regarding the Vista Canyon Ranch Development that need additional consideration prior to project approval:

1. One of the project entrances - the North Lost Canyon Road entrance passes by two elementary schools. I am extremely concerned about this additional traffic load, especially given the fact that the Sulphur Springs School District and the Pinecrest School do not have crossing guards. This presents a significant life safety concern. A city traffic planner indicated there was no effective way to limit use of this means of access.

1

2. The developer is requesting an overlay that would allow the conversion of commercial space to additional residential units. This valley needs jobs before more approved housing units. One of the main goals of OVOV is job growth. Giving the developer an out on filling a large amount of commercial space with new jobs is just not appropriate.

2

3. The City is providing a density bonus in order to facilitate more affordable housing. This project must be required to have inclusionary housing. "Promoting" affordable housing has not increased the amount offered by developers and getting a better mix of housing affordability is more important now than ever in order to improve the jobs/housing balance.

3

4. The "streambank stabilization" or channelization of the River is troubling. The City says that it is promoting water recharge, and open areas along out major rivers and creeks but the fact of the matter is that this project eliminates a large area of groundwater recharge with no offset. [Additionally, Setbacks from the river are the minimum required by State code. Can't we do better than that?

4

5

5. The project location is in a County Significant Ecological Area, which is also a prime wildlife corridor and a floodplain. What project elements facilitate this use continuing? Significant amounts of fill are required to remove the floodplain restrictions. I find it difficult to reconcile the location of this project with the planning goals the City says are important.

6

6. There is not enough developed parkland on site for the residents. This is especially important as developments become denser. Kids can't swing, play basketball, baseball or soccer in an oaktree preserve or in the limited town square area. Because of this and the lack of yard areas, additional trips out of the community will be generated for uses associated with recreation. As the City wants to encourage these sorts of villages, there must be some standards regarding how large of an onsite "Village Green" is necessary.

7

7. The City bus system and Metrolink have very limited viability in terms of moving good portions of the population here to their destinations. This is because of the lack of frequency and the limitations on what areas can be accessed within reasonable time frames by bus.

8

12/2/2010

8. The location of the village is not near existing job centers making maximizing employment at the project site critical.

9

While I like the project idea in general, I think it is located on a site that is extremely marginal from a development standpoint, and one where significant density is required to overcome the costs associated with the floodplain and access issues. I'd love to pick up this project and relocate it to the existing Via Princessa Metrolink station location and turn the proposed project site into a regional park for Canyon Country.

10

To me that would represent better planning and land use.

Best regards,

Mike Naoum
27301 Eaglehelm Drive
Santa Clarita, CA 91387
661-252-9275

12/2/2010

LETTER NO. C10. LETTER FROM MIKE NAOUM, DECEMBER 2, 2010

Response 1

The comment voices concern regarding the proximity of the proposed project to two elementary schools and the safety concerns given the additional traffic load.

Section 4.3, Traffic and Access, addresses the distribution of project traffic as follows:

Figure 4.3-6, Project Trip Distribution – 2015 illustrates the expected distribution of external project trips in 2015. The forecast trip distribution takes into account the modest amount of traffic that would be redistributed as a result of the street connections that would be constructed as part of the project (e.g., Lost Canyon Road), and also accounts for the redistribution of traffic related to the future relocation of students from the existing Sulphur Springs Elementary School to the new Spring Canyon Elementary School. It is estimated that approximately 50 percent of the students attending Sulphur Springs Elementary School come from residential neighborhoods north of SR-14. Upon completion of Spring Canyon Elementary School, future students located in residential neighborhoods north of SR-14 would attend Spring Canyon Elementary School and students generated in Vista Canyon would attend Sulphur Springs Elementary School (see **Section 4.10, Education**). Of the four project access roads, the Lost Canyon Road access (to/from Via Princessa) and Vista Canyon Road access (to/from Soledad Canyon Road) are each expected to be used by 37 and 38 percent of project trips, respectively.

(Draft EIR, p. 4.3-43.) Furthermore, the Draft EIR acknowledges that the Sand Canyon Road/Lost Canyon Road intersection is presently congested in the morning and afternoon when Pinecrest School and Sulphur Springs Elementary School are in session due to student drop-off and pick-up. However, roadway improvements to Sand Canyon Road/Lost Canyon Road (Mitigation Measure 4.3-5) will serve to improve circulation in the project area, as well as provide more orderliness to the circulation surrounding the school. Lastly, the project applicant has entered into an agreement with the Sulphur Springs Unified School District, and the District has not indicated that there was a school safety issue to be addressed. Nonetheless, the project applicant will be required to fund, as a condition of approval, a crossing guard, for a temporary period, after the completion of the intersection improvements at Lost Canyon Road/Sand Canyon Road. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment only expresses the opinions of the commenter, specifically expressing opposition to the residential overlay option due to the Santa Clarita Valley's need for more jobs. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the

proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment opines that the proposed project must be required to provide affordable housing. As discussed in the Draft Vista Canyon Specific Plan (October 2010), the proposed project would provide a range of housing types that would accommodate households with varied income levels. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment states that the proposed project would eliminate a large area of groundwater recharge with no offset. Section 4.2, Hydrology, of the Draft EIR provides responsive information that contradicts the assertion that the project design does not include an offset for groundwater recharge:

Table 4.2-8 compares the existing and proposed development condition hydrology and concludes that a net decrease of 85.6 cfs is expected to occur in the proposed project condition. The apparent cause of the reduction of the peak discharge is a function of the reduction of the time of concentration for the proposed project. In other words, the increase in imperviousness reduces the time of concentration for various subbasins. As a result, the hydrograph of water discharged from the project site is flatter and broader, reducing the peak. This small change (<1 percent) shows that the existing and proposed project conditions are substantially consistent. Importantly, the existing condition is the 50-year burned and bulked discharge, also defined as the Capital Flood discharge. The proposed project condition, in contrast, is burned and unbulked discharge. While the volume of water is the same for both the existing and proposed project conditions, the existing condition discharge is laden with sediment while the proposed project condition discharge removes the sediment.

(Draft EIR, p. 4.2-52.) Additionally, as discussed in Section 4.8, Water Service, of the Draft EIR, project impacts on groundwater recharge and levels would be less than significant. (*Ibid.*, at p. 4.8-109.) As discussed in Section 4.8:

The increase in paved area would reduce overall recharge on the site; however, two factors would serve to counter the impact of urbanization on groundwater recharge:

- Development on the project site would increase stormwater runoff volume discharged after treatment (*e.g.*, in water quality control facilities) to the Santa Clara River, whose channel is predominantly natural and consists of vegetation and coarse-grained sediments. The porous nature of the sands and gravels forming the

streambed allows for significant infiltration to occur to the Alluvial aquifer underlying the Santa Clara River;

- Development of the project site would increase the area of irrigated landscaping on currently undeveloped land, which would serve to increase the amount of recharge to the project area; and,
- The percolation ponds associated with the water factory would result in increase recharge in the project area.

(*Ibid.*) The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment states that the setbacks are the minimum required by state code. For purposes of the proposed project, the design and analysis has focused on preserving a viable east-west animal movement corridor along the Santa Clara River. Therefore, the project has been designed to preserve and enhance the River Corridor, which is approximately 775 feet wide. (Draft EIR, p. 4.20-22.) As discussed in Section 4.6, Biological Resources, “the project proposes to maintain, restore, and enhance the River Corridor within the project site; and, therefore, the existing east-west River Corridor wildlife movement area would not be significantly impacted due to project implementation.” (*Ibid.*, at p. 4.6-75; see also *id.* at pp. 4.20-36 to -38, and -56 to -57.)

Further, as the active River channel varies between just 20 and 60 feet during a 2-year flood event, an extensive setback area exists between the active River channel and the proposed development. (*Ibid.*) This corridor width ensures that wildlife will have adequate areas to navigate and migrate under post-project conditions.

Additional evidence supporting the post-project viability of the River Corridor is provided by the results of Dudek's *California Rapid Assessment Method Report* (CRAM Report; February 2009), a copy of which is included in Appendix 4.6 of the Draft EIR. The CRAM for wetlands is a diagnostic tool used to evaluate the existing condition of wetlands and riparian habitats within a project area compared to achievable wetlands functions/values after implementation of the project's development design. (Draft EIR, p. 4.20-34.) The CRAM Report determined that the post-project conditions would be more favorable than the pre-project conditions, and “result in a regional increase of jurisdiction resource functions and provide for an ecologically meaningful resource to existing riparian resources associated with” the reach of the Santa Clara River in the project site. (Draft EIR, p. 4.20-59; see also *id.* at pp. 4.20-59 to -64.) The comment will be included as part of the record and made available to the decision makers prior to a final decision

on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 6

The comment addresses general subject areas, which received extensive analysis in Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, please see Section 4.20 and **Response 5**, above, for responsive information. Additionally, please see **Appendix F2** of the Final EIR, which compares the width of the Santa Clara River throughout the project site with the River width at other locations. As illustrated in that figure, the average width of the River through the project site is 775 feet, with the width at the proposed bridge approximately 650 feet. In comparison, the width of the River at three off-site locations (i.e., 460, 570 and 600 feet) was well below the proposed project's 775 feet width. Similarly, the following bridges have River widths noticeably more narrow than that proposed by the project: Whites Canyon: 530 feet; Soledad Canyon Road: 400 feet; Sierra Highway: 350 feet; Antelope Valley Freeway: 430 feet; and, Sand Canyon Road; 350 feet. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment states that there is not enough parkland on the site for the residents, and concludes that future residences would be forced to make more trips out of the community for recreational purposes. As discussed in Section 4.12, Parks and Recreation, of the Draft EIR, the project would comply with Quimby requirements and City Code standards, and would not result in significant impacts to parkland and recreational facilities. The 10-acre Oak Park, Town Green, Community Garden, and up to six private recreational areas would provide sufficient recreational opportunities for on-site residents. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment only expresses the opinions of the commenter regarding the scheduling and routing of the City bus system and Metrolink. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 9

The comment states that the project is not located close to existing job centers. While the eastern Santa Clarita Valley is not known for large employment centers, the project is proposing to build a Metrolink Station and Bus Transfer Station, which would facilitate access to off-site centers. Additionally, and importantly, the project itself contains a significant amount of employment-generating, non-residential uses. As proposed, the project would result in 164,000 square feet of retail; 646,000 square feet of office; and, 140,000 square feet of hotel. (See Table 1.0-2, Vista Canyon Statistical Summary By Planning Area, of the Draft EIR.) These uses would provide potential employment opportunities for future residents of the Vista Canyon project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment expresses support for the project, in general, but believes it is better suited for a different site. Relatedly, the comment expresses support for turning the proposed site into a regional park. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Jeff Hogan

From: Maggi Sanchez
Sent: Wednesday, December 08, 2010 10:49 AM
To: Jeff Hogan
Subject: FW: Extension Request of EIR: Vista Canyon

From: Suzanne Silva [mailto:smpsilva4@yahoo.com]
Sent: Thursday, December 02, 2010 4:06 PM
To: Maggi Sanchez; Julie Skinner
Subject: Extension Request of EIR: Vista Canyon

My name is Suzanne Silva. I am a homeowner on La Veda Ave in Santa Clarita. My street is adjacent to the new proposed Vista Canyon site. It is my understanding that a select few on my street received a copy of the EIR report. I did not receive a copy and, from what I understand, the report is very extensive. As a community member of almost 30 years, I want to be able to read what can greatly impact my home, neighbors, and community. I am **requesting that the EIR comment period be extended 90 days and that the Public Hearing be extended past the December 21st meeting by 90 days.**

1

Sincerely,
Suzanne Silva, RN BSN
Homeowner:
28133 La Veda Ave
Santa Clarita, CA
91387
661.212.3059
Please send a copy to this address.

12/8/2010

LETTER NO. C11. LETTER FROM SUZANNE SILVA, DECEMBER 2, 2010

Response 1

The comment requests that the comment period and public hearing schedule be extended by 90 days. The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

28141 La Veda Avenue
Canyon Country, CA 91387
December 3, 2010

City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355
Attn: Jeff Hogan/Patrick LeClair, Community Dev. Dept.

Re: Vista Canyon Development and EIR

Via email and USPS

Dear Sirs:

In regards to the Draft EIR for the above referenced project, we have the following Comments:

1) Traffic

- a) The intersection of Lost Canyon and La Veda Avenue is designated with a roundabout (traffic circle) however, it is our concern that there is a danger for pedestrians (especially children) due to the high volume of traffic in the morning and afternoon. We would like to see a 3-way stop at this intersection.
- b) The intersection of Sand Canyon/Lost Canyon has 4 options. We prefer Option 2, as it does not involve removing any of the Heritage Oak trees.

2) Damage to existing structures(homes on La Veda Avenue)

- a) Although this item was not addressed in the Draft EIR, the potential for damage to the homes on La Veda Avenue during construction needs to be mitigated. What are the accepted criteria for damage claims and recovery?

Other: Despite assurances of watering and best efforts to reduce dust this project will inevitably produce airborne dust/debris which will be carried on the prevailing winds into and onto our houses. We will incur additional costs and efforts, over the next several years, to clean our houses. Developers hopefully will be creating profits from this venture and should bear this cost rather than the residents.

We look forward to attending the planning commission meeting on December 21, 2010

Yours truly,


Robert F. Mooney


Carmen M. Mooney

Cc: (via email) J. Backer and S. Valenziano: JSB Development

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	2
	3
	4
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LETTER NO. C12. LETTER FROM ROBERT MOONEY, DECEMBER 3, 2010

Response 1

The comment requests that a three-way stop be installed at the Lost Canyon Road/La Veda Avenue intersection in place of a roundabout (traffic circle) due to concerns over pedestrian safety. As described on page 1.0-31 of the Draft EIR (Project Description), the project proposes to construct a roundabout at this intersection as a means to “calm” traffic on Lost Canyon Road between the project site and Sand Canyon Road by reducing vehicle speeds and discouraging through traffic travel. The roundabout would be designed to accommodate a variety of vehicle types and accommodate pedestrians via crosswalks, protected splitter islands, and American with Disabilities Act (ADA) ramps. Figure 1.0-8, Vista Canyon Mobility Plan, of the Draft EIR depicts a mid-block pedestrian crossing west of the roundabout that would connect the proposed Vista Canyon development and La Veda neighborhood to the equestrian and multi-use paths located along the Santa Clara River. Accordingly, any potential impacts to pedestrians would be less than significant. The comment will be made available to the City prior to any decision regarding the proposed project; however, it is unlikely that the City would support the installation of an all-way stop-control as minimum vehicular warrants (particularly on the La Veda Avenue approach) would not be satisfied.

Response 2

The comment expresses a preference for Option 2 (i.e., traffic signal that maintains heritage oak tree) at the Lost Canyon Road/Sand Canyon Road intersection. This comment is noted and will be made available to the City prior to any decision regarding the proposed project. Of note, on December 21, 2010, the Planning Commission selected Option 3 (i.e., roundabout). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment expresses concern regarding potential damage to homes on La Veda Avenue during project construction. Construction of the proposed project would not result in potentially significant impacts to homes on La Veda Avenue. First, construction truck and equipment routes would not use Lost Canyon Road west of Sand Canyon Road, nor would construction staging occur near La Veda Avenue. Additionally, much of the rough grading, earthwork, and backbone infrastructure will be completed during the initial phase of project construction, prior to construction of the extension of Lost Canyon Road westerly from its current terminus into the project site. Therefore, the amount of construction activities occurring at any one time would be limited. Finally, the Planning Commission has added conditions of approval, at the request of residents along La Veda Avenue, to minimize potential dust and

vibration impacts associated with project-related construction to the existing La Veda Avenue neighborhood (see Draft Conditions PC1 and 2). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment expresses concern regarding the amount of dust/debris generated by the project that could impact the La Veda Avenue residents. Please see **Response 3**, above, for information regarding the conditions of approval designed to address this concern. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.

Jeff Hogan

From: Diane Trautman [dtrautman@ca.rr.com]
Sent: Friday, December 03, 2010 4:48 PM
To: Jeff Hogan; Maggi Sanchez
Subject: Fwd: Vista Canyon Ranch Comments

To Staff and Commissioners:

I agree with many of the comments and concerns as expressed by Mike Naoum in the attached email. I, too, am concerned about traffic and safety, about loss of aquifer recharge and river habitat area, and other issues. I understand that other residents in the vicinity have only just learned about this project and want an opportunity to weigh in on Vista Canyon Ranch which is very large and ambitious project for the site.

1

This massive project is being presented at a time when the community is trying to review thousands of pages of One Valley One Vision documentation. Given the size and scope of both applications and the potential adverse affects of the Vista Canyon Ranch project on the surrounding community (beyond the 1000 foot- notification boundary), I respectfully request that the Planning Commission re-open and extend the comment period for this DEIR for 60 days.

2

Thank you for your consideration.

Diane Trautman
Santa Clarita

Begin forwarded message:

From: M naoum <mikenaoum@prodigy.net>
Date: December 2, 2010 12:34:40 PM PST
To: jhogan@santa-clarita.com
Subject: Vista Canyon Ranch Comments

Dear Jeff:

I have the following concerns regarding the Vista Canyon Ranch Development that need additional consideration prior to project approval:

1. One of the project entrances - the North Lost Canyon Road entrance passes by two elementary schools. I am extremely concerned about this additional traffic load, especially given the fact that the Sulphur Springs School District and the Pinecrest School do not have crossing guards. This presents a significant life safety concern. A city traffic planner indicated there was no effective way to limit use of this means of access.
2. The developer is requesting an overlay that would allow the conversion of commercial space to additional residential units. This valley needs jobs before more approved housing units. One of the main goals of OVOV is job growth. Giving the developer an out on

12/6/2010

filling a large amount of commercial space with new jobs is just not appropriate.

3. The City is providing a density bonus in order to facilitate more affordable housing. This project must be required to have inclusionary housing. "Promoting" affordable housing has not increased the amount offered by developers and getting a better mix of housing affordability is more important now than ever in order to improve the jobs/housing balance.

4. The "streambank stabilization" or channelization of the River is troubling. The City says that it is promoting water recharge, and open areas along out major rivers and creeks but the fact of the matter is that this project eliminates a large area of groundwater recharge with no offset. Additionally, Setbacks from the river are the minimum required by State code. Can't we do better than that?

5. The project location is in a County Significant Ecological Area, which is also a prime wildlife corridor and a floodplain. What project elements facilitate this use continuing? Significant amounts of fill are required to remove the floodplain restrictions. I find it difficult to reconcile the location of this project with the planning goals the City says are important.

6. There is not enough developed parkland on site for the residents. This is especially important as developments become denser. Kids can't swing, play basketball, baseball or soccer in an oaktree preserve or in the limited town square area. Because of this and the lack of yard areas, additional trips out of the community will be generated for uses associated with recreation. As the City wants to encourage these sorts of villages, there must be some standards regarding how large of an onsite "Village Green" is necessary.

7. The City bus system and Metrolink have very limited viability in terms of moving good portions of the population here to their destinations. This is because of the lack of frequency and the limitations on what areas can be accessed within reasonable time frames by bus.

8. The location of the village is not near existing job centers making maximizing employment at the project site critical.

While I like the project idea in general, I think it is located on a site that is extremely marginal from a development standpoint, and one where significant density is required to overcome the costs associated with the floodplain and access issues. I'd love to pick up this project and relocate it to the existing Via Princessa Metrolink station location and turn the proposed project site into a regional park for Canyon Country.

To me that would represent better planning and land use.

Best regards,

Mike Naoum
27301 Eaglehelm Drive
Santa Clarita, CA 91387
661-252-9275

12/6/2010

LETTER NO. C13. LETTER FROM DIANE TRAUTMAN, DECEMBER 3, 2010

Response 1

The commenter states that she has the same concerns as those articulated in Comment Letter C10; accordingly, please see the responses to Letter C10. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 2

The comment requests that the comment period be extended by 60 days. However, the comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Jeff Hogan

From: Maggi Sanchez
Sent: Wednesday, December 08, 2010 10:48 AM
To: Jeff Hogan
Subject: FW: Attn: Sand Clarita City Council & Planning...DEIR comment period be extended 90 days

From: The McCool's [mailto:mccoolsting@att.net]
Sent: Friday, December 03, 2010 12:52 PM
To: Maggi Sanchez; Julie Skinner
Subject: Attn: Sand Clarita City Council & Planning...DEIR comment period be extended 90 days

We did not receive the EIR report and we are residents on La Veda Avenue.

1

I'm sure you are trying to notify all the residents surrounding the area, but a lot of home owners seem to not know the extent of this project will have on them. Have the residents living in the Sand Canyon area been told of the two expansions? Our traffic problems commuting through the Sand Canyon and Lost Canyon intersections are awful at the present. I think more people need to be notified. A traffic signal will be needed for sure at the intersection of Sand & Lost for safety issues alone, also, the additional projects being proposed at the east end of Lost Canyon Road has that been include in the impacts of the EIR report.

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Additional time should be extended 90 days from December 3, 2010 and request that the Public Hearing be left open for 90 days past the December 31, 2010 meeting.

7

Thank you for your consideration in this matter.

Richard & Carolyn McCool
28124 La Veda Avenue
Canyon Country CA 91387

12/8/2010

**LETTER NO. C14. LETTER FROM RICHARD AND CAROLYN MCCOOL,
DECEMBER 3, 2010**

Response 1

The comment states that the commenters, residents of La Veda Avenue, did not receive a copy of the Draft EIR. Please note that CEQA does not require lead agencies to distribute hard copies of Draft EIRs; instead, it requires that a Notice of Availability (NOA) of the Draft EIR be circulated. (See Cal. Code Regs., tit. 14, Section 15087.) Here, the City sent the NOA to over 4,300 property owners in the Sand Canyon, Fair Oaks Ranch and Jakes Way areas. Eleven public hearing signs were placed on the property and in the Jakes Way, Sand Canyon and Fair Oaks Ranch areas (three signs were placed on the Vista Canyon project site). A larger than normal notice was also placed in the Santa Clarita Signal. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment asks whether the residents of the Sand Canyon community have been notified of the proposed project. In response, the project applicant has had over 50 community meetings on the project. These meetings have included multiple presentations to the La Veda Homeowners Association, Fair Oaks Ranch Homeowners Association, Sand Canyon Property Owners Association and Board, Canyon Country Advisory Committee, as well as numerous meetings with homeowners and community members in the Sand Canyon and Canyon Country area. The project applicant also contacted and met with each of the property owners at the intersection of Lost Canyon Road/Sand Canyon Road to discuss the four potential improvement options for this intersection and the impact of each on their respective properties. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment observes that the Lost Canyon Road/Sand Canyon Road intersection presently is congested. As noted in Section 4.3, Traffic and Access, of the Draft EIR, the referenced intersection currently operates at Level of Service (LOS) D during the AM peak hour. (Draft EIR, p. 4.3-13.) On December 21, 2010, the Planning Commission selected Intersection Design Option 3 for the mitigation strategy for that intersection. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment opines that more people need to be notified of the proposed project. Please see **Response 2** and **Response 3**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 5

The comment states that a traffic signal is needed at the intersection of Lost Canyon Road/Sand Canyon Road. Mitigation Measure 4.3-5 outlines the mitigation options for this intersection as follows:

4.3-5 Prior to the completion and full occupancy of the project (beyond Phase 1), the project applicant shall install the selected Intersection Design Option (No. 2, 3 or 4) at the Sand Canyon Road/Lost Canyon Road intersection. If Intersection Design Option No. 1 is selected, the project would have a significant, unavoidable impact.

The four design options are:

- Option 1 (Four-Way Stop) – this design option (See Figure 4.3-16 and 4.3-16a) is presently in place at the intersection. The intersection is presently congested in the morning and afternoon when Pinecrest School and Sulphur Springs Elementary School are in session due to student drop-off and pick-up. Under this design option, the operation of this intersection in the future would worsen to a Level of Service (LOS) F with or without the Vista Canyon project. If this option is selected, the project would result in a significant unavoidable impact at the intersection.
- Option 2 (Signalized Intersection “Look Ahead Signal”) – this design option (See Figure 4.3-17) would result in a signalized intersection, with a “look ahead” signal at the southwest corner to address northbound “line of sight” requirements. Minimal widening of the intersection would occur with this design option, with right-of-way necessary at the northwest and southeast corners. Encroachment within the protected zone of the heritage oak tree located along the eastern edge of Sand Canyon Road would remain similar to the existing condition. A fence, located within the right-of-way, would have to be removed to adhere to “line of sight” requirements. Option 2 would result in the improved operation of the intersection in the future (LOS D) even with future growth (including Vista Canyon), as compared to the existing four-way stop design.
- Option 3 (Roundabout) – this design option (See Figure 4.3-18 and 4.3-18a) would include the installation of a “roundabout” or traffic circle at the intersection. This option would involve the relocation of the intersection to the north and west to adhere to northbound “line of sight” requirements. Right-of-way acquisition would be necessary on all four corners; most of it would come from the northwest corner (which is presently vacant). Encroachment within the protected zone of the heritage oak tree located along the eastern edge of Sand Canyon Road would still occur, consistent with the existing condition. From a traffic operational standpoint, this design option would be the best of the four, improving the future LOS F under the existing design to an LOS C in the AM peak hour and LOS B in the PM peak hour even with future growth (including the Vista Canyon project).

- Option 4 (Signalized Intersection - Standard Configuration) – this design option (See Figure 4.3-19) improves the intersection of Lost Canyon Road/Sand Canyon Road with a right-turn lane extension. This option would require the acquisition of right-of-way on the northwest and southeast corner. A “line of sight” easement would be needed from three properties located east of Sand Canyon Road and south of the intersection. All vegetation and fencing within this easement would need to be removed, including the heritage oak tree located along the eastern edge of Sand Canyon Road. Similar to the “Look Ahead Signal” design option, this option would result in the improved operation of the intersection (LOS D), as compared to the existing design, even with future growth (including the Vista Canyon project).

On December 21, 2010, the Planning Commission selected Intersection Design Option 3 for the mitigation strategy for that intersection. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment asks whether projects located at the east end of Lost Canyon Road have been accounted for in the Draft EIR's impact analysis. As required by CEQA, the cumulative conditions analysis assumed reasonable and foreseeable land uses in the study area. This includes additional residential development on Lost Canyon Road east of Sand Canyon Road. This is illustrated by a comparison of the existing and project buildout/interim no project peak hour turning movement volumes at the Lost Canyon Road/Sand Canyon Road intersection, which confirms that additional background trips (i.e., trips not related to Vista Canyon) are using the easterly segment of Lost Canyon Road. (See Draft EIR Table 4.3-11; Traffic Study Table 17.) These additional trips are associated with new residential developments in that area such as the Mancara project. These trips are reflected in the analysis of the Lost Canyon Road/Sand Canyon Road intersection and in the evaluation of proposed mitigation measures. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment requests that the comment period and public hearing schedule be extended by 90 days. However, the comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Jeff Hogan

From: Maggi Sanchez
Sent: Wednesday, December 08, 2010 10:48 AM
To: Jeff Hogan
Subject: FW:

From: penny [mailto:scvpenny@socal.rr.com]
Sent: Friday, December 03, 2010 5:38 PM
To: Maggi Sanchez
Cc: Julie Skinner
Subject:

Please forward the follow letter to all of the Planning Commissioners.
Thank you

December 3, 2010

RE: Vista Canyon Ranch project – location Sand Canyon

Dear Planning Commissioners

As a resident within 300 feet of the proposed Vista Canyon Ranch project, I am requesting that the DEIR comment period be extended 90 days form December 3, 2010 AND Requesting that the Public Hearing be left open for 90 days past the December 21, 2010 meeting.

1

The reasons for requesting additional time are;

1. The EIR is so huge and the impacts so significant that the public/lay people, especially those most affected on Lost Canyon Road and La Veda Ave., have not had sufficient time to examine the documents to see if our concerns are addressed.

2

2. Despite the effort of City Staff in extending the notification area to 1,000 feet from the project, many residents in the Sand Canyon area are not aware of the project. The traffic problems identified in the DEIR will significantly

3

12/8/2010

impact their daily commuting through the Sand Canyon and Lost Canyon intersection. Another attempt should be made to notify them.

3

3. The additional projects being proposed at the east end of Lost Canyon Road have not been included in the cumulative impacts report in the EIR. This includes additional students, additional traffic, especially at Sand Canyon and Lost Canyon Roads.

4



Penny Upton
28154 La Veda Ave.
Canyon Country, CA 91387

12/8/2010

LETTER NO. C15. LETTER FROM PENNY UPTON, DECEMBER 3, 2010

Response 1

The comment requests that the comment period and public hearing schedule be extended by 90 days. The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

The comment addresses a subject area, namely impacts to Lost Canyon Road and La Veda Avenue, which received extensive analysis in Section 4.3, Traffic and Access, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment states that many residents in the Sand Canyon area are not aware of the proposed project. By way of background, the project applicant has had over 50 community meetings on the project. These meetings have included multiple presentations to the La Veda Homeowners Association, Fair Oaks Ranch Homeowners Association, Sand Canyon Property Owners Association and Board, Canyon Country Advisory Committee, as well as numerous meetings with homeowners and community members in the Sand Canyon and Canyon Country area. The project applicant also contacted and met with each of the property owners at the intersection of Lost Canyon Road/Sand Canyon Road to discuss the four potential improvement options for this intersection and the impact of each on the their respective properties.

The project applicant has also met on several times with the Sulphur Springs School District in regards to the proposed improvements on Lost Canyon Road and other project-related items. The applicant and City staff have also reached out to Pinecrest School over the last six months. Only recently did a representative from Pinecrest School contact the applicant. The representative asked several questions about the project and schedule, and indicated that there would be no need for a presentation from the applicant at this point.

In addition to the public scoping meeting and three EIR Notices of Preparation, the City sent a public hearing notice to over 4,300 property owners in the Sand Canyon, Fair Oaks Ranch and Jakes Way areas. Eleven public hearing signs were placed on the property and in the Jakes Way, Sand Canyon and Fair Oaks Ranch areas (three signs were placed on the Vista Canyon project site). A larger than normal public hearing notice was also placed in the Santa Clarita Signal. In conclusion, the public outreach and noticing associated with this project have been very extensive. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment indicates that there are other projects located at the east end of Lost Canyon Road that have been excluded from the cumulative impact analysis in the Draft EIR. However, as required by CEQA, the cumulative conditions analysis assumed reasonable and foreseeable land uses in the study area. This includes additional residential development on Lost Canyon Road east of Sand Canyon Road. This is illustrated by a comparison of the existing and project buildout/interim no project peak hour turning movement volumes at the Lost Canyon Road/Sand Canyon Road intersection, which confirms that additional background trips (i.e., trips not related to Vista Canyon) are using the easterly segment of Lost Canyon Road. (See Draft EIR Table 4.3-11; Traffic Study Table 17.) These additional trips are associated with new residential developments in that area such as the Mancara project. These trips are reflected in the analysis of the Lost Canyon Road/Sand Canyon Road intersection and in the evaluation of proposed mitigation measures. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Santa Clarita City Planning Commissioners
and Mr. Jeff Hogan, Senior Planner

December 3, 2010

Thank you for the opportunity to comment on the proposed Vista Canyon Ranch project and the Draft Environmental Impact Report. Due to the size and complexity of this project, there are many areas that I have yet to cover. I ask that you extend the comment period for the EIR. For now, I submit the following concerns and comments.

1

The DEIR does not address the following issues:

SOIL

1. During the City’s Scoping meeting, February 27, 2008, I raised the specific concern of health issues such as Valley Fever spores while grading over this large area and bringing in fill dirt. My concern was for our neighborhood and the elementary school children, within 200 feet, who will be exposed to the unavoidable impacts during construction. There is no mention of this in this DEIR

2

TRAFFIC

1. This DEIR does not state if the existing bridge located on Lost Canyon Road just west of Sand Canyon Road, can bear the weight of the additional traffic nor does it address any improvements or widening to accommodate the lane structure if Lost Canyon Road is opened to the project.

3

2. This DEIR does not mention the two residential projects at the east end of Lost Canyon Road. The Mancara project that has 99 homes and is in the environmental review stage, nor the larger project adjacent to it. These projects will add hundreds of vehicle trips per day through the intersection of Lost Canyon and Sand Canyon Road, already at level F. Lost Canyon Road will be the only road in and out of these projects. This additional traffic is not addressed in the Cumulative Impacts.

4

3. In the suggested improvements to ease Sulphur Springs School traffic this DEIR states the following:

4.3-55 “In addition to the above improvements, it is recommended that the City and project applicant work with the Sulphur Springs School District on potentially creating an on-site pick-up/drop-off area in the parking area directly east of the School buildings, which would, if implemented, further alleviate congestion on this roadway during the peak hours.”

5

Despite the suggestions and the efforts, over several years, of City staff, the project applicant, school and district staff, neighbors and parents – the space to accomplish this suggestion – just can’t be found. The DEIR states that improvements will mitigate these traffic problems but there is no explanation as to how this will work. A roundabout at Lost Canyon Road and La Veda Ave and/or a roundabout at Lost Canyon Road and Sand Canyon Road with vehicles and young children as pedestrians is not conceivable.

6

4. The following statements in the DEIR do not make it clear what the impact will be to the Sand Canyon/Lost Canyon intersection during Phase 1 of the project.

“SIGNIFICANT UNAVOIDABLE IMPACTS

Phase 1 of the project would further degrade LOS F operations at the Sand Canyon Road/Lost Canyon Road intersection (No. 5), resulting in a temporary, unavoidable significant impact.”

7

4.3-50

“With respect to the Sand Canyon/Lost Canyon Road intersection (No. 5), as noted above, Phase 1 of the project would further degrade LOS F operations at the intersection, thereby resulting in significant impacts. However, Phase 1 does not include a connection to Lost Canyon Road at La Veda Avenue. This connection would be completed as part of project buildout. Therefore, the project would have a “temporary” significant unavoidable impact. It should be noted that Phase 1 would have a minimal contribution of traffic to the intersection (15 AM peak hour trips, which is a 1 percent increase).”

4.3-1 Phase 1 of the project would cause significant impacts at five study intersections in 2012. Implementation of mitigation measures would reduce these impacts to less than significant levels at four of the five impacted intersections. Recommended improvements at one of the intersections (Sand Canyon Road/Lost Canyon Road) would not be completed until after Phase I, as a connection to Lost Canyon Road at La Veda Avenue is not proposed with Phase I and, therefore, the project would have a temporary significant and unavoidable impact. However, implementation of identified mitigation at this intersection as part of project buildout would reduce impacts to a less than significant level. ?

7

PARKING

“Parking. The proposed project would not result in significant impacts to parking .” In this DEIR the only mention regarding parking is within the project. The existing issue of inadequate parking for school faculty and visitors is not addressed despite my bringing it to the attention of the City and the VCR developers. At my invitation, two of the VCR developers, a City Traffic Engineer and representative from Fehrs & Pccrs [who did the traffic study] came out to witness the parking during Open House and Back to School nights at Sulphur Spring School. The DEIR mentions only traffic during these events – not parking. The project proposal of eliminating street parking on the north side of Lost Canyon from Sand Canyon Road to La Veda Ave will have a significant impact to the two schools and La Veda Ave residents. Suggestions have been made that there will be parking on Sulphur Springs School campus. However, no one can find that space for parking.

8

In addition, there is no mention in this DEIR or during meetings of the cars related to the additional Pinecrest School located next to Sulphur Springs School that park on both sides of Lost Canyon Road and La Veda Ave. This must be addressed before approving this project.

9

ALTERNATIVES

There is not sufficient attention in the DEIR to the impacts of leaving Lost Canyon Road closed nor the safety considerations if the road is opened to the project. There is no mention of the risk to the safety of elementary children if Lost Canyon Road is opened as a “secondary highway” to the project.

10

This DEIR does not describe the impacts of grading Lost Canyon Road from the project to La Veda Ave. to accommodate emergency traffic but to include an emergency [fire] gate.

11

This alternative would eliminate all construction vehicles that do not take the proposed route to the site. It would also eliminate most of the trash dumping the project proposal mentions. The fees and money needed to complete the road later could be collected and held as the City has done with other projects. If it was determined at a later date that Lost Canyon Road needed to be opened to the project, the gate could be removed.

12

The alternative below states:

6.5-57 Alternative 5, Open Space Corridor Alternative, would increase the size of the Oak Park (creating a north/south open space corridor to undeveloped properties south of the project site), eliminate development in PA-4 (Mitchell Hill) and not extend Lost Canyon Road to La Veda Avenue, thereby terminating Lost Canyon Road in the project site. This alternative would be environmentally superior to the proposed project. Furthermore, similar to Alternative 4, this alternative would mostly satisfy the primary project objective: developing an environmentally sensitive, transit-oriented, mixed-use community. However, this alternative may not fully meet two of the project objectives (one of the land use planning objectives and one of the economic objectives).

13

Thank you for your attention,
Penny Upton
28154 La Veda Ave. Canyon Country CA 91387

LETTER NO. C16. LETTER FROM PENNY UPTON, DECEMBER 3, 2010

Response 1

The comment requests that the comment period be extended. The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 2

Some health problems, particularly those of the eye and respiratory tract (*i.e.*, Coccidioidomycosis or its common name Valley Fever) may be exacerbated by fugitive dust generated at the project site. Valley Fever is not new to the Los Angeles County area. In fact, many people who have resided in Ventura County, Los Angeles County and the Central Valley portion of California have been exposed to Valley Fever during their lifetimes and have developed an immunity. As discussed in Section 4.4, Air Quality, of the Draft EIR, the South Coast Air Quality Management District (SCAQMD) recommends the implementation of dust control measures. The mitigation measures in the Draft EIR would minimize dust generation and, therefore, the corresponding risk of coccidioidomycosis exposure. (See Draft EIR, pp. 4.4-54 to -59.) Furthermore, at its meeting of December 21, 2010, the Planning Commission directed staff to add conditions further minimizing dust and vibration impacts to the La Veda Avenue residents (Draft Conditions PC1 and 2). Therefore, it can be concluded that grading associated with development activity on the project site, or any other site, would not result in outbreaks of Valley Fever or pose any significant or unique health risk. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment asks if the existing bridge located on Lost Canyon Road west of Sand Canyon Road can bear the weight of the additional traffic or if additional improvements or widening are necessary. Lost Canyon Road, including the bridge over Sand Canyon wash, is a public street and has been built in accordance with public street requirements. The Vista Canyon Transportation Impact Study and Draft EIR (see Section 4.3, Traffic and Access) do not require any widening of this bridge to accommodate project traffic. A separate pedestrian/equestrian bridge, adjacent to this bridge, would be constructed as part of the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment states that the two residential projects at the east end of Lost Canyon Road are neither mentioned in the Draft EIR nor considered in the cumulative analysis. As explained below, the traffic impact analysis did consider future development, both in assessing potential impacts and proposing appropriate mitigation. As required by CEQA, the cumulative conditions analysis assumed reasonable and foreseeable land uses in the study area. This includes additional residential development on Lost Canyon Road east of Sand Canyon Road. This is illustrated by a comparison of the existing and project buildout/interim no project peak hour turning movement volumes at the Lost Canyon Road/Sand Canyon Road intersection, which confirms that additional background trips (i.e., trips not related to Vista Canyon) are using the easterly segment of Lost Canyon Road. (See Draft EIR Table 4.3-11; Traffic Study Table 17.) These additional trips are associated with new residential developments in that area such as the Mancara project referenced in the comment. These trips are reflected in the analysis of the Lost Canyon Road/Sand Canyon Road intersection and in the evaluation of proposed mitigation measures. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment expresses concern that efforts to find available space east of Sulphur Springs School for off-street student pick-up/drop-off have failed. The comment also asks how such improvements would mitigate the traffic problems. The Draft EIR presents a summary of an analysis specifically undertaken to address school access and potential traffic-related impacts of the proposed project relative to the Sulphur Springs and Pinecrest schools. (See Draft EIR, pp. 4.3-54 to 55.) Based on the analysis, to alleviate existing congestion on Lost Canyon Road in the vicinity of the schools and to accommodate project-generated traffic, certain improvements will be constructed as part of the project, including: a median turn lane, a trail along the north side of the roadway, a roundabout at La Veda Avenue, parallel parking on the south side of the road, and construction of a narrow raised median at the easterly Pinecrest School driveway including a sign prohibiting u-turns. (Draft EIR p. 4.3-55.) Additionally, the Draft EIR identifies the need for improvements at the Lost Canyon Road/Sand Canyon Road intersection and includes four potential mitigation measure options; the option that is selected will be determined by the decision maker, which is the City in this case. (See Draft EIR, pp. 4.3-76 to -77.) Field observations indicate that this intersection contributes to the overall levels of congestion along Lost Canyon Road during school pick-up/drop-off hours. As shown on Draft EIR Table 4.3-13, with implementation of the mitigation measures, the intersection would operate at acceptable LOS C.

The improvements to be constructed as part of the proposed project, in combination with the traffic mitigation measures, would reduce the project's potential impacts to a level below significant and no further mitigation is required. Additionally, street parking adjacent to the proposed Oak Park would be available for school pick-up and drop-off. Finally, as noted in the Draft EIR (see Section 4.3), approximately 50 percent of the children presently attending Sulphur Springs Elementary School come from homes north of SR-14, exacerbating existing pick-up and drop-off conditions along Lost Canyon Road. In the future, these students would be replaced by children within the Vista Canyon project, The proximity of Vista Canyon to Sulphur Springs Elementary school would encourage walking, especially from easterly areas of Vista Canyon, further reducing congestion along Lost Canyon Road. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment expresses concern regarding pedestrian safety at the proposed roundabouts at Lost Canyon Road/La Veda Avenue and Lost Canyon Road/Sand Canyon Road. Both roundabouts would be constructed with crosswalks, ADA ramps, appropriate signing/stripping, and pedestrian refuge areas within the splitter islands. (The roundabout is a means to “calm” traffic on Lost Canyon Road between the project site and Sand Canyon Road by reducing vehicle speeds and discouraging through traffic travel. As explained at page 103 of *Roundabouts: An informational Guide* (Federal Highway Administration, 2000), roundabouts are a means of enhancing pedestrian safety: “Roundabouts have fewer conflict points in comparison to conventional intersections. Pedestrians need only cross one direction of traffic at a time at each approach as they traverse roundabouts. The speeds of motorists entering and exiting a roundabout are reduced with good design. Single-lane roundabouts have been found to perform better (in overall safety) than two-way stop-controlled intersections in the U.S.”

As to the Lost Canyon Road/Sand Canyon Road intersection, a roundabout is one of four options for the intersection that the City's Planning Commission and City Council will be reviewing and, ultimately, selecting a preferred improvement. The Planning Commission has initially selected the roundabout option and will be making this recommendation to the City Council. The concerns raised by the comment are noted and will be made available to the City prior to any decision on the proposed project. Also of note, the project applicant will be required to fund the retention of a crossing guard, for a temporary period of time, after the completion of the intersection improvements at Lost Canyon Road/Sand Canyon Road (Draft Condition No. PC6). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment requests clarification of the impact at the Sand Canyon Road/Lost Canyon Road intersection during Phase 1 of the project. In short, the proposed project would result in a significant impact at the intersection. Although Phase 1 does not include the extension of Lost Canyon Road westerly from La Veda Avenue into the project site, a modest number of Phase 1 trips will nevertheless travel through the Sand Canyon Road/Lost Canyon Road intersection, which is projected to operate at LOS F without the project during the AM peak hour under 2012 conditions, assuming no improvements are made. The addition of Phase 1 traffic exacerbates to a significant degree (i.e., increases delays by more than two seconds per vehicle) the unacceptable operations at the intersection. (See Draft EIR Table 4.3-8.) Although the project causes a 1 percent increase in traffic, the resulting impact is considered significant under the City's significance criteria. The impact would remain significant until project buildout, when the connection to Lost Canyon Road at La Veda Avenue is completed and the Lost Canyon Road/Sand Canyon Road intersection is improved with one of the three mitigation options described in the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

This comment asserts that the Draft EIR did not adequately address the impacts of the proposed project relative to the supply of parking in the vicinity of Sulphur Springs School.

The proposed project would not result in an increase in parking demand in the vicinity of the Sulphur Springs School. As noted in the Draft EIR (see Section 4.3), the proposed project would help fund a new elementary school that would be located north of SR-14, which would result in the transfer of some students who are currently driven to/from Sulphur Springs School to the new school. These students would be replaced with new students that will reside within the Vista Canyon project, which would be a short walk or bike ride to the school. Thus, the project is likely to result in a net reduction in parking demand at the Sulphur Springs School.

Additionally, the proposed project would upgrade Lost Canyon Road to include one travel lane in each direction, a median turn lane, and parallel parking on the south side of the street between Sand Canyon Road and La Veda Avenue. This is preferable to maintaining parking on the north side, as that condition requires parents/students to cross Lost Canyon Road at multiple unmarked locations and, therefore, would help improve pedestrian safety and circulation related conditions. Also, the proposed placement of a roundabout at La Veda Avenue would enable westbound motorists to make a u-turn to access eastbound parallel parking, further improving conditions. Finally, it is noted that on-street parking would be provided on both sides of Lost Canyon Road west of La Veda Avenue along the proposed Oak

Park. Based on this information, the proposed project would not result in a significant impact to the parking supply in the vicinity of Sulphur Springs School. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

This comment relates to motorists parked on Lost Canyon Road that are dropping off or picking up students from Pinecrest School. The Draft EIR considered the vehicles related to the Pinecrest School in that the existing traffic volumes and conditions, and the related analysis, reflects these related trips. Specific to parking, as discussed in **Response 8**, above, the proposed project would not result in an increase in parking demand in the vicinity of the Sulphur Springs School and the adjacent Pinecrest School. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

This comment relates to the need for a CEQA project alternative in which Lost Canyon Road does not extend westerly from La Veda Avenue into the project site. The Draft EIR includes an alternative that eliminates this roadway connection – Alternative 5 (Open Space Corridor Alternative). Both the Planning Commission and City Council could consider implementing all or portions of this Alternative or other Draft EIR Alternatives. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment suggests that the impacts of grading of Lost Canyon Road to La Veda Avenue to accommodate emergency traffic and an emergency fire gate in Alternative 5 were not addressed in the Alternative 5 analysis. The geotechnical analysis within the Alternatives section does discuss the impacts of grading in a more generalized method, which is appropriate for an alternatives analysis pursuant to *State CEQA Guidelines* section 15126.6. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment appears to support express support for Alternative 5, as studied within Section 6.0, Alternatives, of the Draft EIR. No further response is required.

Response 13

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

From: Liz Smith [mailto:pl-smith@pacbell.net]
Sent: Wednesday, December 22, 2010 11:44 PM
To: Jeff Hogan
Subject: Vista Canyon Plot

Hi Jeff,

Thanks for taking my call yesterday regarding the proposed annexation of the Sand Canyon areas (with regards to the Vista Canyon development) and for identifying that my property is NOT being affected by the proposed annexation. And thanks for offering to email a plot map of the actual location of the development; as I mentioned, I'm still a bit uncertain about how close the retail, hotel and housing elements will come to our Sand Canyon entrance (at Lost Canyon and Sand Canyon Rds).

I should also go on record as saying that my husband and I and all of our immediate neighbors (those we've spoken to) are opposed to the entire development, specifically due to: 1) the negative environmental impact upon the area, the narrowing of the river bed and destruction of so many heritage oaks (and the encroachment upon several others); 2) the disturbance to the existing wildlife corridors; 3) the increased traffic and noise that will be brought to the rural setting of Sand Canyon (I also fully expect to see an increase of traffic coming from Placerita Canyon Road onto Sand Canyon Road - we already have a big speeding problem with commuters who choose that path to avoid slow-down's on the I-14); 4) further damage to our deteriorating property values - how on earth will MORE housing help boost our realty woes? 5) unwanted transient traffic and possible increase in local crime via the proposed hotel - building hotel rooms amidst a residential neighborhood is ill-advised and brings no benefit to residents whatsoever; 6) the height of the structures does nothing to enhance the rural setting of Sand Canyon and is incongruous with the surrounding community. Does the City really want to recommend additional retail development when the nearby Lowes/Target/Kohl's complex adjacent to Fair Oaks STILL has so many empty storefronts? Who really benefits from Vista Canyon other than the City and the developers?

1

Thanks again, Jeff, for forwarding those documents and for answering my specific questions regarding annexation.

Have a Merry Christmas!

Best Regards,
Liz Smith
15375 Live Oak Springs Canyon Road
Canyon Country, CA 91387

pl-smith@pacbell.net
661-250-2088 (home)

LETTER NO. C17. LETTER FROM LIZ SMITH, DECEMBER 22, 2010

Response 1

This comment is an introduction to comments that follow, and provides background information regarding a telephone conversation between the commenter and Jeff Hogan, Interim Planning Manager for the City. No further response is required.

Response 2

The comment only expresses the opinions of the commenter, and specifically expresses opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment expresses general opposition to the proposed project because of the narrowing of the river. This comment addresses a general subject area, which received extensive analysis in the Draft EIR. For example, Section 4.2, Flood, of the Draft EIR determined that the potential hydrologic impacts of the project would not be significant with implementation of the recommended mitigation measures. Similarly, Section 4.6, Biological Resources, and Section 4.20, Santa Clara River Corridor Analysis, evaluated the project's impacts on sensitive biological resources and habitat and concluded that impacts would not be significant with implementation of the recommended mitigation measures. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment expresses general opposition to the proposed project because of the project's "destruction of so many heritage oaks (and the encroachment upon several others)."

The proposed project's impacts on oak trees were assessed in Section 4.6, Biological Resources, of the Draft EIR. (See, e.g., Draft EIR, pp. 4.6-73 to -74.) As disclosed in that analysis:

In total, the project's oak tree permit could permit the removal of up to 11 oak trees (five of which are heritage), the encroachment into the protected zone of up to 12 oak trees, including the trimming or pruning of up to eight of the 12 oak trees. Because of the sensitivity status of oak trees in the City of Santa Clarita, the removal of up to 11 oak trees, and potential adverse impacts within the protected zone of 12 oak trees is

considered a significant impact, absent mitigation. With implementation of **Mitigation Measures 4.6-34** through **4.6-48**, the impact would be reduced to less than significant. In addition, the applicant intends to relocate one of the oak trees proposed for removal.

(*Ibid.*, p. 4.6-74.) The referenced mitigation measures are found on pages 4.6-88 through -90 of the Draft EIR and, in summary, require the following:

- Receipt of an Oak Tree Permit prior to removal or encroachment (Mitigation Measure 4.6-34);
- Compliance with the City's Oak Tree Ordinance and Preservation and Protection Guidelines (Mitigation Measure 4.6-35);
- Adherence to the recommendations of the applicant's Arborist of record (Mitigation Measure 4.6-36);
- Dedication of the 2-acre oak preserve located adjacent to the proposed Oak Park to the City (Mitigation Measure 4.6-37);
- Installation of protective fencing (Mitigation Measure 4.6-38);
- Compliance with design specifications for the protective fencing (Mitigation Measure 4.6-39);
- Monitoring by City staff and the Arborist of Record during construction (Mitigation Measure 4.6-40);
- Proper signage (Mitigation Measure 4.6-41);
- Submittal of all future site plans to the City's Oak Tree Specialist and approval from the City's Urban Forestry Division (Mitigation Measure 4.6-42);
- Relocation shall be completed by an approved and qualified company (Mitigation Measure 4.6-43);
- Compliance with relocation specifications (Mitigation Measure 4.6-44);
- Monitoring of all relocated oaks for a five-year period (Mitigation Measure 4.6-45);
- Incorporation of large scale trees (Mitigation Measure 4.6-46);
- Inclusion of Coast live oak or Canyon oak (Mitigation Measure 4.6-47); and,
- Compliance with all requirements of the Oak Tree permit (Mitigation Measure 4.6-48).

With adoption of the recommended mitigation measures, the project would not significantly impact oak trees, contrary to the comment's statement. Furthermore, at its meeting of December 21, 2010, the Planning Commission directed several modifications to the project, including the elimination of 26 single-family homes near the project's eastern boundary. This modification eliminates the removal of one heritage oak tree resulting in the project now removing a total of nine oak trees on-site and preserving the

remaining 32 on-site oak trees. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment expresses general opposition to the proposed project because it would disturb “the existing wildlife corridors.”

The proposed project's impacts on wildlife movement corridors was assessed in Section 4.6, Biological Resources, and Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR. That analysis concluded that the project would not adversely affect wildlife movement corridors for the following reasons:

[A]fter project implementation, the River Corridor would continue to function as an east-west wildlife movement corridor, in part, because it would preserve and enhance a River Corridor width that averages 775 feet. In addition, based on the *Species Movement Report, 2009*, post-project, species presently can and would be able post-project to negotiate the length of the river, moving east or west, and eventually reach the Angeles National Forest and other open space surrounding the City of Santa Clarita. Further, the proposed Vista Canyon Road Bridge would be sufficiently high so as to allow the continued use of the Santa Clara River for wildlife movement east-west along and within the River Corridor; and lighting controls on the proposed bridge would be implemented to ensure that the SEA would continue to function as a wildlife movement corridor. According to the *Species Movement Report, 2009* (p. 7.), '[t]he value of the Santa Clara River is clear; species can move the entire length of the river and some terrestrial species would only be precluded from doing so during infrequent major storm events.'

(Draft EIR, p. 4.20-56; see also *Ibid.*, p. 4.6-75 [“The project proposes to maintain, restore, and enhance the River Corridor within the project site; and, therefore, the existing east-west River Corridor wildlife movement area would not be significantly impacted due to project implementation.”].)

Additionally, in a December 21, 2010 staff report submitted to the Planning Commission regarding the proposed project, City staff recommended that the project be modified to eliminate 26 single-family lots located in the area adjacent to the La Veda neighborhood. The elimination of development in this area would increase the size of the Oak Park from seven to 10 acres, and allow for the preservation and enhancement of the north/south animal movement corridor from the Santa Clara River through the project site to undeveloped land to the south. More specifically, the modified Oak Park would provide a minimum animal corridor width of approximately 400 feet. At the December 21, 2010 public hearing, the Planning Commission directed that this project modification be made.

As discussed in Forde Biological Consultants' *Species Movement: Vista Canyon Ranch, Los Angeles County, California* (Species Movement Report; July 27, 2009), a copy of which is included in Appendix 4.6 of the Draft EIR, a corridor width of approximately 300-400 feet could accommodate movement of the species expected to traverse the project site. (See Appendix 4.6, Species Movement Report, p. 9; see also Draft EIR, p. 4.6-75 to -76 ["While the preclusion of a northerly movement corridor within the project is not considered a significant impact, primarily due to constraints associated with the project site being surrounding [sic] by existing and potential future development, the *Species Movement Report, 2009*, indicates that an approximate 300 to 400-foot-wide northerly movement corridor along the east side of the project site could provide for north-south movement of species."].)

In short, there is no evidence that the project would significantly impact wildlife corridors; instead, the project would preserve and enhance such corridors. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment expresses concern with regard to increased noise and traffic, particularly from Placerita Canyon Road onto Sand Canyon Road. The comment also mentions that speeding is an issue with existing commuters. Section 4.5 of the Draft EIR concludes that, while noise may increase, increases will be within acceptable levels (outside of SR-14). Additionally, Section 4.3, Traffic and Access, provides a thorough assessment of the proposed project's traffic-related impacts. That said, the existing speeding is beyond the scope of the Vista Canyon Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment voices concerns regarding property values, thereby raising economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 8

The comment states that the project would bring unwanted transient traffic and an increase in local crime via the proposed hotel component. The Los Angeles County Sheriff's Department submitted comments on the Draft EIR and did not mention a concern with regard to increased crime at the proposed hotel. With regard to unwanted traffic, the comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final

decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 9

The comment states that building a hotel amongst residential units brings no benefits to residents. The comment only expresses the opinions of the commenter. Additionally, it bears noting that the proposed project is a mixed-use, transit oriented development with office and retail uses. The hotel would serve to accommodate, in part, the demand of these non-residential uses for lodging opportunities. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 10

The comment states that the height of the structures does not compliment the rural setting of Sand Canyon and is incongruous with the surrounding community. The impacts of the proposed project on visual resources were evaluated at length in Section 4.16, Visual Resources, of the Draft EIR, and determined to be less than significant. It should also be noted that its meeting of December 21, 2010, the Planning Commission directed staff to eliminate 26 single-family lots adjacent to the project's eastern or Sand Canyon boundary increasing the Oak Park from 7 acres to 10 acres. The Oak Park provides a 500-foot open space buffer between the existing homes along the La Veda Avenue neighborhood in Sand Canyon and development in the proposed project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment wonders why the City wants more commercial development when existing buildings are vacant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 12

The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



Homeowners Association
P.O. BOX 1596
CANYON COUNTRY, CALIFORNIA 91386

RECEIVED
PLANNING DIVISION

JAN 07 2011

CITY OF SANTA CLARITA

December 31, 2010

Members of the Planning Commission
c/o Department of Community Development
23920 Valencia Blvd., Third Floor
Santa Clarita, CA 91355-2196

Re: Vista Canyon Project – Mater Case No. 07-127

Dear Planning Commission Members:

This letter summarizes some of the most immediate concerns of the Board of Directors of the Crystal Springs Ranch Homeowners Association regarding the proposed Vista Canyon project, which I described in my comments to the Commission at its December 21, 2010 meeting. Our Homeowners Association, representing 120 families in Sand Canyon, is continuing to review the extensive Vista Canyon DEIR and expects to provide additional written comments to the Commission prior to its next meeting on the project.

1

The most immediate concern of the CSRHOA Board regarding this project is that the huge amount of traffic generated by the Vista Canyon project, given its size, density, and mixed uses, will create significant traffic problems along the Sand Canyon Road corridor between Soledad Canyon Road and Lost Canyon Road, and along Soledad Canyon Road. According to the DEIR, there is no way to mitigate those negative impacts if the project is built as proposed.

2

Adding even a portion of the project's 23,000 daily vehicle trips to (a) the intersection of Sand Canyon Road and Lost Canyon Road, (b) the Sand Canyon Road corridor from Lost Canyon Road to Soledad Canyon Road, and (c) along Soledad Canyon Road from Sand Canyon Road to the west, will gridlock those areas at rush hours, and create a very busy, hazardous traffic situation at other times.

3

There is also concern that the type of traffic generated by the project, which will be primarily commuters to the offices and metro/bus stations, and visitors to the hotel, retail and theatre, will change the character of the Sand Canyon Road corridor from Soledad Canyon Road to Lost Canyon Road from its current 'small neighborhood shopping center' to a congested, commuter/visitor access route during most of the day, making it difficult and hazardous for local residents to

4

access the 14 freeway, use the Vons shopping center and nearby businesses, and access Soledad Canyon Road to use it as a cross-city route. As one of our members, Greg Foster, mentioned at the Commission meeting, the additional traffic will also make it very hazardous for drivers to turn left to go in or out of the gas stations and trailer park on Sand Canyon Road.

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Our residents are also very concerned about the risk of injury to school children and others who will be accessing Pinecrest School and Sulphur Springs School on Lost Canyon Road. The current project plan will funnel as substantial portion of Vista Canyon traffic past these two schools, and most of that traffic will be during hours when children and others will be arriving and leaving the school parking lots. This will create a very dangerous situation, especially on weekday mornings when commuters will be intent on getting to their offices and to the metro/bus stations on time, and therefore will be focused on getting through the Lost Canyon/Sand Canyon intersection and past the 2 schools as quickly as possible, with little attention or patience for pedestrians, slow moving car pools, school busses, equestrians and local traffic. Regardless of how that intersection is designed, there will just be too much additional traffic through that access point because drivers to the project will seek the fastest way to and from the freeway and other areas to the east, and that will be via Lost Canyon Road to Sand Canyon Road.

6

7

The CSRHOA Board believes that the Vista Canyon project as currently proposed creates too many traffic and safety issues to be acceptable as currently proposed. The expected traffic impact of 23,000 vehicle trips per day (which is likely conservative) unfairly burdens local residents with an economic cost of the project (time spent in traffic, increased travel time, disruption of our neighborhood shopping area, etc.) that should be borne by the developer, which can be accomplished by the City requiring that the project be reduced in size and types of uses to reduce the amount of traffic generated, and/or requiring that the developer pay for a new on/off ramp to the 14 freeway with access road/bridge directly to the project site, so that project traffic will not so seriously impact the adjacent Sand Canyon and Fair Oaks all-residential areas.

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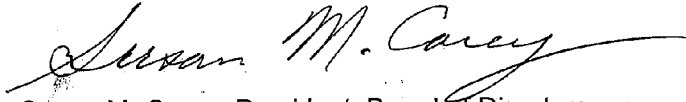
The Board also notes that the County's land use designation for the project site would limit the development to residential only and a total of 700 homes, which is much more in keeping with the surrounding areas as they have developed as all-residential. Most of our Sand Canyon residents moved to this area for the semi-rural surroundings. Allowing a high-density, mixed-use project such as this to be developed right next to Sand Canyon, with such significant traffic impacts on Sand Canyon residents via Lost Canyon Road, is not fair to current residents who want to maintain the un-urbanized aspects of Canyon Country life that drew us here in the first place.

11

The CSRHOA Board urges that the Commission require that the project plan be revised to reduce the unfair and overly-burdensome traffic impact to surrounding areas by one of the above suggested means: requiring a substantial reduction in the size and types of uses permitted for the project, and/or requiring that the developer pay for a new on/off ramp to the 14 freeway with access road/bridge directly to the project site.

12

Sincerely,



Susan M. Carey, President, Board of Directors
Crystal Springs Ranch Homeowners Association

cc: Dept. of Community Development, Jeffrey Hogan, Interim Planning Manager

LETTER NO. C18. LETTER FROM CRYSTAL SPRINGS RANCH, DECEMBER 31, 2010

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment expresses concerns regarding the size and number of trips to be generated by the project, and states that there is no way to mitigate the impacts along the Sand Canyon Road corridor.

The comment's assertion that impacts to the Sand Canyon Road corridor cannot be mitigated is not accurate. The traffic impact analysis presented in Section 4.3 of the Draft EIR identified significant project impacts under project buildout/interim conditions at the Sand Canyon Road/Lost Canyon Road, Sand Canyon Road/Soledad Canyon Road, and Soledad Canyon Road/SR-14 SB Ramps intersections. (Draft EIR, p. 4.3-57.) Draft EIR pages 4.3-75 through 4.3-77 describe the mitigation measures recommended for these intersections that would lessen these impacts to less than significant. Further, Table 4.3-13, Intersection Operations - 2015 Conditions With Mitigation, of the Draft EIR illustrates the post-mitigation operations at each of these intersections. As shown on the table, in each instance the intersection would operate at the same level of service or better than pre-project conditions with the project mitigation. Additionally, each of the mitigation measures included in the Draft EIR is feasible and is the responsibility of the project applicant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 3

The comment states concerns regarding worsened operating conditions along portions of Sand Canyon Road and Soledad Canyon Road if the project is constructed. However, as noted in **Response 2**, feasible mitigation measures are proposed in the Draft EIR to mitigate all significant impacts at intersections along these corridors. This includes installation of new traffic signals and intersection widening to accommodate project trips. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 4

The comment expresses concerns regarding the changing character of Sand Canyon Road due to the "type" of traffic that would be generated by the project. It is correct that implementation of the project will attract new trips from outside the immediate area to the proposed office space, Metrolink station, and other on-site uses. However, the site will also provide substantial benefits for local residents and thereby attract local residents for shopping, employment, and entertainment-related trips. For example,

the Draft EIR notes that almost two-thirds of trips to/from the project's office, retail, and entertainment uses will come from locations within a 6-mile drive. (Draft EIR, p. 4.3-1.) Additionally, while it is correct that traffic volumes would increase on Sand Canyon Road if the project were to be developed, it should be noted that less than 10 percent of project trips will use the segment of Sand Canyon Road between SR-14 and Lost Canyon Road. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment expresses concerns regarding how the additional traffic on Sand Canyon Road south of SR-14 could adversely affect access to adjacent residences and businesses. Although the referenced segment of Sand Canyon Road has a median turn lane, the additional through trips could result in added delays for motorists turning to/from driveways in this corridor. This segment currently carries 11,100 average daily trips (ADT). Under cumulative conditions without any development of the proposed project, it would carry 32,800 ADT. The ADT on this segment is nearly unchanged when the proposed project is assumed in place because the project adds several new street connections. This data suggests that regardless of whether the project is developed, additional traffic growth is expected in the Sand Canyon Road corridor. Therefore, any potential impacts in this regard are not attributable to the proposed project. Separately, in conjunction with future corridor capacity enhancement projects, the City of Santa Clarita will be examining driveway access consolidation and management concepts to facilitate safe and efficient access to residences and businesses on Sand Canyon Road. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment expresses concerns regarding project trips being added to Lost Canyon Road, particularly during hours when the two schools begin/end. Although the project would add trips to Lost Canyon Road, the proposed project would also be responsible for making improvements to the corridor to improve traffic flow and safety. In connection with preparation of the Draft EIR, a traffic analysis specific to school access was conducted. (Draft EIR, pp. 4.3-54 to -55.) Based on the results of the study, improvements will be implemented as part of the project to improve traffic flow and safety. These improvements include the addition of a median turn lane, a trail along the north side of the roadway, and a roundabout at the intersection of La Veda Avenue and Lost Canyon Road. A new traffic signal or roundabout also would be installed at the Lost Canyon Road/Sand Canyon Road intersection, which is the current bottleneck that causes much of the congestion during school hours. A roundabout at these intersections would "calm" traffic on Lost Canyon Road between the project site and Sand Canyon Road

by reducing vehicle speeds and discouraging through traffic travel. The roundabout would be designed to accommodate a variety of vehicle types and accommodate pedestrians via crosswalks, protected splitter islands, and ADA ramps.

In addition, the project would also be contributing to the construction of a new school north of SR-14. This new school would result in fewer parents traveling on Sand Canyon Road and Lost Canyon Road to drop-off/pick-up students at Sulphur Springs School. In summary, although the project is likely to result in a net increase in trips on Lost Canyon Road, the associated access improvements and capacity enhancements on Lost Canyon Road and at the Lost Canyon Road/Sand Canyon Road intersection would result in improved traffic flow and enhanced pedestrian safety. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 7

The comment expresses concerns that Lost Canyon Road to Sand Canyon Road will be the preferred travel route to SR-14 and other more easterly destinations. As shown on Draft EIR Figure 4.3-6, only about 20 percent of all project trips are anticipated to travel through the SR-14/Sand Canyon Road interchange (either to travel to/from the north on SR-14, easterly on Soledad Canyon Road, or northerly on Sand Canyon Road). These trips can either be made via the Lost Canyon Road-to-Sand Canyon Road route or the Vista Canyon Road-to-Soledad Canyon Road route.

The anticipated usage of each route was carefully analyzed and discussed in detail in the Draft EIR traffic technical study included in Appendix II. The analysis used in-field peak hour travel time runs, project-only traffic assignments from the Santa Clarita Valley Consolidated Travel Demand Model (SCVCTDM), and a review of existing travel patterns. The analysis determined that about 40 percent of project trips that desire to use the SR-14/Sand Canyon Road interchange (either to travel to/from the north on SR-14, easterly on Soledad Canyon Road, or northerly on Sand Canyon Road) will use the Lost Canyon Road-to-Sand Canyon Road route. The remaining 60 percent will use Vista Canyon Road via Soledad Canyon Road. (See Draft EIR Figure 4.3-6, Project Trip Distribution - 2015.) To discourage the use of Lost Canyon Road to Sand Canyon Road, the project site has been designed so that the extension of Lost Canyon Road westerly from La Veda Avenue forms a circuitous connection to/from Planning Area 2 within Vista Canyon reducing cut-through traffic and use of Lost Canyon Road east of La Veda Avenue. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment expresses concerns that the Vista Canyon project creates too many traffic and safety issues. However, the traffic impact analysis presented in the Draft EIR identified the proposed project's potentially significant impacts on the surrounding roadway system, and feasible mitigation measures are proposed to lessen their significance. Draft EIR Table 4.3-13 shows the eight study intersections that were impacted by the project under project buildout/interim conditions. At each intersection, feasible mitigation measures were identified, which either restore the operation to an acceptable level or improve the condition to better than no project levels. There is no evidence to suggest that the project would create new traffic and safety issues or exacerbate existing issues beyond those identified in the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 9

The comment expresses concerns that the Vista Canyon project unfairly burdens local residents due to increased travel times, etc. To address this burden, the comment suggests that the City require that the project be reduced in size and types of uses to reduce trips. Page 4.3-1 of the Draft EIR notes that almost two-thirds of trips to/from the project's office, retail, and entertainment uses will come from locations within a 6-mile drive, indicating that many residents and businesses in the surrounding area will derive benefits from the project. These benefits include the proximity of a new Metrolink transit stop, a new Class I bike/pedestrian trail along the Santa Clara River, and other project amenities including employment and retail opportunities. Additionally, the project applicant is responsible for the cost of constructing off-site mitigation measures that are necessary to mitigate project impacts. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 10

The comment suggests that new freeway on/off ramps with direct access to the project site be required at Vista Canyon Road to lessen the project impacts in the Sand Canyon and Fair Oaks areas. An evaluation of such improvement was required by the City's Planning Commission at the November 2010 Planning Commission hearing.

In response to this request, three conceptual alternatives consisting of SR-14 southbound off- and on-ramps were developed and then analyzed by the EIR traffic engineer. Each of the conceptual design alternatives was found to have fatal flaws, including: resulting interchange spacing (with Sand Canyon Road interchange) would not meet Caltrans 1-mile standard, Vista Canyon Road ramp terminal

intersection would operate at LOS F under two of the three alternatives, geometric conditions under the third alternative would require design exceptions and not likely be supported by Caltrans. Therefore, new freeway on/off ramps at Vista Canyon Road are not considered feasible. The complete results of the supplemental analysis are included in Final EIR **Appendix A**. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment states that the County land use would only 700 homes, which is more in keeping with the surrounding areas. As noted in Section 1.0, Project Description, "Under the existing County light industrial zoning designation of M-1.5 and taking into account parking and landscaping requirements, the industrial zoned portion of the project site could be developed with approximately 1.0 million square feet of light industrial use. The agricultural and residential zoned portions of the project site could be developed with approximately 170 single-family residential units." (Draft EIR, p. 1.0-9.) Further, under the County's proposed land use designation in the draft One Valley One Vision Land Use Plan (dated October 2008), the project site could be developed with up to 700 residential units. (*Ibid.*) However, goals and policies within OVOV support higher densities and intensities for projects with transit accessibility. The Vista Canyon project would have both a bus transfer station and Metrolink Station. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment reiterates requests assessed in **Responses 9** and **10**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

January 3, 2011

City of Santa Clarita
23920 Valencia Blvd, Suite300
Santa Clarita, CA. 91355

RE: Vista Canyon Project

Dear Sirs,

We are the homeowners in the Fair Oaks Ranch Community in the Canyon Country area of the Santa Clarita Valley.

1

We are writing this letter to express our concerns regarding the proposed Vista Canyon project. Our first concern deals with the relocation of the existing Metro Rail station from its current location on Via Princessa between Sierra Highway and Whites Canyon Road. This is a perfect location for the station. It is located in an industrial area, away from any existing homes or proposed homes. There is not a noise issue or safety issue since it is located far enough away from any residences. There is no traffic congestion or traffic issue since the current location is accessible from all major arteries, such as Hwy 14, Via Princessa, Whites Canyon, and Sierra Hwy. Again, there are no homes or schools in the close vicinity. In addition, the current location has more than adequate parking.

2

To relocate this station to its proposed new location would result in a devastating effect on the lives of many Fair Oaks Ranch residents as well as residents of the surrounding areas.

3

Currently, the train activity involves approximately forty eight stops and starts per day, seven days per week, beginning at 4:50am until after 10:00pm.

4

These stops and starts result in horn blowing as well as screeching brakes for over a mile. The noise level is comparable to having motorcycles or lawn mowing next door, all day, every day.

All of this activity would take place less than 100 feet from some of our homes, though the effect of this station would reach many.

5

Not to mention the bus depot that is also proposed, which will also contribute to the noise pollution and unnecessary traffic. The placement of this station in its proposed location will change the lives of the surrounding area residents incomprehensibly.

The constant noise pollution will take away the solace and tranquility that a home should provide. Most of us specifically purchased homes in this area because of the quiet nature of the community and the fact the Santa Clara River bed would provide us insulation from the noise emanating from HWY 14.

6

With the developers proposal for the Metro Rail station and bus depot that quiet element will be destroyed. Please ask yourselves if you would honestly want to purchase a home or live right next to a train station.

Our other concern with the current proposal is the approx. 1400 plus multi-family homes mostly apartments and condominiums that are to be built. The building of this number of homes will also add to the same concerns of traffic and congestion.

7

Vista Canyon is right in the middle of

8

an area that is occupied with lovely homes in the Sand Canyon area and the new communities of Fair Oaks Ranch. Both community residents relish the current spacious, quiet country feeling this area provides. Perhaps a community with both Sand Canyon and Fair Oaks Ranch characteristics would be a better fit and could be considered. We respectfully request that the City of Santa Clarita reconsider the proposed Vista Canyon Development and see to it that it is modified to rescind the plan to move the Metro Rail Station from its present location. Additionally, we request that Los Angeles County and the City of Santa Clarita conduct a more in depth study of the impact of extending Lost Canyon Road through to Soledad Canyon Road and accurately measure the sound levels of trains starting and stopping as it is perceived at OUR residences as opposed to the speculative nature of the current data reported in the environmental impact report.

8

It is clear to us that the project in its current form will ruin our quiet lifestyle and will not be consistent with the expressed OVOV (one valley one vision) concept as espoused by the Santa Clarita City Council.

9

Lastly, we as homeowners adjacent to the proposed Vista Canyon Project site would like to acknowledge our preference in reference to the project as follows:

10

- Alternative Number 1, which is no project; this will maintain the environmental integrity of Canyon Country, Sand Canyon and the Fair Oaks Ranch Communities.
- If this is not acceptable to the City of Santa Clarita we would prefer Alternative 2 without the transit oriented element and to further consider building lower density single family homes not townhomes and/or condominiums. Thereby bringing the Eastside (Canyon Country etc) more in line with the Westside of the Santa Clarita Valley while maintaining our open space and quiet and uncongested lifestyle.

11

We thank you for your anticipated consideration regarding this matter and our concerns.

Tony and Rosemary Chavez
27417 English Ivy Lane
Fair Oaks Ranch, CA 91387
661-360-9581

Jeffrey and Samantha Hauptman
27411 English Ivy Lane
Fair Oaks Ranch, CA. 91387
661-299-4077

12

13

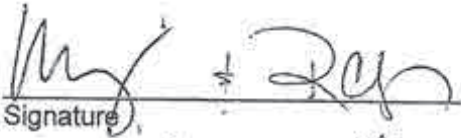
Representatives of the following approx. 150 homeowners that signed this letter to confirm our opposition of the existing project. Additional signatures will be submitted shortly.

14

Cc: Michael D. Antonovich
Mayor Marsha McLean
Los Angeles County Regional Planning Commission
City of Santa Clarita, Planning Commission

Metropolitan Transit Authority
Public Works Department
All Interested Parties

Fair Oaks Ranch Residents objections to the Vista Canyon Project


Signature

Tony & Rosemary Chavez
Print Name

27417 ENGLISH IVY LANE
Address


Signature

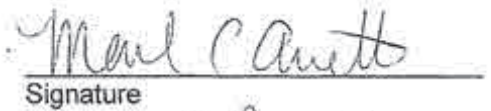
Nanni Mbaraka
Print Name

27336 Willow Oak Ct
Address


Signature

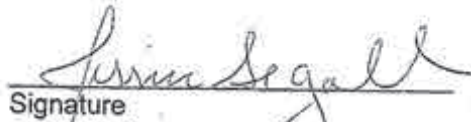
Tracy Thompson
Print Name

27309 Willow Oak Ct
Address


Signature

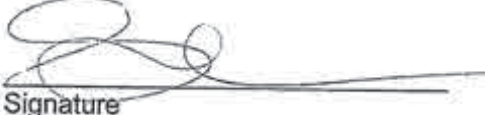
Marisol Arietta
Print Name

17438 Blue Aspen Ln
Address


Signature

Jessica Segall
Print Name

27330 Willow Oak Ct
Address


Signature

Shannon Ends
Print Name

176602 Wren Dr
Address


Signature


Aaron Auduson
Print Name


27323 English Oak Ct
Address


Signature


VIVA PELOVSKA
Print Name


27346 ENGLISH OAK COURT
Address


Signature 
Christina Pacheco
Print Name
17333 Blue Aspen Ln.
Address Canyon country
91387

Signature 
Teena Ung
Print Name
17315 Blue Aspen
Address Santa Clarita
Aspen Ct


Signature 
JEFFREY C. TAN
Print Name
1734 BLUE ASPEN LN
Address SANTA CLARITA 91387

Signature 
GUILLERMO MENDEZ
Print Name
17375 BLUE ASPEN LN
Address SANTA CLARITA 91387

Signature 
Jack Leon
Print Name
17407 Blue Aspen
Address Canyon Country, CA 91387

Signature 
Emily De La Roca
Print Name
17420 Blue Aspen Ln
Address Santa Clarita, CA 91387


Signature 
MARISSA OSMENA
Print Name
27328 English Oak Ct.,
Address Santa Clarita, CA 91387

Signature 
Julie Villanueva
Print Name
17450 Blue Aspen Ln
Address Santa Clarita CA 91387


Signature

Khalid Casmi
Print Name

27054 MOUNTAIN WILLOW LN
Address FAIR OAKS RANCH CA
CA - 91387


Signature


DHRAJ JAIN
Print Name

27060 MOUNTAIN WILLOW LN
Address FAIR OAK RANCH CA
91387


Signature

Nazaret Simityan
Print Name

27412 English Ivy Ln
Address Canyon Country CA 91387


Signature

SAMUEL OAK
Print Name

27465 English Ivy Lane
Address Canyon Country CA 91387

Canyon Country
CA - 91387


Signature

GARY RAS
Print Name

27474 ENGLISH IVY LN
Address


Signature

Gerald Jones
Print Name

27468 English Ivy Lane 91387
Address


Signature

Carlos Lopez
Print Name

17022 Southern Willow St.
Address


Signature

Alejandro Nava
Print Name

17309 Blue Aspen Ln.
Address

Eva Collera
Signature
E. Collera
Print Name
17357 Blue Aspen Ln
Address

~~Robert C Castro~~
Signature
ROBERT C CASTRO
Print Name
27311 ENGLISH OAK CT.
Address

~~A. Masalski~~
Signature
A. MASALSKI
Print Name
17363 Blue Aspen Ln.
Address

Eileen Castro
Signature
27311 English Oak Ct
Print Name
Eileen Castro
Address

~~Peter Ignacio~~
Signature
Peter Ignacio
Print Name
27317 English Oak Ct
Address

~~Prasad Garimella~~
Signature
PRASAD GARIMELLA
Print Name
27318 WILLOW OAK CT
Address

~~Hindi Rullamas~~
Signature
Hindi RULLAMAS
Print Name
27405 ENGLISH HILL
Address

~~Lidia Esqueda~~
Signature
Lidia Esqueda
Print Name
Lidia Esqueda
Address
27456 English Hill

Paul Dsouza
Signature

PASCAL Dsouza
Print Name

27453 English Ivy Lane
Address

[Signature]
Signature

Kevin Meadow
Print Name

17024 Strawberry Pine Ct
Address

[Signature]
Signature

Chris Ekpe
Print Name

27418 English Ivy Lane, Amoka
Address Ranch.

[Signature]
Signature

JENNIFER WILSON
Print Name

27347 ROSEMALLOW LN
Address

[Signature]
Signature

Lu Lu Cheng
Print Name

2739 Rose Mallow Lane.
Address

[Signature]
Signature

Susan Guerber
Print Name

27365 Rose Mallow Ln
Address Canyon Country 91387

[Signature]
Signature


Amy Von Brock
Print Name


27378 Rose Mallow Ln
Address Canyon Country 91387


[Signature]
Signature


Julie Mearns
Print Name


16939 White Pine Way
Address



Signature
David Kodimer
Print Name
27322 English Oak Court
Address



Signature
Belinda Downs
Print Name
17339 Blue Aspen Ln.
Address



Signature
Jaehye Yoon
Print Name
17413 Blue Aspen Lane
Address


Signature
Dushine An
Print Name
17342 BLUE ASPEN LN.
Address


Signature
C. Aubert
Print Name
17375 Blue Aspen Lane
Address


Signature
Emmanuel T. Rubio
Print Name
17330 Blue Aspen Lane
Address Canyon Country, CA 91387


Signature
Stacy Long
Print Name
17351 Blue Aspen Lane
Address


Signature
Tad Pascua
Print Name
27421 English Ivy Ln CC, CA 91387
Address

[Signature]
Signature

DANIEL D. MONAHAN
Print Name

27303 ENGLISH IVY LN
Address

[Signature]
Signature

BARBARA STONE
Print Name

17021 RIVER BIRCH CT
Address

[Signature]
Signature

Troy Bregal
Print Name

27333 English Ivy Ln.
Address

[Signature]
Signature

RANDALL STERN
Print Name

17026 RIVER BIRCH CT.
Address

[Signature]
Signature

FELIX L. JONES
Print Name

27327 ENGLISH IVY LANE.
Address

[Signature]
Signature

DANNON PREEB
Print Name

17007 River Birch Ct.
Address

[Signature]
Signature

Kristina Hicks
Print Name

17027 RIVER Birch
Address

[Signature]
Signature

Helen Yun Hong
Print Name

17003 RIVER Birch CT
Address

Richard Alvarado
Signature

RICHARD ALVARADO
Print Name

17002 RIVER BIRCH CT
Address

Jesse Rodriguez
Signature

JESSE RODRIGUEZ
Print Name

17014 RIVER BIRCH CT
Address

Bonnie Huskey
Signature

BONNIE HUSKEY
Print Name

17038 River Birch Ct.
Address

Jianfeng Zhang
Signature

Jianfeng Zhang
Print Name

17011 Southern Willow Ct
Address

Nik Ranieri
Signature

NIK RANIERI
Print Name

17084 SOUTHERN WILLOW CT
Address

Kathryn Afetian
Signature

Kathryn Afetian
Print Name

26570 Cardinal Dr.
Address

George Khabadi
Signature

George Khabadi
Print Name

17015 River Birch Ct.
Address

Bobby Harris
Signature

Bobby Harris
Print Name

17020 RIVER BIRCH CT
Address


Signature

Sylvia Austria
Print Name

16918 White Pine Way
Address


Signature

Deanna PN Freund
Print Name

16918 White Pine Way
Address


Signature

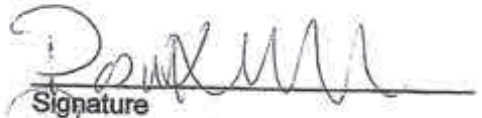
Tony Davison
Print Name

17447 Blue Aspen Lane
Address canyon county 91397


Signature

AL Jensen
Print Name

17453 Blue Aspen Lane
Address


Signature

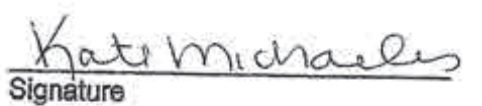
Kasim Kuli
Print Name

17226 EMPISS oak of
Address canyon county 91338


Signature

Yuliya Rossignoli
Print Name

17130 Monterey Piner Ln.
Address


Signature

Kate Michaelis
Print Name

27135 Red maple ct
Address


Signature

GERHARD STIEBEL
Print Name

27115 RED MAPLE CT
Address

Samantha Hauptman
Signature

SAMANTHA HAUPTMAN
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27411 English Ivy Lane
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Zoe P. Manalo
Signature

ZOE MANALO
Print Name

17023 STRAWBERRY PINE G.
Address Canyon City, CA 91387

Heather Anderson
Signature

HEATHER ANDERSON
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17017 STRAWBERRY PINE CT.
Address

Melissa Diaz
Signature

Melissa Diaz
Print Name

17018 Strawberry Pine Ct.
Address Canyon Country, CA 91387

Dale Gillibrand
Signature

Dale Gillibrand
Print Name

27406 English Ivy Ln, C.C. 91387
Address

Chris Pierce
Signature

Chris Pierce
Print Name

27327 Willow Oak Ct. 91387
Address

Sue Kakiki
Signature

Sue Kakiki
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27312 Willow Oak Ct.
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Christopher Re
Signature

Christopher Re
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27315 willow oak ct
Address Canyon Country CA 91387

Cjre3@yahoo.com
818-688-1371

Carmen Fernandez
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CARMEN FERNANDEZ
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16912 Whitepine Way
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Bryan Pangelinan
Signature

BRYAN PANGELINAN
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27093 MOUNTAIN WILLOW LANE
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Joe Notaro
Signature

Joe Notaro
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27051 Mountain Willow Lane
Address

Susan Orfilders
Signature

Susan Orfilders
Print Name

27009 Mountain Willow Ln.
Address

[Signature]
Signature

17219 Sunset Maple
Print Name

Naseli Parks
Address

[Signature]
Signature

SRINIVAS PULIPARA
Print Name

27081 Mountain Willow Lane
Address

[Signature]
Signature

RICK ORTOLANO
Print Name

27009 Mountain Willow Ln.
Address

[Signature]
Signature

Maire Navalth
Print Name

27028 Mountain Willow Lane
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Jarnail Singh
Signature

JARNAIL SINGH
Print Name

27423 English Ivy Ln
Address

[Signature]
Signature

Sandra Esqueda
Print Name

27435 English Ivy Lane
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Monique Esqueda
Signature

Monique Esqueda
Print Name

27456 English Ivy Lane
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[Signature]
Signature

27479 English Ivy Ln
Print Name

Canyon Country, CA, 91387
Address

[Signature]
Signature

Anna M. Allen
Print Name

27483 English Ivy Ln
Address

[Signature]
Signature

THOMAS COX
Print Name

27480 ENGLISH IVY LN.
Address

[Signature]
Signature

Rolanda Estevez
Print Name

17007 Strawberry Pine Ct
Address

[Signature]
Signature

Lynette P. Ferris
Print Name

27315 English Ivy Ln.
Address

Sarah Karamat
Signature

SARAH KARAMAT
Print Name

27345 ENGLISH IVY LN.
Address


Signature

NASIR KARAMAT
Print Name

27345 ENGLISH IVY LANE
Address


Signature

Tarek Ahmad
Print Name

17316 Coast Redwood Ln
Address


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Reema Ahmad
Print Name

17316 Coast Redwood Ln
Address


Signature

CHARLES K. AHN
Print Name

17354 BLUE ASPEN LN
Address


Signature

Josue Rodriguez
Print Name

17441 Blue Aspen Ln.
Address


Signature


GLENN ALEJANDRO
Print Name

17474 BLUE ASPEN LANE
Address


Signature

John Hall
Print Name

27459 English Ivy Lane
Address


Signature

Don Richards
Print Name

17348 BLUE ASPEN
Address


Signature

YVONNE PICONSKI
Print Name

17432 BLUE ASPEN CANYON
Address


Signature

Christa Davison
Print Name

17447 Blue Aspen LN
Address


Signature

JUSTIN CHOW
Print Name

17231 Empress Oak Ct
Address


Signature

Marisol Ramirez
Print Name

17626 Wren Drive
Address


Signature

IVETTE TRAVERSO
Print Name

17219 Empress Oak Ct
Address


Signature


Mark Menes
Print Name


104 Willow 27217
Address



Signature


Jeff Webster
Print Name

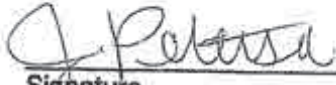
17652 Summer Maple
Address



Signature
Larry Sicins
Print Name
17408 Blue Aspen
Address



Signature
Bryan Matenson
Print Name
17420 Blue Aspen Lane
Address

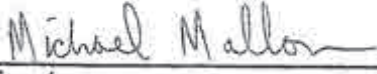

Signature
Wade Barnett
Print Name
27440 English Ivy Lane
Address


Signature
Bryan O'Connell
Print Name
27207 Sterling Grove Ln
Address


Signature
Jessica Peterson
Print Name
27207 Sterling Grove Ln.
Address


Signature
Kimberly Payer
Print Name
27209 Sycamore Pine Pl.
Address


Signature
Julio Alvarado
Print Name
27462 English Ivy Ln.
Address


Signature
Michael Mallon
Print Name
27339 English Ivy lane
Address

Nolan Randall
Signature

Nolan Randall
Print Name

17140 Summer Maple Way
Address
Canyon Country, CA 91387

[Signature]
Signature
27132 RED MAPLE CT
CANYON COUNTRY 91387

Print Name

Address

[Signature]
Signature

GABRIEL A. GUINNE
Print Name

27124 RED MAPLE
Address

[Signature]
Signature

Josh Minger
Print Name

27116 Red Maple Court
Address

[Signature]
Signature

James Horn
Print Name

27371 Rose Mallow Ln.
Address

[Signature]
Signature

Roger Bhakta
Print Name

27364 Rose Mallow Ln.
Address

[Signature]
Signature

Timothy LeBeau
Print Name

27360 Rose Mallow Ln.
Address

[Signature]
Signature

NIRAM VIRANI
Print Name

27346 ROSE MALLOW LN.
Address

Lindsay Briegel
Signature

Lindsay Briegel
Print Name

27333 English Tink Lane
Address Canyon Country, CA 91387

[Signature]
Signature

Joe R. Jimenez
Print Name

2730 Rose Mallow Ln
Address Canyon, CA 91387

[Signature]
Signature

Hope Fisher
Print Name

16953 White Drieway
Address

[Signature]
Signature

Donne Watts
Print Name

16942 White Pine Way
Address

Thomas B. Ahn
Signature

THOMAS B. AHN
Print Name

17354 Blue Aspen Ln
Address Canyon Country, CA 91387

[Signature]
Signature

SARITHA THAMPAN
Print Name

27221 ROSE MALLOW LN
Address CANYON COUNTRY
CA 91387.

[Signature]
Signature

Mitch + Aimee Stemberge
Print Name

27334 Rose Mallow Ln 91387
Address

[Signature]
Signature *John -> regarding Visa Canyon Project*

NOBUAKA (K. TAM)
Print Name

27341 ROSE MALLOW Lane
Address

**LETTER NO. C19. LETTER FROM FAIR OAKS RANCH COMMUNITY,
JANUARY 3, 2011**

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment opposes relocation of the existing Via Princessa Metrolink station to the Vista Canyon project site given that the current location is not proximate to any homes, does not experience traffic congestion, noise or safety issues, and has adequate parking. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Nonetheless, it should be noted that the Vista Canyon Traffic Study includes a ridership survey that was conducted at the Via Princessa Metrolink Station. Riders were asked for their home and work ZIP codes. Over 80 percent of the surveyed riders come from areas north and east of the station, with over 50 percent of the surveyed riders coming from 91387 (Fair Oaks, Sand Canyon, Pinetree areas). In addition, Metrolink and the City have identified various constraints associated with the existing Via Princessa Station, which was constructed as a temporary station following the Northridge Earthquake.

- **Parking** – A total of 392 parking spaces exist at the Via Princessa Station. The vast majority of parking spaces at this station are filled Monday through Friday. Additional parking is needed in the future to accommodate increased ridership and the Via Princessa site is built-out from a surface parking standpoint. A parking structure could be added to the site; however, the site is oddly configured resulting in a far more expensive structure as compared to the Vista Canyon Station. Further increasing the costs of this structure would be the inclusion of a bus-transfer station within the structure.
- **Location** - The station is located in close proximity to the Santa Clarita Station and both Metrolink and the City believe the overall community would be best served with the station moved farther to the east in closer proximity to the population it is serving.

In summary, the Metrolink station would be in closer proximity to many of the riders who reside in the communities surrounding the project.

Response 3

The comment states that the relocation of the Via Princessa Metrolink station would have a devastating effect on the lives of many Fair Oaks Ranch residents. The comment only expresses the opinions of the

commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment discusses the train activity that would occur on the project site and the associated horn blowing and brake noise. The comment states that some residences are located within 100 feet of the train tracks, though the effect of the station would reach many.

As discussed in the December 21, 2010 Vista Canyon staff report to the Planning Commission:

As indicated in the DEIR, the project also would result in the generation of stationary point noise sources. The new retail, restaurant, office, and residential uses, as well as the Metrolink station, on the proposed project site could introduce various stationary noise sources, including electrical and mechanical air conditioning. These same noise sources currently occur near the project site and contribute to the ambient noise levels that are experienced in all similarly developed areas in the vicinity. Noise levels generated by these sources would not exceed the normally acceptable noise levels identified in the City Guidelines due to their intermittent nature. Therefore, the DEIR concludes that impacts from point noise sources would be less than significant. Furthermore, the DEIR concludes that off-site residential uses (including homes in Fair Oaks Ranch) and the project's proposed residential and non-residential uses are located at a sufficient distance from the railroad tracks and Metrolink Station to ensure that residential units would not be located in areas with exterior noise levels in excess of 70 dB(A), and non-residential units would not be located in areas with exterior noise levels in excess of 75 dB(A) CNEL.

Concerns were raised by a resident in Fair Oaks Ranch at the last Planning Commission meeting concerning increased noise due to the project and more specifically the Metrolink Station. As indicated at the last meeting, the DEIR assessed post project noise impacts utilizing real sound level measurements at on-site locations as well as one at the Jan Heidt Metrolink Station. Ambient noise levels at these locations were less than 70 db(A) CNEL. All of these locations were approximately 60 feet from the railroad tracks.

However, to further assess the post-project ambient noise levels, staff directed the environmental consultant to complete additional analysis utilizing measurements from the on-site monitoring location closest to Fair Oaks Ranch. Additionally, since the November 2nd meeting the project applicant has committed to constructing an eight foot tall berm/wall along the southern boundary of the future Metrolink Station to further reduce noise impacts. This berm/wall design is shown in Attachment 3. In light of this additional requirement, the additional analysis includes an evaluation of ambient noise levels with and without the wall/berm in place.

Existing noise levels at the on-site measurement location (approximately 60 feet from the railroad tracks) are 62 db(A) CNEL. The project would increase those noise levels at that location to 67 db(A) CNEL due to project operation (vehicle traffic, Metrolink Station, stationary noise sources, etc.). The closest homes in Fair Oaks Ranch to the Metrolink Station are approximately 300 feet away. At 300 feet the post-project db(A) CNEL would be 63.5 without a noise barrier.

Construction of an eight foot tall berm/wall along the southern boundary of the railroad right-of-way adjacent to the Metrolink Station would reduce ambient noise at off-site locations including Fair Oaks Ranch. With the berm/wall the db(A) CNEL would be reduced to 57.5 at 300 feet which is well within the City's Guidelines.

In other words, based on the additional information contained in the referenced staff report, post-project conditions (with construction of the berm/wall) would not be significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 5

The comment states that the proposed Bus Transfer Station also would contribute to noise pollution and unnecessary traffic. The project's traffic and noise impacts are addressed in the Draft EIR Section 4.3, Traffic and Access, and Section 4.5, Noise. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 6

The comment states that the relocation of the Metrolink station would create noise pollution and take away the existing tranquility in the project area. The comment further mentions that most residents bought homes in Fair Oaks Ranch because the Santa Clara River would provide insulation from SR-14 noise. The comment only expresses the opinions of the commenter. Further, it bears noting that the project is not proposing to construct new train tracks in an area where tracks did not exist before; Metrolink and freight trains currently utilize the existing rail line adjacent to the project site and Fair Oaks Ranch. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 7

The comment states that the project's 1,400 plus residential units will add to traffic and congestion. For clarification purposes, the project as revised proposes 1,091 or 1,324 dwelling units (overlay option). The project's contribution to traffic and congestion is addressed in Section 4.3, Traffic and Access. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 8

The comment states that the project is proposed in an area that is occupied with lovely homes with a country feeling. The comment suggests that including a project with the characteristics of both Sand Canyon and Fair Oaks characteristics would be a better fit. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 9

The comment requests that the Via Princessa Metrolink station not be moved from its present location. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 10

The comment requests that Los Angeles County and the City of Santa Clarita conduct a more in-depth study of extending Lost Canyon Road through to Soledad Canyon Road. Project related impacts of connecting Lost Canyon Road through to Soledad Canyon Road have been addressed in Section 4.3, Traffic and Access. As the comment does not raise any specific issue regarding that analysis, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 11

The comment requests that noise from trains be accurately measured at residences as opposed to the speculative nature of the current data. The data contained in Section 4.5, Noise is not speculative. Noise readings were made on and off of the project site to ascertain noise readings. Please also see **Response 4**, above, for additional responsive information. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 12

The comment states that the project in its current form will ruin the quiet lifestyle of Fair Oaks Ranch residents and will not be consistent with the draft OVOV concept. The comment only expresses the opinions of the commenter. Moreover, as discussed in Section 4.7, Land Use, the project is consistent with the goals and policies of the proposed OVOV General Plan. (See Draft EIR, p. 4.7-11 and Appendix 4.7.) The comment will be included as part of the record and made available to the decision makers prior to a

final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 13

The comment expresses support first for Alternative 1, and then for Alternative 2 when compared to the proposed project. The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 14

The comment attaches the concurring signatures of approximately 150 homeowners that oppose the proposed project. The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.



City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 10/19/10 Agenda item number: 2

Agenda title or subject to be addressed: VISTA CANYON RANCH

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral

Name: ALAN FEROMAN

Street Address: 27248 WALNUT SPRINGS

City: CANYON COUNTRY Phone: 661-713-9344

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: CANYON COUNTRY ADVISORY COMMITTEE

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Under State law, matters raised under Public Comments cannot have immediate action. The Planning Commission will refer the matter to staff, or it may be scheduled on a subsequent Planning Commission Agenda.

[Signature] Signature of Speaker

For tips on making your presentation, see reverse side.

[] Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).



City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 10/19/10 Agenda item number: # 2

Agenda title or subject to be addressed: MASTER CASE 07-127

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral

Name: KARL MALLICK

Street Address: 27107 BUCKSKIN LN

City: SC Phone: 661-251-5094

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SELF

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Under State law, matters raised under Public Comments cannot have immediate action. The Planning Commission will refer the matter to staff, or it may be scheduled on a subsequent Planning Commission Agenda.

[Signature] Signature of Speaker

For tips on making your presentation, see reverse side.

[] Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).



City of
SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: OCT 17, 2010 Agenda item number: #2

Agenda title or subject to be addressed: MASTER CASE 07-127

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: JIM LEVONI

Street Address: 38100 LA VEDA AVE

City: SANTA CLARITA Phone: 661-609-6762

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SELF

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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[Signature]
Signature of Speaker

For tips on making your presentation, see reverse side.

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City of
SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 10/19/10 Agenda item number: 2

Agenda title or subject to be addressed: Master Case No. 07-127

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Colleen Doan WRA Eng. Inc.

Street Address: 24911 Avenue Stanford

City: Valencia Phone: 661 295-3590

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: Client Palo Plesnik

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[Signature]
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

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Meeting date: _____ Agenda item number: _____

Agenda title or subject to be addressed: High Speed Train Railroad (Sound wall -)

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: ROSEMARY CHOUR

Street Address: 27417 English Ivy Lane

City: Fan Oaks Ranch Phone: 661-360 9581

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: _____

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Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: October 19, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Annexation - Sand Canyon Area

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: CAROLYN INGRAM BEITZ

Street Address: PO BOX 265

City: ALTADENA CA 91003-0265 Phone: 626 345 1233

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: FRANK & VERA VACEK, DEREK HUNT, STEVE & DIANE ARKUN

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Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

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Meeting date: 10-19-10 Agenda item number: 2

Agenda title or subject to be addressed: _____

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Lynne Plarbeck

Street Address: _____

City: _____ Phone: _____

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

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Signature of Speaker

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SANTA CLARITA

Planning Commission
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If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 10-19-2010 Agenda item number: 2

Agenda title or subject to be addressed: Annexation - Vista Canyon

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Cam Volteneyer

Street Address: 25936 Sardinia Ct

City: SC Phone: 661 259-7112

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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Cam Volteneyer
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission

Written Comment Card

Please complete this form to register your written comments to the Planning Commission, in lieu of speaking, and turn it in to the Planning Commission Secretary. Your written comments will be considered part of the official proceedings. (Please print clearly.)

Meeting date: 10/19/10 Agenda item number: 2
 Agenda title or subject to be addressed: Master Case No. 07-127
 Please check one: Support Recommendation Oppose Recommendation Neutral
 Name: Colleen Doan WRA Eng. Inc.
 Street Address: 24911 Avenue Stanford City: Valencia
 Written Comment (Use other side if necessary): submitted

The Planning Commission requires that persons registering written comments who represent other individuals, groups or organizations disclose that relationship.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: Client - Polo Plesnik Signature: Colleen Doan

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).



City of
SANTA CLARITA

Planning Commission

Written Comment Card

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Meeting date: OCT. 19, 2010 Agenda item number: 07-127
 Agenda title or subject to be addressed: VISTA CANYON
 Please check one: Support Recommendation Oppose Recommendation Neutral
 Name: CLARENCE L. SIMMONS
 Street Address: 27361 SIERRA HWY. SP.# 283 City: CANYON COUNTRY
 Written Comment (Use other side if necessary): MOVING VIA PRINCESSA METRO LINK STATION
WOULD BE A GREAT HARDSHIP ON ME! I AM DISABLED USING A MODRIZED

The Planning Commission requires that persons registering written comments who represent other individuals, groups or organizations disclose that relationship.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: _____ Signature: Clarence Simmons

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).

(written comment continued)

WHEELCHAIR. WHERE I LIVE NOW IS 15 MINUTES FROM HOME
TO THE METROLINK STATION. THE BUSES ONLY GO THERE
A COUPLE TIMES A DAY. THE METROLINK IS MY SOURCE
OF TRANSPORTATION OUT OF THE S.C. VALLEY.
IT WOULD TAKE TOO LONG TO GET TO ANOTHER STATION,
I WOULD HAVE TO USE ANOTHER MEANS OF TRANSPORTATION.

Lobbyist Registration: Under § 7.03.010 of the Santa Clarita Municipal Code, lobbyists are required to register with the City Clerk's Office. A "lobbyist" means any individual or entity employed, retained or otherwise engaged for compensation to communicate with any elective or appointed official, any officer or employee or any task force, committee, board, commission, or other body of the City for the purpose of influencing any legislative or administrative action.

A regular employee of an organization, communicating to the City during the course of their employment, an individual communicating on behalf of a group or organization and not receiving compensation for such action, or an individual communicating on their own behalf would NOT be considered a lobbyist.



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Planning Commission

Written Comment Card

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Meeting date: 10-19-10 Agenda item number: 07-127

Agenda title or subject to be addressed: _____

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Carolyn Simmons

Street Address: 27361 Sierra Hwy Space 283 City: Canyon Country, CA 91351

Written Comment (Use other side if necessary): With all the empty stores in this area how can you expect the new store work out, and why can't you leave the

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I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: _____ Signature: Carolyn Simmons

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).

(written comment continued)

metro Link where it is, and put the park where the new metro
Link is suppose to be.

Lobbyist Registration: Under § 7.03.010 of the Santa Clarita Municipal Code, lobbyists are required to register with the City Clerk's Office. A "lobbyist" means any individual or entity employed, retained or otherwise engaged for compensation to communicate with any elective or appointed official, any officer or employee or any task force, committee, board, commission, or other body of the City for the purpose of influencing any legislative or administrative action.

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**LETTER NO. D1 COMMENTS MADE AT THE PLANNING COMMISSION MEETING
ON OCTOBER 19, 2010**

1. Alan Ferdman, Chairman of the Canyon Country Advisory Committee (CCAC) stated that he generally supports the proposed project.

The City acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

2. Karl Mallick noted that he is a resident of Sand Canyon and that he is in favor of the project and that more services are needed in the project area.

The City acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

3. Jim Lentini stated that he was a resident of La Veda Avenue and was in support of the proposed project.

The City acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

4. Colleen Doan, of WRA Engineering, Inc. stated that her client (Palo Plesnik) had no concern with the proposed Vista Canyon project, but did not want to be a part of the AAA.

This property has since been removed from the AAA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

5. Rosemary Chavez stated that she lived in Fair Oaks Ranch and was concerned with the train and associated noise. She stated that the train is noisy now and the project would only bring more train noise to the site. Ms. Chavez's Request to Speak slip included a mention of a sound wall in association with the train/railroad.

As discussed in the December 21, 2010 Vista Canyon staff report to the Planning Commission:

As indicated in the DEIR, the project also would result in the generation of stationary point noise sources. The new retail, restaurant, office, and residential uses, as well as the Metrolink station, on the proposed project site could introduce various stationary noise sources, including electrical and mechanical air conditioning. These same noise sources currently occur near the project site and contribute to the ambient noise levels that are experienced in all similarly developed areas in the vicinity. Noise levels generated by these sources would not exceed the normally acceptable noise levels identified in the City Guidelines due to their intermittent nature. Therefore, the DEIR concludes that impacts from point noise sources would be less than significant.

Furthermore, the DEIR concludes that off-site residential uses (including homes in Fair Oaks Ranch) and the project's proposed residential and non-residential uses are located at a sufficient distance from the railroad tracks and Metrolink Station to ensure that residential units would not be located in areas with exterior noise levels in excess of 70 dB(A), and non-residential units would not be located in areas with exterior noise levels in excess of 75 dB(A) CNEL.

Concerns were raised by a resident in Fair Oaks Ranch at the last Planning Commission meeting concerning increased noise due to the project and more specifically the Metrolink Station. As indicated at the last meeting, the DEIR assessed post project noise impacts utilizing real sound level measurements at on-site locations as well as one at the Jan Heidt Metrolink Station. Ambient noise levels at these locations were less than 70 db(A) CNEL. All of these locations were approximately 60 feet from the railroad tracks.

However, to further assess the post-project ambient noise levels, staff directed the environmental consultant to complete additional analysis utilizing measurements from the on-site monitoring location closest to Fair Oaks Ranch. Additionally, since the November 2nd meeting the project applicant has committed to constructing an eight foot tall berm/wall along the southern boundary of the future Metrolink Station to further reduce noise impacts. This berm/wall design is shown in Attachment 3. In light of this additional requirement, the additional analysis includes an evaluation of ambient noise levels with and without the wall/berm in place.

Existing noise levels at the on-site measurement location (approximately 60 feet from the railroad tracks) are 62 db(A) CNEL. The project would increase those noise levels at that location to 67 db(A) CNEL due to project operation (vehicle traffic, Metrolink Station, stationary noise sources, etc.). The closest homes in Fair Oaks Ranch to the Metrolink Station are approximately 300 feet away. At 300 feet the post-project db(A) CNEL would be 63.5 without a noise barrier. Construction of an eight foot tall berm/wall along the southern boundary of the railroad right-of-way adjacent to the Metrolink Station would reduce ambient noise at off-site locations including Fair Oaks Ranch. With the berm/wall the db(A) CNEL would be reduced to 57.5 at 300 feet, which is well within the City's Guidelines.

6. Carolyn Ingram Seitz stated that she represented Frank and Vera Vacek, Derek Hunt and Steve and Diane Arkin. She stated that her clients wanted their parcels removed from the AAA. She mentioned her clients supported the proposed Vista Canyon project.

This property has since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

7. Lynne Plambeck, representing SCOPE, indicated that she supports sustainable, mixed-use projects. Ms. Plambeck stated that the wastewater treatment plant (WRP) is a reclamation plant and that the plant should be a reverse osmosis plant. Ms. Plambeck asserted that the jobs that would be provided by the project would be minimum wage jobs and would not benefit the community. Ms. Plambeck stated that there were no cars in the project video and that it was a cartoon.

Ms. Plambeck's comments regarding mixed-use development, sustainability and the video being a cartoon only expresses the opinions of the commenter. The comments will be included as part of the

record and made available to the decision makers prior to a final decision on the proposed project. However, because the comments do not raise an environmental issue, no further response is required.

Letter A4, California Regional Water Quality Control Board (Los Angeles Region), expressed concurrence with the findings of Section 4.8.1, Water Quality, of the Draft EIR and did not suggest that the WRP be reverse osmosis. Nonetheless, Ms. Plambeck's comment that the WRP should be a reverse osmosis plant will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

With respect to the jobs generated by the project, the majority of jobs generated by the project would be professional office jobs, which can support the housing costs of the community.

8. Cam Noltemeyer wondered how the public could comment on the Draft EIR when it was not available. Ms. Noltemeyer stated that the project was building in the riverbed and floodplain and filling in the floodplain and corridor. Ms. Noltemeyer want to know if the FEMA flood maps that were used were the most current maps available. Ms. Noltemeyer wanted to know the grading proposed for the site and where the imported soil was coming from.

The comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council.

The analysis presented in the Draft EIR, Section 4.20, Santa Clara River Corridor Analysis, concluded that the proposed project's impacts to the River Corridor would be reduced to a level below significant with adoption of the recommended mitigation. Also, **Appendix F2** of the Final EIR, which compares the width of the Santa Clara River throughout the project site with the River width at other locations, illustrates that the average width of the River through the project site is 775 feet. In comparison, the width of the River at three off-site locations (i.e., 460, 570 and 600 feet) was well below the proposed project's 775 feet width. Therefore, the project's proposed development pull-back from the River Corridor is considerably greater in width when compared to existing development immediately upstream and downstream of the project.

The FEMA maps used in the Draft EIR are the latest maps available.

As noted on page 1.0-16, in the Project Description of the Draft EIR: "Import materials are to be from one or both of the following borrow sites: (a) the George Carvalho Santa Clarita Sports Complex Expansion, and (b) the Center Pointe Business Park. Development on both of the borrow sites has been previously approved by the City."

9. Clarence Simmons noted that he opposed the project and that moving the Via Princessa Metrolink Station would be a hardship for him. Mr. Simmons uses a motorized wheelchair and he presently lives 15 minutes from the Via Princessa station. The buses only access the site a few times a day. The Via Princessa Metrolink Station is his source of transportation out of the Santa Clarita Valley.

The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

10. Carolyn Simmons questioned how can the new stores associated with the project work when there are so many empty stores in this area. Ms. Simmons suggested that the Metrolink Station should be left in its present location (i.e., Via Princessa) and that a park should be constructed at the proposed Metrolink location on the project site.

The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

11. The Planning Commission raised various comments that were addressed in subsequent staff reports for the October 19, 2010, November 2, 2010 and December 21, 2010 public hearings.



City of SANTA CLARITA

Planning Commission Request to Speak

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Meeting date: 11/2/10 Agenda item number: 2

Agenda title or subject to be addressed: VISTA CANYON

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral

Name: ROBERT BENJAMIN

Street Address: 15207 SADDLEBACK RD.

City: CANTON COUNTRY CA 91387 Phone: 661-257-6005

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: MYSELF

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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Signature of Speaker (handwritten signature)

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City of SANTA CLARITA

REPLACEMENT Planning Commission Request to Speak

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Meeting date: 11/2/10 Agenda item number: 2

Agenda title or subject to be addressed: VISTA CANYON RANCH

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral

Name: WILLIAM C. CLOYD

Street Address: 15656 IRON CYN. RD.

City: SANTA CLARITA, CA. Phone: 661 251-1305

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Representing: (SELF)

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Signature of Speaker (handwritten signature)

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City of
SANTA CLARITA

Planning Commission
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Meeting date: 11-2-10 Agenda item number: 2

Agenda title or subject to be addressed: Master Case 07-127 ... Annexation

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Colleen Doan WRA Eng. Inc.

Street Address: 24911 Avenue Stanford

City: Valencia Phone: 661 295-3590

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Representing: Client for WRA

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Colleen Doan
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
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Meeting date: Nov 2 Agenda item number: # 2

Agenda title or subject to be addressed: Annexation

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Steve Arkwin

Street Address: 16030 Placerville - Cyn Rd

City: Cyn. City. Phone: 661-904-1904

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Representing: _____

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Steve Arkwin
Signature of Speaker

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Meeting date: 1/2-10 Agenda item number: 2

Agenda title or subject to be addressed: _____

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: GORDON PURZAR

Street Address: PO BOX 2957

City: S.C. CA 91386 Phone: 661-250-9688

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Representing: _____

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[Signature]
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

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Meeting date: November 2, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon EIR

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Penny Upton

Street Address: 28154 La Veda Ave

City: Canyon Country Phone: 661-251-2840

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: Myself

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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[Signature]
Signature of Speaker

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Planning Commission
Request to Speak

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Meeting date: _____ Agenda item number: 2

Agenda title or subject to be addressed: How Placement of Train Station Affects Impact

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: ROSEMARY CHAVEZ

Street Address: 27417 ENGLISH IVY LN

City: FAIN OAKS RANCH Phone: 661-360-9581

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Representing: _____

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Planning Commission
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Meeting date: 11-2-10 Agenda item number: #2

Agenda title or subject to be addressed: _____

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Jeff Beebe

Street Address: 116137 Lost Cyn Rd

City: Santa Clarita Ca Phone: 661 252 9303

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Representing: _____

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Signature of Speaker

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SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: Lynne Plaabek Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: _____

Street Address: _____

City: _____ Phone: _____

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

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[Handwritten Signature]
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: NOVEMBER 2, 2010 Agenda item number: 2

Agenda title or subject to be addressed: ANNEXATION OF SAND CANYON AREA

Please check one: Support Recommendation Oppose Recommendation Neutral NO ISSUE WITH VISTA CYN

Name: CARDLYN INGRAM BEITZ

Street Address: PO BOX 265

City: ALTADENA CA 91003-0265 Phone: 626 345 1233

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: FRANK VERA VACEK, DEREK HUNT, STEVE & DIANA ARKUN

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[Handwritten Signature]
Signature of Speaker

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Meeting date: 11-2-2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Cam Noltemeyer

Street Address: 25936 Sardinia Ct

City: SC Phone: 661 259-7112

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Under State law, matters raised under Public Comments cannot have immediate action. The Planning Commission will refer the matter to staff, or it may be scheduled on a subsequent Planning Commission Agenda.

Cam Noltemeyer
Signature of Speaker

For tips on making your presentation, see reverse side.

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City of
SANTA CLARITA

Planning Commission
Written Comment Card

Please complete this form to register your written comments to the Planning Commission, in lieu of speaking, and turn it in to the Planning Commission Secretary. Your written comments will be considered part of the official proceedings. (Please print clearly.)

Meeting date: 11-2-10 Agenda item number: 2

Agenda title or subject to be addressed: Master Case 07-127, Amendment 07202A

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Colleen Doan for WPA Eng Inc.

Street Address: 24911 Ave. Stanford City: Valencia

Written Comment (Use other side if necessary): see submitted letter

The Planning Commission requires that persons registering written comments who represent other individuals, groups or organizations disclose that relationship.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: Client WPA Eng Inc Signature: Colleen Doan

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).

**LETTER NO. D2 COMMENTS RECEIVED AT THE NOVEMBER 2, 2010 PLANNING
COMMISSION HEARING**

1. Robert Benjamin indicated that he supports the project. The City acknowledges Mr. Benjamin's support. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
2. Colleen Doan (WRA Engineering, Inc.) noted that her clients do not want to be annexed to the City of Santa Clarita. It should be noted that the referenced property has since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.
3. Steve Arklin provided general comments regarding the project area, but did not specifically comment on the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.
4. Penny Upton asked if the Conditional Letter of Map Revision (CLOMR) was finished for the project. Ms. Upton also questioned how opening up Lost Canyon Road would help traffic on Sand Canyon Road, Lost Canyon Road, and La Veda Avenue. Ms. Upton opined that that roundabout would harm pedestrians, and noted that the Sulphur Springs School District favors opening up the road but is still looking for ways to ease traffic. Ms. Upton stated that the EIR addresses the temporary drop-off of students and she is looking for ways to ease the traffic. She suggested using an emergency gate on Lost Canyon rather than opening up the road. Ms. Upton asked if Alternative 5 would include an emergency gate.

On November 13, 2009, FEMA approved the CLOMR for the Vista Canyon project. Please see Section 4.2, Flood, of the Draft EIR and Appendix 4.2 for additional information, including copies of the letter granting the CLOMR request.

Also, impacts to Sand Canyon Road, Lost Canyon Road and La Veda Avenue received extensive analysis in Section 4.3, Traffic and Access, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

With respect to the concern that efforts to find available space east of Sulphur Springs School for off-street student pick-up/drop-off have not been successful, the Draft EIR presents a summary of an analysis specifically undertaken to address school access and potential traffic-related impacts of the proposed project relative to the Sulphur Springs and Pinecrest schools. (See Draft EIR, pp. 4.3-54 to 55.) Based on the analysis, to alleviate existing congestion on Lost Canyon Road in the vicinity of the schools and to accommodate project-generated traffic, certain improvements will be constructed as part of the project,

including: a median turn lane, a trail along the north side of the roadway, a roundabout at La Veda Avenue, parallel parking on the south side of the road, and construction of a narrow raised median at the easterly Pinecrest School driveway including a sign prohibiting u-turns if a roundabout is constructed at the intersection of Lost Canyon Road/Sand Canyon Road. (Draft EIR p. 4.3-55.) Additionally, the Draft EIR identifies the need for improvements at the Lost Canyon Road/Sand Canyon Road intersection and includes four potential options; the option that is selected will be determined by the decision maker, which is the City in this case. (See Draft EIR, pp. 4.3-76 to -77.) Field observations indicate that this intersection contributes to the overall levels of congestion along Lost Canyon Road during school pick-up/drop-off hours. As shown on Draft EIR Table 4.3-13, with implementation of the mitigation measures, the intersection would operate at acceptable levels of service.

The improvements to be constructed as part of the proposed project, in combination with the traffic mitigation measures, would reduce the project's potential impacts to a level below significant and no further mitigation is required. Additionally, street parking adjacent to the proposed Oak Park would be available for school pick-up and drop-off. Finally, as noted in the Draft EIR (see Section 4.3), approximately 50 percent of the children presently attending Sulphur Springs Elementary School come from homes north of SR-14, exacerbating existing pick-up and drop-off conditions along Lost Canyon Road. In the future, these students would be replaced by children within the Vista Canyon project. The proximity of Vista Canyon to Sulphur Springs Elementary School would encourage walking, especially from easterly areas of Vista Canyon, further reducing congestion along Lost Canyon Road. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

As for the comment regarding pedestrian safety at the proposed roundabouts at Lost Canyon Road/La Veda Avenue and Lost Canyon Road/Sand Canyon Road, both roundabouts would be constructed with crosswalks, ADA ramps, appropriate signing/stripping, and pedestrian refuge areas within the splitter islands. The roundabout is a means to "calm" traffic on Lost Canyon Road between the project site and Sand Canyon Road by reducing vehicle speeds and discouraging through traffic travel. As explained at page 103 of *Roundabouts: An informational Guide* (Federal Highway Administration, 2000), roundabouts are a means of enhancing pedestrian safety: "Roundabouts have fewer conflict points in comparison to conventional intersections. Pedestrians need only cross one direction of traffic at a time at each approach as they traverse roundabouts. The speeds of motorists entering and exiting a roundabout are reduced with good design. Single-lane roundabouts have been found to perform better (in overall safety) than two-way stop-controlled intersections in the U.S."

As to the Lost Canyon Road/Sand Canyon Road intersection, a roundabout is one of four options for the intersection that the City's Planning Commission and City Council will be reviewing and, ultimately,

selecting a preferred improvement. The Planning Commission has initially selected the roundabout option and will be making this recommendation to the City Council. However, the concerns raised by the comment are noted and will be made available to the City prior to any decision on the proposed project. Also of note, the project applicant will be required to fund the retention of a crossing guard, for a temporary period, after the completion of the intersection improvements at Lost Canyon Road/Sand Canyon Road (Draft Condition No. PC6). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Alternative 5 would not include a temporary gate. Ms. Upton's suggestion to include an emergency gate rather than open up Lost Canyon Road is noted for the record. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

5. Rosemary Chavez addressed noise associated with the proposed Metrolink Station, and noted that the existing train turnout will be removed. Ms. Chavez asked if recording devices have been placed at homes to measure noise, and requested that the noise analysis address starting and stopping rather than trains just rolling through. Ms. Chavez finally stated that homes on English Ivy Lane have a direct line of sight to the tracks, and opined that the comparison to the Jan Heidt Metrolink Station is not a good one.

The December 21, 2010 staff report addressed Ms. Chavez's concerns regarding noise as follows:

As indicated in the DEIR, the project also would result in the generation of stationary point noise sources. The new retail, restaurant, office, and residential uses, as well as the Metrolink station, on the proposed project site could introduce various stationary noise sources, including electrical and mechanical air conditioning. These same noise sources currently occur near the project site and contribute to the ambient noise levels that are experienced in all similarly developed areas in the vicinity. Noise levels generated by these sources would not exceed the normally acceptable noise levels identified in the City Guidelines due to their intermittent nature. Therefore, the DEIR concludes that impacts from point noise sources would be less than significant.

Furthermore, the DEIR concludes that off-site residential uses (including homes in Fair Oaks Ranch) and the project's proposed residential and non-residential uses are located at a sufficient distance from the railroad tracks and Metrolink Station to ensure that residential units would not be located in areas with exterior noise levels in excess of 70 dB(A), and non-residential units would not be located in areas with exterior noise levels in excess of 75 dB(A) CNEL.

Concerns were raised by a resident in Fair Oaks Ranch at the last Planning Commission meeting concerning increased noise due to the project and more specifically the Metrolink Station. As indicated at the last meeting, the DEIR assessed post project noise impacts utilizing real sound level measurements at on-site locations as well as one at the Jan Heidt Metrolink Station. Ambient noise levels at these locations were less than 70 db(A) CNEL. All of these locations were approximately 60 feet from the railroad tracks.

However, to further assess the post-project ambient noise levels, staff directed the environmental consultant to complete additional analysis utilizing measurements from the on-site monitoring

location closest to Fair Oaks Ranch. Additionally, since the November 2nd meeting the project applicant has committed to constructing an eight foot tall berm/wall along the southern boundary of the future Metrolink Station to further reduce noise impacts. This berm/wall design is shown in Attachment 3. In light of this additional requirement, the additional analysis includes an evaluation of ambient noise levels with and without the wall/berm in place.

Existing noise levels at the on-site measurement location (approximately 60 feet from the railroad tracks) are 62 db(A) CNEL. The project would increase those noise levels at that location to 67 db(A) CNEL due to project operation (vehicle traffic, Metrolink Station, stationary noise sources, etc.). The closest homes in Fair Oaks Ranch to the Metrolink Station are approximately 300 feet away. At 300 feet the post-project db(A) CNEL would be 63.5 without a noise barrier. Construction of an eight foot tall berm/wall along the southern boundary of the railroad right-of-way adjacent to the Metrolink Station would reduce ambient noise at off-site locations including Fair Oaks Ranch. With the berm/wall the db(A) CNEL would be reduced to 57.5 at 300 feet, which is well within the City's Guidelines.

Ms. Chavez's comment regarding the Jan Heidt Metrolink Station not being a good comparison is noted for the record. However, the City disagrees with this statement as the Jan Heidt Metrolink Station design is very similar to that proposed for the Vista Canyon Metrolink Station. Noise readings taken at the Jan Heidt Metrolink Station also would be consistent with and likely higher (due to adjacent roadways) than noise generated at the proposed Vista Canyon Metrolink Station. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

6. Jeff Beebe noted that he loved horses and is concerned about pedestrian and horse safety at Lost Canyon Road with the road open near the elementary school. Mr. Beebe believes that the open road would make existing problems worse and suggested that the road not be opened.

With regard to pedestrian and horse safety on Lost Canyon Road, please see **Response 4** above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

7. Lynne Plambeck stated that she was startled to hear Daryl Koutnik from Impact Sciences speak about the SEA line. Ms. Plambeck noted that SEATAC are a group of qualified biologists who are neutral, and opined that environmental consultants are biased because they are paid for by project developers. Ms. Plambeck also stated that the FEMA line should not be used for environmental analysis; instead, she requested that the resource line be used. Ms. Plambeck noted that she had not evaluated the noise impacts of the project, but requested that readings be taken at existing homes to record noise levels—as the levels exceed thresholds now. Lastly, Ms. Plambeck stated that the 2005 UWMP cannot be relied upon because the project's GPA was not accounted for.

Ms. Plambeck's comments regarding SEATAC and consultants being biased because of whom they are paid by only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Section 4.20, Santa Clara River Corridor Analysis, specifically addresses the issue of the resource and FEMA lines on page 4.20-1: “This existing SEA overlay generally corresponds to the limits of the Federal Emergency Management Agency (FEMA) 100-year floodplain elevation. Based on detailed biota surveys completed for the proposed project, the existing SEA/FEMA overlay boundary does not correspond to the sensitive riparian and jurisdictional resources within the project site. Therefore, the project proposes a General Plan Amendment, which would revise both the land use designation for the Vista Canyon property to SP (Specific Plan), and adjust the existing SEA/FEMA overlay boundary to correspond to the area to be designated SP-OS (open space within the Santa Clara River Corridor). Proposed project impacts to biological resources within the existing SEA/FEMA overlay area would not be considered significant because the project design proposes to minimize impacts to jurisdictional and sensitive riparian-associated resources on site, and assure project compatibility with ongoing ecological functions of the post-project SEA/FEMA overlay area. In addition, the project's proposed development footprint corresponds to and preserves and enhances the sensitive biological and jurisdictional resources present within the River Corridor on the project site, and is designed to: (a) be compatible with the sensitive biological resources present, including the set aside of undisturbed areas; (b) maintain the Santa Clara River watercourse in a natural state; (c) maintain the existing east-west wildlife movement area within the Santa Clara River Corridor; (d) preserve adequate buffer areas between proposed development and sensitive natural resources; and (e) ensure that roads and utilities are designed to reduce or avoid impacts to sensitive biological and jurisdictional resources.”

With regard to noise readings, please see **Response 5** above and note that the post-project noise levels will be within threshold standards with mitigation.

As indicated in Draft EIR Section 4.8, Water Service, pages 4.8-11 and 4.8-12, the project site is entirely within the service area of the Castaic Lake Water Agency (CLWA) and the Santa Clarita Water Division of CLWA (SCWD). As stated in the Draft EIR,

CLWA Santa Clarita Water Division (SCWD) service area includes portions of the City of Santa Clarita and unincorporated portions of Los Angeles County in the communities of Canyon Country, Newhall, and Saugus. SCWD supplies water from local groundwater and CLWA imported water. SCWD is owned by CLWA, and its service area includes the project site. As a result, SCWD is the retail water purveyor for the project. **Figure 4.8-2, Santa Clarita Water Division Service Area**, illustrates the CLWA and Santa Clarita Water Division service area.

While the proposed Project was not specifically fully contemplated at the time the 2005 UWMP was prepared, the Draft EIR clearly demonstrates that an adequate supply of water is available for the entire project in each scenario analyzed in the EIR. As shown on Draft EIR page 4.8-1, the proposed Project's potable water demand is approximately 497 afy, or 529 afy with implementation of the residential overlay

option. Table 4.8-18, Projected Average/Normal Year Supplies and Demands, Table 4.8-19, Projected Single-Dry Year Supplies and Demands, Table 4.8-20, Projected Multiple-Dry Year Supplies and Demands, and Table 4.8-22, Scenario 2: Santa Clarita Valley 2030 Build-Out Scenario Water Demand and Supply, all show that an adequate supply of water is available to meet the demands of the proposed Project. This information is also consistent with the finding of the water supply assessment (WSA) prepared by the water purveyor for the project, the SCWD. As presented on Draft EIR page 4.8-116:

[T]he SCWD prepared a Vista Canyon WSA (2010) for the proposed project. The WSA is found in **Appendix 4.8**. Based on the information in this WSA, SCWD concludes there will be a sufficient water supply available at the time the project is ready for occupancy to meet the needs of the project, in addition to existing and other planned future uses in the Santa Clarita Valley.

Based on the information presented in the project's WSA and the Draft EIR, impacts associated with supplying the proposed Project with an adequate water supply are less than significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

8. Carolyn Ingram Seitz objected to the inclusion of specified properties within the AAA. Of note, the specified properties have since been removed from this annexation. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.
9. Cam Noltemeyer stated that there must be an agreement with Metrolink first. Additionally, she opined that there should be an agreement with the City for wastewater. She stated that the developer could do an assessment district, but there would be no opposition because homeowners are not there yet. Ms. Noltemeyer asked if there was a FEMA agreement because the site would need to be raised and filled in above the floodplain as the project is not meeting FEMA standards. She also noted that the project would be taking down a ridgeline. Ms. Noltemeyer finally asked if there was an agreement with Caltrans, and opined that the project applicant does not have to pay for SR-14 impacts because there is no agreement in place.

Ms. Noltemeyer's comment regarding a Metrolink agreement expresses the opinions of the commenter. Suffice it to say, however, that the need for action from the Southern California Regional Rail Authority, Metrolink, and Metropolitan Transit Authority is recognized in Table 1.0-1, Future Agency Actions, of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Ms. Noltemeyer's suggestion that the project applicant enter into an agreement with the City for the wastewater treatment facility has been addressed in the Draft EIR by the following mitigation measures:

- 4.21-1** Upon completion of the WRP, the applicant shall dedicate the WRP property to the City of Santa Clarita.
- 4.22-2** A 395,411 gallon per day water reclamation plant shall be constructed on the Vista Canyon Specific Plan site, pursuant to local, regional, state and federal design standards (as applicable), to serve the Vista Canyon Specific Plan. The project applicant shall assign the responsibility for ownership, operation, and maintenance of the water reclamation plant to the City of Santa Clarita.

Also, FEMA has issued a CLOMR for the project. Please see **Response 4**, above.

Ms. Noltemeyer's suggestion to execute an agreement with Caltrans now cannot be accomplished. Caltrans policy is to not execute agreements until after the project has received approval by the decision-making body. However, Mitigation Measure 4.3-9 requires that the project applicant enter into an agreement with Caltrans: "The applicant shall execute and adhere to the terms of the mitigation agreement with Caltrans to minimize the project's impacts to SR-14. " Nonetheless, the draft agreement contained within Appendix 4.3, Traffic and Access, of the Draft EIR has been reviewed and approved by Caltrans and would be signed upon project approval. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

10. Gordon Purzak stated that he is a local business owner and represents the little guys. He noted that many shops and medical facilities are empty now. He believes that the Santa Clarita Valley is becoming the San Fernando Valley and that the City does not need the project. Mr. Purzak asked where the estimates for job figures came from and opined that the project will not produce any jobs.

Mr. Purzak's comments regarding Santa Clarita becoming similar to the San Fernando Valley and not needing the project express the opinions of the commenter. The comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comments do not raise an environmental issue, no further response is required.

Section 4.17, Population, Housing, Employment, of the Draft EIR provides the source of job estimates as follows: "Using the SCAG employment generation factor of 2.36 employees per 1,000 square feet of commercial retail uses and 3.14 employees per 1,000 square feet of office uses,² these uses would generate a total of 3,288 employees (540 commercial retail employees, 2,568 office employees and 180 hotel employees). With implementation of the residential overlay option, 250,000 square feet of office space

² The Natelson Company, Inc., *Employment Density Study Summary Report Prepared for Southern California Association of Governments* (October 31, 2001).

would be removed resulting in a reduced project employment generation of 1,963 employees. This increase represents 5.3 percent of the employment within the City for year 2010 (62,227 jobs). In summary, the proposed project, with or without application of the residential overlay, would result in a substantial increase in jobs.” (Draft EIR, p. 4.17-8.) The comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.



City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 12-21-10 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral

Name: Glenn Adamidis

Street Address: 27451 Tourney Road, Side 100

City: Santa Clarita, CA Phone: 661-255-3275

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: Vista Canyon LLC (applicant)

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Under State law, matters raised under Public Comments cannot have immediate action. The Planning Commission will refer the matter to staff, or it may be scheduled on a subsequent Planning Commission Agenda.

Signature of Speaker

For tips on making your presentation, see reverse side.

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City of SANTA CLARITA

Planning Commission Request to Speak only if questions

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 12/21/10 Agenda item number: 2

Agenda title or subject to be addressed: VISTA CANYON

Please check one: [X] Support Recommendation [] Oppose Recommendation [] Neutral [QUESTIONS, IF NEEDED]

Name: JIM BAKER

Street Address: 27451 TOURNEY RD. # 100

City: VALENCIA Phone: 661-255-3275

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Representing: VISTA CANYON APPLICANT

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

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Meeting date: 12/21/2010 Agenda item number: # 2

Agenda title or subject to be addressed: Vista Cyn

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Robert Nolat

Street Address: 21915 Placeritas Blvd.

City: Newhall, Ct 91321 Phone: 287-3577

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Representing: Sulphur Springs School Dist.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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R Nolat
Signature of Speaker

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City of
SANTA CLARITA

Planning Commission
Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: Dec. 21, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon Project

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Susan Carey

Street Address: 27143 Crystal Springs Road

City: Canyon Country Phone: 818 777 5937

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Representing: Crystal Springs Ranch HOA

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Susan M. Carey
Signature of Speaker

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City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 12-21-10 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: Support Recommendation Oppose Recommendation Neutral - 3

Name: Greg Foster

Street Address: 27327 Bronco DR.

City: Canyon Country Phone: 661-2988022

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Representing:

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Signature of Speaker

Gregory A. Foster

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City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: December 21, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon Ranch

Please check one: Support Recommendation Oppose Recommendation X Neutral

Name: Penny Lipton

Street Address: 28154 LaVeda Ave

City: Canyon Country Phone: 661-251-2840

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: myself

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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Signature of Speaker

Penny Lipton

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City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 12-22-10 Agenda item number: Item 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: [] Support Recommendation [] Oppose Recommendation [] Neutral

Name: Lynne Plambek for SCOPE

Street Address: PO Box 1182

City: Canyon Country CA 91386 Phone:

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

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Signature of Speaker (handwritten signature)

For tips on making your presentation, see reverse side.

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City of SANTA CLARITA

Planning Commission Request to Speak

If you wish to speak before the Planning Commission, please complete the following information and turn this form in to the Planning Commission Secretary. (Please print clearly.)

Meeting date: 12-21-10 Agenda item number: Public Comment

Agenda title or subject to be addressed:

Please check one: [] Support Recommendation [] Oppose Recommendation [] Neutral

Name: Lynne Plambek

Street Address:

City: Phone:

The Planning Commission requires that speakers who represent other individuals, groups or organizations disclose that relationship.

Representing: SCOPE

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Signature of Speaker (handwritten signature)

For tips on making your presentation, see reverse side.

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City of
SANTA CLARITA

Planning Commission

Written Comment Card

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Meeting date: Dec 21, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon Project

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Suzanne Silva

Street Address: 28133 La Veda Ave City: Santa Clarita CA

Written Comment (Use other side if necessary): Interested in knowing 91387
how traffic will be affected on Lost Canyon Rd

The Planning Commission requires that persons registering written comments who represent other individuals, groups or organizations disclose that relationship.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: _____ Signature: [Handwritten Signature]

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).

(written comment continued)

to La Veda Ave and do the families that
commute to Sulphur Springs Elem School
and Precrest know about this traffic impact?
What are the plans for the parking needs of
families that park in front of Sulphur
Springs?

Lobbyist Registration: Under § 7.03.010 of the Santa Clarita Municipal Code, lobbyists are required to register with the City Clerk's Office. A "lobbyist" means any individual or entity employed, retained or otherwise engaged for compensation to communicate with any elective or appointed official, any officer or employee or any task force, committee, board, commission, or other body of the City for the purpose of influencing any legislative or administrative action.

A regular employee of an organization, communicating to the City during the course of their employment, an individual communicating on behalf of a group or organization and not receiving compensation for such action, or an individual communicating on their own behalf would NOT be considered a lobbyist.



City of
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Planning Commission

Written Comment Card

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Meeting date: Dec 21, 2010 Agenda item number: 2

Agenda title or subject to be addressed: Vista Canyon

Please check one: Support Recommendation Oppose Recommendation Neutral

Name: Kerry Tabak

Street Address: 28140 La Veda City: Cyn Contry Ca.

Written Comment (Use other side if necessary): - notification needs to be given to the parents of the students that do not

The Planning Commission requires that persons registering written comments who represent other individuals, groups or organizations disclose that relationship.

I DECLARE THAT THE FOREGOING IS TRUE AND CORRECT.

Representing: Kerry Tabak Signature: [Handwritten Signature]

Please check here if you are a registered lobbyist with the City of Santa Clarita (see back of card for more information).

(written comment continued)

live in immediate area (those that come from
Timberlane / Mammoth area) - Also after the
restructure of Lost Cyn Rd (in front of school) we on
La Veda would like to meet w/ Traffic Commission
regarding traffic flow + additional school
parking availability

Lobbyist Registration: Under § 7.03.010 of the Santa Clarita Municipal Code, lobbyists are required to register with the City Clerk's Office. A "lobbyist" means any individual or entity employed, retained or otherwise engaged for compensation to communicate with any elective or appointed official, any officer or employee or any task force, committee, board, commission, or other body of the City for the purpose of influencing any legislative or administrative action.

A regular employee of an organization, communicating to the City during the course of their employment, an individual communicating on behalf of a group or organization and not receiving compensation for such action, or an individual communicating on their own behalf would NOT be considered a lobbyist.

**LETTER NO. D3 COMMENTS RECEIVED AT THE DECEMBER 21, 2010 PLANNING
COMMISSION HEARING**

1. Robert Nolet, Superintendent of the Sulphur Springs School District (District), indicated that the project was beneficial for the District. Mr. Nolet also noted that the project applicant had entered into a school agreement with the District, which provides for construction funding for a school north of SR-14.

The comment restates school information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

2. Susan Carey appeared on behalf of the Crystal Springs Homeowners Association and expressed opposition to the project. Ms. Kerry noted the impact of traffic along Soledad Canyon, Sand Canyon, and Lost Canyon roads. Ms. Carey stated that the investigation in the EIR does not appear to be adequate. Ms. Carey stated that the project was too dense and not compatible with the surrounding area. Ms. Carey also suggested that there should be an on-and off-ramp directly accessible to the project.

Ms. Carey's comments concerning the Crystal Springs Homeowners Association's opposition to the project, project density and compatibility with surrounding areas, and adequacy of the EIR are acknowledged. These comments only express the opinions of the commenter. The comments will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comments do not raise an environmental issue, no further response is required.

Post-project traffic conditions along Soledad Canyon, Sand Canyon, and Lost Canyon roads is discussed in depth in Section 4.3, Traffic and Access, of the Draft EIR. Also, there is not enough traffic volume attributable to the proposed project to warrant additional on- and off-ramps to SR-14, nor is there a feasible design to accommodate said on/off ramps.

3. Greg Foster stated that he did not know much about the project but that he felt that the EIR was comprehensive. He was concerned with the additional traffic generated by the project, particularly Soledad Canyon Road and Sand Canyon Road. Mr. Foster noted that he liked the project. Mr. Foster suggested that the project should be designed consistent with Alternative 5.

Please see **Response 2**, above, with regard to traffic, and in particular the Soledad Canyon and Sand Canyon roadways.

Mr. Foster's support for Alternative 5 also is acknowledged. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

4. Penny Upton stated that she did not have enough time to review the Draft EIR. Ms. Upton was concerned with the impacts of connecting Lost Canyon Road to the project. Ms. Upton also stated that she was asking for a meeting in January with the City's Traffic Engineer.

With regard to Ms. Upton's comments regarding adequate time to review the Draft EIR, the comment period for the Draft EIR complied with all of the noticing and duration requirements of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

The impacts of connecting Lost Canyon Road to the project are discussed in detail in Section 4.3, Traffic and Access. Ms. Upton's request to meet with the City's Traffic Engineer is noted, but does not raise an environmental issue within the meaning of CEQA. However, it should be noted that City staff met with Ms. Upton in January 2011. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

5. Lynne Plambeck, SCOPE, asked if comments could be submitted up to January 15, 2010. Ms. Plambeck also noted that the FEMA line is not the resource line and FEMA is not concerned with wildlife. Ms. Plambeck stated that, before any action is taken on the Vista Canyon project, the project should receive its federal and state permits first. Additionally, Ms. Plambeck stated that the project must look at chlorides. Finally, Ms. Plambeck noted that CLWA does not have enough water and that people must use a contaminated source of water.

Ms. Plambeck's comment with regard to the submittal of comments provides factual background information only and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Section 4.20, Santa Clara River Corridor Analysis, of the Draft EIR specifically addresses the issue of the resource line and FEMA on page 4.20-1:

This existing SEA overlay generally corresponds to the limits of the Federal Emergency Management Agency (FEMA) 100-year floodplain elevation. [¶] Based on detailed biota surveys completed for the proposed project, the existing SEA/FEMA overlay boundary does not correspond to the sensitive riparian and jurisdictional resources within the

project site. Therefore, the project proposes a General Plan Amendment, which would revise both the land use designation for the Vista Canyon property to SP (Specific Plan), and adjust the existing SEA/FEMA overlay boundary to correspond to the area to be designated SP-OS (open space within the Santa Clara River Corridor). Proposed project impacts to biological resources within the existing SEA/FEMA overlay area would not be considered significant because the project design proposes to minimize impacts to jurisdictional and sensitive riparian-associated resources on site, and assure project compatibility with ongoing ecological functions of the post-project SEA/FEMA overlay area. In addition, the project's proposed development footprint corresponds to and preserves and enhances the sensitive biological and jurisdictional resources present within the River Corridor on the project site, and is designed to: (a) be compatible with the sensitive biological resources present, including the set aside of undisturbed areas; (b) maintain the Santa Clara River watercourse in a natural state; (c) maintain the existing east-west wildlife movement area within the Santa Clara River Corridor; (d) preserve adequate buffer areas between proposed development and sensitive natural resources; and (e) ensure that roads and utilities are designed to reduce or avoid impacts to sensitive biological and jurisdictional resources.

In other words, the analysis concurs with Ms. Plambeck's opinion that the FEMA line is not the resource line.

Ms. Plambeck's request that no action be taken on the Vista Canyon project until such time that applicable federal and state permits have been issued is acknowledged. This request only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

The comment states that the County Sanitation Districts have failed to meet the Santa Clara River chloride total maximum daily load (TMDL) standard of 100 mg/L, mainly as a result of the increase in use of State Water Project (SWP) water, and that this failure resulted in the stakeholder development of a comprehensive compromise plan to achieve compliance.

SWP water intended for use by the Castaic Lake Water Agency (CLWA) is conveyed through the West Branch of the California Aqueduct to Quail and Pyramid Lakes and then to Castaic Lake, the terminus for the West Branch. Chloride concentrations in SWP water at Castaic Lake have been consistently below 80 mg/L since 2004 based on data collected by CLWA (see Figure 1, below). This water quality is well below the adopted SSOs for Santa Clara River Reach 5 (*e.g.*, 150 mg/L as a 12-month rolling average) and the lower reaches of the Santa Clara River (*e.g.*, 117 mg/L as a 3-month rolling average at Reach 4B, downstream of Blue Cut). Therefore, SWP water is not expected to cause the Santa Clarita Sanitation District to fail to meet the TMDL for chloride.

Chloride in SWP Locations
CY 2004 - 09

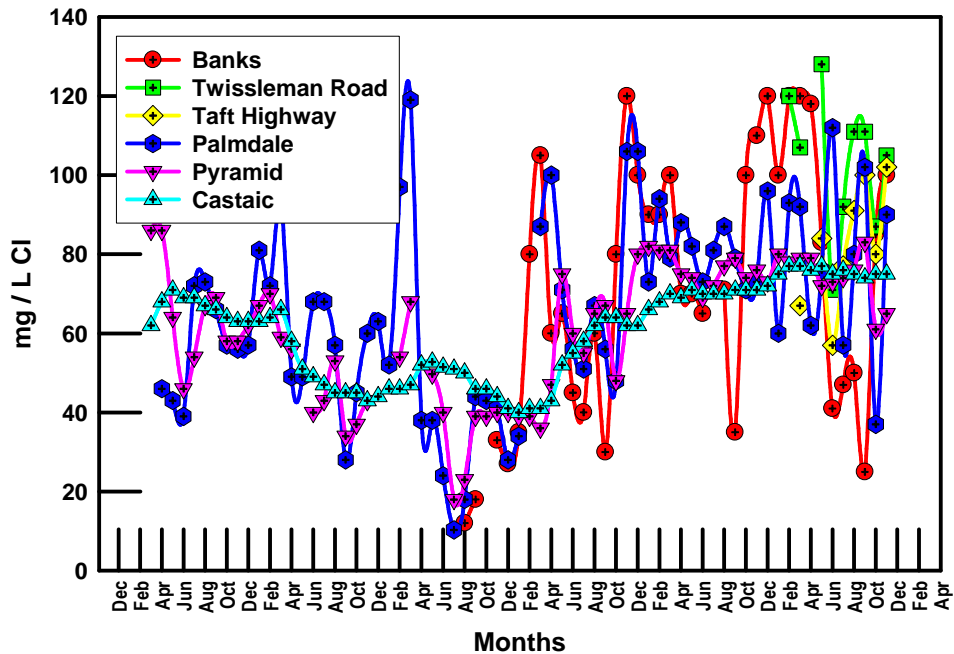


Figure 1: Chloride Concentrations in Locations throughout the State Water Project

The Los Angeles Regional Water Quality Control Board (RWQCB) first adopted a TMDL for chloride in the Upper Santa Clara River in October 2002 (Resolution No. 2002-018). On May 6, 2004, the RWQCB amended the Upper Santa Clara River chloride TMDL to revise the interim wasteload allocations (WLAs) and implementation schedule (Resolution 04-004). The amended TMDL was approved by the State Water Resources Control Board (SWRCB), Office of Administrative Law, and the USEPA, and became effective on May 4, 2005.

As stated in the TMDL, the principle source of chloride loads in the Upper Santa Clara River is the effluent from the Saugus and Valencia water reclamation plants (WRP). The WRP effluent chloride load is comprised of two main sources: chloride present in the imported water supply and chloride added by residents, businesses, and institutions in the Saugus and Valencia WRP service areas. The chloride load added by users can be further divided into two parts: brine discharge from self-regenerating water softeners (SRWS) and all other loads added by users. Excluding the chloride load that exists in the water supply, non-SRWS sources of chloride include: residential, commercial, industrial, infiltration, and wastewater disinfection. The two largest sources of chloride in the WRP effluent are the imported water supply and SRWS, which have historically comprised from 37 percent to 45 percent and from 26 percent to 33 percent of the chloride in the WRP effluent, respectively (RWQCB, 2008).

At the time the TMDL was adopted and approved, there were key scientific uncertainties regarding the sensitivity of crops to chloride and the complex interactions between surface water and groundwater in the Upper Santa Clara River watershed. The TMDL recognized the possibility of revised chloride water quality objectives (WQO) and included mandatory reconsiderations by the RWQCB to consider Site Specific Objectives (SSO). The TMDL required the County Sanitation Districts to implement special studies and actions to reduce chloride loadings from the Saugus and Valencia WRPs. The TMDL included the following special studies to be considered by the RWQCB:

- Literature Review and Evaluation (LRE) – review agronomic literature to determine a chloride threshold for salt sensitive crops.
- Extended Study Alternatives (ESA) – identify agricultural studies, including schedules and costs, to refine the chloride threshold.
- Endangered Species Protection (ESP) – review available literature to determine chloride sensitivities of endangered species in the Upper Santa Clara River.
- Groundwater and Surface Water Interaction Study (GSWI) – determine chloride transport and fate from surface waters to groundwater basins underlying the Upper Santa Clara River.
- Conceptual Compliance Measures – identify potential chloride control measures and costs based on different hypothetical WQO and final WLA scenarios.
- Site Specific Objectives and Antidegradation Analysis – consider a site-specific objective for chloride based on the results of the agricultural chloride threshold study and the GSWI.

The TMDL special studies were conducted in a facilitated stakeholder process in which stakeholders participated in scoping and reviewing the studies. This process has resulted in an alternative TMDL implementation plan that addresses chloride impairment of surface waters and degradation of groundwater. The alternative plan, termed Alternative Water Resources Management (AWRM), was first set forth by Upper Basin water purveyors and United Water Conservation District (UWCD), the management agency for groundwater resources in the Ventura County portions of the Upper Santa Clara River watershed.

Revised Chloride TMDL Resolution No R4-2008-012, which was approved by the RWQCB on December 11, 2008, established numeric targets that are equivalent to conditional SSOs. The conditional SSOs are based on the technical studies regarding chloride levels, which protect salt sensitive crops and endangered and threatened species, chloride source identification, and the magnitude of assimilative capacity in the upper reaches of the Santa Clara River and underlying groundwater basin. The conditional chloride SSO of 150 mg/L (based on a 12-month rolling average) supersedes the previous water quality objective of 100 mg/L for Santa Clara River Reaches 5 and 6. This SSO is conditional in that

it applies only when chloride load reductions and/or chloride export projects are in operation by the County Sanitation Districts. If these conditions are not met, WLAs shall be based on existing water quality objectives for chloride of 100 mg/L.

Lastly, Ms. Plambeck's contention that CLWA does not have enough water and that people will be using a contaminated source of water is unsubstantiated and incorrect. Section 4.8, Water Service, of the Draft EIR concludes that there is adequate water to serve the proposed project.

6. Suzanne Silva indicated her interest in knowing how traffic would be affected on Lost Canyon Road to La Veda Avenue. Ms. Silva also wanted to know if the families who commute to Sulphur Springs Road know about this impact. How will parking be addressed for those who park in front of Sulphur Springs School?

Project impacts to Lost Canyon Road to La Veda Avenue are discussed in detail in Section 4.3, Traffic/Access, of the Draft EIR. In brief, there will be short-term impacts to one of the intersections: Sand Canyon Road/Lost Canyon Road. Recommended improvements at this intersection would not be completed until after Phase 1, as a connection to Lost Canyon Road at La Veda Avenue is not proposed with Phase 1; therefore, the project would have a temporary significant and unavoidable impact. However, implementation of identified mitigation at this intersection as part of project buildout would reduce impacts to a less than significant level.

Sulphur Springs Elementary School and Pinecrest School both take vehicular access from Lost Canyon Road. Presently, this segment of Lost Canyon Road is congested when school is in session during the morning when students are being dropped off and in the afternoon when students are being picked up. The proposed improvements to this segment of Lost Canyon Road include:

- Pavement widening and striping to accommodate one travel lane in each direction with a median turn lane, a trail along the north side of the roadway, a roundabout at the intersection of La Veda Avenue and Lost Canyon Road, and parallel parking on the south side of Lost Canyon Road (these improvements would be completed within the existing right-of-way);
 - Restricting the outbound-only driveways at each school to right-turns to minimize conflicting turning movements (provided that a roundabout is installed at the Sand Canyon Road/Lost Canyon Road intersection); and
 - Construction of a narrow raised median at the easterly Pinecrest School driveway, including a sign prohibiting u-turns.
7. Kerry Tabak stated that notification needs to be given to the parents of the students that do not live in the immediate area (those that come from Timberland/Mammoth area). Additionally, Ms. Tabak requested that after the restructuring of Lost Canyon Road, in front of the school, she would like to meet with the Traffic Commission regarding traffic flow and parking availability.

The comment period and noticing for the Draft EIR complied with all of the noticing and duration requirements of CEQA. Additionally, numerous public hearings on the proposed project have been held before the Planning Commission (October 19, November 2, December 21, 2010, as well as a future meeting scheduled for February 15, 2011), and additional hearings will be held before the City Council. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Ms. Tabak's request to meet with the City's Traffic staff after project improvements are in place is acknowledged. The comment raises issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.