

FINAL ENVIRONMENTAL IMPACT REPORT

The Keystone Project



Prepared for:
City of Santa Clarita

Prepared By:
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Environmental Planning and Research

March 2006

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I. INTRODUCTION

A. CEQA REQUIREMENTS

In accordance with the California Environmental Quality Act (CEQA) and Sections 15088, 15089 and 15132 of CEQA, the City of Santa Clarita has prepared the Final Environmental Impact Report (EIR) for the proposed Keystone project. A Final EIR is defined by Section 15362(b) of the CEQA Guidelines as "...containing the information contained in the Draft EIR; comments, either in verbatim or in summary received in the review process; a list of persons commenting; and the responses of the Lead Agency to the comments received."

Section II of this document contains all comments received on the proposed Keystone project Draft EIR during the document public 45-day review period of July 19, 2005 to September 1, 2005 and at public hearings held by the Planning Commission on June 7, August 30, September 20 and November 15, 2005. Responses to comments received by all interested parties have been prepared and are included in this document. Also, as necessary, are corrections and additions in response to comments received on the document, or as initiated by the Lead Agency (City of Santa Clarita) on the Draft EIR.

This document, along with the Draft EIR (incorporated by reference), make up the Final EIR as defined in the State CEQA Guidelines, Section 15132, which states that:

The Final EIR shall consist of:

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

B. USE OF THE FINAL EIR

The Final EIR allows the public and the decision-making body an opportunity to review revisions to the Draft EIR, the response to comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

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

- That the Final EIR has been completed in compliance with CEQA;

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

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

These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate document (Resolution). Both the Final EIR and the Findings are submitted to the decision making body for consideration of the Proposed Project.

C. REVIEW PROCESS

The Draft EIR for the Keystone project was circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day public review period on beginning July 19, 2005 and concluding September 1, 2005. The Notice of Availability of the Draft EIR was advertised in the local newspapers. The Draft EIR was circulated to state agencies for review through the State Clearinghouse, Office of Planning and Research. In addition, approximately 80 agencies and interested parties received copies of the Draft EIR. Copies of the Draft EIR were also available at the Valencia Library, the Canyon Country Jo Anne Darcy Library and the Planning & Economic Development Department at City Hall. In addition, the Draft EIR and technical appendices were placed on the City's website for public review. During the review period, the public was provided the opportunity to submit written comments on the Draft EIR. Also, three public hearings were held in which the public had an opportunity to provide oral testimony.

D. CHANGES IN THE PROJECT DESCRIPTION SINCE RELEASE OF THE DRAFT EIR

Since the release of the Draft EIR, the Project Applicant brought forward to the Planning Commission at the August 30, 2005 hearing a revised project that included an approximate 33 percent reduction in the total units from 979 residential units (883 multi-family and 96 single family) to 648 units (552 multi-family attached units and 96 single family units). The revised project included an 8.7-acre park and a 1.6-acre private park for the multi-family units use only with additional lookout points. At the September 20, 2005 meeting, the Planning Commission provided comments on the Project Applicant's revised project to city staff and expressed interest in an all single family development, which was analyzed as an alternative in the Draft EIR as Alternative F, Single-Family Alternative. City staff was directed to return to the

November 15, 2005 meeting with a breakdown of Alternative F. In addition, comments from the Commission included the elimination of development west of the LA DWP right-of-way, elimination of the Ermine Street connection, a development scenario that takes the best aspects of each Alternative analyzed in the Draft EIR, and a comparison between the applicant's preferred plan and EIR alternatives.

In response to the Planning Commission's comments, three development scenarios were presented to the Planning Commission at the November 15, 2005 meeting. All three scenarios assumed that the Junior High School site and YMCA site would be provided, graded and prepared. The scenarios also assumed that the multi-use trail and Class1 bike trail remain as part of the project since they are a requirement of the development.

Three Development Scenarios

Scenario A: Applicant's Project Revisions

Staff reviewed the applicant's revised project presented at the August 20, 2005 Planning Commission meeting and provided comments to the Project Applicant who provided revisions based on staff comments. The following is a breakdown of the revisions:

Scenario A included a total of 260 Single Family and 388 Multi Family units, resulting from a reduction in number of residential units from 96 Single Family and 883 Multi-Family units. The reduction in the number of total residential units would change the requested General Plan Amendment and Zone Change from Residential Medium High to Residential Moderate. The Residential Moderate designation with slope density would allow for a total of 848 units. The applicant's proposed number of units would fall below the maximum allowed by 200 units. In addition, this development scenario would be similar to Alternative E, in the Draft EIR, which allows for a mix of single-family and multi-family residential units resulting in a total of 692 dwelling units.

With the reduction in the number of residential units, the project development envelope and grading will remain the same. Development west of the DWP right-of-way will include 96 single-family residential units as originally proposed. Development east of the DWP right-of-way will include three development pads that contain a mix of detached single-family residential units for sale townhouse residential units.

Elimination of "for rent" apartment units – the applicant's elimination of the "for rent" product is a response to comments communicated at the June 7, 2005 Planning Commission meeting.

Six-acre public park – the applicant is proposed to add a six-acre park that will be City owned and maintained. The park will include a splash pad, dog park, non-programmed sports fields, bathrooms, and picnic areas.

Additional knoll parks and trails – the applicant is proposed several "knoll" parks that would be owned and maintained by the Homeowners Association, but would have pedestrian accessibility to the public

through the network of paseos and trails that run through the project site. In addition, the applicant is also proposed a trail and trail head which connects from the Ermine Street neighborhood to the Class 1 bike trail along Golden Valley Road, providing pedestrian access from Sky Blue Mesa Elementary School to the proposed Junior High School and YMCA sites. These are additional amenities to the project and are above and beyond the trails that are required to be provided for the project site, such as the multi-use trail along the south of the project site and the Class 1 bike trail along Golden Valley Road.

Recreation for Single-family and multi-family developments – The applicant is proposed a 1.6 acre private recreation facility along proposed “I” street. This facility would provide private recreational amenities such as a pool and recreation room for the residents of both the Single-family and multi-family residential areas.

Junior High School and YMCA – both the Junior High School and YMCA site would remain as part of the revised project. However, the change would be that the site for the Junior High School would be deeded to the Hart Union School District rather than offering it for sale to the District. The YMCA site would still be deeded to the YMCA as proposed previously. In addition, the applicant is offered a contribution of two million dollars to the Hart Union School District for the Performing Arts program. These changes are memorialized in the Mitigation Agreement between the applicant and the School District.

Contribution to the City of Santa Clarita – The applicant is proposing to make a monetary contribution of \$200,000 to the completion of the multi-use trail east of the project site. The multi-use trail that runs along the southern portion of the project site is identified as a future trail on the City’s Regional Trails Map. The multi-use trail along this portion of the City, stretches from Central Park and continues through the approved Riverpark project. The Keystone project is providing the trail through the project site with an extension west to the Riverpark project. The trail is planned to continue east of the Keystone project site to Discovery Park.

Scenario B1 & B2 - Alternative F, Single Family Alternative

Per the direction of the Planning Commission, staff has prepared a breakdown of the components of Alternative F, with a description of each in italics. Scenario B1 is reflective of Alternative F as analyzed in the Draft EIR. Scenario B2 is reflective of Alternative F without development of the 96 single-family homes west of the DWP right-of-way.

Scenario B1

Total of 383 Single Family Residential units on typical fee lots. The total number of units will include 96 lots to be built west of the DWP right-of-way, as originally proposed and 287 units to be built east of the DWP right-of-way on four residential development pads. This development scenario would require a General Plan Amendment and Zone Change to Residential Suburban (RS).

With this scenario, the same areas would be graded, totaling 5.4 million cubic yards and 1.8 million cubic yards of remedial grading. The spatial extent of development east and west of the DWP right-of-way would be the same as with the originally proposed project of 979 units, although fewer total units would be constructed and all the units would consist of single family detached homes rather than multi-family. This is due primarily to the construction of Golden Valley Road. In order to grade the project site for the extension of Golden Valley Road, several plateaus or development pads would need to be created. In addition, this scenario would still alter both of the secondary ridgelines on site, the western secondary ridgeline for the construction of the 96 single family homes west of the DWP right-of-way and the eastern secondary ridgeline for the construction of 287 single family homes on the four development pads east of the right-of-way.

Junior High School and YMCA would consist of the provision of finished graded pads for the proposed Junior High School and proposed YMCA. These sites would then be offered for sale by the applicant to both the Hart Union School District and YMCA. The applicant has indicated that while these sites would be offered for sale, it is unlikely that either the Hart Union School District or the YMCA would purchase the properties. In the event that neither of the properties is purchased by the School District or YMCA, these sites would not be developed. In addition, if a Junior High School does not locate on-site, the school mitigation agreement between the Hart Union School District and the applicant would become null and void, including the two million dollar contribution to the School District's performing arts program.

Scenario B2

Total of 287 Single Family residential units on typical fee lots. The total number of residential units would be built east of the DWP right-of-way, leaving the area west of the DWP right-of-way undeveloped.

The perceived benefits of not developing west of the DWP include preservation of the northwest canyon and blueline stream, provision of a north/south wildlife corridor and preservation of the western secondary ridgeline. However, preservation of the canyon would mean that 217,000 cubic yards of earth that would otherwise be balanced on site, would need to be exported off-site. In addition, although this scenario would preserve the western secondary ridgeline, the eastern secondary ridgeline would still be altered in order to construct Golden Valley Road. Further, the Draft EIR states that because of extensive urban development in areas to the north (SunCal development), west (approved Riverpark project) and south (existing high intensity industrial uses) of the project site, there is not a north/south wildlife corridor. However, the Santa Clara River, which traverses the southern boundary of the site and functions as the major east-west corridor in the vicinity of the site also provides for regional connectivity and would be maintained under either scenario.

Junior High School and YMCA would consist of the provision of finished graded pads for the proposed Junior High School and proposed YMCA. These sites would then be offered for sale by the applicant to both the Hart Union School District and YMCA. The applicant has indicated that while these sites would

be offered for sale, it is unlikely that either the Hart Union School District or the YMCA would purchase the properties. In the event that neither of the properties is purchased by the School District or YMCA, these sites would not be developed. In addition, if a Junior High School does not locate on site, the school mitigation agreement between the Hart Union School District and the applicant would become null and void, including the two million dollar contribution to the School District's performing arts program.

Alternatives B1 and B2 do not include the following project components:

- Six-acre public park
- Additional knoll parks and trails
- Dedication of 24 acres to the Hart Union School District and YMCA
- Contribution of two million dollars to the Hart Union School District
- Contribution of five million dollars to the City for construction of the multi-use trail east of the project site.

Scenario C – Combination of Alternatives

Scenario C is a middle ground between the applicant's proposal and Alternative F, and takes the best aspects of all the Alternatives analyzed in the Draft EIR, with more single family residential units and less multi-family residential units. However, this scenario provides for all the amenities as proposed by the applicant. A breakdown of this scenario is provided as follows:

Total of 319 Single-family and 180 Multi-family residential units. This alternative would include a mix of both single family and "for sale" townhome residential units. However, the split between the number of units would differ from the applicant's proposal by increasing the number of single family units and decreasing the number of multi-family units. This development scenario includes 319 single family residential units and 180 "for sale" townhouse units. The mix of housing units would allow for three different housing types: fee lots with homes from 3,000 to 4,000 square feet; detached single family condo units of 1,400 – 2,100 square feet; and attached townhouse units. The project site would result in 47 acres of single family development, 10 acres of townhouse units and 24 acres of school and YMCA sites.

This development scenario is a result of taking the best parts of the Alternatives, and responds to comments heard in the past at Planning Commission study sessions and in Commission discussions regarding other recent residential proposals.

Six-acre public park – the six-acre park would be included with this scenario and would be City owned and maintained. The park would include a splash pad, dog park, non-programmed sports fields, bathrooms, and picnic areas.

Additional knoll parks and trails – the scenario would include several "knoll" parks that would be owned and maintained by the Homeowners Association, but would have pedestrian accessibility to the

public through the network of paseos and trails that run through the project site. In addition, the applicant also proposed a trail and trail head which would connect from the Ermine Street neighborhood to the Class 1 bike trail along Golden Valley Road, providing pedestrian access from Sky Blue Mesa Elementary School to the proposed Junior High School and YMCA sites. These are additional amenities to the project and are above and beyond the trails that are required to be provided for the project site, such as the multi-use trail along the south of the project site and the Class 1 bike trail along Golden Valley Road.

Junior High School and YMCA – both the Junior High School and YMCA site would remain as part of this scenario. Both the Junior High School site and YMCA site would be deeded to the Hart Union School District and YMCA, respectively. In addition, the applicant is offering a contribution of two million dollars to the Hart Union School District for the Performing Arts program. The contribution is memorialized in the Mitigation Agreement between the applicant and the School District.

Recreation for Single-family and multi-family developments – The applicant proposed a 1.6 acre private recreation facility along proposed “I” street. This facility would provide private recreational amenities such as a pool and recreation room for the residents of both the Single-family and multi-family residential areas.

Contribution to the City of Santa Clarita – The applicant proposed to make a monetary contribution of \$200,000 to the completion of the multi-use trail east of the project site. The multi-use trail that runs along the southern portion of the project site is identified as a future trail on the City’s Regional Trails Map. The multi-use trail along this portion of the City, stretches from Central Park and continues through the approved Riverpark project. The Keystone project is providing the trail through the project site with an extension west to the Riverpark project. The trail is planned to continue east of the Keystone project site to Discovery Park.

Elimination of Ermine Street connection

None of the three scenarios included elimination of the Ermine Street. The connection was a topic of discussion throughout the public hearing process. At the direction of the Planning Commission at their June 7, 2005 meeting, staff added to the Draft EIR an Alternative, which analyzed the elimination of the Ermine Street connection.

Preferred Development Scenario

At the November 20, 2005 Planning Commission Public Hearing, the three development scenarios as identified previously were presented. Based on discussion and comments from staff and the public, the Planning Commission recommended for City Council consideration Scenario C with the additional provision that Ermine Street not be connected to Golden Valley Road and a cul-de-sac be provided at its current western terminus, east of the project site. The footprint of the development would remain the

essentially the same under this scenario with fewer residential units as analyzed in alternatives in the Draft EIR and thus, the change in density of units would not be considered significant new information. The reduction of units does not change the conclusions of the Draft EIR, including conclusions relating to significant unavoidable impacts to construction and operational air quality, aesthetics (change in visual character), construction noise, traffic (nine intersections) and solid waste. However, the elimination of the roadway connection between the current western terminus of Ermine Street and Golden Valley Road would remove the cumulatively considerable noise operational impact to current residents along that roadway. With that exception, the impact area as analyzed in the Draft EIR would remain the same and not result in any changes to the conclusions in the Final EIR.

E. REVISIONS TO THE DRAFT EIR

Text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the document, or as initiated by Lead Agency (City) staff. The comment letters provided by California Department of Fish and Game, South Coast Air Quality Management District, Southern California Association of Governments and County Sanitation Districts of Los Angeles County provided comments requiring clarification and thus text changes.

F. MITIGATION MONITORING PROGRAM

A Mitigation Monitoring Program (MMP) will be adopted by the City Council for the Keystone project, as required for compliance with Section 21081(a) and 21081.6 of the Public Resources Code. The proposed MMP is included in this Final EIR.

G. ORGANIZATION OF THIS FINAL EIR

This document, together with the Draft EIR for the Proposed Project and the Technical Appendices to the Draft EIR, constitute the “Final EIR” for the Proposed Project. The Draft EIR consisted of the following:

- The Draft EIR, which included the environmental analysis for the Proposed Project; and
- Technical Appendices, which included:

Volume I

- Appendix 1: Notice of Preparation/Initial Study Materials
 - A. Notice of Preparation/Initial Study
 - B. Responses to the Notice of Preparation
- Appendix 2: Air Quality Calculations

- Appendix 3: Biological Resources
 - A. Draft Biological Assessment (February 21, 2005)
 - B. Oak Assessment Report (January 3, 2005)
 - C. Preliminary Jurisdictional Delineation (January 21, 2005)
- Appendix 4: Cultural Resources
 - A. Phase 1 Cultural Resources Investigation (2005)
 - B. Paleontological Resources Inventory/Impact Assessment (July 2004)

Volume II

Appendix 5: Geologic and Technological Report (June 2004)

Volume III

Appendix 6: Hazards

- A. Phase 1 Environmental Site Assessment, 117-acre site (May 2003)
- B. Phase 1 Environmental Site Assessment, 17-acre site (November 2003)
- C. Phase 1 Environmental Site Assessment, 75-acre site (November 2003)
- D. Phase 1 Environmental Site Assessment, Parcel Map No. 2812 site (May 2004)

Volume IV

Appendix 7: Hydrology and Water Quality

- A. Floodway Study/Drainage Concept for Tentative Tract 060258 (November 2004)
- B. Addendum #1 For Floodway Study/Drainage Concept for Tentative Tract 060258 (November 2004) (December 2004)

Volume V

- C. Keystone Project Water Quality Technical Report (February 2005)

Appendix 8: The Keystone, Traffic Impact Analysis (March 2005)

Appendix 9: Noise Calculations

Appendix 10: SB 610 Water Supply Assessment for the Keystone Project (March 2005)

The Final EIR is organized in the following sections:

I. Introduction

This section is intended to provide an overview of the CEQA requirements an EIR history for the Proposed Project.

II. Responses to Comments

This section includes detailed responses to comment letters submitted to the City during the public review period and summary of comments raised during the public hearings and responses to those comments.

III. Corrections and Additions

This section provides a complete overview of the corrections and additions that have been incorporated into the Draft EIR in response to comments submitted during the public review period.

IV. Mitigation Monitoring Program

This section includes a list of the required mitigation measures and includes detailed information with respect to the City's policies and procedures for implementation of the recommended mitigation measures. This Mitigation Monitoring Program (MMP) identifies the monitoring phase, the enforcement phase and the applicable department or agency who is responsible for ensuring each recommended mitigation measure is implemented.

II. RESPONSES TO COMMENTS

A. OVERVIEW

The purpose of the Draft Environmental Impact Report (Draft EIR) is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the CEQA Guidelines states the following regarding standards from which adequacy is judged:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information, which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. This typically requires clarification of points contained in the Draft EIR. Section 15088 of the CEQA Guidelines describes the evaluation CEQA requires in the response to comments. It states that:

The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

B. LIST OF THOSE WHO COMMENTED ON THE DRAFT EIR

A total of 8 comment letters for the Draft EIR were received by the Community Development Department of the City of Santa Clarita. All written comments are excerpted and responded to in this section. Each comment letter has been assigned a corresponding "number." And comments in each letter are numbered. For example, Letter "1" is from California Department of Fish and Game (CDFG). The comments in the CDFG letter are numbered 1-1 through 1-14 and the responses are numbered 1-1 through 1-14 indicating the letter number and the corresponding response number.

Written comments made during the public review of the Draft EIR intermixed points and opinions relevant to the environmental review. The responses acknowledge comments addressing points and opinions relevant to consideration for project approval, and discuss as necessary the points relevant to the environmental review.

The following agencies and/or persons submitted comments on the Draft EIR

1.	Larry I. Eng, Ph.D., California Department of Fish and Game	August 30, 2005
2.	Cheryl J. Powell, California Department of Transportation, District 7	September 9, 2005
3.	Steve Smith, Ph.D., South Coast Air Quality Management District	September 2, 2005
4.	Brian Wallace, Southern California Association of Governments	August 22, 2005
5.	Ruth I. Frazen, County Sanitation Districts of Los Angeles County	August 24, 2005
6.	David R. Leininger, Fire Department, Los Angeles County	January 24, 2006
7.	Elizabeth A. Cheadle, Santa Monica Mountains Conservancy	August 22, 2005
8.	John and Sandra Powell, 20468 Ermine Street, Santa Clarita	August 26, 2005
9.	Ronald and Anne Marie Rudzinski, 27519 Label Avenue, Santa Clarita	August 29, 2005

In addition to the written comments, the Planning Commission heard comments from the public at the Public Hearings held on August 30, 2005, September 20 August 2005 and November 15, 2005.

C. COMMENTS AND RESPONSES

Written Comments

Comment letters on the Draft EIR followed by corresponding responses, begin on the following page.



State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME

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August 30, 2005

BY FACSIMILE AND U.S. MAIL

Ms. Heather Waldstein, Associate Planner
City of Santa Clarita
23920 Valencia, Boulevard, Suite 300
Santa Clarita, CA 91355-2196
Fax No.: (661) 286-4007



Draft Environmental Impact Report for
Keystone Project
SCH # 2004081017, Los Angeles County

Dear Ms. Waldstein:

The Department of Fish and Game (Department) has reviewed the Draft Environmental Impact Report (DEIR) for the above referenced project relative to impacts to biological resources. The project consists of the development of ten parcels of vacant land totaling approximately 246 acres for single-family homes, a school, a YMCA, open space, and roadways. The project site supports coastal sage scrub habitat within designated critical habitat of the coastal California gnatcatcher, and four drainages including the Santa Clara River. The project is located at the westerly extent of Ermine Street, north of the Santa Clara River and Soledad Canyon Road, south of the intersection of Bouquet Canyon Road and Plum Canyon, City of Santa Clarita. The project is bounded to the south by the Santa Clara River and industrial uses, to the east by the proposed Riverpark residential project, to the north by vacant lands and suburban uses, and to the east by vacant lands a suburban uses.

These comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources (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 the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq.:

IMPACTS TO BIOLOGICAL RESOURCES

- 1. Sensitive Wildlife Resources - The DEIR states that adverse impacts to habitat for special status bird species observed on site such as yellow warbler, Bell's sage sparrow, yellow-breasted chat and loggerhead shrike would not be considered significant under CEQA because these species are still 'widespread and common in the region'. Similarly loss of spadefoot habitat was concluded not to be significant because only one individual spadefoot was observed.
a. The Department does not concur with the conclusions in the DEIR regarding loss of habitat for the above special status species. The proposed loss of the majority of the southern cottonwood willow riparian forest in Drainage C and upland habitat on the project site is a direct and cumulative adverse

1-1

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Agenda Item: 1

<p>impact to these species. Loss of these habitats as the result of development and other incompatible land use practices has contributed to regional population declines. Impacts to these species and their habitats should be considered significant. The project should be redesigned to avoid suitable habitats for these species within open space preserve areas on site including Drainage C. The Department recommends annual focused protocol surveys for least Bell's vireo and southwestern willow flycatcher prior to any unavoidable impacts to riparian habitat within Drainage C. The presence of listed species in subsequent years prior to site development would require further consultation with the Department under the California Endangered Species Act (sect 2080 et seq.).</p>	1-2 contd.
<p>b. The observation of only one spadefoot toad, a California Species of Special Concern, cannot justify a conclusion of insignificance under CEQA. The DEIR did not indicate if population studies were conducted to estimate total individuals of this species and to what extent spadefoot utilize the project site for reproduction, foraging and aestivation. The presence of breeding ponds or other pools which could be used by spadefoot during the breeding season was also not discussed. Spadefoots are inherently difficult to survey for unless there are breeding pools from which to observe egg masses and larva during years of adequate precipitation. For example, on the adjacent Riverpark project, spadefoot were not originally documented until greater efforts were taken to detect this species. The observation of one spadefoot suggests a larger population than one individual on the project site. Spadefoots require adequate upland habitat in which to aestivate and to escape high seasonal flooding. The Department recommends avoidance of spadefoot habitat including uplands adjacent to any potential breeding ponds. Mitigation for the unavoidable loss of seasonal breeding pools for spadefoot should include the creation of such seasonal ponds within preserve areas with suitable adjacent uplands.</p>	1-3 1-4
<p>c. The White-tailed kite (WTK), a California Fully Protected Species, nested at two locations during the 2005 nesting season within the Santa Clara River to the west of the project site. One territory extended just east of the California Aqueduct. The kites were observed using the riverbed for the majority of their foraging during the nesting season. The proposed project may adversely impact WTK if conducted during the nesting season within 500 feet of active nests or within documented foraging areas used by kites during the nesting season. These areas must be avoided as the Department cannot authorize by permit or otherwise the take of fully protected species. WTK nest sites and roost sites are easily disturbed by artificial night light spillover onto natural habitat areas. All proposed night lighting should be directed away from such areas.</p>	1-5
<p>2. <u>Department Jurisdictional Drainages</u> – The project would impact a total of 4.26 acres within Department jurisdiction. The majority of preservation within Department jurisdiction would take place in the Santa Clara River Wash.</p>	1-6
<p>a. It is not clear in the impact section of the DEIR where or how much impact to Department jurisdiction will occur per drainage. In addition the DEIR is not clear in its description on the location of Drainages A-C. A dark line indicating each drainage and tributary on Figure V.D-3, would help clarify this issue.</p>	1-7

Letter 1

Ms. Heather Waldstein
August 30, 2005
Page 3

Figure V.D-1 shows that southern Cottonwood-willow Riparian Forest exists in what appears to be drainage C. This is also the drainage where special status bird species such a yellow warbler and yellow-breasted chat were observed on site. It appears that 2.44 acres of this habitat out of a total of 3.09 acres is slated for loss due to the proposed project. The DEIR does not state in the biological impact section if the loss is permanent or temporary. This should be clarified.

1-8

- b. The Department understands from a previous site visit with project consultants to discuss Department jurisdictional issues that the project will result in the loss of mainland cherry forest (MCF), a very threatened natural community. This community was not included as a vegetative community on page 275 of the DEIR or as a project impact. The loss of mainland cherry forest would be considered significant under CEQA. The Department recommends avoidance and preservation of MCF since mitigation for loss of this community would necessitate a high mitigation ratio in any stream alteration agreement required by the Department.

1-9

MITIGATION MEASURES

- 1. Mitigation for Loss of Vegetative Communities - The DEIR states that mitigation for sensitive vegetative communities including coastal sage scrub within designated critical habitat for the coastal California gnatcatcher will be accomplished via habitat restoration and/or acquisition. Loss of CSS habitat is proposed at a 1:1 ratio.

The DEIR lacks detail on where restoration and/or acquisition will occur for loss of vegetative communities. The Department does not support restoration for sensitive plant communities within manufactured slopes. Impacts for loss of coastal sage scrub should occur at a minimum of 2:1 and often up to 10:1 for areas proposed for restoration to mitigate for temporal losses to native habitats. Specific locations for habitat acquisition for loss of sensitive vegetative communities should be included in the EIR for review and comment.

1-10

- 2. Habitat Restoration Success Criteria – Success criteria should be included in the mitigation monitoring plan as described in the EIR for all habitat restoration, creation, and/or acquisition/s proposed for mitigation for losses of habitat for special status species. Mitigation should not be considered complete until it is confirmed that these areas are used by the special status species for which the mitigation was designed. The use level by target species should be at a minimum equal to that which was documented on the project site.

1-11

- 3. Avoidance of Nesting Birds – The DEIR states that to assist in the avoidance of take of native birds, preconstruction surveys for nesting birds will take place between January 31st and August 1, if grading or grubbing of vegetation is proposed during that time.

- a. The Department recommends that nesting bird surveys be conducted until August 31st to avoid take of late nesting birds including white-tailed kite which may reside on/near the construction site. White-tailed kites may rear more than one brood and could still have dependant young later into the nesting season.

1-12

Ms. Heather Waldstein
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Letter 1

- b. In addition to vegetated areas, bird surveys should be conducted within all potential nesting habitat including unvegated ground surfaces for ground nesters and human structures that will be disturbed by project activities. 1-13
- c. As a mitigation measure the DEIR proposes to retain the Santa Clara River and other portions of on site habitat within Drainage C and elsewhere. Mitigation areas need to provide maximum habitat values in order to be considered adequate and meaningful mitigation under CEQA. This portion of the Santa Clara River offered as mitigation is currently impacted by severe trespass problems. The EIR should provide solutions to minimizing the trespass problems in order for the residual areas of drainage C offered as mitigation to have any substantial habitat value. 1-14

The Department recommends that the above concerns and comments be addressed in the FEIR prior to project approval.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist, at (626) 797-3170.

Sincerely,


 Larry J. Eng, Ph. D.
 Regional Manager

- cc: Ms. Morgan Wehtje, Camarillo
 Mr. Scott Harris, Pasadena
 Ms. Betty Courtney, Newhall
 RM-Chron; HCP-Chron
 Department of Fish and Game
- Mr. Scott Morgan
 State Clearinghouse, Sacramento

SPH:sph/si
spharris\DEIRKeystone_08-05.doc

Letter No. 1**California Department of Fish and Game, dated August 30, 2005.****Comment 1-1:**

1. Sensitive Wildlife Resources - The DEIR states that adverse impacts to habitat for special status bird species observed on site such as yellow warbler, Bell's sage sparrow, yellow-breasted chat and loggerhead shrike would not be considered significant under CEQA because these species are still 'widespread and common in the region'. Similarly loss of spadefoot habitat was concluded not to be significant because only one individual spadefoot was observed.

Response to Comment 1-1:

The Draft EIR is correct in its characterization of the widespread distribution of the yellow warbler, Bell's sage sparrow and the yellow-breasted chat. The yellow warbler exhibits the widest range of any woodland warbler in North America including portions of Canada and Mexico. Declines in the west appear to have been reversed as the Breeding Bird Survey reports recent increases in the west,¹ with at least some of the increases attributed to cowbird controls.² While the yellow warbler is a California Species of Special Concern, the loss of a single occurrence would not be considered to "(h)ave a **substantial adverse effect**, either or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service" given the increases in the west and its overall widespread distribution. While the impact cannot be considered "substantial" and therefore significant, it should be noted that CDFG has proposed 5:1 replacement of the southern Cottonwood-Willow Riparian Forest meaning that the project would contribute to the continued recovery and local upward trends for this species. [Emphasis Added]

Bell's sage sparrow exhibits a more limited range, including most of the coastal slope of California, ranging into Mexico. Its current distribution is summarized in the *California Partners in Flight Coastal Scrub and Chaparral Bird Conservation Plan*:³

California distribution described in Small (1994). Distribution in southern CA described in Garrett and Dunn 1981; centers of abundance were western Riverside County and in the vicinity of El Cajon, San Diego County. Fairly common to common resident in semidesert scrub in eastern Santa Barbara County (A. b. canescens) and very uncommon and rare

¹ Stokes, Donald and Lilian Stokes. 1996. Field Guide to Birds: Western Region. Little Brown and Company, New York.

² Dunn, John and K. Garrett. 1997. Peterson Field Guides: Warblers. Houghton Mifflin Company, New York.

³ http://www.prbo.org/calpif/htmldocs/species/scrub/sage_sparrow.html

residents in coastal areas of this county (Lehman 1994). Patchy distribution in Monterey County in chamise chaparral but exact extent unknown (Roberson 1985). Small (1994) states A.b. belli to be irregular at northern edge of range in Trinity and Shasta counties, and describes an isolated pocket resident in western Sierra Nevada foothills.

Distribution is also summarized by California Department of Fish and Game (CDFG) as follows:

*Bell's sage sparrows are generally uncommon to fairly common inhabitants of dense brushlands, ranging from the Cascade Mountains and southward into Baja California. Their distribution is rather spotty, and they are essentially sedentary.*⁴ [Emphasis Added]

Given the widespread distribution of this species and given that it is still “fairly common” in many parts of its range, the conclusion in the Draft EIR that impacts associated with the project are not significant is correct as the proposed impacts would not be considered to “(h)ave a **substantial adverse effect**. While the loss of a single occurrence of Bell’s sage sparrow is not substantial given its widespread distribution in California and Mexico, it should be noted that the project will provide compensation for the loss of coastal sage scrub and chaparral that could be potentially used by Bell’s sage sparrow, promoting recovery of this species in the region.

Yellow-breasted chat, like the yellow warbler exhibits widespread distribution, covering nearly all of the 48 lower states and portions of Canada. As with the yellow warbler, declines in the west appear to have been reversed as the Breeding Bird Survey reports recent increases in the west.⁵ As noted for the yellow warbler, the loss of a single occurrence of the yellow-breasted chat, given its upward trends in the west could not be considered as a **substantial adverse effect**. Nevertheless, as noted for the yellow warbler, it should be noted that CDFG has proposed 5:1 replacement of the southern Cottonwood-Willow Riparian Forest meaning that the project would contribute to the continued recovery and local upward trends for this species. [Emphasis Added]

The Draft EIR noted that only a single individual western spadefoot toad was observed in 2003 surveys. However, at the request of CDFG, based on an observation of a seasonal pool with standing water on April 20, 2005, additional surveys were conducted for the subject pool by Thomas Leslie Corporation (TLC) biologist in 2005. No evidence of western spadefoot toad occupation was detected in the 2005 subsequent survey of the subject pool and given the optimal conditions in 2005 for western spadefoot toad to occur, it can be concluded that the site does not support an important or meaningful population (if it continues to support the species at all) (see Response CDFG 1-4 for additional details regarding the western spadefoot toad).

⁴ <http://www.dfg.ca.gov/lands/er/region5/crestridge/crestridge-amph-bel.html>

⁵ Stokes, Donald and Lilian Stokes. 1996. Field Guide to Birds: Western Region. Little Brown and Company, New York.

Comment 1-2:

- a. The Department does not concur with the conclusions in the DEIR regarding loss of habitat for the above special status species. The proposed loss of the majority of the southern cottonwood willow riparian forest in Drainage C and upland habitat on the project site is a direct and cumulative adverse impact to these species. Loss of these habitats as the result of development and other incompatible land use practices has contributed to regional population declines. Impacts to these species and their habitats should be considered significant.

Response to Comment 1-2:

As noted in response 1-1, regional declines for the yellow warbler and yellow-breasted chat have reversed in recent years as documented by the Breeding Bird Survey. Both of these species breed in riparian thickets dominated by willows and cottonwoods. CDFG is correct that the project will impact southern cottonwood willow riparian forest; and the loss of habitat was determined to be significant in accordance with Appendix G subparagraph (b), because southern cottonwood willow riparian forest is regulated by both CDFG and the U.S. Army Corps of Engineers. However, the loss would not be significant relative to the yellow warbler and yellow-breasted chat given the widespread distribution and increasing trend for these species. The loss of upland habitats on the site would not have a measurable effect on these species, as they are not dependent on the upland areas. Additionally, with mitigation proposed for the southern cottonwood willow riparian forest, there will be a net increase in suitable riparian habitat for these species ensuring that no cumulative impacts are associated with the project.

Bell's sage sparrow was recorded from a single location on the site and was not observed breeding.⁶ The loss of a single individual (or potentially a single pair) would not be significant under CEQA given its distribution. Mitigation for impacts to coastal sage scrub and chaparral, which were determined to be significant, will be fully mitigated through a combination of habitat preservation and creation, ensuring that potential cumulative impacts to these habitats (and therefore associated species) are fully mitigated.

Comment 1-3:

The project should be redesigned to avoid suitable habitats for these species within open space preserve areas on site including Drainage C. The Department recommends annual focused protocol surveys for least Bell's vireo arid southwestern willow flycatcher prior to any unavoidable impacts to riparian habitat within Drainage C. The presence of listed species in subsequent years prior to site development would require further consultation with the Department under the California Endangered Species Act (sect 2080 et seq.).

⁶ Thomas Leslie Corporation. 2005. Draft Biological Assessment of Vesting Tentative Tract No. 060258 and Associated Roadway Improvements, Santa Clarita, California. Prepared for Synergy, Irvine California.

Response to Comment 1-3:

The project applicant, through Vandermost Consulting Services (VCS) (the project regulatory consultant) has consulted with CDFG in order to obtain a Section 1602 Streambed Alteration Agreement for impacts to the southern cottonwood willow riparian forest. According to VCS, CDFG Streambed personnel have proposed mitigation at a ratio of up to 3:1 for ephemeral drainages and up to 5:1 for riparian habitat. Relative to the potential occurrence of least Bell's vireo and southwestern willow flycatcher, surveys conducted in 2003 did not detect these species onsite and the habitat was determined by the project biological consultant Thomas Leslie Corporation to not be suitable for these species. As such, additional surveys would not be necessary.

Comment 1-4:

- b The observation of only one spadefoot toad, a California Species of Special Concern, cannot justify a conclusion of insignificance under CEQA. The DEIR did not indicate if population studies were conducted to estimate total individuals of this species and to what extent spadefoot utilize the project site for reproduction, foraging and aestivation. The presence of breeding ponds or other pools which could be used by spadefoot during the breeding season was also not discussed. Spadefoots are inherently difficult to survey for unless there are breeding pools from which to observe egg masses and larva during years of adequate precipitation. For example, on the adjacent Riverpark project, spadefoot were not originally documented until greater efforts were taken to detect this species. The observation of one spadefoot suggests a larger population than one individual on the project site. Spadefoots require adequate upland habitat in which to aestivate and to escape high seasonal flooding. The Department recommends avoidance of spadefoot habitat including uplands adjacent to any potential breeding ponds. Mitigation for the unavoidable loss of seasonal breeding pools for spadefoot should include the creation of such seasonal ponds within preserve areas with suitable adjacent uplands.

Response to Comment 1-4:

Observation of only an individual western spadefoot toad does not per se warrant a conclusion that only a single western spadefoot toad occurs on the site as the initial observation was fairly late in the breeding season (June 28, 2003).⁷ However, at the request of CDFG, based on an observation of a seasonal pool with standing water on April 20, 2005, additional surveys were conducted for the subject pool by Thomas Leslie Corporation (TLC) biologists in 2005. During the 2005 survey's phase, the single feature (ponded puddle), where a one individual western spadefoot toad was observed in June 2003, was not found to

⁷ Thomas Leslie. 2005. Personal Communication to Tony Bomkamp regarding 2005 surveys for western spadefoot toad.

support western spadefoot toads.⁸ Two follow-up visits during the appropriate season in 2005 did not detect egg masses, larvae, or adults. Given that only a single individual was observed in 2003 and that no evidence of western spadefoot toad occupation was detected in 2005, it can only be concluded that the site does not support an important or meaningful population (if it continues to support the species at all). CDFG's assertion that western spadefoot toads "are inherently difficult to survey for unless there are breeding pools from which to observe egg masses and larva during years of adequate precipitation" supports the determination by TLC biologists that the site does not support a meaningful population because 2005 was an optimal year for western spadefoot toads and lack of detection in 2005 is strong evidence that the site does not support an important population. While it is not possible to completely rule out the potential that western spadefoot toads occur on the site in very low numbers, implementation of the project would not result in significant impacts to the western spadefoot toad as the loss of at best, a marginal population, would not be considered a **substantial adverse effect**. [Emphasis Added].

Comment 1-5:

- c. The White-tailed kite (WTK), a California Fully Protected Species, nested at two locations during the 2005 nesting season within the Santa Clara River to the west of the project site. One territory extended just east of the California Aqueduct. The kites were observed using the riverbed for the majority of their foraging during the nesting season. The proposed project may adversely impact WTK if conducted during the nesting season within 500 feet of active nests or within documented foraging areas used by kites during the nesting season. These areas must be avoided as the Department cannot authorize by permit or otherwise the take of fully protected species. WTK nest sites and roost sites are easily disturbed by artificial night light spillover onto natural habitat areas. All proposed night lighting should be directed away from such areas.

Response to Comment 1-5:

The white-tailed kite was not detected on the project site during focused surveys in 2003 and 2004. Furthermore, the territory described by CDFG as "extending just east of the California Aqueduct" is approximately 3,000 feet west of the project's southwest corner and even further removed from potential work areas. Nevertheless, the Draft EIR includes Mitigation Measure D-5 to ensure that raptor nests are not affected by the project:

If grubbing or clearing of vegetation is scheduled to occur during the nesting season (January 31 to August 1), then prior to issuance of grading permits the project applicant shall have a qualified biologist survey the project site for the presence of any occupied raptor nests. If such a nest is found, then no construction work shall occur within a 300-foot radius from the nest until the nestlings have fledged, or as directed by the biological monitor to ensure compliance with Section 3503.5 of the California Fish and Game Code.

⁸ Thomas Leslie. 2005. Personal Communication to Tony Bomkamp regarding 2005 surveys for western spadefoot toad.

Similarly, potential lighting impacts that could affect nesting white-tailed kites has also been addressed through a Mitigation Measure D-18 set forth in the Draft EIR:

All street, residential, and parking lot lighting shall be downcast luminaries or directional lighting with light patterns directed away from natural areas. Covenants, Codes and restrictions (CC&Rs) shall require the exterior lighting within the residential area be limited to low voltage.

Comment 1-6:

2. Department Jurisdictional Drainages - The project would impact a total of 4.26 acres within Department jurisdiction. The majority of preservation within Department jurisdiction would take place in the Santa Clara River Wash.
 - a. It is not clear in the impact section of the DEIR where or how much impact to Department jurisdiction will occur per drainage.

Response to Comment 1-6:

Impacts to CDFG jurisdiction were summarized in the Draft EIR (V.D. Biological Resources, pages V.D-46 and -47) with a more detailed analysis provided on page 9 of the project delineation report prepared by VCS (see Appendix 3 C). These impacts are summarized in Table 1 below:

Drainage Complex	Total Jurisdiction	On-Site Impacts	Off-Site Impacts	Total Impacts
A	0.43	0.33	0.05	0.38
B	3.26	1.14	0.74	1.88
C	3.09	2.44	N/A	2.44
D	0.01	0.01	N/A	0.01
Santa Clara River	9.95	0.0	N/A	0.0
Total	16.74 acres	3.92 acres	0.79 acre	4.71 acres

Comment 1-7:

In addition the DEIR is not clear in its description on the location of Drainages A-C. A dark line indicating each drainage and tributary on Figure V.D-3, would help clarify this issue.

Response to Comment 1-7:

Figure V.D-3 (Section V. D Biological Resources, page V.D-35) provides location of all on-site drainages, which are labeled A – D, and Figure V.D-4 provides a detailed map showing Drainage C and D, as well as CDFG Jurisdictional Habitat and Corps and CDFG Jurisdictional Area. Drainage A is

located in the northwest portion of the site, northwest of the DWP Easement. Drainage B originates offsite to the north of the site, extending along the boundary immediately southeast of the DWP easement. Drainage C extends roughly from east to west, bisecting the southern one-third of the site. Drainage Complex D consists of three small ephemeral drainages immediately adjacent to the Santa Clara River near the southeast corner of the site. Revised Figures IV.D-3 and IV.D-4 delineating the specific drainages would be provided in the Final EIR (see Section III Corrections and Additions).

Comment 1-8:

Figure V.D-1 shows that southern Cottonwood-willow Riparian Forest exists in what appears to be drainage C. This is also the drainage where special status bird species such a yellow warbler and yellow-breasted chat were observed on site. It appears that 2.44 acres of this habitat out of a total of 3.09 acres is slated for loss due to the proposed project. The DEIR does not state in the biological impact section if the loss is permanent or temporary. This should be clarified.

Response to Comment 1-8:

Drainage C will be subject to permanent impacts resulting in the loss of 2.44 acres of southern cottonwood willow riparian forest. This was determined to be a significant impact. The project regulatory specialist (VCS) has met onsite with Ms. Betty Courtney of CDFG and the mitigation ratio for impacts to the southern cottonwood willow riparian forest have been preliminarily established at up to 5:1 or as much as 12.2 acres.⁹

Comment 1-9:

- b. The Department understands from a previous site visit with project consultants to discuss Department jurisdictional issues that the project will result in the loss of mainland cherry forest (MCF), a very threatened natural community. This community was not included as a vegetative community on page 275 of the DEIR or as a project impact. The loss of mainland cherry forest would be considered significant under CEQA. The Department recommends avoidance and preservation of MCF since mitigation for loss of this community would necessitate a high mitigation ratio in any stream alteration agreement required by the Department.

Response to Comment 1-9:

According to the project biologist, Mr. Thomas Leslie, mainland cherry forest does not occur on the site. Rather, individuals of holly-leaf cherry (*Prunus ilicifolia*) were identified on the site as a component of chaparral. The Biological Assessment, Appendix 3 of the Draft EIR, prepared by TLC states the

⁹ Conley, Sherri, Vandermost Consulting Services. 2005. Personal communication regarding onsite discussions with Ms. Betty Courtney of CDFG.

following:

NOTE: Although, Holly-leaf Cherry is a common plant in the onsite Chaparral habitat it is **not** the sole species in the tree canopy. In addition, dense shrub layer is present in onsite Chaparral. Therefore, **no** Mainland Cherry Forest Habitat is present onsite. [Emphasis in original]

The reference to “sole species in tree canopy” is from the description for Hollyleaf cherry in *A Manual of California Vegetation*¹⁰ and based on the assessment of the structure and composition of the habitat that supports Hollyleaf cherry onsite, the areas with Hollyleaf cherry are not consistent with the description of “Mainland Cherry Forest”. In addition, in the September 2003 Edition of *The Vegetation Classification and Mapping Program: List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database*, Mainland Cherry Forest was moved from the Hollyleaf Cherry Woodland and Scrub Unique Stands (Code 78.000.00) to Hollyleaf Cherry [*Prunus ilicifolia*] (Code 37.910.00) (while the Island Hollyleaf Cherry (Code 78.100.00) was retained under Hollyleaf Cherry Woodland and Scrub Unique Stands (Code 78.000.00)) indicating that no special status is currently designated for the Mainland Cherry Forest.¹¹

Given that the onsite habitat does not meet the definition of Mainland Cherry Forest and given that this community has not special status in the CNDDDB, specific impacts to *Prunus ilicifolia* would not be considered significant. This is consistent with the recent determination set forth for areas mapped as Hollyleaf Cherry Forest in the recently approved Riverpark EIR which stated on page 4.6-65:

*Because holly-leaf cherry scrub on the project site is not known to support special-status plant or wildlife species, and because this plant community is not considered sensitive by resource agencies, the loss of 3.6 acres of this habitat type is not considered a significant impact.*¹²

Furthermore, holly-leaf cherry is not a riparian or wetland species over which CDFG would have regulatory oversight pursuant to Section 1602 of the Fish and Game Code. Rather, holly-leaf cherry is an upland species often associated with chaparral and other upland habitats. A review of the national wetland plant indicator lists: *The National List of Vascular Plant Species that Occur in Wetlands: 1996 National Summary (1996 National List)*¹³ and *The National List of Plant Species that Occur in*

¹⁰ John Sawyer and Todd Keller-Wolf. 1995. *A Manual of California Vegetation*. California Native Plant Society, page 339.

¹¹ <http://www.dfg.ca.gov/whdab/pdfs/natcomlist.pdf>

¹² Impact Sciences, Inc. March 2004. Riverpark: Revised Section 4.6 Biological Resources, Draft Environmental Impact Report SCH 2002091081. Prepared for the City of Santa Clarita.

¹³ U.S. Fish and Wildlife Service. 1997. *The National List of Vascular Plant Species that Occur in Wetlands: 1996 National Summary (1996 National List)* Published by the U.S. Fish and Wildlife Service, National Wetlands Inventory, St. Petersburg, Florida.

Wetlands,¹⁴ confirms the upland status of this species.

While specific impacts to individuals of hollyleaf cherry are not considered significant, it should be noted that impacts to chaparral habitat was determined to be significant because it is within the California gnatcatcher Critical Habitat and provide primary constituent elements within the Critical Habitat Unit. Impacts to chaparral will be fully mitigated as set forth in Mitigation Measure D-2 of the Draft EIR.

Comment 1-10:

1. Mitigation for Loss of Vegetative Communities - The DEIR states that mitigation for sensitive vegetative communities including coastal sage scrub within designated critical habitat for the coastal California gnatcatcher will be accomplished via habitat restoration and/or acquisition. Loss of CSS habitat is proposed at a 1:1 ratio.

The DEIR lacks detail on where restoration and/or acquisition will occur for loss of vegetative communities. The Department does not support restoration for sensitive plant communities within manufactured slopes. Impacts for loss of coastal sage scrub should occur at a minimum of 2:1 and often up to 10:1 for areas proposed for restoration to mitigate for temporal losses to native habitats. Specific locations for habitat acquisition for loss of sensitive vegetative communities should be included in the EIR for review and comment.

Response to Comment 1-10:

As noted in the Draft EIR, significant impacts to native coastal sage scrub and chaparral, designated as critical habitat for the coastal California gnatcatcher will require consultation with the USFWS prior to any project impacts. In accordance with the federal Endangered Species Act (FESA), impacts to critical habitat must be addressed through the Section 7 Consultation process before any impacts to the habitat can be authorized. Under the FESA, USFWS must determine that the project will not result in adverse modification to designated critical habitat and where impacts to such habitat are unavoidable USFWS must require mitigation that offsets potential impacts. While mitigation has not been developed in detail, the applicant is working with USFWS to identify suitable areas for offsite mitigation and compliance with the FESA will ensure that the impacts to coastal sage scrub and chaparral designated as critical habitat are fully mitigated at appropriate ratios.

Comment 1-11:

2. Habitat Restoration Success Criteria - Success criteria should be included in the mitigation monitoring plan as described in the EIR for all habitat restoration, creation, and/or acquisition/s

¹⁴ Reed, P.B., Jr. 1988. *National List of Plant Species that Occur in Wetlands*. U.S. Fish and Wildlife Service Biological Report 88(26.10).

proposed for mitigation for losses of habitat for special status species. Mitigation should not be considered complete until it is confirmed that these areas are used by the special status species for which the mitigation was designed. The use level by target species should be at a minimum equal to that which was documented on the project site.

Response to Comment 1-11:

Success criteria for impacts to coastal sage scrub, chaparral and southern cottonwood willow riparian forest were included in the Draft EIR under Mitigation Measures for Biological Resources, pages V.D-56 – V.D-62.

Impacts to special-status species associated with the coastal sage scrub and southern cottonwood willow riparian forest were not found to be significant. Therefore, no performance standards or monitoring requirements for these species would be required.

Comment 1-12:

3. Avoidance of Nesting Birds -The DEIR states that to assist in the avoidance of take of native birds, preconstruction surveys for nesting birds will take place between January 31st and August 1, if grading or grubbing of vegetation is proposed during that time.
 - a. The Department recommends that nesting bird surveys be conducted until August 31st to avoid take of late nesting birds including white-tailed kite which may reside on/near the construction site. White-tailed kites may rear more than one brood and could still have dependant young later into the nesting season.

Response to Comment 1-12:

Performance of nesting bird surveys through August 1 is sufficient to protect nesting birds including the white-tailed kite. As noted above, the nearest white-tailed kite breeding territory was approximately 3,000 feet west of the site and would not be affected by the project. Second, records of 120 nesting kites indicate that most nesting occurs between February 12 to June 21 with half of the eggs laid between April 2 and 29. Another study found nesting to occur between February 6 and July 10.¹⁵ Given the distance from the site for breeding kites and the documented nesting records, the proposed mitigation measure is more than adequate to protect nesting kites, should they occur in the vicinity; nevertheless, in order to ensure the highest level of protection, the survey period will be extended to August 31. Mitigation Measure D-5 has been changed in the Final EIR (see Section III Corrections and Additions).

¹⁵ Johnsgard, Paul. 1990. Hawks, Eagles, & Falcons of North America. Smithsonian Institution Press, Washington D.C.

Comment 1-13:

- b. In addition to vegetated areas, bird surveys should be conducted within all potential nesting habitat including unvegetated ground surfaces for ground nesters and human structures that will be disturbed by project activities.

Response to Comment 1-13:

While nesting bird surveys typically focus on vegetated areas, nesting birds identified on bare or otherwise unvegetated areas would require avoidance until fledglings have vacated the nest.

Comment 1-14:

- c. As a mitigation measure the DEIR proposes to retain the Santa Clara River and other portions of on site habitat within Drainage C and elsewhere. Mitigation areas need to provide maximum habitat values in order to be considered adequate and meaningful mitigation under CEQA. This portion of the Santa Clara River offered as mitigation is currently impacted by severe trespass problems. The EIR should provide solutions to minimizing the trespass problems in order for the residual areas of drainage C offered as mitigation to have any substantial habitat value.

Response to Comment 1-14:

While the project avoids the Santa Clara River and also provides sufficient buffer, such avoidance is not proposed as mitigation for the project. Relative to trespass within the river, the observed trespass is the existing condition and is in no way a result of the project. Development of the site would not result in additional trespass and as such, the project would not require mitigation measures related to the project. Mitigation Measure D-17, Section V.D Biological Resources (page V.D-69) requires interpretive signage to be placed in appropriate areas explaining the sensitivity of natural habitats. This mitigation measure has been clarified in the Final EIR to include signage along the Santa Clara River (see Section III Corrections and Additions).

Letter 2

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC TRANSPORTATION
AND REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012



Flex your power!
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SEP 15 2005

September 9, 2005

CITY OF SANTA CLARITA

Ms. Heather Waldstein
Planning Department
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA. 91355-2136

Re: *The Keystone, Draft EIR*

IGR/CEQA No: 050741/EA, SCH 2004081017

Vic. LA-14- PM R27.05, LA-05-PM R50.33

Dear Ms. Waldstein

We acknowledge receipt of the Draft Environmental Impact Report prepared for The Keystone Development project. The proposed development consists of 979 residential units, a middle school, and a YMCA. In the interest of mutual cooperation through build-out of the project, we offer the following comments.

- We note the proposed project would generate approximately 10,500 off-site average daily trips with 1330 occurring during the AM peak hours and 970 during PM peak hours. The traffic impact study determined that State Route 14 southbound interchanges at Sierra Highway would be significantly impacted and mitigation measures are identified. Southbound ramps at SR-14/Sierra Highway interchange would be improved by adding a separate northbound turn lane and a second southbound turn lane. *We remind you that implementation of proposed modifications on State right-of-way will need an encroachment permit from this Department. Final details will be determined during the encroachment permit review process and additional modifications may be required.* 2-1
- We reviewed a Traffic Impact Analysis prepared for this project dated February 2005, and it determined that SR-14/Golden Valley Road would also be significantly impacted and mitigation measures were identified. *The Traffic Impact Analysis in the Draft Environmental Impact Report (DEIR) does not include transportation mitigation measures for this interchange. Southbound ramps at SR-14/Golden Valley Road were to be improved by restriping the southbound lane to create a left/through lane. City of Santa Clarita may have plans for additional improvements to this interchange, please provide an update. Please add improvements to this interchange as conditions of approval for this project. In addition, this report also indicates in Appendix 8, that the project would contribute traffic to the Placerita Canyon Road and SR-14 northbound ramps. To avoid further deterioration of traffic operations at Golden Valley Road and Placerita Canyon interchanges, we strongly recommend that mitigation measures be considered at these locations as well.* 2-2
- All proposed work on State right-of-way would need to meet the State's geometric and operational standards. Therefore, the above mentioned improvements would need to go through our encroachment permit process or through our formal project initiation process which includes preparation of a project study report (PSR). We suggest that coordination with this Department and the City start early so that mitigation measures can be in-place by project build-out. If proposed improvements require the acquisition of right-of-way, it would need to be dedicated to the State. 2-3

Letter 2

Ms. Heather Waldstein

Page 2 of 2

September 9, 2005

- Furthermore, we note the traffic impact study determined that the proposed Keystone residential development is projected to contribute to significant cumulative traffic impacts to mainline through lanes on State Route 14 (Antelope Valley Freeway). We acknowledge that to address its cumulative transportation impacts to SR-14, the proposed development would contribute funds to the Bouquet Canyon Bridge and Thoroughfare District. Fee computations are shown on Table 4-9. This local fee District funds freeway interchange improvements which are an essential component of the planned freeway mainline widening projects.
We request that payment of said funds be made a condition of approval. Please forward a copy of the final conditions of approval to this Department for our records.

2-4

If you have any questions regarding our comments, you may call me at (213) 897 - 3747 or Elinor Alvarez of my staff at (213) 897-6696 and refer to our internal record number 050204/EA.

Sincerely,



CHERYL J. POWELL
IGR/CEQA Program Manager
Caltrans, District 7

Letter No. 2**California Department of Transportation, dated September 15, 2005.****Comment 2-1:**

We note the proposed project would generate approximately 10,500 off-site average daily trips with 1330 occurring during the AM peak hours and 970 during PM peak hours. The traffic impact study determined that State Route 14 southbound interchanges at Sierra Highway would be significantly impacted and mitigation measures are identified. Southbound ramps at SR-14/Sierra Highway interchange would be improved by adding a separate northbound turn lane and a southbound turn lane. We remind you that implementation of proposed modifications on State right-of-way will need an encroachment permit from this Department. Final details will be determined during the encroachment permit review process and additional modifications may be required.

Response Comment 2-1:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment accurately describes the proposed project's off-site average daily trips, peak hour trips, SR 14 impacts and interchange improvements. We understand that an encroachment permit to conduct proposed modifications is required and that during the permit review process the Department of Transportation may require additional modifications. A mitigation measure has been added to the Final EIR requiring an encroachment permit from the Department of Transportation (see Section III Corrections and Additions).

Comment 2-2:

We reviewed a Traffic Impact Analysis prepared for this project dated February 2005, and it determined that SR-14/Golden Valley Road would also be significantly impacted and mitigation measures were identified. The Traffic Impact Analysis in the Draft Environmental Impact Report (DEIR) does not include transportation mitigation measures for this interchange. Southbound ramps at SR-14/Golden Valley Road were to be improved by restriping the southbound turn lane. City of Santa Clarita may have plans for additional improvements to this interchange, please provide an update. Please add improvements to this interchange as conditions of approval for this project. In addition, this report also indicates in Appendix 8, that the project would contribute traffic to the Placerita Canyon Road and SR-14 northbound ramps. To avoid further deterioration of traffic operations at Golden Valley Road and Placerita Canyon interchanges, we strongly recommend that mitigation measures be considered at these locations as well

Response Comment 2-2:

At the SR-14/Golden Valley Road interchange, committed improvements that will be implemented by the

Golden Valley Ranch project (county of Los Angeles project east of SR-14) were not accounted for in the first draft traffic study dated February 2005. Subsequent drafts of the traffic study, which include these committed improvements to the ramp intersections, show that the Keystone project does not cause a significant impact at the SR-14/Golden Valley Road interchange. Since there is not a significant impact, the Keystone project is not being conditioned to implement improvements at this location.

The Keystone project contributes traffic to the Placerita Canyon Road/SR-14 Northbound Ramps intersection as noted in the comment. The traffic study also shows that the intersection is forecast to operate at an acceptable level of service and that the additional traffic due to the project does not result in a significant impact. Therefore, improvements at this location are not needed.

Comment 2-3:

All proposed work on State right-of-way would need to meet the State's geometric and operational Standards. Therefore, the above mentioned improvements would need to go through our encroachment permit process or through our formal project initiation process which includes preparation of a project study report (PSR). We suggest that coordination with this Department and the City start early so that mitigation measures can be in-place by project build-out. If proposed improvements require the acquisition of right-of-way, it would need to be dedicated to the State.

Response Comment 2-3:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, we understand that an encroachment permit process or preparation of a PSR is required for SR-14 and roadway intersection improvements. Coordination with the Department of Transportation will be conducted as suggested and any acquisition of right-of-way would be dedicated to the State.

Comment 2-4:

Furthermore, we note the traffic impact study determined that the proposed Keystone residential development is projected to contribute to significant cumulative traffic impacts to mainline through lanes on State Route 14 (Antelope Valley Freeway). We acknowledge that to address its cumulative transportation impacts to SR-14, the proposed development would contribute funds to the Bouquet Canyon Bridge and Thoroughfare District. Fee computations are shown on Table 4-9. This local fee District funds freeway interchange improvements which are an essential component of the planned freeway mainline widening projects. We request that payment of said funds be made a condition of approval. Please forward a copy of the final conditions of approval to this Department for our records.

Response to Comment 2-4:

While the Keystone project does contribute traffic to the SR-14 freeway, the freeway impact analysis,

which has been prepared in accordance with the adopted Los Angeles County Congestion Management Program, indicates that the Keystone project does not cause a significant impact to the SR-14 freeway. As noted in the comment, the project will contribute to the Bouquet Canyon Bridge and Thoroughfare District which funds freeway interchange improvements. A copy of the final conditions of approval will be provided as requested.

Letter 3



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

FAXED: SEPTEMBER 2, 2005

RECEIVED September 2, 2005
PLANNING DIVISION

SEP 12 2005

CITY OF SANTA CLARITA

Ms. Heather Waldstein
City of Santa Clarita
Planning Department
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355-2196

**Draft Environmental Impact Report (DEIR) for
The Keystone Project (July 2005)**

Dear Ms. Waldstein:

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

A handwritten signature in cursive script that reads "Steve Smith".

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

LAC050720-01
Control Number

Letter 3

Ms. Heather Waldstein

-1-

September 2, 2005

**Draft Environmental Impact Report (DEIR) for
The Keystone Project (July 2005)**

General Plan Consistency with the AQMP: The lead agency states on page V.C-12 of the DEIR that the “implementation of the Proposed Project would not directly or indirectly induce substantial population or employment growth beyond current growth projections established by the Southern California Association of Governments (SCAG) for the Santa Clarita Valley and City of Santa Clarita.” Therefore “the Proposed Project would be consistent with the AQMP employment forecasts for the City of Santa Clarita and the Santa Clarita Valley, and it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.”

SCAQMD staff believes that the above statement is misleading and therefore disagrees with the conclusion regarding consistency with the AQMP for the following reasons. According to the information in Section I- Land use, the proposed site is designated as Residential Very Low (RVL). This designation allows only one dwelling unit per gross acre. Because the proposed project consists of 96 single-family residences, 667 multi-family condominium units and 216 multi-family apartments, these proposed residential densities greatly exceed the densities allowed by the City of Santa Clarita’s General Plan. As a result, the project proponent has applied to the City of Santa Clarita City Council for a General Plan Amendment to redesignate 52 acres of the proposed project area to Residential Suburban and 193.3 acres to Residential Medium High. Because the proposed project requires a General Plan amendment to increase residential density, the proposed project is not currently consistent with the City of Santa Clarita’s General Plan, and therefore, is not consistent with the AQMP.

3-1

CO Hotspots Analysis

- The CO hotspots analysis was completed using the BAAQMD simplified CALINE4 analysis. Page 37 of BAAQMD CEQA Guidelines states that the full CALINE4 model should be used for any projects or plans that will generate 10,000 or more motor vehicle trips per day. Page V.O-12 of the Keystone Project DEIR states that the proposed project would generate approximately 11,005 average daily trips. Based on the proposed project daily trips in the Draft EIR and the limitations of the BAAQMD simplified CALINE4 analysis, the Final EIR should include a CO hotspots analysis based on dispersion modeling completed with the full CALINE4 model.
- The reference note for the emission factors used in the CO hotspots analysis states that EMFAC2002 was used. The emission factors could not be verified since the EMFAC2002 output was not provided nor were the parameters used to develop the emission factors (e.g., geographical area (county, district or basin), temperature, relative humidity, etc.). Based on an EMFAC2002 run using Los Angeles County data, an annual season, a temperature of 75°F, and a relative humidity of 40 percent, the average emission factors for the 2004 fleet appear to be underestimated. The

3-2

3-3

Letter 3

Ms. Heather Waldstein

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September 2, 2005

Final EIR should include the EMFAC2002 output or parameters used to develop the emission factors.

3-3
contd.

- The highest traffic volumes estimated in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets in Appendix 2 of the Draft EIR do not appear to be estimated correctly. For example, the existing Sierra Highway and Golden Valley Road north south peak hour volume is estimated with both the approach and departure volumes ($752 = (404 + 48) + (191 + 109)$). However, the east west peak hour volume of 2,323 could not be identified. The correct value for the east west approach and departure volumes should be 4,208 ($4,208 = (191 + 145) + (109 + 1,583) + (145 + 48) + (1,583 + 404)$). The highest traffic volumes should be corrected in the Final EIR.

3-4

- All the receptors in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets begin at 25 feet from the edge of the roadway. Assuming that the roads have sidewalks this is not consistent with CALINE4 analysis. The BAAQMD Simplified Methodology was developed using CALINE4. Since the Simplified Methodology is based on CALINE4, receptor siting should follow the CALINE4 methodology, which is presented in the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997. The CO Protocol can be downloaded from the Caltrans website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should be placed on sidewalks, which would be the at edge receptor in the BAAQMD Simplified Methodology. The Final EIR should include receptors placed at the edge of roadway.

3-5

- The peak hour traffic volumes for the existing roads were taken from the AM and PM turning movements in Figures V.O-3 and V.O-4. Similar figures for the future interim year with project traffic volumes were not included in the traffic section. Since peak hour turning volumes for the future interim year with project traffic volumes were not included in the Draft EIR, traffic volumes for the future interim year with project could not be verified. The Final EIR should include peak hour turning volumes for the future interim year with project.

3-6

PM10 Mitigation Measures: As part of the mitigated URBEMIS 2002 model run for grading, the lead agency has selected the following bulleted mitigation.

- Water active grading sites, unpaved roads or surfaces at least three times daily.
- Cover stock piles with tarps.
- Water haul roads three times per day.
- Apply soil binders to exposed piles, i.e. gravel, sand or dirt.
- Apply approved non-toxic chemical soil stabilizers to all inactive construction areas.
- Replace ground cover in disturbed areas.

3-7

These mitigation measures, however, are not listed as part of mitigation measure C-1 on pages V.C.- 20 and V.C.-21. These mitigation measures should be required by the lead agency since the analysis uses them to mitigate PM10 emissions, and they should be listed in the DEIR along with the other mitigation measures under C-1.

Letter 3

Ms. Heather Waldstein

-3-

September 2, 2005

Please add the following additional PM10 mitigation measures to the list mentioned under Section C-1 on pages V.C.- 20 and 21 if applicable and feasible:

- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Construction access roads to the main roads should be paved to avoid dirt being carried on to the roadway.
- A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.

3-8

Operational Mitigation Measures: The following are additional operational mitigation measures for the lead agency's consideration:

- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Use double-paned windows to reduce thermal loss in buildings.
- Install solar panels on roofs to supply electricity for home-heating and cooling systems.
- Install automatic lighting on/off controls and energy-efficient lighting.

3-9

Letter No. 3**South Coast Air Quality Management District, dated September 12, 2005.****Comment 3-1:**

General Plan Consistency with the AQMP: The lead agency states on page V.0-12 of the DEIR that the “implementation of the Proposed Project would not directly or indirectly induce substantial population or employment growth beyond current growth projections established by the Southern California Association of Governments (SCAG) for the Santa Clarita Valley and City of Santa Clarita.” Therefore “the Proposed Project would be consistent with the AQMP employment forecasts for the City of Santa Clarita and the Santa Clarita Valley, and it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.

SCAQMD staff believes that the above statement is misleading and therefore disagrees with the conclusion regarding consistency with the AQMP for the following reasons. According to the information in Section I- Land use, the proposed site is designated as Residential Very Low (RVL). This designation allows only one dwelling unit per gross acre. Because the Proposed Project consists of 96 single-family residences, 667 multifamily condominium units and 216 multi-family apartments, these proposed residential densities greatly exceed the densities allowed by the City of Santa Clarita’s General Plan. As a result, the project proponent has applied to the City of Santa Clarita City Council for a General Plan Amendment to redesignate 52 acres of the proposed project area to Residential Suburban and 193.3 acres to Residential Medium High. Because the proposed project requires a General Plan amendment to increase residential density, the proposed project is not currently consistent with the City of Santa Clarita’s General Plan, and therefore, is not consistent with the AQMP.

Response to Comment 3-1:

It is incorrect to assume that a project is inconsistent with regional growth projections – and, therefore, the AQMP – simply because it proposes a number of housing units that are greater than allowed under the current land use designations in the applicable general plan. SCAG projects an increase of six million people throughout the region by 2030. These growth projections are based on historic and recent regional trends.

The Forecasting Section, under the Community Development Division Planning and Policy Department is responsible for producing socioeconomic projections and developing, refining and maintaining SCAG’s regional and small area forecasting models. The Forecasting Section works closely with SCAG’s Plans and Programs Technical Advisory Committee, the California Department of Finance, subregions, local jurisdictions, county transportation commissions, the public and other major stakeholders.

Using a base year socioeconomic forecasts, the Forecasting Section develops future forecasts in 5-year intervals. These forecast numbers are used by SCAG's Modeling Section to forecast travel demand and air quality data for planning activities such as the Regional Transportation Plan, the AQMP, the Regional Transportation Improvement Program, and the Regional Housing Plan.

According to SCAG staff (interview with Jihong McDermott, October 20, 2005), the land use plans of general plans are not a direct factor in the development of the regional growth projections and the projections are definitely not based on site specific designations in general plan land use plans. General Plan amendments are common in all jurisdictions in the SCAG region and the regional growth projections assume that general plan amendments that allow for increased site-specific density will occur. Therefore, the Proposed Keystone Project would not be inconsistent with SCAG's regional growth projections – and, therefore, the AQMP – simply because it proposes a number of housing units that are greater than allowed under the current land use designations for the Project site. As discussed in Section V.L. Population and Housing of the Draft EIR, the Proposed Keystone Project would not directly or indirectly induce substantial population or employment growth beyond current growth projections established by SCAG for the Santa Clarita Valley and City of Santa Clarita. Because it is these regional growth projections that form the basis of the AQMP – rather than specific general plan land use designations – the Draft EIR concludes that the Proposed Keystone Project would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.

In many cases, the amount of development that actually occurs at a site is less than what is allowed under the general plan land use designation. For example, the General Plan land use designations for the Riverpark project site in the City of Santa Clarita (located to the west of the Proposed Keystone Project site) allow the development of up to 7,616 dwelling units. The Riverpark project was recently approved for the development of 1,183 dwelling units, which is 15.5 percent of the maximum allowed. When considered together, the Proposed Keystone Project and the approved Riverpark project would provide fewer homes than the combined amount allowed under the General Plan land use designations.

Comment 3-2:

CO Hotspots Analysis

The CO hotspots analysis was completed using the BAAQMD simplified CALINE4 analysis. Page 37 of BAAQMD CEQA Guidelines states that the full CALINE4 model should be used for any projects or plans that will generate 10,000 or more motor vehicle trips per day. Page V.0-12 of the Keystone Project DEIR states that the proposed project would generate approximately 11,005 average daily trips. Based on the proposed project daily trips in the Draft EIR and the limitations of the BAAQMD simplified CALINE4 analysis, the Final EIR should include a CO hotspots analysis based on dispersion modeling completed with the full CALINE4 model.

Response to Comment 3-2:

Several air quality models have been developed to calculate localized carbon monoxide (CO) concentrations near roadways and intersections. The CALINE4 – California LINE Source Dispersion Model – is the most commonly used line source model in California. This model provides a robust analysis of localized CO concentrations based on highly detailed input parameters. The disadvantage of this model is that the input parameters and model runs can require a substantial amount of time. In response to this issue, several agencies have developed screening procedures based on the CALINE4 model. The two procedures that are commonly used today are the screening analysis procedure developed by the Institute of Transportation Studies at the University of California, Davis and presented in Appendix A of the Transportation Project-Level Carbon Monoxide Protocol, and the CALINE4 screening procedure developed by the Bay Air Quality Management District (BAAQMD). The intent of both screening procedures is to provide an easy means of estimating localized CO concentrations under worst-case conditions. The screening procedures use a variety of worst-case assumptions that typically result in greater emissions concentrations than would be calculated under a detailed CALINE4 analysis. The general recommendation is for someone to conduct an analysis of worst-case emissions using a screening procedure. If the screening procedure predicts that localized emissions would be lower than national and State standards, then no further CO analysis is required. If the screening procedure predicts localized emissions above the standards, then the extent of the impact should be evaluated under a detailed analysis using CALINE4.

As shown on pages V.C-9 and V.C-18 of the Draft EIR, existing and predicted future localized CO concentrations at intersections in the vicinity of the Project site would be well below national and State ambient air quality standard levels. Because the emissions calculated by the screening procedure are based on worst-case assumptions and are well below national and State standards, a detailed analysis of localized CO concentrations using the CALINE4 would not be necessary to evaluate the impacts of the Proposed Keystone Project.

Comment 3-3:

The reference note for the emission factors used in the CO hotspots analysis states that EMFAC2002 was used. The emission factors could not be verified since the EMFAC2002 output was not provided nor were the parameters used to develop the emission factors (e.g., geographical area (county, district or basin), temperature, relative humidity, etc.). Based on an EMFAC2002 run using Los Angeles County data, an annual season, a temperature of 75°F, and a relative humidity of 40 percent, the average emission factors for the 2004 fleet appear to be underestimated. The Final ER should include the EMFAC2002 output or parameters used to develop the emission factors.

Response to Comment 3-3:

As discussed on page V.C-2 of the Draft EIR, CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground level. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Therefore, the EMFAC2002 emission factors used for the screening procedure were calculated for individual years based on the state-wide vehicle fleet averages programmed in EMFAC2002, an average low winter temperature of 50°F, and an average winter humidity level of 60%. Emissions were calculated for vehicle speeds in five miles-per-hour increments. The emission factors for the year 2004 are shown on the following page. Average vehicle speeds for each roadway were estimated based on the roadway level of service as defined in the Traffic Impact Analysis Report and the associated emission factors were used to calculate the estimated localized emissions.

Comment 3-4:

The highest traffic volumes estimated in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets in Appendix 2 of the Draft EIR do not appear to be estimated correctly. For example, the existing Sierra Highway and Golden Valley Road north south peak hour volume is estimated with both the approach and departure volumes ($752 = (404 + 48) + (191 \pm 109)$). However, the east west peak hour volume of 2,323 could not be identified. The correct value for the east west approach and departure volumes should be 4,208 ($4,208 = (191 + 145) + (109 + 1,583) + (145 + 48) + (1,583 + 404)$). The highest traffic volumes should be corrected in the Final EIR.

Response to Comment 3-4:

The roadway traffic volumes identified in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets in Appendix 2 of the Draft EIR are correct. The traffic volumes are calculated for each individual roadway segment located north, south, east, and west of the intersection. The localized CO concentrations are calculated for the corner of the intersection adjacent to the north- south and east-west roadway segments with the highest traffic volumes. For example, if the northern roadway segment has higher traffic volumes than the southern roadway segment, the number for the northern roadway segment will be shown in the spreadsheet. If the eastern roadway segment has higher traffic volumes than the western roadway segment, the number for the eastern roadway segment will be shown in the spreadsheet. In this example, the localized CO concentrations are calculated for the northeast corner of the intersection since this is the worst-case location.

The roadway segment traffic volumes are not calculated by adding all of the vehicles together as attempted in the comment. They are calculated by adding up all of the vehicles that would travel on each of the individual roadway segments. Using the Sierra Highway and Golden Valley Road intersection as an example (the same intersection as cited in the comment), the northern roadway segment volume is calculated by adding the southbound (northern roadway segment) volumes of 404 and 48 AM peak hour trips, and the northbound (eastbound left turn and westbound right turn) volumes of 191 and 109 together. This adds up to 752 as shown in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheet. This “T” intersection does not have a southern roadway segment so the northern roadway segment is automatically the highest north-south roadway segment.

The eastern roadway segment volume is calculated by adding the westbound (eastern roadway segment) volumes of 109 and 1,583 AM peak hour trips, and the eastbound (southbound left turn and eastbound thru) volumes of 48 and 145 together, for a total of 1,885. The western roadway segment volume is calculated by adding the eastbound (western roadway segment) volumes of 191 and 145 AM peak hour trips, and the westbound (southbound right turn and westbound thru) volumes of 404 and 1,583 together, for a total of 2,323. Because the western roadway segment would have more traffic than the eastern roadway segment in this instance, the volume for the western roadway segment is shown in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheet and is used to calculate the worst-case localized CO concentrations at the northwest corner of the intersection.

Comment 3-5:

- All the receptors in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets begin at 25 feet from the edge of the roadway. Assuming that the roads have sidewalks this is not consistent with CALINE4 analysis. The BAAQMD Simplified Methodology was developed using CALINE4. Since the Simplified Methodology is based on CALINE4, receptor siting should follow the CALINE4 methodology, which is presented in the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997. The CO Protocol can be downloaded from the Caltrans website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should be placed on sidewalks, which would be the at edge receptor in the BAAQMD Simplified Methodology. The Final EJR should include receptors placed at the edge of roadway.

Response to Comment 3-5:

National and State ambient air quality standards have been developed for 1-hour and 8-hour concentrations of CO. In order for a person to be significantly affected by localized CO concentrations, they would have to be exposed to concentrations over a 1-hour or 8-hour period that exceed the associated standard. There are no permanent uses such as homes or businesses in the Project vicinity that would locate people at the edge of the study-area intersections. The closest that any uses could be located to the intersections is 25 feet. Although someone could walk along the sidewalks in the Project vicinity, they are not expected to stand at any of the study area intersections for eight hours. Therefore, the analysis in

the Draft EIR focused on locations where people could actually be exposed to ambient CO concentrations over long periods of time.

Comment 3-6:

The peak hour traffic volumes for the existing roads were taken from the AM and PM turning movements in Figures V.O-3 and V.O-4. Similar figures for the future interim year with project traffic volumes were not included in the traffic section. Since peak hour turning volumes for the future interim year with project traffic volumes were not included in the Draft EIR, traffic volumes for the future interim year with project could not be verified. The Final EIR should include peak hour turning volumes for the future interim year with project.

Response to Comment 3-6:

Although the Transportation section of the Draft EIR did not include figures showing the future peak hour turning movements at the study-area intersections, these figures were included in The Keystone Traffic Impact Analysis, which is included in Appendix 8 to the Draft EIR. The evaluation of future localized CO concentrations is based on the AM and PM peak hour turning movement volumes in the interim year with the Keystone Project and the Golden Valley Road extension shown in Figure C-5 and C-6 on pages C-6 and C-7 of The Keystone Traffic Impact Analysis.

Comment 3-7:

PM10 Mitigation Measures: As part of the mitigated URBEMIS 2002 model run for grading, the lead agency has selected the following bulleted mitigation.

- Water active grading sites, unpaved roads or surfaces at least three times daily.
- Cover stock piles with tarps.
- Water haul roads three times per day.
- Apply soil binders to exposed piles, i.e. gravel, sand or dirt.
- Apply approved non-toxic chemical soil stabilizers to all inactive construction areas.
- Replace ground cover in disturbed areas.

These mitigation measures, however, are not listed as part of mitigation measure C-1 on pages V.C.-20 and V.C.-21. These mitigation measures should be required by the lead agency since the analysis uses them to mitigate PM10 emissions, and they should be listed in the DEIR along with the other mitigation measures under C-1.

Response to Comment 3-7:

One of the shortcomings of the URBEMIS 2002 computer model that was used to calculate the construction-related and operational emissions associated with the Proposed Keystone Project is that it considers any emissions-reducing actions or characteristics to be mitigation rather than a required or proposed feature of a project. In the case of the Proposed Keystone Project and nearly every construction project in the South Coast Air Basin, the South Coast Air Quality Management District (SCAQMD) requires that dust control measures be implemented during each phase of development in accordance with SCAQMD Rule 403 – Fugitive Dust. This is not an optional strategy that lead agencies or developers can choose whether or not to apply or implement. As such, it is not mitigation that would be needed to reduce an otherwise significant air quality impact associated with the Proposed Keystone Project.

In response to this comment, however, mitigation measure C-1b has been added to the Final EIR and Mitigation Monitoring and Reporting Program to assist the City in monitoring the dust control program for the Proposed Keystone Project. See Section C, Corrections and Additions.

Comment 3-8:

Please add the following additional PM10 mitigation measures to the list mentioned under Section C-1 on pages V.C.-20 and 21 if applicable and feasible:

- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Construction access roads to the main roads should be paved to avoid dirt being carried on to the roadway.
- A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.

Response to Comment 3-8:

California Vehicle Code Section 23114 is applicable to all trucks that haul dirt, sand, gravel or soil. It is a State law that all such vehicles must comply with. Violators are subject to citation by the law enforcement agencies throughout California, including the Los Angeles County Sheriff's Department and the California Highway Patrol. It is also required under SCAQMD Rule 403 – Fugitive Dust. As such, it is not a measure that needs to be applied specifically to the Proposed Keystone Project to mitigate a potentially significant air quality impact.

The new mitigation measure C1b requires the Applicant to apply gravel/paving to all haul routes as soon as possible to all future roadway areas. This is consistent with the guidance of SCAQMD Rule 403 – Fugitive Dust. However, the City will not require the Applicant to pave all temporary routes since this action could cause additional smog-related air quality impacts associated with the operation of hauling

and paving equipment, the off-gas associated with the temporary asphalt surface, and the demolition of the temporary surface.

Mitigation measure C-1c has been added to the Final EIR and Mitigation Monitoring and Reporting Program to provide a construction relations officer as a community liaison to oversee on-site construction activity and all emissions and congestion related matters. See Section C, Corrections and Additions.

Comment 3-9:

Operational Mitigation Measures: The following are additional operational mitigation measures for the lead agency's consideration:

- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Use double-paned windows to reduce thermal loss in buildings.
- Install solar panels on roofs to supply electricity for home-heating and cooling systems.
- Install automatic lighting on/off controls and energy-efficient lighting.

Response to Comment 3-9:

The recommended mitigation measures would reduce operational electrical consumption, but they would do nothing to reduce the operational air quality impacts associated with the Proposed Keystone Project. Although the SCAQMD's CEQA Air Quality Handbook provides factors to estimate the emissions associated with electricity generation and mitigation measures to reduce the emissions associated with the electricity demand of new development projects, the emissions associated with electricity generation are no longer calculated for general development projects and these emissions are no longer applied to the thresholds of significance recommended by the SCAQMD. The URBEMIS 2002 computer model – which was developed with the financial and technical support of the SCAQMD – does not calculate these indirect emissions. It is the EIR consultant's understanding that this is due to new thinking amongst the air districts throughout California that the emissions generated by power plants are subject to facility-specific permit limits. Power plants cannot increase their output and associated emissions simply as a result of the demand associated with new development projects. The power plants can only operate up to their permitted emission levels. This is one of the reasons that much of the electricity consumed in California is generated outside the State.

As discussed on page V.P-1 of the Draft EIR, the Southern California Edison Company (SCE) provides electricity service to Los Angeles County, outside of the City of Los Angeles. SCE obtains power from numerous sources, including (1) the San Onofre Nuclear Generating Station (SONGS), (2) The Mohave Generating Station in Laughlin, Nevada, and (3) The Big Creek System. None of these facilities are located within the Santa Clarita Valley or the South Coast Air Basin. Also discussed on page V.P-1 of the Draft EIR is that energy consumption by new buildings in California is regulated by the State

Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR). The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided that these standards meet or exceed those provided in Title 24 guidelines. The measures recommended in the comment are consistent with the intent of Title 24. Mitigation measure P1-2 requires the Project developer to consult with the Southern California Edison's, Energy Design Resources program or SCE's Savings by Design program, regarding additional possible energy efficiency measures. With this measure, the Proposed Keystone Project's demand for electrical power could be reduced further than required under Title 24. This is consistent with the intent of the SCAQMD's comment and requested mitigation measures.

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AUG 23 2005

22 August 2005

Ms. Heather Waldstein
Associate Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355-2196

PLANNING & ECONOMIC DEVELOPMENT
CITY OF SANTA CLARITA

RE: SCAG Comments on the Draft Environmental Impact Report (DEIR) for the Keystone Project
SCAG No. I 20050467

Dear Ms. Waldstein:

Thank you for submitting the Draft Environmental Impact Report for the Keystone Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). The Draft EIR does not yet address SCAG's Notice of Preparation (NOP) response, dated 2 September 2004, which outlined relevant policies and forecasts. We expect the Final EIR to respond fully to SCAG's published comments. We would appreciate notification of the Final EIR, especially should a change in project scope occur, and a minimum of 45 days to review the document when it becomes available.

4-1

A description of the proposed General Plan and Zoning Ordinance was published in the July 16-31, 2005 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213) 236-1851. Thank you.

Sincerely,

Brian Wallace
Associate Regional Planner
Intergovernmental Review

SOUTHERN CALIFORNIA



ASSOCIATION OF
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Orange County Transportation Authority: Los
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Riverside County Transportation Commission:
Robin Lowe, Hemet

Ventura County Transportation Commission:
Keith Millhouse, Moorpark

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Agenda Item: 1



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PLANNING AND BUILDING SERVICES
CITY OF SANTA CLARITA

September 2, 2004

Ms. Heather Werner
Associate Planner
City of Santa Clarita
Planning Department
23920 Valencia Boulevard, Suite 302
Santa Clarita, CA 91355

RE: **Comments on the Notice of Preparation for a Draft Environmental Impact Report for The Keystone Project – SCAG No. I 20040508**

Dear Ms. Werner:

Thank you for submitting the **Notice of Preparation for a Draft Environmental Impact Report for The Keystone Project** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Notice of Preparation**, and have determined that the proposed **Project is regionally significant per California Environmental Quality Act (CEQA) Guidelines (Section 15206)**. The proposed Project considers the construction of more than 500 dwelling units. CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans, **Section 15125(d)**. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

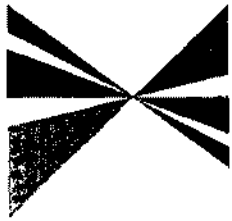
Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan, which may be applicable to your project, are outlined in the attachment. We expect the **DEIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies**. Please use our policy numbers to refer to them in your **DEIR**. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the **Proposed Project**.

Please provide a minimum of 45 days for SCAG to review the DEIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

SOUTHERN CALIFORNIA



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Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

September 2, 2004
 Ms. Heather Werner
 Page 2

**COMMENTS ON THE PROPOSAL TO DEVELOP A
 DRAFT ENVIRONMENTAL IMPACT REPORT
 FOR
 THE KEYSTONE PROJECT
 SCAG NO. I 20040508**

PROJECT DESCRIPTION

The proposed Project considers the development of 96 single family residential lots, 218 apartment units and 665 townhouse units for a total of 976 residential units. The proposed Project will also include a park and school. The 276-acre project site is located along the future extension of Golden Valley Road and to the north of the future Newhall Ranch Road and Golden Valley Road intersection, within the community of Canyon Country in the City of Santa Clarita.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for The Keystone Project.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The Draft EIR should reflect the most current SCAG forecasts which are the 2004 RTP (April 2004) Population, Household and Employment forecasts for the North Los Angeles County subregion and the City of Santa Clarita. These forecasts are as follows:

NORTH LA SUBREGION	2000	2005	2010	2015	2020	2025
POPULATION	512,391	614,502	735,262	852,964	967,387	1,076,013
HOUSEHOLD	161,131	181,825	221,538	256,966	292,658	327,745
EMPLOYMENT	178,999	182,284	215,955	235,070	253,417	270,409
CITY OF S. CLARITA						
	2000	2005	2010	2015	2020	2025
POPULATION	152,039	169,793	187,795	200,104	211,367	221,915
HOUSEHOLD	50,887	55,614	62,837	67,832	72,663	77,868
EMPLOYMENT	49,612	50,292	57,248	60,691	64,012	67,133

September 2, 2004
Ms. Heather Werner
Page 3

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3.05 Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.

3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

3.14 Support local plans to increase density of future development located at strategic

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Ms. Heather Werner
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- points along the regional commuter rail, transit systems, and activity centers.*
- 3.17 *Support and encourage settlement patterns, which contain a range of urban densities*
- 3.18 *Encourage planned development in locations least likely to cause environmental impact.*
- 3.19 *SCAG shall support policies and actions that preserve open space areas identified in local, state and federal plans.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social*

September 2, 2004
Ms. Heather Werner
Page 5

services, recreational facilities, law enforcement, and fire protection.

REGIONAL TRANSPORTATION PLAN

The 2004 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals

- Maximize mobility and accessibility for all people and goods in the region.
- Ensure travel safety and reliability for all people and goods in the region.
- Preserve and ensure a sustainable regional transportation system.
- Maximize the productivity of our transportation system.
- Protect the environment, improve air quality and promote energy efficiency.
- Encourage land use and growth patterns that complement our transportation investments.

Regional Transportation Plan Policies

- Transportation Investments shall be based on SCAG's adopted Regional Performance Indicators.

<p>Mobility</p> <p>Speed experienced by travelers regardless of mode.</p>	<p>Average Daily Speed</p> <p>Average Daily Delay</p>	<p>Delay</p> <p>Delay excess travel time resulting from the difference between a reference speed and actual speed. Daily delay and daily delay receipts are indicators used.</p>	<p>10% Improvement</p> <p>40% Improvement</p>
<p>Reliability</p>	<p>Percent Variation in Travel Time</p>	<p>Day-to-day change in travel times experienced by travelers.</p> <p>Variability results from accidents, weather, road closures, system problems and other non-recurrent conditions.</p>	<p>10% Improvement</p>

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 Ms. Heather Werner
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Performance Indicator	Performance Measures	Definition	Target	Notes
Cost Effectiveness	Benefit-to-Cost (B/C) Ratio	Ratio of benefits of RTP investments to the associated investments costs	\$3.06	
Sustainability	Total cost per capita to sustain current system performance	Focus on overall performance, including infrastructure condition. Preservation measure is a sub-set of sustainability.	\$29 per capita	primarily in
Environmental	Emissions generated by travel	Measured/forecast emissions include CO, NOX, PM10, SOX and VOC, CO2 as secondary measure to reflect greenhouse emissions	Meets conform	ly
Environmental	Expenditures in community	Expenditures in the RTP	\$650,000	Expenditures

- Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments.
- RTP land use and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and sub-regions.
- HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy #1.

September 2, 2004
Ms. Heather Werner
Page 7

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter core actions related to the proposed project includes:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

OPEN SPACE CHAPTER ANCILLARY GOALS

Outdoor Recreation

- 9.01 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*
- 9.02 *Increase the accessibility to open space lands for outdoor recreation.*
- 9.03 *Promote self-sustaining regional recreation resources and facilities.*

Public Health and Safety

- 9.04 *Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*
- 9.05 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

Resource Production

- 9.07 *Maintain adequate viable resource production land, particularly lands devoted to commercial agriculture and mining operations.*

September 2, 2004
 Ms. Heather Werner
 Page 8

Resource Protection

9.08 Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 Encourage water reclamation throughout the region where it is cost effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

GROWTH VISIONING

The fundamental goal of the Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's **mobility, livability and prosperity**. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve **mobility** for all residents

- Encourage transportation investments and land use decisions that are mutually supportive.
- Locate new housing near existing jobs and new jobs near existing housing.
- Encourage transit-oriented development.
- Promote a variety of travel choices.

Principle 2: Foster **livability** in all communities

- Promote infill development and redevelopment to revitalize existing communities.
- Promote developments, which provide a mix of uses.
- Promote "people scaled," walkable communities.
- Support the preservation of stable, single-family neighborhoods.

September 2, 2004
Ms. Heather Werner
Page 9

Principle 3: Enable prosperity for all people

- Provide, in each community, a variety of housing types to meet the housing needs of all income levels.
- Support educational opportunities that promote balanced growth.
- Ensure environmental justice regardless of race, ethnicity or income class.
- Support local and state fiscal policies that encourage balanced growth
- Encourage civic engagement.

Principle 4: Promote sustainability for future generations

- Preserve rural, agricultural, recreational and environmentally sensitive areas.
- Focus development in urban centers and existing cities.
- Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
- Utilize "green" development techniques.

CONCLUSIONS

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

September 2, 2004
Ms. Heather Werner
Page 10

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategic portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '1506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A 95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21063 and 21067, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

Letter No. 4

Southern California Association of Governments, dated August 23, 2005.

Comment 4-1:

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). The Draft FIR does not yet address SCAGs Notice of Preparation (NOP) response, dated 2 September 2004, which outlined relevant policies and forecasts. We expect the Final EIR to respond fully to SCAG's published comments. We would appreciate notification of the Final EIR, especially should a change in project scope occur, and a minimum of 45 days to review the document when it becomes available.

Reponse to Comment 4-1:

A discussion of SCAG's relevant policies has been incorporated into the Final EIR (see Section III Corrections and Additions).



Letter 5

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
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JAMES F. STAHL
Chief Engineer and General Manager

August 24, 2005

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PLANNING DIVISION

File No: 32-00.04-00

AUG 25 2005

PLANNING & ECONOMIC DEVELOPMENT
CITY OF SANTA CLARITA

Ms. Heather Waldstein, Associate Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355-4330

Dear Ms. Waldstein:

**Keystone Project, Master Case No. 03-358, General Plan Amendment 03-002,
Zone Change 03-002, Vesting Tentative Tract Map No. 060258, Conditional
Use Permit 03-016, Hillside Plan Review 03-006, and Oak Tree Permit 03-066**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on July 19, 2005. We offer the following comments regarding sewerage service:

1. County Sanitation District No. 32 of Los Angeles County has changed its name to the Santa Clarita Valley Sanitation District of Los Angeles County (SCVSD) after the recent consolidation of District No. 26 into District No. 32. This change should be made throughout the DEIR. 5-1
2. References throughout the document to a joint powers agreement between District No. 26 and District No. 32 should be deleted. 5-2
3. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a design capacity of 28.1 mgd and currently processes an average flow of 19.9 mgd. 5-3
4. The 2015 SCVJSS Facilities Plan and approved Final EIR proposed a treatment capacity expansion of 6 mgd at the Valencia WRP, which could increase the SCVJSS treatment capacity to 34.1 mgd. 5-4
5. Table V.N.2-2 should be changed to reflect the current average flow processed by the SCVJSS of 19.9 mgd and the corresponding "Remaining Available Capacity" should be changed to 7.96 mgd. 5-5
6. The current remaining capacity of the SCVJSS is approximately 8.2 mgd. The cumulative sewage generation of 1.5 mgd represents about 18 percent of the remaining capacity. 5-6

Agenda Item: |

Letter 5

Ms. Heather Waldstein

2

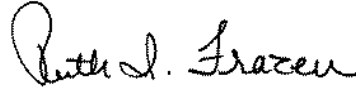
August 24, 2005

7. All other information concerning Districts' facilities and sewerage service contained in the document is currently complete and accurate. 5-7

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

James F. Stahl



Ruth I. Frazen
Engineering Technician
Planning & Property Management Section

RIF:rf

c: M. Cabrera

521015.1

Letter No. 5

County Sanitation Districts of Los Angeles County, dated August 25, 2005.

Comment 5-1:

1. County Sanitation District No. 32 of Los Angeles County has changed its name to the Santa Clarita Valley Sanitation District of Los Angeles County (SCVSD) after the recent consolidation of District No. 26 into District No. 32. This change should be made throughout the DEIR.

Response to Comment 5-1:

The name change of the County Sanitation District No. 32 to the Santa Clarita Valley Sanitation District of Los Angeles County (SCVSD) has been changed in the Final EIR (see Section III (Corrections and Additions)).

Comment 5-2:

2. References throughout the document to a joint powers agreement between District No. 26 and District No. 32 should be deleted.

Response to Comment 5-2:

The reference to a joint powers agreement between District No. 26 and District No. 32 have been deleted in the Final EIR (see Section III (Corrections and Additions)).

Comment 5-3:

3. The District operates two water reclamation plants (WRPs), the Saugus WRP and 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 19.9 mgd.

Response to Comment 5-3:

The updated information provided in the comment regarding design capacity and average sewerage flow has been incorporated into the Final EIR (see Section III (Corrections and Additions)).

Comment 5-4:

4. The 2015 SCVJSS Facilities Plan and approved Final EIR proposed a treatment capacity expansion of 6 mgd at the Valencia WRP, which could increase the SCVJSS treatment capacity

to 34.1 mgd.

Response to Comment 5-4:

The updated information provided in the comment regarding expansion plans at the Valencia WRP and the design treatment capacity of the combined sewerage treatment facilities has been changed in the Final EIR (see Section III (Corrections and Additions)).

Comment 5-5:

5. Table V.N.2-2 should be changed to reflect the current average flow processed by the SCVJSS of 19.9 mgd and the corresponding “Remaining Available Capacity” should be changed to 7.96 mgd.

Response to Comment 5-5:

The updated information regarding current average flow processed at the combined treatment facilities and the “Remaining Available Capacity” provided in Table V.N.2-2 of the Draft EIR has been changed in the Final EIR (see Section III (Corrections and Additions)).

Comment 5-6:

6. The current remaining capacity of the SCVJSS is approximately 8.2 mgd. The cumulative sewage generation of 1.5 mgd represents about 18 percent of the remaining capacity.

Response to Comment 5-6:

The updated information regarding remaining capacity of the combined treatment facilities under cumulative analysis has been changed in the Final EIR (see Section III (Corrections and Additions)).

Comment 5-7:

7. All other information concerning Districts facilities and sewerage service contained in the document is currently complete and accurate.

Response to Comment 5-7:

Comment noted. This comment states that the rest of the information contained in the Draft EIR regarding sewerage service is complete and accurate. No further response is required.

Letter No. 6**Fire Department, Los Angeles County, dated January 24, 2006****Comment 6-1:****PLANNING DIVISION:**

1. Section V.M.2, Fire Protection, is accurate on the whole. The only factual error is in the staffing of Station 104. Quint 104 is a 4-person company. As regards cumulative impact, the Section amply explains that the need for additional fire stations, equipment, and manpower in the area is a result of cumulative impact; hence the requirement to pay a developer fee in proportion to the size of the project as a mitigation measure.

Response to Comment 6-1

The staff number at Station 104 has been corrected from three-person engine company to four-person engine company in the Final EIR (see Section III (Corrections and Additions)). Comment noted regarding cumulative impact. The rest of the comment states that cumulative discussion adequately addresses the regional impact on fire service. No further response is required.

Comment 6-2:

2. It is not clear why the description of the Environmental Setting focuses on the resources in Battalion 6. The discussion correctly notes that all our emergency response units are dispatched as needed to an incident anywhere in our service territory. A major incident such as an apartment house fire would draw units from many fire stations based on distance and availability, irrespective of their battalion assignment. Fire stations are grouped into battalions primarily for administrative purposes. Stations assigned to another battalion may be closer to the project than some of the stations in the same battalion.

Response to Comment 6-2

As stated on page, V.M-11 of the Draft EIR, the City of Santa Clarita is located within Battalion 6 and therefore the Los Angeles County's Fire Department's resources within this area was identified. The rest of the comment acknowledges the Draft EIR's accuracy in discussion of the emergency response units and that irrespective of battalion assignment, the Department dispatches engines from other battalions that might be closer to an emergency. No further response is required.

Comment 6-3:

3. Our response to the Notice of Preparation stated that response distances and times could not be calculated without a detailed, scaled map showing the existing and proposed circulation system. As the Draft EIR does not provide such a map, it is still not possible to calculate response times to various points within this development

Response to Comment 6-3

A detailed map of the proposed circulation system is provided in Figures IV-2 and IV-3 and an aerial map of the region is provided in Figure IV-1 of the Draft EIR.

Comment 6-4:

LAND DEVELOPMENT UNIT:

1. The Fire Prevention Division, Land Development Unit has no additional comments regarding this project. The conditions that were addressed in EIR #2161, dated November 5, 2004, have not been changed at this time.

Response to Comment 6-4

Comment noted. The comment states that the Land Development Unit has no additional comments. No further response is required.

Comment 6-5:

2. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's EIR Specialist at (323) 890-4243.

Response to Comment 6-5

Comment noted. An address has been provided regarding any questions regarding subdivision, water systems or access. No further response is required.

Comment 6-6:

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.

Response to Comment 6-6

Comment noted. The comment addresses the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division. No further response is required.

Comment 6-7:

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

Response to Comment 6-7

Comment noted. The comment acknowledges that the areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed. No further response is required.

SANTA MONICA MOUNTAINS CONSERVANCY

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



August 22, 2005

Ms. Heather Waldstein, Associate Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, California 91355

**Comments on Keystone Project DEIR, Master Case No. 03358, General Plan
Amendment 03-002, Zone Change 03-002, Vesting Tentative Tract
Map 60258, Santa Clara River Watershed
(SCH No. 2004081017)**

Dear Ms. Waldstein:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft Environmental Impact Report (DEIR) for the Keystone Project. Despite the existing and anticipated development in the vicinity of the subject site, at each potential project approval, the City has the opportunity to contribute to maintaining a functional biological system in the Santa Clara River watershed rather than a patchwork of disjunct and poorly protected open space fragments. Specifically, the subject development as proposed is a poor model of integrating the Santa Clara River and its adjacent upland habitat, and it does not adequately protect the significant biological resources onsite.

7-1

Any increase in existing zoning and General Plan land use designation should be accompanied by public benefits that includes functional habitat. Furthermore, for a site to be upzoned, the development must maximize the avoidance of the biological constraints on the site. Upzoning should be considered only very carefully and it should be limited. The presence of sensitive biological resources on the site makes such avoidance even more critical. Now, during the California Environmental Quality Act (CEQA) process, is the time to carefully consider less damaging alternatives, and to require solid and specific mitigation measures, rather than defer them until a later time when additional permits are to be obtained. The Conservancy urges the City to maximize the protection of onsite biological resources, not pad areas. In light of the City's general reluctance to require open space dedications of over 50 percent of properties, the Conservancy recommends five changes to the project as described in this letter, as well as additional specificity regarding mitigation measures for impacts to plant communities and drainages.

7-2

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Biological Value of the Site

The DEIR (p. II-43) incorrectly refers to the "the overall low value of the biological resources on the site," with no supporting justification. The site incorporates part of the Santa Clara River Significant Ecological Area (SEA), a major wildlife movement corridor. Despite existing and planned developments, the site fully serves as an open space habitat refuge for wildlife moving between Santa Clara River and habitat areas to the north, and eventually into Angeles National Forest. In addition, the majority of the site is considered Critical Habitat by the federal government for the threatened songbird, the coastal California gnatcatcher. The site supports approximately 100 acres of coastal sage scrub, considered a very threatened plant community by California Department of Fish and Game. The DEIR states that the site supports several special status wildlife species (pp. II-34 to II-35). The site also supports oak trees and several acres of jurisdictional waters.

7-3

7-4

Summary of Project

The project consists of the subdivision of the 246-acre project site into 132 lots for a mix of residential, recreational, educational, YMCA facility and open space uses (pp. II-4 to II-5). This includes the construction of 979 dwelling units (consisting of 96 single-family lots, 215 multi-family apartment units and 667 townhouse units) and finished (graded) lots for a 1,200-1,600 student and 70 faculty/staff junior high school, and an approximate 30,476 square foot community/fitness YMCA center. The project includes a trail system, and the extension of Golden Valley Road westward to Newhall Ranch Road. This approximately 1,890 feet of Golden Valley Road is located outside of the project boundary. A City of Los Angeles Department of Water and Power (DWP) right-of-way divides the site diagonally. In total, approximately 178.33 acres (71 percent) of the project site would be converted to a developed condition (p. V.D-41).

7-5

The majority of the site is designated by the City of Santa Clarita General Plan and by the zoning code as Residential Very Low (RVL), with the remainder (3.7 acres) being designated as Industrial Commercial (IC; p. III-11). Approximately 17 acres are situated within the Santa Clara River (p. III-15), which is SEA 23. The project consists of a General Plan Amendment and zone change to change the land use designation (and zoning) to Residential Suburban (RS) and Residential Medium High (RMH). Of the area currently zoned and designated under the General Plan as IC, 0.5 acre would remain as IC. The project also includes a Vesting Tentative Tract Map, Conditional Use Permit, Hillside Plan Review, and Oak Tree Permit (pp. IV-20 to IV-21).

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Need for Project Modifications and Project Alternatives

With respect to the proposed development, the Conservancy recommends incorporating the following changes into the project:

- 1) avoid all impacts to the 100-foot-buffer area adjacent to the Santa Clara River SEA;
- 2) avoid all development on the property northwest of the DWP easement and delete connecting roads through the DWP easement (as shown on Alternatives B and C);
- 3) incorporate a permanent 100-foot-wide wildlife movement area adjacent to the western property boundary from the DWP easement south to the Santa Clara River (requires a 100 foot reduction in the school/YMCA site);
- 4) incorporate a wildlife undercrossing (minimum 10 foot by 10 foot opening) under the new proposed Golden Valley Road on the west side of the project; and
- 5) require open space fee title dedications and conservation easements over remaining open space onsite.

7-6

The Final Environmental Impact Report (FEIR) must include a modified Alternative C, incorporating the above recommendations. (Alternative C in the DEIR proposes to avoid development on property northwest of the DWP easement, and to delete the two roads through the DWP easement, described in Recommendation # 2, above.) If the City chooses to approve a development on the site, the Conservancy recommends that the City approve this Alternative C. The Conservancy also supports a modified Alternative B (the 78-unit Current General Plan Land Use and Zoning Alternative), provided that it incorporates the additional recommendations 4 and 5, above.

7-7

Recommendation #1-Avoid 100-foot Santa Clara River Buffer: With respect to providing a buffer for the Santa Clara River, it is important to note that 200-foot buffers are more appropriate to protect the biological values and functions of the river. The developments along the Santa Clara River show that there has been an ongoing disregard for providing natural buffers to river. If the City implements only a 100-foot-buffer, at the very least, the FEIR mitigation measures and conditions of approval should require that no development, including grading, temporary placement of construction materials, vegetation removal including fuel modification, etc., be allowed within the 100-foot-buffer.

7-8

According to the DEIR, "temporary" project grading would be allowed within 100-foot-buffer area adjacent to Santa Clara River Riparian Area (p. II-37). This is clearly encroachment into the "buffer." The DEIR is deficient for not providing specific information regarding the "temporary" grading. The DEIR does not define what

7-9

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“temporary” grading is and how this differs from permanent grading. Specifically, the DEIR does not define whether the impacts would be permanent, or if the original topography would be restored. The DEIR is also deficient by not providing information on how long the “temporary” grading would occur, and what is the square footage of grading that would occur in this 100-foot-buffer. This information must be included in the FEIR. Also, the FEIR must show a zoomed-in figure of the southern project area, with a scale, clearly depicting the SEA boundary and Santa Clara River floodplain, the 100-foot buffer area, and the limits of grading. (Figure IV-2A is difficult to discern, but appears to show that the grading would occur adjacent to the floodplain boundary.)

7-9
contd.

Recommendation #2-Avoid development northwest of DWP easement: The Conservancy concurs with the part of the proposal in Alternative C to delete any development northwest of the DWP easement, including the two street connections through the DWP easement. This change would avoid impacts to the northern secondary ridgeline and would substantially reduce biological impacts (to critical habitat for the coastal California gnatcatcher, to sensitive plant communities, and to drainages), as well as reduce cumulative water quality impacts, by retaining a large block of contiguous, unfragmented open space.

7-10

Recommendation #3-Provide 100-foot-wide wildlife movement area south of DWP easement: While information regarding planned and current developments in the vicinity is essential to understanding the biological value of the site, the DEIR did poor job of describing habitat connections to the north. The DEIR failed to recognize the importance of maintaining habitat areas adjacent to the river, and maintaining habitat connections from the river, northward, to Angeles National Forest and other small habitat blocks. Specifically, despite the current and planned development in the vicinity, the DWP corridor must be the focus of a preserved wildlife movement area to the north. The project should not completely cut-off this habitat connection to the north. Instead, the project should provide a stand-alone 100-foot-wide contiguous habitat corridor from the DWP corridor along the western boundary through the site, to the Santa Clara River. This must be provided on the project site because there is no guarantee that any other properties in the vicinity will provide the open space onsite to maintain this connection from the river northward. Also, there may be operational requirements within the DWP easement that may conflict with protection of a wildlife movement area.

7-11

Providing the described 100-foot-wide wildlife movement area south of the DWP easement would involve moving the school/YMCA site eastward a minimum of 100 feet unless the applicant could guarantee securing one 100-foot-wide easement area offsite between the Golden Valley Road extension and the YMCA site. This would substantially reduce the impacts to known locations of several special status species, to critical habitat for the

7-12

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coastal California gnatcatcher, to sensitive plant communities, and to drainages, and would reduce cumulative water quality impacts.

7-12
contd

Recommendation #4-Install wildlife crossing at Golden Valley Road extension: It is critical for the City to require a wildlife crossing (minimum 10 feet by 10 feet) under the proposed Golden Valley Road in the FEIR mitigation measures and conditions of approval. This undercrossing should be located at the western edge of the project, within the needed 100-foot-wildlife movement area south of the DWP easement, described under Recommendation #3, above. This project would result in not only direct loss of habitat, but would fragment the remaining habitat via the construction of multiple roads, including Golden Valley Road. One of the principal factors contributing to habitat fragmentation has been the construction of roads (Meffe et al. 1997). Roads can create barriers for animals attempting to move between patches, increase mortality (e.g., by collisions with vehicles), and can create deleterious edge effects. The DEIR is deficient for not addressing the impacts associated with increased road kill (of mammals such as coyotes and deer, reptiles such as snakes, and birds).

7-13

Recommendation #5: Assure Long-Term Open Space Protection: Mitigation Measure D-16 states that prohibitions against human, domestic animal, and motorized vehicle use in preserved natural open space areas shall be established by covenants conditions and restrictions (CC&Rs) (p. II-41). The DEIR further states that the Santa Clara River wash will be preserved as Natural Open Space (p. II-28). This DEIR language is inadequate to ensure that the open space areas onsite will be protected in perpetuity for the protection of the natural resources. The FEIR mitigation measures and conditions of approval must require a fee title dedication and overlapping conservation easements, with long-term management funding. Such funding can only be adequately secured through a Community Facilities District (CFD).

7-14

The mitigation measures for the proposed project *and all alternatives* in the FEIR must include a requirement for a fee simple dedication of the portion of the project site encompassing the Santa Clara River area and accompanying 100-foot-buffer. The requirement should specify that this dedication is to be granted to an appropriate public entity capable of managing open space for resource protection and recreational use, such as the City. If the City declines, the Mountains Recreation and Conservation Authority (MRCA) would accept such interest in the land to guarantee that the biological resources in the dedication areas are not adversely affected in the future. Also, any additional large blocks of open space onsite such as on the property northwest of the DWP easement, and any additional avoidance areas (i.e., the recommended 100-foot-wide wildlife movement area south of the DWP easement) should also be dedicated in fee to such agency. No fuel

7-15

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modification should be allowed in these areas.

7-15
contd.

Any remaining smaller pieces of open space remaining onsite should be required to be protected via conservation easements to the City and to an agency such as the MRCA at no public cost. The easements must prohibit development, structures, new roads, grading, mineral extraction, grazing, vineyards, planting of non-native vegetation, fencing (other than used for habitat restoration), and utilities (other than what is allowed under current utility easements). Uses that should be allowed in this conservation easement include trails and habitat restoration.

7-16

The DEIR should incorporate a Community Facilities District or Landscape Maintenance District, or a sufficient endowment fund from the developer (e.g., in the form of a non-wasting endowment), in the mitigation measures and conditions of approval to fund maintenance of the open space for the life of the project. Open space dedications are a form of mitigation. For such mitigation to stand the test of time, it must be protected and in some cases actively managed. A complete open space mitigation package must include maintenance funding. The proposed project and every CEQA alternative must require that the funding mechanism be established prior to grading or vegetation removal.

7-17

Need for Specificity Regarding Mitigation Measures for Impacts to Biological Resources

The mitigation proposed in the DEIR for impacts to native plant communities and jurisdictional drainages is deficient because it does not provide the necessary specificity to provide reasonable assurance that the mitigation will offset the significant adverse impacts to these native plant communities. Most importantly, there is no identification of locations for mitigation areas, and timing of mitigation. The applicant may find himself limited with respect to mitigation areas, and the project should not be approved without assurances that the conceptual mitigation idea (as the DEIR proposes) is actually feasible, and that it will be implemented in a timely manner. The Conservancy concurs in concept with the idea of mitigating the loss of native plant communities and habitats by restoration or acquisition, as long as adequate avoidance has been achieved, which in this case, it has not been. We provided recommendations earlier in this letter regarding appropriate areas to avoid.

7-18

Anticipated impacts include those to coastal sage scrub (86 acres), chaparral (57.85 acres) (both considered critical habitat for the gnatcatcher), and jurisdictional drainages (2.44 acres of southern cottonwood-willow riparian habitat, 4.26 acres of California Department of Fish and Game (CDFG) jurisdictional streambeds, and 1.22 acres of waters of the United States [as considered by the U.S. Army Corps of Engineers]) (p. II-26, p. II-27, p. V.D-61, pp. II-36 to II-37). "Receiving approval of a mitigation and monitoring plan by CDFG" is not

7-19

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specific enough, and is not adequate mitigation. This specificity is clearly warranted in the CEQA document, as well as in the mitigation monitoring program. Relying on defining these specifics in permits to be obtained later, is insufficient mitigation in a CEQA document.

7-19
contd.

Most importantly, the mitigation measures in the FEIR must provide specifics regarding the *locations* of the restoration and/or acquisition areas. Timing of the mitigation should also be specified in the FEIR to ensure that the properties are protected and that any acquisition or restoration has demonstrably progressed prior to issuance of a grading permit, or within six months for restoration (to optimize planting of vegetation according to the season). The FEIR should specify a mitigation ratio of at least 2:1 for coastal sage scrub impacts and impacts to drainages. The FEIR mitigation measures should require that impacts associated with fuel modification areas are also mitigated by restoration or purchase of land at at least a 1:1 ratio.

7-20

It is also critical that the FEIR mitigation measures specify that any restoration/mitigation areas are permanently preserved by recordation of conservation easement(s) to the City and to an appropriate conservation entity (e.g., MRCA) (if they are not already to be protected via fee title dedications to an agency such as MRCA).

7-21

Other Comments

The FEIR should identify the loss of loss of 10.81 acres of non-native grassland, which includes 1.03 acres for fuel modification, of the approximately 18.42 acres onsite (p. II-27) as a significant adverse impact due to the loss of foraging habitat for raptors. The FEIR must also specify how much habitat (non-native grassland, or other habitat) would be lost due to restoration of other habitat types onsite.

7-22

The analysis of impacts in the FEIR (including to vegetation communities as shown on Figure V.D-1 Vegetation Communities) must incorporate the full extent of impacts (including grading associated with the offsite roads) as shown on the Illustrative Site Plan (Figure IV-3).

7-23

In summary, the Conservancy recommends the five previously described changes to the project, as well as additional specificity regarding mitigation for impacts to vegetation communities. The Conservancy recommends that the City take a leadership role in protecting the valuable biological resources onsite and within the City by making habitat avoidance the primary public planning objective with key Master Plan road segments. Thank you for your consideration of these comments. Please direct any questions and all

7-24

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future correspondence to Judi Tamasi of our staff at the above address and by phone at
(310) 589-3200, ext. 121.

7-24
contd.

Sincerely,

Elizabeth A. Cheadle
ELIZABETH A. CHEADLE
Acting Chairperson

cc: State Clearinghouse (Scott Morgan)
California Department of Fish and Game (Betty Courtney)

Letter No. 7

Santa Monica Mountains Conservancy, dated August 22, 2005.

Comment 7-1:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft Environmental Impact Report (DEIR) for the Keystone Project. Despite the existing and anticipated development in the vicinity of the subject site, at each potential project approval, the City has the opportunity to contribute to maintaining a functional biological system in the Santa Clara River watershed rather than a patchwork of disjunct and poorly protected open space fragments. Specifically, the subject development as proposed is a poor model of integrating the Santa Clara River and its adjacent upland habitat, and it does not adequately protect the significant biological resources onsite.

Response to Comment 7-1:

This first portion of the comment expresses opinions about existing and future development in the project vicinity relating to the Santa Clara River watershed, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

With respect of the proposed project development as a “poor model of integrating the Santa Clara River and its adjacent upland habitat and it does not adequately protect the significant biological resources onsite”, the comment does not specifically address the adequacy of the analysis contained in the Draft EIR and does not provide enough detail. Therefore, a response is not required pursuant to CEQA. However, both parts of the comment are acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-2:

Any increase in existing zoning and General Plan land use designation should be accompanied by public benefits that includes functional habitat. Furthermore, for a site to be upzoned, the development must maximize the avoidance of the biological constraints on the site. Upzoning should be considered only very carefully and it should be limited. The presence of sensitive biological resources on the site makes such avoidance even more critical. Now, during the California Environmental Quality Act (CEQA) process, is the time to carefully consider less damaging alternatives, and to require solid and specific mitigation measures, rather than deter them until a later time when additional permits are to be obtained. The Conservancy urges the City to maximize the protection of onsite biological resources, not pad areas. In light of the City's general reluctance to require open space dedications of over 50 percent of properties, the Conservancy recommends five changes to the project as described in this letter, as well as additional specificity regarding mitigation measures for impacts to plant communities and drainages.

Response to Comment 7-2:

This first portion of the comment expresses opinions about the proposed project's "upzoning" and avoidance of the biological constraints on the site, encourages avoidance of sensitive biological resources onsite and but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. The comment further urges the City to maximize protection of onsite biological resources which is an opinion statement and does not specifically addresses the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. Regarding the recommended "five changes to the project", see Response to Comments 6-6 through 6-17 Regarding biological resource specific mitigation measures, see Letter 1, Department of Fish and Game, Response to Comments 1-10 through 1-14.

Comment 7-3:

The DEIR (p. 11-43) incorrectly refers to the "the overall low value of the biological resources on the site," with no supporting justification. The site incorporates part of the Santa Clara River Significant Ecological Area (SEA), a major wildlife movement corridor. Despite existing and planned developments, the site fully serves as an open space habitat refuge for wildlife moving between Santa Clara River and habitat areas to the north, and eventually into Angeles National Forest.

Response to Comment 7-3:

The Conservancy correctly observes that the Santa Clara River is within the Santa Clara River Significant Ecological Area, which is subject to preservation. The first sentence under Cumulative Impacts on page II-43 has been deleted from the Final EIR (see Section III, Corrections and Additions).

Comment 7-4:

In addition, the majority of the site is considered Critical Habitat by the federal government for the threatened songbird, the coastal California gnatcatcher. The site supports approximately 100 acres of coastal sage scrub, considered a *very* threatened plant community by California Department of Fish and Game. The *DEIR* states that the site supports several special status wildlife species (pp. II34 to II-35). The site also supports oak trees and several acres of jurisdictional waters.

Response to Comment 7-4:

The comment is correct that the site contains approximately 100 acres of coastal sage scrub and that the site has been designated as critical habitat for the coastal California gnatcatcher. Impacts to approximately 86 acres of coastal sage scrub are considered significant, though it should be noted that focused surveys did not detect the coastal California gnatcatcher on the site.

Comment 7-5:

The project consists of the subdivision of the 246-acre project site into 132 lots for a mix of residential, recreational, educational, YMCA facility and *open space uses* (pp. II-4 to II-S). This includes the construction of 979 dwelling units (consisting of 96 single-family lots, 215 multi-family apartment units and 667 townhouse units) and finished (graded) lots for a 1,200-1,600 student and 70 faculty/staff junior high school, and an approximate 30,476 square foot community/fitness YMCA center. The project includes a trail system, and the extension of Golden Valley Road westward to Newhall Ranch Road. This approximately 1,890 feet of Golden Valley Road is located outside of the project boundary. A City of Los Angeles Department of Water and Power (DWP) right-of-way divides the site diagonally. In total, approximately 178.33 acres (71 percent) of the project site would be converted to a developed condition (p. V.D-41).

The majority of the site is designated by the City of Santa Clarita General Plan and by *the* zoning code as Residential Very Low (RVL), with the remainder (3.7 acres) being designated as Industrial Commercial (IC; p. III-11). Approximately 17 acres are situated within the Santa Clara River (p. III-15), which is SFA 23. The project consists of a General Plan Amendment and zone change to change the land use designation (and zoning) to Residential Suburban (RS) and Residential Medium High (RMH). Of the area currently zoned and designated under the General Plan as IC, 0.5 acre would remain as IC. The project also includes a Vesting Tentative Tract Map, Conditional Use Permit, Hillside Plan Review, and Oak Tree Permit (pp. IV-20 to IV-21).

Response to Comment 7-5:

The comment accurately describes the proposed project. This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA.

Comment 7-6:

With respect to the proposed development, the Conservancy recommends incorporating the following changes *into the project*:

- 1) avoid all impacts to the 100-foot-buffer area adjacent to the Santa Clara River SEA;
- 2) avoid all development on the property northwest of the DWP easement and delete connecting roads through the DWP easement (as shown on Alternatives B and c);
- 3) incorporate a permanent 100-foot-wide wildlife movement area adjacent to the western property boundary from the DWP easement south to the Santa Clara River (requires a 100 foot reduction in the school/YMCA site);

- 4) incorporate a wildlife undercrossing (minimum. 10 foot by 10 foot opening) under the new proposed Golden Valley Road on the west side of the project; and
- 5) require open space fee title dedications and conservation easements over remaining open -space onsite.

Response to Comment 7-6:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-7:

The Final Environmental Impact Report (FEIR) must include a modified Alternative C, incorporating the above recommendations. (Alternative C in the DEIR proposes to avoid development on property northwest of the DWP easement, and to delete the two roads through the DWP easement, described in Recommendation # 2, above.) If the City chooses to approve a development on the site, the Conservancy recommends that the City approve this Alternative C. The Conservancy also supports a modified Alternative B (the 78-unit Current General Plan Land Use and Zoning Alternative), provided that it incorporates the additional recommendations 4 and 5, above.

Response to Comment 7-7:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment that the Conservancy's recommends approval of project Alternative C, Compliance with Noise Setbacks and Preservation of Northern Secondary Ridgeline, and also supports project Alternative B, Current General Plan Land Use and Zoning, will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-8:

Recommendation #1-Avoid 100 foot Santa Clara River Buffer: With respect to providing a buffer for the Santa Clara River, it is important to note that 200-foot buffers are more appropriate to protect the biological values and functions of the river. The developments along the Santa Clara River show that there has been an ongoing disregard for providing natural buffers to river. If the City implements only a 100-foot-buffer, at the very least, the FEIR mitigation measures and conditions of approval should require that no development, including grading, temporary placement. of construction materials, vegetation removal including fuel modification, etc., be allowed within the 100-foot-buffer.

Response to Comment 7-8:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment expresses opinions about the 100-foot Santa Clara River buffer and recommends either a 200-foot buffer or require as mitigation or conditions of approval that no grading should occur within the 100-foot buffer including temporary placement of construction materials, vegetation removal (including fuel modification) be allowed within the 100-foot buffer. The comment will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-9:

According to the DEIR, "temporary" project grading would be allowed within 100-footbuffer area adjacent to Santa Clara River Riparian Area (p. 11-37). This is clearly encroachment into the "buffer." The DEIR is deficient for not providing specific information regarding the "temporary" grading. The DEIR does not define what "temporary" grading is and how this differs from permanent grading. Specifically, the DMR does not define whether the impacts would be permanent, or if the original topography would be restored. The DEIR is also deficient by not providing; information on how long the "temporary" grading would occur, and what is the square footage of grading that would occur in this 100-foot-buffer. This information must be included in the FEIR . Also, the FEIR must show a zoomed-in figure of the southern project area, with a scale, clearly depicting the SEA boundary and Santa Clara River floodplain, the 100-foot buffer area, and the limits of grading. (Figure IV-2A is difficult to discern, but appears to show that the grading would occur adjacent to the floodplain boundary.)

Response to Comment 7-9:

In order to construct the manufactured slopes that would support the YMCA/School site development pad and the multi-use trail along the Santa Clara River, construction vehicles would need to access the southern facing slopes through the Santa Clara River along the Floodway limit. No temporary or permanent grading would occur in the Santa Clara River nor within the Floodway limit. As discussed in the Draft EIR, page V.D-40, Additional Area-Specific Thresholds, "the applicant would need to revegetate these areas [100 foot upland habitat preserve area] with appropriate native upland plant species (i.e., coastal sage scrub or scrub/grassland mix) that either historically occurred in the area or that would be of higher biological value to riparian and upland species." This threshold is addressed in the discussion under "Impacts on Habitat Adjacent to Santa Clara River Riparian Area", page V.D-47 and Mitigation Measure D-9, page V.D-67, was provided to ensure that any disturbance in the 100 foot buffer area in the Santa Clara River area be mitigated with revegetation of appropriate native upland plant species as required by the threshold.

For further clarification, reference to "temporary grading" has been changed to "construction vehicles" in the Final EIR (see Section III (Corrections and Additions)).

Comment 7-10:

Recommendation #2-Avoid development northwest of DWP easement: The Conservancy concurs with the part of the proposal in Alternative C to delete any development northwest of the DWP easement, including the two street connections through the DWP easement. This change would avoid impacts to the northern secondary ridgeline and would substantially reduce biological impacts (to critical habitat for the coastal California gnatcatcher, to sensitive plant communities, and to drainages), as well as reduce cumulative water quality impacts, by retaining a large block of contiguous, unfragmented open space.

Response to Comment 7-10:

The comment that the Conservancy's recommends approval of project Alternative C, Compliance with Noise Setbacks and Preservation of Northern Secondary Ridgeline, will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-11:

Recommendation #3-Provide 100-foot-wide wildlife movement area south of DWP easement: While information regarding planned and current developments in the vicinity is essential to understanding the biological value of the site, the DEIR did poor job of describing habitat connections to the north. The DEIR failed to recognize the importance of maintaining habitat areas adjacent to the river, and maintaining habitat connections from the river, northward, to Angeles National Forest and other small habitat blocks. Specifically, despite the current and planned development in the vicinity, the DWP corridor must be the focus of a preserved wildlife movement area to the north. The project should not completely cutoff this habitat connection to the north. Instead, the project should provide a stand-alone 100-foot-wide contiguous habitat corridor from the DWP corridor along the western boundary through the site, to the Santa Clara River. This roust be provided on the project site because there is no guarantee: that any other properties in the vicinity will provide the open space onsite to maintain this connection from the river northward. Also, there may be operational requirements within the DWP easement that may conflict with protection of a wildlife movement area.

Response to Comment 7-11:

The Biological Assessment prepared by TLC (see Appendix 3 A of the Draft EIR) addresses the potential for the site to provide for wildlife movement and notes that the site is not within an area that exhibits potential for connecting the Santa Clara River with the Angeles National Forest. The portion of the Angeles National Forest approximately 3.3 miles to the south is separated from the site by existing commercial development, Soledad Canyon Road and the Antelope Valley Freeway. National Forest approximately 2.7 miles to the north is separated by existing and future approved development. With buildout of the SunCal project to the north (currently under construction) and Riverpark (recently

approved) to west, the site (under future conditions) will be more-or-less surrounded by development eliminating any potential for meaningful wildlife movement. It should be noted that the Riverpark Draft EIR evaluated the potential for wildlife movement in this area and determined that the Santa Clara River was the only regional wildlife corridor in the area and that development of the Riverpark project would not have a significant impact on wildlife movement.¹⁶ The portion of the site that includes the Santa Clara River will be preserved with associated buffers, ensuring that the Santa Clara River continues to serve as the primary east-west corridor.

Comment 7-12:

Providing the described 100-foot-wide wildlife movement area south of the DWP easement would involve moving the school/YMCA site eastward a minimum of 100 feet unless the applicant could guarantee securing one 100-foot-wide casement area offsite between the Golden Valley Road extension and the YMCA Site. "This would substantially reduce the impacts to known locations of several special status species, to critical habitat for the coastal California gnatcatcher, to *sensitive* plant communities, and to drainages, and would reduce cumulative water quality impact".

Response to Comment 7-12:

See Response to Comment 7-11.

Comment 7-13:

Recommendation #4-Install wildlife crossing at Golden Valley Road extension: It is critical for the City to require a wildlife crossing (minimum '10 feet by 10 feet) under the proposed Golden Valley Road in the FEIR mitigation measures and conditions of approval. This undercrossing should be located at the western edge of the project, within the needed 100foot-wildlife movement area south of the DWP easement; described under *Recommendation #3*, above. This project would result in not only direct loss of habitat, but would fragment the remaining habitat via the construction of multiple roads, including Golden Valley Road. One of the principal factors contributing to habitat fragmentation has been the construction of roads (Meffe et al. 1997). Roads can create barriers for animals attempting to move between patches, increase *mortality* (e.g., by collisions with vehicles), and can create deleterious edge effects. The DEIR is deficient for not addressing the impacts associated with increased road kill (of mammals such as coyotes and deer, reptiles such as snakes, and birds).

Response to Comment 7-13:

¹⁶ Impact Sciences, Inc. March 2004. Riverpark: Revised Section 4.6 Biological Resources, Draft Environmental Impact Report SCH 2002091081. Prepared for the City of Santa Clarita.

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, this comment expresses a recommendation about installation of a wildlife crossing at Golden Valley Road. The comment will be forwarded to the decision-making bodies for their review and consideration.

As noted in Response 7-11, due to the configuration of existing development and additional substantial development that is under construction (i.e., SunCal) and recently approved (i.e., Riverpark), the project site is surrounded by development, with the Santa Clara River serving as the major east-west wildlife corridor in the area. The comment suggestion regarding installation of a 10-foot by 10-foot wildlife undercrossing suggests that large mammals are the target species relative to wildlife movement. Given the surrounding developments, including the recently approved Riverpark project to the west, the site cannot function as a wildlife movement corridor for large mammal such as the mountain lion or mule deer as the Riverpark project will create a “dead end” near the intersection of Bouquet Canyon Road and Newhall Ranch Road. Other large mammals such as coyote, bobcat and gray fox, which exhibit high levels of adaptability to human use would still be expected to occur.

The ability of Bobcats and Coyotes to move between habitat blocks and adjacent habitat fragments along with their adaptability to the urban/wildland interface is well summarized in the Conclusion Section of Tigas et al. cited in Footnote 2 above and reproduced below:

Bobcats and coyotes persisting in an urban environment show behavioral adjustments to habitat fragmentation and human activities. Both species reduce their daytime activity and show avoidance of developed area during times of high human activity. Some individuals, mostly female bobcats, restrict their home ranges to a single fragment, while other individuals frequent several fragments. Home ranges however, are not enlarged in fragmented habitat, perhaps due to abundant resources in other parts of the home range. Individuals take a variety of routes between fragments, occasionally using corridors but also crossing through development, including crossing over roads rather than using culverts. Although corridors are not always used for traveling between fragments, they were used often enough to suggest that they may serve an important role in maintaining connectivity. Frequent road crossing leads to high mortality due to vehicle collision and may be an important problem in urban fragmented area. Preventing collisions with vehicles might be enhanced by designing open space to minimize the need for animals to cross major roads, by identifying frequent crossing points and reducing speed limits and posting warning signs at these points, and by educating residents, who in our study displayed a general interest in the well-being of bobcats and coyotes. Culverts were used to cross under roads, thereby avoiding vehicles, but we found no clear evidence of preference for culverts. Carnivores such as bobcats and coyotes may be able to persist in fragmented habitat, but movement between fragments needs to be maintained by providing connectivity and preventing vehicular collision.

In considering the conclusions set forth by Tigas, as related to the project, two additional points are warranted regarding mortality and vehicle collisions. First, Riley et al., cited in Footnote 3, found no difference in mortality rates due to anthropogenic causes in bobcats and coyotes associated with urban/wildland interface than for animals associated within natural areas. In fact they report:

Similarly, mortality rates from human-related causes were not positively related to urban association. For bobcats, the vehicle death rate was highest in animals with the least urban association.

This was attributed to learned responses by animals that occupy the urban/wildland interface, wherein they learn to negotiate road crossings in a way to avoid collisions.

Comment 7-14:

Recommendation #5: Assure Long-Term. Open Space Protection: Mitigation Measure D-16 states that prohibitions against human, domestic animal, and motorized vehicle use in preserved natural open space areas shall be established by covenants conditions and restrictions (CC&Rs) (p. Ii-41). The DEIR further states that the Santa Clara River wash will be preserved as Natural Open Space (p. II-28). This DEIR language is inadequate to ensure that the open space areas onsite will be protected in perpetuity for the protection of the natural resources. The FEIR mitigation measures and conditions of approval must require a fee title dedication and overlapping conservation easements, with long-term management funding. Such funding can only be adequately secured through a Community Facilities District (CFD).

Response to Comment 7-14:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. The comment recommends a fee title dedication and overlapping conservation easement, with long term management funding (secured through a Community Facilities District) to protect in perpetuity natural open space areas. This recommendation will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-15:

The mitigation *measures for the* proposed project and all *alternatives in* the FEIR must include a requirement for a fee simple dedication of the portion of the project site encompassing the Santa Clara River area and accompanying 100-foot-buffer. The requirement should specify that this dedication is to be granted to an appropriate public entity capable of managing open space for resource protection and recreational use, such as the City. If the City declines, the Mountains Recreation and Conservation Authority (MRCA) would accept such interest in the land to guarantee that the biological resources in the dedication areas are not adversely affected in the future. Also, any additional large blocks of open space

onsite such as on the property northwest of the DWP easement, and any additional avoidance areas (i.e., the recommended 100-foot-wide wildlife movement area south of the DWP easement) should also be dedicated in fee to such agency. No fuel modification should be allowed in these areas.

Response to Comment 7-15:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. The comment provides specific detail recommending a fee simple dedication of the portion of the project site encompassing the Santa Clara River and the accompanying 100-foot buffer for the project and all project alternatives. This recommendation will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-16:

Any remaining smaller pieces of open space remaining onsite should be required to be protected via conservation easements to the City and to an agency such as the MRCA at no public cost. The easements must prohibit development, structures, new roads, grading, mineral extraction, grazing, vineyards, planting of non-native vegetation, fencing (other than used for habitat restoration), and utilities (other than what is allowed under current utility easements). Uses that should be allowed in this conservation easement include trails and habitat restoration.

Response to Comment 7-16

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. The comment recommends conservation easements be provided to the City and to MRCA on smaller pieces of open space areas that should be protected with specific recommendations of prohibited uses. This comment and recommendation will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-17:

The DEIR should incorporate a Community Facilities District or Landscape Maintenance District, or a sufficient endowment fund from the developer (e.g., in the form of a non-wasting endowment), in the mitigation measures and conditions of approval to fund maintenance of the open space for the life of the project. Open space dedications are a form of mitigation. For such mitigation to stand the test of time, it must be protected and in some cases actively managed. A complete open space mitigation package must include maintenance funding. The proposed project and every CEQA alternative trust require that the funding mechanism be established prior to grading or vegetation removal.

Response to Comment 7-17:

This comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. The comment recommends the creation of a Community Facilities District or Landscape Maintenance District or an endowment fund from the developer to fund maintenance of the open space for the life of the project.

This comment and recommendation will be forwarded to the decision-making bodies for their review and consideration.

Comment 7-18:

The mitigation proposed in the DEIR for impacts to native plant communities and jurisdictional drainages is deficient because it does not provide the necessary specificity to provide reasonable assurance that the mitigation will offset the significant adverse impacts to these native plant communities. Most importantly, there is no identification of locations for mitigation areas, and timing of mitigation. The applicant may find himself limited with respect to mitigation areas, and the project should not be approved without assurances that the conceptual mitigation idea (as the DEIR proposes) is actually feasible, and that it will be implemented in a timely manner. The Conservancy concurs in concept with the idea of mitigating the loss of native plant communities and habitats by restoration or acquisition, as long as adequate avoidance has been achieved, which in this case, it has not been. We provided recommendations earlier in this letter regarding appropriate areas to avoid.

Response to Comment 7-18:

As noted in the Draft EIR, pages V.D-57 through V. D-59 (Mitigation Measures D-1 and D-2), significant impacts to native coastal sage scrub and chaparral, designated as critical habitat for the coastal California gnatcatcher will require consultation with the USFWS prior to any project impacts. In accordance with the federal Endangered Species Act (FESA), impacts to critical habitat must be addressed through the Section 7 Consultation process before any impacts to the habitat can be authorized. Under the FESA, USFWS must determine that the project will not result in adverse modification to designated critical habitat and where impacts to such habitat are unavoidable USFWS must require mitigation that offsets potential impacts. While mitigation has not been developed in detail, compliance with the FESA will ensure that the impacts to coastal sage scrub and chaparral designated as critical habitat are fully mitigated.

Similarly, impacts to southern cottonwood willow riparian forest will require authorizations from CDFG and U.S. Army Corps of Engineers. The applicant's regulatory consultant (VCS) has met onsite with CDFG to review impacts and associated mitigation. Based on preliminary discussions with CDFG, mitigation for riparian habitat will be provided at a ratio of 5:1. Compensation for unvegetated streambeds will be provided at a ratio of 3:1 on an acre-for acre basis.

Comment 7-19:

Anticipated impacts include those to coastal sage scrub (86 acres), chaparral (57.85 acres) (both considered critical habitat for the gnatcatcher), and jurisdictional drainages (2.44 acres of southern cottonwood-willow riparian habitat, 4.26 acres of California Department of Fish and Game (CDFG) jurisdictional streambeds, and 1.22 acres of waters of the United States [as considered by the u.s. Army

Corps of Engineers]) (p. II-26, p. II-27, p. V.D-61, pp. n-36 to II-37). "Receiving approval of a mitigation and monitoring plan by CDFG" is not specific enough, and is not adequate mitigation. This specificity is clearly warranted in the CEQA document, as well as in the mitigation monitoring program. Relying on defining these specifics in permits to be obtained later, is insufficient mitigation in a CEQA document.

Response to Comment 7-19

See Response to Comment 7-18.

Comment 7-20:

Must importantly, the mitigation measures in the FEIR must provide specifics regarding the locations of the restoration and/or acquisition areas. Timing of the mitigation should also be specified in the FEIR to ensure that the properties are protected and that any acquisition or restoration has demonstrably progressed prior to issuance of a grading permit, or within six months for restoration (to optimize planting of vegetation according to the season). The FEIR should specify a mitigation ratio of at least 2:1 for coastal sage scrub impacts and impacts to drainages. The FEIR mitigation measures should require that impacts associated with fuel modification areas are also mitigated by restoration or purchase of land at least a 1:1 ratio.

Response to Comment 7-20:

See Response to Comment 7-18.

Comment 7-21:

It is also critical that the FEIR mitigation measures specify that any restoration/mitigation areas are permanently preserved by recordation of conservation easement(s) to the City and to an appropriate conservation entity (e.g., MRCA) (if they are not already to be protected via fee title dedications to an agency such as MCA).

Response to Comment 7-21:

The State and federal agencies that will authorize impacts to regulated aquatic resources (CDFG and Corps) routinely require that all mitigation areas are preserved in perpetuity through conservation easements or similar mechanisms. Similarly, USFWS will require permanent preservation of areas restored and/or preserved to compensate for impacts to coastal sage scrub and chaparral, designated as critical habitat for the California gnatcatcher.

Comment 7-22:

The FEIR should identify the loss of loss of 10.81 acres of non-native grassland, which includes 1.03 acres for fuel modification, of the approximately 18.42 acres onsite (p.11-27) as a significant adverse impact due to the loss of foraging habitat for raptors. The FEIR must also specify how much habitat (non-native grassland, or other habitat) would be lost due to restoration of other habitat types onsite.

Response to Comment 7-22

Only one special-status raptor (Cooper's hawk) was observed on the project site. Cooper's hawks largely forage in woodland habitats. The loss of 11.84 acres of grassland habitat would not adversely affect the Cooper's Hawk. Two other raptors were identified, red-tail hawk and turkey vulture. Both of these species are common and widespread and the loss of 11.84 acres of grassland would not adversely affect these species.

Comment 7-23:

The analysis of impacts in the FOR (including to vegetation communities as shown on Figure V.D-1 Vegetation Communities) must incorporate the full extent of impacts (including grading associated with the offsite roads) as shown on the Illustrative Site Plan (Figure IV-3).

Response to Comment 7-23:

As set forth on Page V.D-1 of the Draft EIR, the area evaluated for impacts included all offsite impacts for Golden Valley Road and offsite impacts associated with "A" Street.

Comment 7-24:

In summary, the Conservancy recommends the five previously described changes to the project, as well as additional specificity regarding mitigation for impacts to vegetation communities. The Conservancy recommends that the City take a leadership role in protecting the valuable biological resources onsite and within the City by making habitat avoidance the primary public planning objective with key Master Plan road segments. Thank you for your consideration of these comments. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Response to Comment 7-24:

This comment is acknowledged and will be forwarded to the decision-making bodies for their review and consideration.

John & Sandra Powell

20468 Ermine St., Santa Clarita, CA 91351

Tel (661) 298-2267 Fax (661) 298-3002

Date: August 26, 2005

To: Heather Waldstein, Santa Clarita Planning Dept.

From: John Powell

Subject: Keystone Development, Master Case No. 03358

RECEIVED
PLANNING DIVISION

AUG 30 2005

PLANNING & ECONOMIC DEVELOPMENT
CITY OF SANTA CLARITA

Dear Ms. Waldstein,

I have several objections to the DEIR findings and conclusions as outlined below:

1) The ramifications of removing habitat for special status wildlife (Bell's Sage Sparrow, Loggerhead Shrike and others) are written off as insignificant. I disagree with this assessment and it must be acknowledged that irreparable harm will be done to these species. We are also removing habitat for several riparian species. More must be done to limit the damage done to these natural residents of the area, such as limiting the size and scope of the Keystone development.

8-1

8-2

2) I vehemently disagree with the opinion expressed in the report that the Elimination of the Ermine Street Connection be rejected as an infeasible alternative. The Keystone project does NOT need Ermine for access. The existing neighborhood has had the same traffic level since 1988, why do we need to change that now? There is no thought or consideration given to the quality of life for those of us living in the neighborhood at the western extension of Ermine. We will already be faced with greatly increased noise, lighting and pollution levels with Golden Valley going through. To add to this by also extending Ermine is tantamount to destroying the very flavor and essence of our neighborhood. To further exacerbate the problem, the very project that proposes to destroy our tranquil neighborhood will be creating exactly what we have now, a series of quiet cul-de-sacs that open on to natural areas. The DEIR completely ignores the impact on our quality of life. This is totally unacceptable and cannot stand!

8-3

8-4

8-5

3) Land use – the area is zoned for RVL. At most, RS should be allowed. There is no reason to increase it several levels up to RMH. The General Plan was drafted with these limits in mind for a reason. We must not forget that the reason most of us live here in the SCV is for the peace and quiet and the natural beauty of the area. These are things that a massive development like Keystone will greatly diminish.

8-6

4) Elementary Schools – the examination of elementary school capacity does not take into account all the developments happening in the surrounding areas and I feel their estimates of students generated are very low. Most families moving to the SCV are young families with children. General estimates are not applicable. Also, nearly all local

8-7

8-8

Agenda Item: |

elementary schools are at or near capacity. All large scale developments should be obligated to provide an elementary school as part of their development.

8-8
contd.

5) Parks – where is the park that this development should provide? We don't have enough parks as it is in Santa Clarita, and I feel no development should be allowed that does not include a park on a scale relative to the increase in population the development will generate.

8-9

6) Simply creating a small buffer zone around the Significant Ecological Areas is not enough. These areas cannot be defined so easily, as events and developments around them will inevitably impact them in a negative manner. This development will certainly spell the end to the SEA in the area.

8-10

7) The cumulative noise increase to existing neighborhoods is unacceptable. While the DEIR does mention this and admits there is no mitigation available, this point should be considered. Again, this goes directly to our quality of life here in Canyon Country. A 9dB increase in sound levels is huge. I work in audio and know very well that this represents a 16 fold increase in noise to us living in the western Ermine area (every 3dB increase the perceived sound level doubles).

8-11

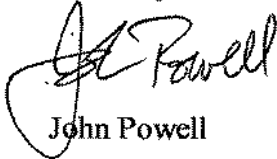
In summary, I would like for our planning department to thoroughly consider the impacts on the existing neighborhood. We all pay our taxes, we vote in local elections, we shop locally, and many of us work here as well. We too are important and should not be marginalized by flashy developers who promise basic features (Jr. High School, YMCA, trails) as if they were magnificent gifts to the city. We wouldn't need more schools if they didn't develop the area. The YMCA is only available for certain people; it is not available for the general public. We already have dozens of trails in the area. Their development would only serve to limit the variety and quantity of trails already available. If this development is to go through, it must be greatly reduced in scope and size and must have a MINIMAL impact on the exiting neighborhood and area; such as not connecting Ermine, doing more to reduce the noise level increase, and doing more to protect native wildlife and vegetation.

8-12

8-13

Thank you for your consideration and for remembering that we too are citizens of this great city.

Sincerely,


John Powell

Letter No. 8

John and Sandra Powell, dated August 26, 2005.

Comment 8-1:

1) The ramifications of removing habitat for special status wildlife (Bell's Sage Sparrow, Loggerhead Shrike and others) are written off as insignificant. I disagree with this assessment and it must be acknowledged that irreparable harm will be done to these species.

Response to Comment 8-1:

Regarding Bell's sage sparrow as well as others see comment Letter 1, California Department of Fish and Game, responses 1-1, 1-2, 1-4, 1-5 and 1-12 and comment Letter 6, Santa Monica Mountain Conservancy, response 7-22. Regarding the loggerhead shrike, this grassland/open country species exhibits wide distribution across the 48 states and into Canada and Mexico. The Breeding Bird Survey notes declines across much of the range for this species; however, because it is still widespread and relatively common and only limited areas of suitable habitat (primarily grassland) occur on the site, potential impacts to this species would not be significant as determined in the Draft EIR.

Comment 8-2:

We are also removing habitat for several riparian species. More must be done to limit the damage done to these natural residents of the area, such as limiting the size and scope of the Keystone development.

Response to Comment 8-2:

The Draft EIR has analyzed six alternatives in addition to the California Environmental Quality Act (CEQA) required No Project alternative to the proposed project. Of those six alternatives, five analyze various iterations of a reduced size and scope project. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. See also comment Letter 1, California Department of Fish and Game, responses 1-2 and 1-8.

Comment 8-3:

2) I vehemently disagree with the opinion expressed in the report that the Elimination of the Ermine Street Connection be rejected as an infeasible alternative. The Keystone project does NOT need Ermine for access. The existing neighborhood has had the same traffic level since 1988, why do we need to change that now?

Response to Comment 8-3:

The City of Santa Clarita, as the lead agency, views the connection to Ermine Street as a traffic circulation improvement for the Ermine Street neighborhood as discussed on page VIII-28 of the Draft EIR. The connection would provide Ermine Street neighborhood an alternative route to Soledad Canyon via Golden Valley Road and Newhall Ranch Road. In addition, the proposed project would include a development pad for a junior high school that would be utilized by Ermine Street residents and Keystone residents would be in the attendance boundary of Skyblue Mesa Elementary school on Hardesty Street. As discussed on page VIII-28 of the Draft EIR, for circulation purposes, an Ermine Street connection would be serve the parents for both the junior high school and elementary school.

Comment 8-4:

There is no thought or consideration given to the quality of life for those of us living in the neighborhood at the western extension of Ermine. We will already be faced with greatly increased noise, lighting and pollution levels with Golden Valley going through. To add to this by also extending Ermine is tantamount to destroying the very flavor and essence of our neighborhood.

Response to Comment 8-4:

This comment expresses concerns about the quality of life for the Ermine Street neighborhood residents, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 8-5:

To further exacerbate the problem, the very project that proposes to destroy our tranquil neighborhood will be creating exactly what we have now, a series of quiet cul-de-sacs that open on to natural areas. The DEIR completely ignores the impact on our quality of life. This is totally unacceptable and cannot stand!

Response to Comment 8-5:

The Environmental Impact Report prepared for the proposed Keystone project examined the potential environmental effects on the project site and the immediate surrounding area. The EIR examined environmental issue areas that would affect the community, such as police and fire service and education, but issues in the immediate vicinity such as traffic, noise and visual resources. For example, on page V.O-39 provides a discussion of traffic on the existing residential neighborhood, i.e., Ermine Street neighborhood, and how traffic patterns would change with the Ermine Street connection and without the street connection. Further, page V.K-25 discusses the connection of Ermine Street and the implications of that roadway connection on to the existing residential neighborhood. Finally, the Draft EIR, pages V.B-

16 through V.B-21, discussed view impacts of the project affecting the Ermine Street residents abutting the project site. Therefore, the Draft EIR did not ignore the impacts of the proposed project on to the residential neighborhood to the east of the project site.

Comment 8-6:

3) Land use - the area is zoned for RVL. At most, RS should be allowed. There is no reason to increase it several levels up to RMH. The General Plan was drafted with these limits in mind for a reason. We must not forget that the reason most of us live here in the SCV is for the peace and quiet and the natural beauty of the area. These are things that a massive development like Keystone will greatly diminish.

Response to Comment 8-6:

This comment expresses opinions about zoning, the General Plan and Santa Clarita Valley, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 8-7:

4) Elementary Schools -the examination of elementary school capacity does not take into account all the developments happening in the surrounding areas and I feel their estimates of students generated are very low. Most families moving to the SCV are young families with children, General estimates are not applicable.

Response to Comment 8-7:

The student generation estimate for elementary, middle and high school was provided by the Saugus Union School District and the William S. Hart Union High School district as noted on Table V.M.3-3, page V.M-31 of the Draft EIR. School district estimates are aggregated by land use type (i.e., single family, multi-family apartments and townhouse units) and account for families generating students at the primary and secondary schools. Therefore, these estimates are not general and arbitrary. Further, pages V.M-34 through V.M-37 discuss and analyze the impacts of the surrounding developments (see related projects list, page V.M-34) onto the schools and their cumulative impact (related projects plus proposed project).

Comment 8-8:

Also, nearly all local elementary schools are at or near capacity. All large scale developments should be obligated to provide an elementary school as part of their development.

Response to Comment 8-8:

The Draft EIR examined capacity at two local elementary schools in which project students would attend: Skyblue Mesa Elementary School and Emblem Elementary School. Page V.M-25 of the Draft EIR discusses current enrollment and identifies capacity of these schools as presented in Table V.M.3-1. The enrollment and capacity data was provided by the Saugus Union School District as noted on Table V.M.3-1. As shown on the table, both local elementary schools are under capacity: Skyblue Mesa has capacity for 52 more students and Emblem Elementary for 213. Due to sufficient capacity at the two local elementary schools, the Saugus School District did not express the need for additional facilities including more classrooms at the two existing schools or construction of a new elementary school. Thus, no additional elementary schools are needed for the area at this time. However, the project will provide a development pad and deed the property to the William S. Hart District for construction of a new middle school.

Comment 8-9:

5) Parks — where is the park that this development should provide? We don't have enough parks as it is in Santa Clarita, and I feel no development should be allowed that does not include a park on a scale relative to the increase in population the development will generate.

Response to Comment 8-9:

The project as proposed in the Draft EIR does not include a park. The development would include a multi-use trail along the Santa Clara River connecting to other regional multi-regional trails and uses, bicycle trails on Golden Valley Road and pedestrian walking/hiking trails within the development. The Draft EIR acknowledged that the project would impact local parks and that Quimby parkland requirements would necessitate an estimated 8.97 acre park. State law requires the developer, as a condition of approval of a subdivision, the dedication of land or payment of a fee in lieu of dedication, or combination of both, for park or recreational uses.

Note: At the August 30, 2005 Planning Commission hearing, the project applicant, Synergy-Brookefield, LLC, presented a reduced density project (by approximately 33 percent) and provision of an approximate 8.7 acre park that would include a dog park area (1.5 acre leash free), play passive area, hard courts, restrooms, covered picnic areas, trail facilities and locker/shower facilities for bicyclist. The applicant would provide the land and facilities and deed the land and facilities to the City of Santa Clarita as a public park.

Comment 8-10:

6) Simply creating a small buffer zone around the Significant Ecological Areas is not enough. These areas cannot be defined so easily, as events and developments around them will inevitably impact them in a negative manner. This development will certainly spell the end to the SEA in the area.

Response to Comment 8-10:

This comment expresses opinions about buffer zone around the Significant Ecological Area, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 8-11:

7) The cumulative noise increase to existing neighborhoods is unacceptable. While the DEW does mention this and admits there is no mitigation available, this point should be considered. Again, this goes directly to our quality of life here in Canyon Country. A 9dB increase in sound levels is huge. I work in audio and know very well that this represents a 16 fold increase in noise to us living in the western Ermine area (every 3dB Increase the perceived sound level doubles).

Response to Comment 8-11:

As discussed on page V.K-24 of the Draft EIR, the trained healthy human ear is able to discern changes in sound levels of 1 decibel (dBA), when exposed to steady, single frequency “pure tone” signals in the mid-frequency range under controlled conditions, in an acoustics laboratory. Outside of such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. Changes from three to five dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA increase is readily noticeable, while the human ear perceives a 10 dBA increase as a doubling of sound.

The 9.0 dBA increase in noise level is considered significant in the Draft EIR because it would be a substantial in relation to the existing noise levels in the immediate neighborhood without the extension of Ermine Street, not because it would exceed City standards for residential land uses. The Noise Element of the City of Santa Clarita General Plan identifies 65 dBA and 55 dBA as the established exterior noise standards for residential uses during daytime and nighttime hours, respectively. When averaged over a 24-hour period, these noise levels average to approximately 65 dBA CNEL. As discussed on page V.K-25 of the Draft EIR, the 52.4 dBA CNEL noise level predicted for the homes along the eastern-most segment of Ermine Street would be well below the City’s 65.0 dBA CNEL standard for residential uses.

The comment expresses the opinion that an increase of 9.0 dBA is unacceptable in the existing neighborhood, but does not question the adequacy of the analysis contained in the Draft EIR. Therefore, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 8-12:

In summary, I would like for our planning department to thoroughly consider the impacts on the existing neighborhood.

Response to Comment 8-12:

This comment expresses opinions about impacts on the existing neighborhood, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 8-13:

We all pay our taxes, we vote in local elections, we shop locally, and many of us work here as well. We too are important and should not be marginalized by flashy developers who promise basic features (Jr. High School, YMCA, trails) as if they were magnificent gifts to the city. We wouldn't need more schools if they didn't develop the area. The YMCA is only available for certain people; it is not available for the general public. We already have dozens of trails in the area. Their development would only serve to limit the variety and quantity of trails already available. If this development is to go through, it must be greatly reduced in scope and size and must have a MINIMAL impact on the exiting neighborhood and area; such as not connecting Ermine, doing more to reduce the noise level increase, and doing more to protect native wildlife and vegetation.

Response to Comment 8-13:

This comment expresses opinions about the features of the proposed project, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Letter 9

Ronald and Anne Marie Rudzinski
27519 Label Avenue
Santa Clarita, CA 91351
(661) 252-6995

R E C E I V E D
PLANNING DIVISION

AUG 30 2005

PLANNING & ECONOMIC DEVELOPMENT
CITY OF SANTA CLARITA

August 29, 2005

Heather Waldstein, Associate Planner
City of Santa Clarita
23920 Valencia Blvd., Ste. 300
Santa Clarita, CA 91355-2196

Dear Ms. Waldstein:

We are contacting you regarding the **Synergy - Keystone Project** proposed to be developed to the west of the current termination of Ermine Street in Canyon Country. We are current residents of the Skyblue area of Santa Clarita-Canyon Country, where we have resided since late 1979. We have been in our current home, just east of the proposed development, for just over 10 years. We are asking that you take the following into consideration, and pass it on to all members of City's Planning Commission.

We have reviewed information from the DEIR and Staff Report concerning this proposed project. The following are our concerns and responses:

- 1. **Density:** In our minds, this is an overriding issue. The report indicates that the increase in population density under the proposed General Plan Amendments to change the land use designations, is in line with expected growth in the area, and therefore acceptable and not significant. We must strongly disagree with this assessment, and the logic used as its foundation. This would be tantamount to saying because a percentage of all ships will sink, no efforts should be made to remedy or improve the situation when a new ship is built.

9-1

The original General Plan guidelines and stipulations are there for a purpose. We are not talking about the Santa Clarita Valley 30, 20, or even 10 years ago. Today, congestion on the roadways, both within the valley, and passing in and out of this area, is almost intolerable – and this addition of approximately 4,000 people (2,000 more cars), in an area that is currently zoned for a little less than 400 people, can only make things worse. Yes, we need more roadways – but not at the expense of our way of life, our environment, and our neighborhoods. The only place we really have any direct say-so is within the City limits – let's not give up our resources in this area.

9-2

- 2. **Ridgeline Ordinances:** Once again, there are currently guidelines in place. Why are we considering modifying these to the detriment of our community – to gain a road? We believe that there are other, more creative ways, to acquire increased cross-gridding of the valley without selling our souls to developers that want to come in, turn a profit, and leave. The ridgelines are part of what defines Santa Clarita. Why do we need to accept some innovation to fix what isn't broken?

9-3

- 3. **Ermine Street Extension:** Although we don't live directly on Ermine, it is in close proximity to our home. One of the Traffic Engineers for the City asked why

9-4

Letter 9

we bought where we did, knowing that Ermine would be opened (thinking we lived on Ermine). The fact is that the road was not posted to "open" 10 years ago. Additionally, we are not aware that any other neighbors in our area are pushing to get this opened. It may reduce flow on the east end of the neighborhood, but may also increase flow over all.

9-4
cont.

4. **Waste Increases:** The report mentioned some concerns about increase in waste generated by the increased number of residences. This, again, reflects on the need to hold the density down to something near the original General Plan amounts.

9-5

5. **Cut Slopes and Stability:** The proposed project will create a slope within as close as one foot of our rear fence line, according to the developer. This slope will drop some 60 feet as it moves out from our back yard to a distance of 200 feet out. The developer assured us that the hill would be "engineered". Anyone who has lived in California with its alternating *burn and slide* hillside situations knows that "engineering" is not a perfect science.

9-6

6. **Proximity of Golden Valley Road:** The developer insists that the extension of Golden Valley Road can only follow the path that is currently being proposed. Yet a smaller road follows a pathway right next to the development that is proposed. Why not widen that road and leave some space between the current home owners who already have a cumulative total of millions of dollars invested in their homes and this large highway. Additionally, this would relieve the concerns about eventual sliding of the slope (as stated above in #5).

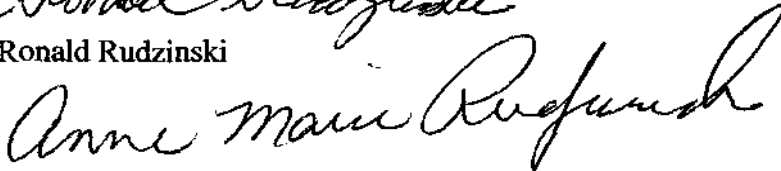
9-7

We are looking forward to the decisions made by our representatives on the Planning Commission, and in turn on the City Council. As residents of Santa Clarita, we need to stand together for the overall betterment of our community. We are confident that our elected officials will respond positively to their constituents in resolving these concerns.

Sincerely,



Ronald Rudzinski



Anne Marie Rudzinski

Letter No. 9**Ronald and Anne Marie Rudzinski, dated August 26, 2005.****Comment 9-1:**

1. **Density:** In our minds, this is an overriding issue. The report indicates that the increase in population density under the proposed General Plan Amendments to change the land use designations, is in line with expected growth in the area, and therefore acceptable and not significant. We must strongly disagree with this assessment, and the logic used as its foundation. This would be tantamount to saying because a percentage of all ships will sink, no efforts should be made to remedy or improve the situation when a new ship is built.

Response to Comment 9-1:

This comment expresses opinions about the population density and growth conclusions of the Draft EIR, but does not state specifically the inadequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-2:

The original General Plan guidelines and stipulations are there for a purpose. We are not talking about the Santa Clarita Valley 30, 20, or even 10 years ago. Today, congestion on the roadways, both within the valley, and passing in and out of this area, is almost intolerable — and this addition of approximately 4,000 people (2,000 more cars), in an area that is currently zoned for a little less than 400 people, can only make things worse. Yes, we need more roadways — but not at the expense of our way of life, our environment, and our neighborhoods. The only place we really have any direct say-so is within the City limits, let's not give up our resources in this area.

Response to Comment 9-2:

This comment expresses opinions about the General Plan and roadway congestion, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-3:

2. **Ridgeline Ordinances:** Once again, there are currently guidelines in place. Why are we considering modifying these to the detriment of our community – to gain a road? We believe that there are other, more creative ways, to acquire increased cross-gridding of the valley without selling our souls to

developers that want to come in, turn a profit, and leave. The ridgelines are part of what defines Santa Clarita. Why do we need to accept some innovation to fix what isn't broken?

Response to Comment 9-3:

This comment expresses opinions about the ridgelines ordinance and the Proposed Project and poses questions regarding these issues, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-4:

3. **Ermine Street Extension:** Although we don't live directly on Ermine, it is in close proximity to our home. One of the Traffic Engineers for the City asked why we bought where we did, knowing that Ermine would be opened (thinking we lived on Ermine). The fact is that the road was not posted to "open" 10 years ago. Additionally, we are not aware that any other neighbors in our area are pushing to get this opened. It may reduce flow on the east end of the neighborhood, but may also increase flow over all.

Response to Comment 9-4:

This comment expresses opinions about Ermine Street, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-5:

4. **Waste Increases:** The report mentioned some concerns about increase in waste generated by the increased number of residences. This, again, reflects on the need to hold the density down to something near the original General Plan amounts.

Response to Comment 9-5:

This comment expresses opinions about increase in waste, population and concern to reduce density, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-6:

5. **Cut Slopes and Stability:** The proposed project will create a slope within as close as one foot of our rear fence line, according to the developer. This slope will drop some 60 feet as it moves out from our back yard to a distance of 200 feet out. The developer assured us that the hill would be “engineered”. Anyone who has lived in California with its alternating *burn and slide* hillside situations knows that “engineering” is not a perfect science.

Response to Comment 9-6:

This comment expresses opinions about the proximity of the proposed manufactured (engineered) slope adjacent to the commentor’s property, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment 9-7:

6. **Proximity of Golden Valley Road:** The developer insists that the extension of Golden Valley Road can only follow the path that is currently being proposed. Yet a smaller road follows a pathway right next to the development that is proposed. Why not widen that road and leave some space between the current home owners who already have a cumulative total of millions of dollars invested in their homes and this large highway. Additionally, this would relieve the concerns about eventual sliding of the slope (as stated above in #5).

Response to Comment 9-7:

The proposed Golden Valley Road has limited variability in the alignment as the roadway will connect between two fixed points: one to the north of the project site and the other to the southwest. To the north, Golden Valley Road is currently under construction from Plum Canyon to the northern project site boundary. To the southwest, the proposed Newhall Ranch Road has been designed and the alignment is set as its part of the Cross Valley Connector road. Therefore, the portion of Golden Valley Road proposed through the project site has to connect to these fixed points. However, the Draft EIR examined a project alternative, Alternative G, in which Golden Valley Road would be re-aligned to follow a straighter southwest to northeast line with the main portion of this road segment located further north than under the Proposed Project. Section VII. Alternatives, examined the environmental implications of this project alternative and found the impacts to be similar to the Proposed Project.

The comment was not specific about the exact location of the “smaller road [that] follows a pathway right next to the development that is proposed.” A response cannot be provided without more specific detail. However, the comment is acknowledged. Other comments pose questions that do not address the adequacy of the analysis contained in the Draft EIR. Therefore, a response is not required pursuant to

CEQA. However, the comments are acknowledged for the record and all comments will be forwarded to the decision-making bodies for their review and consideration.

Oral Comments

Oral comments made at the public hearings are summarized as follows.

June 7, 2005 Planning Commission Meeting

At the June 7, 2005 Planning Commission meeting, the Commission opened the public hearing for the Keystone project, received a presentation on the Keystone project from staff and the applicant, and received public testimony regarding the project. In addition, the Planning Commission raised concern over several items regarding the project, which included: land use and density, hillside impacts/innovative development findings, school impacts and demand for apartment housing. These issues were addressed by staff at subsequent Planning Commission meetings.

August 30, 2005 Planning Commission Meeting

At the August 30, 2005 Planning Commission meeting, the Commission received a presentation on several of the section of the Draft EIR for the Keystone project from staff, received a presentation from the applicant, and received public testimony regarding the project and the Draft EIR. Staff presented Draft EIR findings for land use, cultural resources, utilities (water, sewer, solid waste), geology and soils, population/housing/employment, hazards, mineral resources, energy conservation, and hydrology and water quality.

Approximately 15 individuals (residents of the City of Santa Clarita) and one representative from the William S. Hart School District (Robert Lee) addressed the Planning Commission as public testimony regarding the Proposed Project and the Draft EIR. The primary concern raised by the residents was traffic (additional volumes, roadway capacity and associated safety and noise concerns) with regards to the proposed connection of Ermine Street to Golden Valley Road. The Planning Commission provided issues of concern that were addressed at the August 30, 2005 public hearing which include land use, hazards, public services (police, schools, parks, trails) utilities (water supply) geology, hydrology and water quality and provided concerns for air quality, Ermine Street closure, population and housing, biological resources, aesthetics and alternatives that were addressed at the subsequent Planning Commission meeting on September 20, 2005.

The Planning Commission then continued the public hearing to the meeting of September 20, 2005.

September 20, 2005 Planning Commission Meeting

At the September 20, 2005 meeting, the Commission received a presentation on several of the section of the Draft EIR for the Keystone project from staff and received public testimony regarding the project and the Draft EIR. Staff presented Draft EIR findings for public services (police protection, fire protection, schools, libraries, parks/recreation) transportation, air quality, noise, aesthetics, biological resources and alternatives. Staff presentation covered issues raised at the prior Planning Commission meeting and the

environmental consultant (Christopher A. Joseph & Associates) and their subconsultants (Austin Foust for traffic and Glen Lukos Associates for biological resources) was present in which members of the environmental team answered and addressed questions and issues raised by the Planning Commission on the previously identified issue areas. Further, the Project Applicant provided testimony addressing issues and concerns raised by the Planning Commission.

Approximately 18 individuals addressed the Planning Commission including a representative from SCOPE, Lynn Plambeck. The residents primary issues of concern related to traffic (additional volumes, roadway capacity and associated safety and noise concerns) with regards to the proposed connection of Ermine Street to Golden Valley Road. Ms. Plambeck's testimony re-iterated concerns raised by the Santa Monica Mountains Conservancy letter submitted to City staff during the public review comment period on the Draft EIR. Concerns of the Conservancy, and re-stated by Ms. Plambeck involved primarily biological issues. These issues have been addressed in the Response to Comments written response section of the Final EIR.

The Planning Commission continued the item to November 15, 2005 with direction to staff return to the November 15, 2005 Planning Commission meeting, with a breakdown of Alternative F- Single Family Alternative. In addition, comments from the Commission included the elimination of development west of the DWP right-of-way, elimination of the Ermine Street connection, a B-2a comparison between the applicant's preferred plan and EIR Alternatives.

November 15, 2005 Planning Commission Meeting

At the November 15, 2005 meeting, the Commission received a presentation from staff on their comments on the applicant's proposed revisions to the project as presented at the August 30, 2005 Planning Commission meeting; provided a breakdown and comments on Alternative F- Single Family Alternative; and provided a response to comments received on the Draft EIR.

In preparation for providing comments on the applicant's revised project, staff requested that the applicant prepare a comparison of the proposed revisions, Alternative F, and a third development scenario that is a combination of the Alternatives listed in the Draft EIR. The comparison of the three development scenarios as previously outlined in Section I of this Final EIR included a breakdown of the housing types, number of units, density and acreage, summary of benefits and construction costs was presented to the Planning Commission. The three development scenarios presented included:

- Scenario A included a total of 260 Single Family and 388 Multi Family units, resulting from a reduction in number of residential units from 96 Single Family and 883 Multi-Family units.
- Scenario B1 & B2 - Alternative F, Single Family Alternative
 - B-1: Total of 383 Single Family Residential units on typical fee lot.

- B-2: Total of 287 Single Family residential units on typical fee lots.
- Scenario C - Combination of Alternatives: Total of 319 Single-family and 180 Multi-family residential units.

Based on discussion and comments from staff and the public, the Planning Commission recommended for City Council consideration Scenario C with the additional provision that Ermine Street not be connected to Golden Valley Road and a cul-de-sac be provided at its current western terminus, east of the project site.

The Planning Commission then closed the public hearing and directed staff to return to the January 17, 2006 meeting with a recommendation to City Council for consideration of Scenario C with the additional provision of no connection of Ermine Street to Golden Valley Road.

III. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

The following corrections and additions are set forth to update the Keystone Project Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period, as well as City staff directed changes. Changes to the Draft EIR are listed by chapter and page number.

I. INTRODUCTION

No corrections or additions are provided.

II. SUMMARY

See V.C, Air Quality below for changes to Mitigation Measure C-1 and introduction before Mitigation Measure C-2.

Page II-35 of the Draft EIR, Mitigation Measure D-5 is revised. See V.D, Biological Resources section below for revised mitigation measure.

Page II-37, paragraph under “Impacts on Habitat Adjacent to Santa Clara River Riparian Area,” second sentence is revised to read:

Upland habitat within 100 feet from riparian wildlife species is necessary to maintain species diversity within the riparian ecosystem and adequately buffer this ecosystem from adjacent incompatible land uses. ~~Temporary grading~~ **Construction vehicles** would be allowed in the 100-foot buffer if the area is revegetated with native habitats following completion of grading. With incorporation of native habitat into the 100-foot buffer area, any impacts to the Santa Clara River would be reduced to less than significant.

Page II-41 of the Draft EIR, Mitigation Measure D-17 is revised. See V.D, Biological Resources section below for revised mitigation measure.

Page II-43 of the Draft EIR, first full paragraph, first sentence under cumulative impacts is deleted and is revised to read:

~~Because of the overall low value of the biological resources on the site, the proposed Keystone project's contribution to the regional loss would not be substantial. However, significant impacts to Coastal Sage Scrub, Chaparral, Southern Cottonwood-Willow Riparian Forest and individual oak trees have been determined and the loss of these habitats with project and related project implementation would add to the cumulative loss in the regions. With implementation of the mitigation for direct habitat loss would be fully compensated and the cumulative impacts would also be reduced to a less-than significant level as set forth mitigation measures D-1, D-2, D-3, and D-5.~~

Page II-117 of the Draft EIR, paragraph under Sewer, first, second and third sentences have been revised to read:

The design capacity of the Santa Clarita Valley Joint Sewage System (SCVJSS) is 28.10 mgd and the SCVJSS's current average wastewater flow is ~~18.4~~ **19.9** mgd. Therefore, the SCVJSS has a remaining capacity of approximately ~~9.7~~ **8.2** mgd. The cumulative sewage generation of 1.5 mgd would be well within the design capacity of the SCVJSS, representing about ~~15.5~~ **18** percent of the remaining capacity.

III. ENVIRONMENTAL SETTING

No corrections or additions are provided.

IV. PROJECT DESCRIPTION

No corrections or additions are provided.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. Impacts Found To Be Less Than Significant

No corrections or additions are provided.

B. Aesthetics

No corrections or additions are provided.

C. Air Quality

Page V.C-8, first full paragraph, last sentence is revised to read:

Motor vehicles ~~and ships~~ are the primary source of pollutants in the local vicinity.

Mitigation measure C-1 beginning on page V.C-2 is revised to read:

C-1a The Applicant shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The Applicant shall include in construction contracts the control measures required and recommended by the SCAQMD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Keep all construction equipment in proper tune in accordance with manufacturer's specifications;
- Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin;
- Use diesel-powered equipment that has been retrofitted with after-treatment products (e.g., engine catalyts or cooled exhaust gas recirculation technology) to the extent that it is readily available in the South Coast Air Basin;
- Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (this does not apply to diesel-powered trucks traveling to and from the site);
- Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin;
- Limit truck and equipment idling time to five minutes or less;
- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.
- ~~The following measures are recommended to reduce the potential emissions associated with operational activities to the maximum extent feasible.~~

An introduction to mitigation measure C-2 beginning on page V.C-21 is added as follows:

The following measures are recommended to reduce the potential emissions associated with operational activities to the maximum extent feasible.

- C-2 The Applicant shall include in construction contracts the following requirements or measures shown to be equally effective:
- Use solar or low-emission water heaters in the residential, school, and YMCA buildings.
 - Provide energy-efficient natural gas heating and cooking equipment.
 - Install ozone destruction catalyst on air conditioning systems, in consultation with the SCAQMD.

- Require that commercial landscapers providing services at the common areas of project site use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Los Angeles County.

Page V.O-53 of the Draft EIR, a mitigation measure has been added. See V.O, Transportation below for the added mitigation measure.

Page V.O-53 of the Draft EIR, Mitigation Measure D-14 had been changed to D-15. See V.O, Transportation below for revised mitigation measure.

D. Biological Resources

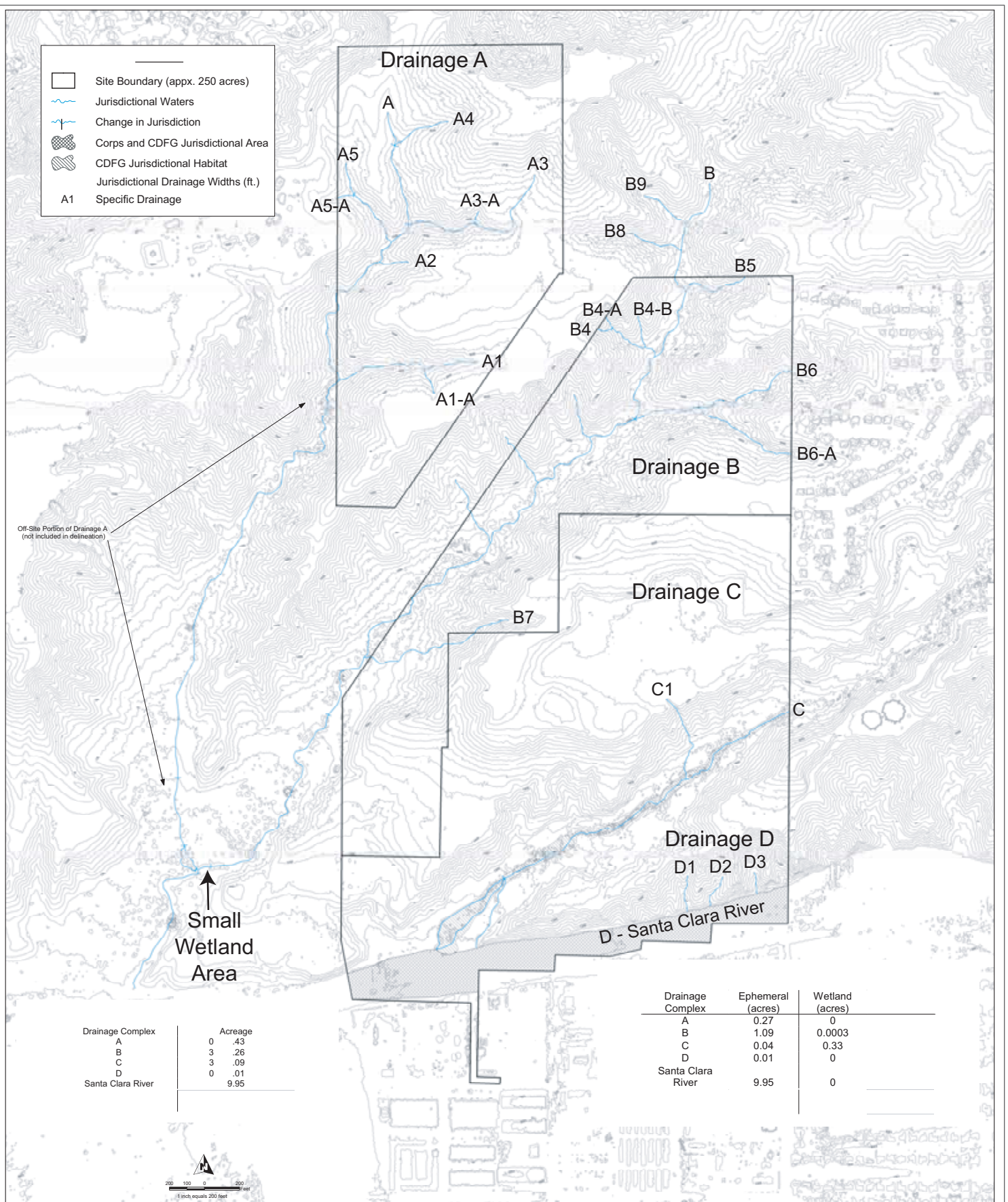
Figures V.D-3, Wetland Delineation/Drainage Map and V.D-4, Detailed Wetland Delineation Map have been revised. These Figures are provided following this page.

Page V.D-47 of the Draft EIR, second paragraph under “Impacts on Habitat Adjacent to Santa Clara River Riparian Area,” second sentence is revised to read:

As stated in the significance threshold criteria, providing an upland preserve area of less than 100 feet (in areas where at least 100 feet of upland habitat from the riparian resource currently occurs) of high quality habitat would be presumed to be a significant impact on the riparian ecosystem associated with the Santa Clara River. ~~Temporary grading~~ Construction vehicles would be allowed in the 100-foot buffer if the area is re-vegetated with native habitats following completion of grading. With incorporation of native habitat into the 100-foot buffer area, any impacts to the Santa Clara River would be reduced to less than significant.

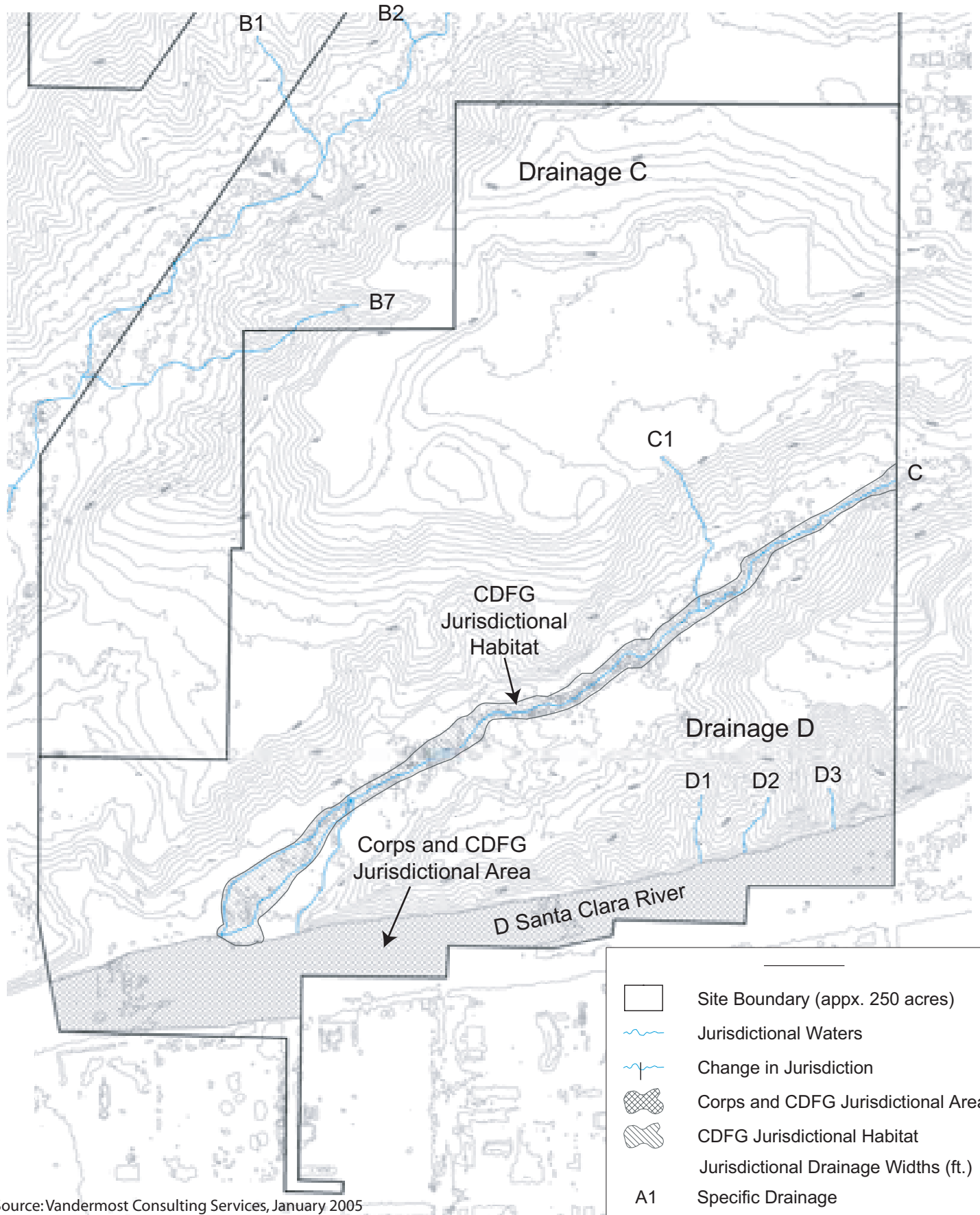
Page V.D-66 of the Draft EIR, Mitigation Measure D-5, is revised to read:

D-5 If grubbing or clearing of vegetation is scheduled to occur during the nesting season (January 31 to August ± **31**), then prior to issuance of grading permits the project applicant shall have a qualified biologist survey the project site for the presence of any occupied raptor nests. If such a nest is found, then no construction work shall occur within a 300-foot radius from the nest until the nestlings have fledged, or as directed by the biological monitor to ensure compliance with Section 35.03.5 of the California Fish and Game Code.



Source: Vandermost Consulting Services, January 2005





Source: Vandermost Consulting Services, January 2005



Page V.D-69 of the Draft EIR, Mitigation Measure D-17, is revised to read:

- D-17 Interpretative signs shall be constructed and placed in appropriate areas **(including along the Santa Clara River)**, as determined by the City Planning and building Services Department that explain the sensitivity of natural habitats and the need to minimize impacts on these natural areas. The signs will state that they are entering a protected natural area and that all pedestrians must remain on designated trails, all pets are to be restrained on leash, and that it is illegal to harm, remove, and/or collect native plants and animals. The project applicant shall be responsible for installation of interpretive signs and fencing.

E. Cultural Resources

No corrections or additions are provided.

F. Geology and Soils

No corrections or additions are provided.

G. Hazards

No corrections or additions are provided.

H. Hydrology and Water Quality

No corrections or additions are provided.

I. Land Use

The following text and table are provided and to be added to page V.I-82 of the Draft EIR just before the cumulative impact discussion:

SCAG Goals and Policies of the Regional Comprehensive Plan and Guide

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains growth management policies that are applicable to the Proposed Project. Existence of an inconsistency between a proposed project and a policy of an agency (e.g., SCAG's Regional Comprehensive Plan and Guide), is vested in the City Council and subject to court review if challenged. Inconsistency is not an impact under CEQA – plan inconsistencies in and of themselves are not significant impacts on the environment under CEQA. SCAG's Regional Comprehensive Plan and Guide's Goals and Policies and their applicability to the Proposed Project are discussed in Table V.I-5.

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>Policy 3.01: The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.</p>	<p>Based on SCAG's most recent forecasts, by the year 2025, the Los Angeles region is expected to grow to approximately 22.6 million people, representing 7.4 million households units and 9.9 million jobs. This growth represents a population increase of 34.5 percent, an increase in housing of 37.9 percent, and an increase in employment of 34.2 percent between the years 2000 and 2025. SCAG's distribution of regional growth was developed through the subregional planning process. Development of the proposed project will accommodate an increase in population of about 2,992 persons and 96 single-family and 883 multi-family residences. The resultant increase in region-wide population is considered negligible. While the proposed project would not create new significant or permanent employment opportunities, it would provide new housing in support of existing and new employment opportunities expected to occur in the Santa Clarita Valley. A detailed analysis of the project's consistency with the population and housing forecasts for the North Los Angeles County Council of Governments (NLACCOG) subregion and City of Santa Clarita is provided in Section 4.17, Population/Housing/Employment, of this EIR. SCAG forecasts contained in the 2001 RTP were used for all population and housing</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	analyses contained in this EIR.
<p>Policy 3.03: The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</p>	<p>The proposed project will be developed as part of Vesting Tentative Tract Map No. 060258. Given that the proposed project is located adjacent to existing infrastructure, it would represent an orderly progression of development that would aid in implementing the region's growth policies. The proposed project would use various techniques currently available for financing and maintenance of public facilities, streets, and utilities. The exact financing method is not known; however, the City and the property owner/developer must mutually agree to the method and enter into an agreement reflecting the selected financing and maintenance method.</p>
<p>GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING</p>	
<p>In addition to the mandatory goals of the Growth Management Chapter of the RCPG, listed below are a number of non-mandatory goals used by SCAG. For example, the Growth Management Chapter includes a goal to improve the regional standard of living by developing urban forms that: (1) enable individuals to spend less income on housing costs, (2) minimize public and private development costs, (3) enable firms to be more competitive, and (4) and strengthen the regional strategic goal to stimulate the regional economy.</p>	
<p>Policy 3.05: SCAG shall encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.</p>	<p>The project site is located adjacent to existing urban uses that are supported by a full complement of roadways, water, sewer, electricity, natural gas, communications links,</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>Policy 3.09: SCAG shall support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.</p> <p>Policy 3.10: SCAG shall support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.</p>	<p>cable, and other urban infrastructure. In addition, existing development in the area is served by local law enforcement and fire protection services. As a result, extension of these services to proposed on-site uses would make use of existing facilities. Project residents would generate revenue in the form of property taxes, fees, etc., which would be available to the City to fund public services on the site, such as fire and police service, flood control, library service, street maintenance, and wastewater treatment. Revenues for capital improvements would also be generated by the project directly through various forms of development fees, including, but not limited to, bridge and thoroughfare fees, fire facilities fees, sewer annexation and connection fees, and school fees. In addition, the project would build all on-site roadways, potable water, sewer, energy, and communications systems, as well as share in the upgrade of all affected roadways. Financing mechanisms for needed on-site infrastructure improvements and supporting public service facilities could possibly include, but are not limited to, private financing, assessment districts, fee districts, and Mello-Roos districts.</p>
<p>GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING</p>	
<p>The Growth Management Chapter also includes a goal to improve the regional quality of life by developing urban forms that: (1) enhance quality of life, (2) accommodate a diversity of life styles, (3) preserve open space and natural resources, (3) are aesthetically pleasing and preserve the character of</p>	

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>communities, and (4) enhance the regional strategic goal of maintaining the regional quality of life.</p>	
<p>Policy 3.12: SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.</p> <p>Policy 3.14: SCAG shall support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.</p>	<p>The City of Santa Clarita bus system primarily serves local travel in the Santa Clarita Valley. The nearest fixed-route transit line is for Routes 5 and 6 operated by Santa Clarita Transit (SCT), which passes south of the project site on Soledad Canyon Road. Routes 5 and 6 provide service to the Stevenson Ranch Area, Hart High School, the Valencia Town Center and Canyon Country. Also, Route 1 passes just east of the project site through the Ermine Street neighborhood. The nearest transit center is the Santa Clarita Metrolink station which is located approximately one mile southwest of the project site. The project is also consistent with these transit policies because of its extensive pedestrian and bicycle trails network, which are linked to adjacent uses and roadways. This network would provide project residents with a combination of transportation modes, including, bicycles, walking and automobiles.</p> <p>Furthermore, because the project has been designed to provide housing that would support existing and new employment opportunities that are projected to occur in the Santa Clarita Valley, it could reduce travel distances and could create opportunities for employees to walk and bike to work.</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>Policy 3.17: SCAG shall support and encourage settlement patterns, which contain a range of urban densities.</p> <p>Policy 3.18: Encourage planned development in locations least likely to cause environmental impact.</p> <p>Policy 3.19: SCAG shall support policies and actions that preserve open space areas identified in local, state and federal plans.</p> <p>Policy 3.20: SCAG shall support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.</p>	<p>The project includes a range of proposed residential uses including single-family residences, multi-family units, recreational, educational, YMCA facility and open space uses. The project includes approximately 71-acres (or nearly 30 percent) of the site would remain as natural open space and another 88-acres as graded open space lots.</p>
<p>Policy 3.21: SCAG shall encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>One prehistoric archaeological site (CA-LAN-0295) and two prehistoric isolates have been recorded within a one mile radius of the project site. According to the Phase I that was prepared for the project, the site appears to be clear of any known, potentially significant resources and not likely to yield buried deposits. However, given the archaeological-sensitivity of the area, it is possible that during the project's construction phase, unknown prehistoric archaeological resources could be encountered. Measures to preserve and protect cultural resources and archaeological sites will</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p>be incorporated into the project as part of the environmental review process.</p> <p>Refer to Section IV.E.2, Cultural Resources, for additional information on cultural and archaeological resources on the project site and measures that will be taken to protect them.</p>
<p>Policy 3.22: SCAG shall discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood and seismic hazards.</p>	<p>The potential increase in runoff associated with urban development has been highly moderated by Proposed Project PDFs. Most of the site design PDFs, especially the minimization of impervious area and the conservation of approximately 60 percent open space areas within the tract area, reduce the impact of the proposed development on stormwater runoff volume. Hydrologic source control PDFs included in the Proposed Project would consist of diversion of rooftop runoff into yards and vegetated areas to promote onsite infiltration, the use of native and drought tolerant plants in landscaped areas, and the use of treatment control BMPs (detention basins and vegetated swales) that are expected to reduce post-development runoff volumes from developed areas of the site by 55 percent. Volume control measures included in the project are also intended to eliminate hydromodification potential due to erosion in the natural sections of Drainages A, B, and C. Thus, the total volume of discharges to these drainages post-development would be equal to or less than pre-development volumes.</p>

**Table V.I-5
SCAG’s Regional Comprehensive Plan and Guide’s Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>Policy 3.23: SCAG shall encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.</p>	<p>Mitigation measures have been incorporated into the EIR that will minimize noise impacts to those residential units closest to the proposed project site (Section IV.K, Noise). Mitigation measures have also been proposed which will reduce impacts to biological and ecological resources to the extent feasible (Section IV.D, Biological Resources). Section IV.F, Geology and Soils, of this EIR incorporates mitigation measures that will minimize exposure to earthquake and seismic hazards. The City of Santa Clarita currently has emergency response and recovery plans in place to react to City-wide emergencies.</p>
<p>GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING</p>	
<p>The Growth Management Chapter also includes a goal to provide social, political, and cultural equity. This goal avoids economic and social polarization by promoting a regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended to guide direction of this goal, and does not, however, infer regional mandates and interference with local land use powers.</p>	
<p>Policy 3.24: Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluating in the Regional Housing Needs Assessment.</p> <p>Policy 3.27: Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of</p>	<p>The project proposes a total of 96 single-family lots, 216 multi-family apartment units and 667 townhouse units. The variety of housing types proposed for the project site will serve a variety of housing needs. Typically multi-family units serve as more affordable housing opportunities within the community.</p> <p>The nearest fixed-route transit line is for Routes 5 and 6 operated by Santa Clarita</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>society, accessible and effective services such as: public education, housing, health care, social services, recreational services, law enforcement, and fire protection.</p>	<p>Transit (SCT), which passes south of the project site on Soledad Canyon Road. Routes 5 and 6 provide service to the Stevenson Ranch Area, Hart High School, the Valencia Town Center and Canyon Country. Also, Route 1 passes just east of the project site through the Ermine Street neighborhood. The nearest transit center is the Santa Clarita Metrolink station which is located approximately one mile southwest of the project site.</p>
<p>REGIONAL TRANSPORTATION PLAN (RTP)</p>	
<p>The Regional Mobility Chapter is a summary of another SCAG document entitled, Regional Mobility Element (RME). The RME, originally adopted in 1994, is the principal transportation policy, strategy and objective statement of SCAG, proposing a comprehensive strategy for achieving mobility and air quality mandates. The RME is also referred to as the Regional Transportation Plan (RTP), and it serves as both the federal- and state-required regional long-range transportation plan for the SCAG region. The RTP was most recently updated in 2001. The RTP is the guide for developing the federal and state Regional Transportation Improvement Program (RTIP), which is a seven-year program for regional transportation improvements for highways, transit, and aviation. The RTIP is aimed at improving the overall efficiency and people-moving capabilities of the existing transportation system.</p> <p>The Regional Mobility Chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation friendly development patterns, and encouraging fair and equitable access to residents affected by socioeconomic, geographic, and commercial limitations.</p> <p>In order to foster these broad goals, SCAG outlined specific goals, objectives and policies of the RTP applicable to the project. Goals relevant to the Keystone project are listed below along with an analysis of the project's consistency with them.</p>	

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p><u>Mobility</u> – Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movement of people and goods.</p> <ul style="list-style-type: none"> • Average Daily Speed (Speed experienced by travelers regardless of mode) - 10% Improvement • Average Daily Delay (Delay excess travel time resulting from the difference between a reference speed and actual speed. Total daily delay and daily delay per capita are indicators used) - 40% Improvement <p><u>Accessibility</u></p> <ul style="list-style-type: none"> • Percent PM peak work trips within 45 minutes of home - Auto 90% - Transit 37% • Distribution of work trip travel times - Auto 8% Improvement - Transit 8% Improvement <p><u>Reliability</u></p> <ul style="list-style-type: none"> • Percent variation on travel time (Day-today change in travel times experienced by travelers. Variability results from accidents, weather, road closures, system problems, and other non-recurrent conditions). - 10% Improvement. <p><u>Safety</u></p> <ul style="list-style-type: none"> • Accident Rates (Measured in accidents per million vehicle miles by mode). - 0.3% Improvement <p><u>Cost Effectiveness</u></p> <ul style="list-style-type: none"> • Benefit-to-Cost (B/C) Ratio (Ratio of RTP investments to the associated investments costs). - \$3.08 <p><u>Productivity</u></p> <ul style="list-style-type: none"> • Percent capability utilized during peak conditions. (Transportation infrastructure capacity and services provided. Roadway Capacity – vehicles per hour per lane by type of facility. Transit Capacity – seating capacity utilized by mode). Roadway Capacity – 20% Improvement at known bottlenecks. Transit Capacity – N/A. <p><u>Sustainability</u></p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<ul style="list-style-type: none"> Total cost per capita to sustain current system performance. (Focus in on overall performance, including infrastructure condition. Preservation measure us a sub-set of sustainability). - \$20 per capita, primarily in preservation costs. <p><u>Preservation</u></p> <ul style="list-style-type: none"> Maintenance cost per capita to preserve system at base year conditions. (Focus is on infrastructure condition. Sub-set of sustainability). – Maintain current conditions. <p><u>Environmental</u></p> <ul style="list-style-type: none"> Emissions generated by travel. (Measured/forecast emissions include CO, NO_x, PM₁₀, SO_x, and VOC. CO₂ as secondary measure to reflect greenhouse emissions). – Meets conformity requirements. <p><u>Environmental Justice</u></p> <ul style="list-style-type: none"> Expenditures by quintile and ethnicity. (Proportionate share of expenditures in the 2004 RTP by each quintile). – No disproportionate impact to any group in quintile. Benefit vs. burden by quintile. (Proportionate share of benefits to each quintile ethnicity). – No disproportionate impact to any group in quintile. 	
<ul style="list-style-type: none"> Ensuring Safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments. RTP land use and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and sub-regions. HOV gap closures that significantly increase transit and rideshare usage will be supported 	<p>The project is proposed to accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers. Because the project has been designed to provide housing that would support existing and new employment opportunities that are projected to occur in the Santa Clarita Valley, it could reduce travel distances and could create opportunities for employees to walk and bike to work, thereby potentially reducing vehicle miles traveled.</p> <p>The project would preserve the environment by providing for needed housing and opportunities</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>and encouraged, subject to Policy #1.</p>	<p>to work closer to home. The shorter travel distances will reduce vehicle miles traveled and associated emissions by shortening the distance between home and work and providing safe and convenient access to public transit opportunities. Refer to Section V.O, Traffic/Access, and Section V.C, Air Quality, for a further discussion of traffic and air quality impacts associated with project-related traffic.</p> <p>A traffic study for the Keystone project has been prepared and is discussed fully in Section V.O, Traffic/Access. The study evaluates project-related, as well as long-term, Santa Clarita Valley buildout traffic impacts on local and regional road networks.</p> <p>The project includes a number of on- and off-site transportation system management actions, such as traffic signals and intersection improvements to speed the flow of traffic. Mitigation measures are proposed for traffic improvements and traffic signals, and comply with the requirements of the County's Congestion Management Program.</p>
<p>AIR QUALITY CHAPTER CORE ACTIONS</p>	
<p>Goal 5.07: Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emissions</p>	<p>The project is proposing to construct its own arterial street/infrastructure system and a network of pedestrian and bicycle trails that would provide for local travel by a combination of transportation modes, including bicycles,</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>fees) so that options to command and control regulations can be assessed.</p> <p>Goal 5.11: Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.</p>	<p>walking, bus transit, commuter rail service and automobiles. The project also incorporates bus pull-ins, as necessary, to accommodate bus-related transit and proposes to fund its fair share of infrastructure improvements required off site through the payment of fees. Funding and construction of main-line freeway capacity is provided by existing sources of tax revenue and by CalTrans through allocations made by the Metropolitan Transportation Authority (MTA). Existing funding sources include state and federal gas taxes and Los Angeles County Proposition A and C sales taxes. As transportation improvements are constructed over the life of the project, the desire to improve air quality while providing adequate transportation infrastructure can be facilitated. Consequently, the project favorably addresses this issue.</p> <p>As indicated above, the project proposes a pattern of development that includes a wide range of housing unit types and job-creating uses. These uses would be linked by an arterial street system that provides for local travel by a combination of transportation modes, including bicycles, walking, bus transit, and automobiles. Because the project has been designed to provide future residents of the site with employment opportunities and services (with the inclusion of the YMCA) within close proximity to the project, and an on-site park and access to the community wide trail system, is promoting an efficient means of access to</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p>these uses, vehicle miles traveled (VMT) and air pollutant emissions can be minimized. Furthermore, the project is located in close proximity and adjacent to existing job centers (e.g., Valencia Commerce Center, Industrial Center, Town Center and Corporate Center) which would help to reduce the need for long commutes from the site to more distant employment centers in Ventura County, the San Fernando Valley and beyond. As a result, VMT and, consequently, air pollution emissions would be minimized. Based on this information, the proposed project favorably addresses the above noted air quality core actions.</p> <p>The intent of the AQMP is to establish a comprehensive program that will result in the achievement of federal and state air quality standards. The project site is located in the South Coast Air Basin which currently fails to meet federal and state air quality standards for ozone, carbon monoxide, nitrogen dioxide and particulate matter. The AQMP for the SCAQMD is incorporated into the State Implementation Plan (SIP). The SIP constitutes all AQMPs prepared by all AQMDs in the state. The SIP represents the state's effort to comply with federal air quality standards.</p> <p>For detailed discussion of this project's AQMP consistency, refer to Section V.C, Air Quality, of this EIR.</p> <p>The AQMP suggests that a determination of a</p>

**Table V.I-5
SCAG’s Regional Comprehensive Plan and Guide’s Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p>project’s consistency with the goals and policies of the AQMP can be measured against the “Population Number and Location” projected for a given area. As indicated in Section V.L, Population/Housing/Employment, of this EIR, SCAG projects that the City of Santa Clarita population (including the proposed project site) will increase to approximately 211,367 persons by the year 2020. As mandated by the Federal Clean Air Act (§ 176[c]), SCAG is the responsible agency for providing current population estimates. Based on this measurement criterion, the proposed project is consistent with the AQMP.</p> <p>Where a specific project is consistent with regional population projections, another measurement tool in determining AQMP consistency is to determine how a project accommodates the expected increase in population. Generally, if a project is planned in away that results in the minimization of VMT, and consequently air pollutant emissions, that project is consistent with the AQMP.</p> <p>The project is proposed to contain a range of housing unit types and some limited job creating uses. Such uses would occur near areas which are linked by an arterial street system and a pedestrian and bicycle trails network that promote efficient local travel by a combination of transportation modes including bicycles, walking, bus transit, and automobiles.</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p>Because the project has been designed to provide future residents of the site with parkland, open space, and access to trails, VMT and air pollutant emissions can be minimized. Furthermore, because the project is located near existing job centers (e.g., Valencia Commerce Center, Industrial Center, Town Center and Corporate Center), which helps preclude longer commutes from the site to more distant employment centers in Ventura County, the San Fernando Valley and beyond, VMT, and consequently air pollutant emissions, are again minimized.</p>
OPEN SPACE CHAPTER ANCILLARY GOALS	
<p>The following discusses the proposed project's relationship to outdoor recreation, public health and safety, and resource protection policies identified in the Open Space Chapter of the RCPG.</p>	
<p>Outdoor Recreation</p> <p>Policy 9.01: Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.</p> <p>Policy 9.02: Increase the accessibility to open space lands for outdoor recreation.</p> <p>Policy 9.03: Promote self-sustaining regional recreation resources and facilities.</p>	<p>In July 1996, the CLWA signed an agreement with the County Sanitation Districts to purchase 1,600 acre-feet of reclaimed water annually (with a maximum of 1.4 million gallons per day) under Phase I of CLWA's master plan to provide reclaimed water service in Santa Clarita Valley. While the applicant currently does not anticipate utilizing reclaimed water on the project, it is feasible that such a resource could be used to provide on-site irrigation for the recreation areas, paseos, major slopes, parkways, and medians. However, it is neither the responsibility of the project, nor is it feasible for the project to encourage water reclamation on a regional</p>

Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion

GOALS AND POLICIES	DISCUSSION
	<p>basis. The City of Santa Clarita does not prohibit nor does it mandate the use of reclaimed water. Consequently, there are no administrative impediments to the use of reclaimed water.</p> <p>The project provides access from Newhall Ranch Road through the project site to a proposed trail along the Santa Clara River; thereby, the opportunity for passive outdoor recreational experiences is increased. The proposed project provides for on-site recreational opportunities that will, in-turn, not place a burden on regional recreational facilities.</p>
<p>Public Health and Safety</p> <p>Policy 9.04: Maintain open space for adequate protection of lives and properties against natural and man-made hazards.</p> <p>Policy 9.05: Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.</p>	<p>Open spaces proposed within the project site will be maintained and owned by a Homeowners Association's or the City of Santa Clarita to ensure that open space areas protect both persons and properties against natural and manmade hazards. Implementation of geotechnical reports and review of plans by the Los Angeles County Sheriff and Fire Departments will ensure that development located in hillside and canyon areas susceptible to flooding, earthquakes and wildfire hazards are constructed and situated so as to minimize and avoid potential hazards.</p>

**Table V.I-5
SCAG's Regional Comprehensive Plan and Guide's Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<p>Resource Protection</p> <p>Policy 9.07: Maintain adequate viable resource production land, particularly lands devoted to commercial agriculture and mining operations.</p> <p>Policy 9.08: Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.</p>	<p>There are no viable commercial agricultural activities on the project site. Mitigation measures have been incorporated into the proposed project (Section V.D, Biological Resources) to minimize impacts on the endangered species, which reside in the Santa Clara River.</p>
<p>WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS</p>	
<p>The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nations water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.</p>	
<p>Policy 11.07: Encourage water reclamation throughout the region where it is cost effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increase use of wastewater should be addressed.</p>	<p>The 246-acre Ketstone project site is part of the Santa Clara River Basin and associated watershed and is, therefore, subject to the Basin Plan. The project includes a Drainage Plan, shown in Section V.H, Hydrology and Water Quality, which would comply with each of the identified regulations and which would provide drainage and flood protection to the project. The Drainage Concept Plan delineates the conceptual NPDES system for the project, which would include the necessary accessory facilities, such as catch basins, manholes, inlet and outlet structures, a water quality basin and water quality base easements to accommodate the proposed development. The proposed project would have construction activity that</p>

**Table V.I-5
SCAG’s Regional Comprehensive Plan and Guide’s Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
	<p>disturbs more than 5 acres; therefore, it would require a NPDES Permit. All necessary NPDES Permits would be obtained for both the construction and ultimate development stages. Best Management Practices (BMPs) would be incorporated into the development and final specific design of drainage facilities (see Section V. H, Hydrology and Water Quality, for more detailed discussion of how the project would comply with the Basin Plan’s water quality requirements).</p>
GROWTH VISIONING	
<p>The fundamental goal of the Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity, or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principals” are proposed to provide a framework fro local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.</p>	
<p>Principle 1: Improve mobility for all residents.</p> <ul style="list-style-type: none"> • Encourage transportation investments and land use decisions that are mutually supportive. • Locate new housing near existing jobs and new jobs near existing housing. • Encourage transit oriented development • Promote a variety of travel choices. 	<p>The project is proposed to accommodate projected regional growth in a location that is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers. Because the project has been designed to provide housing that would support existing and new employment opportunities that are projected to occur in the Santa Clarita Valley, it could reduce travel</p>

Table V.I-5
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GOALS AND POLICIES	DISCUSSION
	distances and could create opportunities for employees to walk and bike to work, thereby reducing vehicle miles traveled.
<p>Principle 2: Foster livability in all communities.</p> <ul style="list-style-type: none"> • Promote infill development and redevelopment to revitalize existing communities. • Promote developments which provide a mix of uses. • Promote “people scaled,” walkable communities • Support the preservation of stable single-family neighborhoods. 	<p>The project includes a range of proposed residential uses including single-family residences, multi-family units (apartments), recreational, educational, YMCA facility and open space uses. The project includes approximately 71-acres (or nearly 30 percent) of the site would remain as natural open space and another 88-acres as graded open space lots.</p>
<p>Principle 3: Enable prosperity for all people.</p> <ul style="list-style-type: none"> • Provide, in each community, a variety of housing types to meet the housing needs of all income levels. • Support educational opportunities that promote balanced growth. • Ensure environmental justice regardless of race, ethnicity or income class. • Support local and state fiscal policies that encourage balanced growth • Encourage civic engagement 	<p>The project consists of the subdivision of the site into 132 lots for a mix of residential (single-family and multi-family), recreational, educational, YMCA facility and open space uses. The project specifically includes construction of 979 dwelling units that consists of 96 single-family lots, 216 multi-family apartment units and 667 townhouse units and finished (graded) lots for a 1,200-1,600 student and 70- faculty/staff junior high school, and an approximate 30,476 square foot community/fitness YMCA center.</p>
<p>Principle 4: Promote sustainability for future generations.</p>	<p>The Project Site does not encompass rural or active agricultural or recreational land. However, the site does contain critical habitat</p>

**Table V.I-5
SCAG’s Regional Comprehensive Plan and Guide’s Goals and Policies Discussion**

GOALS AND POLICIES	DISCUSSION
<ul style="list-style-type: none"> • Preserve rural, agricultural, recreational and environmentally sensitive areas. • Focus development in urban centers and existing cities. • Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste. • Utilize “green” development technologies. 	<p>for the California gnatcatcher. Mitigation measures have been recommended that would involve restoration or purchase of land consisting of habitat (e.g., Chaparral, Coastal Sage Scrub) for this environmentally sensitive species.</p> <p>Existing development, development under construction and a site that has been approved for development surrounds the Project Site. Therefore, development of the Project Site would be considered in-fill.</p> <p>Further, the City of Santa Clarita SRRE was prepared in response to AB 939. It describes policies and programs that will be implemented by the City to achieve the state’s mandates of 25 and 50% waste disposal reductions by the years 1995 and 2000 respectively. Per the CIWMAC the SRRE projects disposal capacity for a fifteen-year period. The current SRRE fifteen-year period commenced in 1991.</p>

J. Mineral Resources

No corrections or additions are provided.

K. Noise

No corrections or additions are provided.

L. Population and Housing

No corrections or additions are provided.

M. Public Services

1. Police Protection

No corrections or additions are provided.

2. Fire Protection

Page V.M-11 of the Draft EIR, second paragraph, seventh sentence has been revised to read:

Fire Station No. 104 is equipped with a ~~three~~**four**-person quint (a combination engine/ladder truck apparatus).

3. Schools

No corrections or additions are provided.

4. Libraries

No corrections or additions are provided.

5. Parks/Recreation

No corrections or additions are provided.

N. Utilities

1. Water

No corrections or additions are provided.

2. Sewer

Page V.N-29 of the Draft EIR, first paragraph, second sentence has been revised and the third sentence has been deleted to read:

The Santa Clarita Valley is served by the Santa Clarita Valley Sanitation District (SCVSD) which is one of 24 separate Sanitation Districts in Los Angeles County that work cooperatively under a Joint Administration Agreement with one administrative staff headquartered near the City of Whittier. The District operates two water reclamation plants (WRPs), which provide wastewater treatment in the Santa Clarita Valley. The majority of wastewater generated in the Santa Clarita Valley (that which is conveyed to the

~~County's sewer system rather than to individual septic tanks and leach fields) is treated at two existing water reclamation plants (WRPs) which are operated by the County Sanitation Districts of Los Angeles County (CSDLAC). These two treatment facilities, the Saugus WRP (District 26) located at 26200 Springbrook Avenue in Saugus and the Valencia WRP (District 32) located at 28185 The Old Road in Valencia have been interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The relationship between the two districts was established through a joint powers agreement that created the regional treatment system and permits the Valencia WRP to accept flows that exceed the capacity of the Saugus WRP. These two facilities, provide primary, secondary and tertiary treatment. The location of these treatment facilities and service areas are shown in Figure V.N.2-1.~~

Page V.N-29 of the Draft EIR, second paragraph, first, second, third and eighth sentences have been revised to read:

The SCVJSS currently has a combined permitted treatment capacity of ~~19.1~~ **28.1** million gallons per day (mgd) and treats an average ~~18.4~~ **19.9** mgd. The 2015 SCVJSS Facilities Plan includes a ~~9.6~~ **6** mgd expansion of the Valencia WRP ~~will be completed in early 2005~~ giving the SCVJSS a combined treatment capacity of ~~28.1~~ **34.1** mgd **when it is funded;** ~~with this expansion the system is expected to meet the Regional Growth Management Plan forecasted demand through 2040.¹ Expansion of the SCVJSS is funded through the District's Connection Fee Program. All new users are required to pay a fair share² connection fee to the CSDLAC prior to their connection to the local sewer network. These fees fund the expansion of treatment capacity and the installation of trunk lines, while all on-site improvements remain the responsibility of the developer of the Proposed Project. The rate of area development with the accompanying demand for connections, and the fees associated with them, drives the rate at which expansions to the existing system are designed and built. Connection permits are not issued if it is determined there would not be sufficient capacity in the existing system. A second phase expansion to the SCVJSS of 6 mgd has been designed and approved, but construction is currently on hold pending the development of further demand in the area.~~

Page V.N-32 of the Draft EIR, the following sentences are added to the end of the second paragraph:

¹ Telecommunication with Ruth Frazen, Engineering Technician, County Sanitation Districts of Los Angeles County, December 23, 2004.

² A 'fair share' is defined as those costs associated with expanding the existing regional system to accommodate the anticipated sewage flows from the Proposed Project.

The Proposed Project would generate approximately 0.24 million gallons of sewage that would require treatment at the SCVSD. As shown in Table V.N.2-2, the existing sewage treatment capacity of the SCVSD is 19.9 million gallons per day and adding the Proposed Project's sewage flow, approximately 20.14 million gallons would be treated and the facility has a current treatment capacity of 28.1 million gallons per day. Therefore, SCVSD has a capacity to treat existing flows plus the Proposed Project's sewage, with a remaining capacity of approximately 7.96 million gallons per day.

Page V.N-33 of the Draft EIR, Table V.N.2-2 is revised to read:

**Table V.N.2-2
Project Sewage Generation**

Wastewater Generation	Million Gallons per Day
Existing Site Generation	0.00
Forecasted Project Generation	0.24
<u>Existing Sewage Treatment Flow at SCVSD</u>	<u>19.9</u>
Existing plus Project	18.64 <u>20.14</u>
Existing Available SCVJSS SCVSD Capacity ¹	28.10
Remaining Available Capacity	9.46 <u>7.96</u>
<i>Source: County Sanitation Districts of Los Angeles Loadings and Unit Rates</i>	
<i>¹ – including 9 mgd expansion coming on-line in early 2005</i>	

Page V.N-34 of the Draft EIR, first paragraph, first, third, fourth and fifth sentences have been revised to read:

Implementation of the Proposed Project in conjunction with the 12 related projects (see Related Projects list above) would increase the generation of sewage within the SCVJSS's service area. The cumulative amount of sewage generated is projected to be approximately 1.5 mgd (see Table V.N.2-3). As previously discussed, the **current** design capacity of the SCVJSS is 28.10 mgd and the SCVJSS's current average wastewater flow is ~~18.4~~ **19.9** mgd. Therefore, the SCVJSS has a remaining capacity of approximately ~~9.7~~ **8.2** mgd. The cumulative sewage generation of 1.5 mgd

would be well within the design capacity of the SCVJSS, representing about ~~45.5~~ **18** percent of the remaining capacity. In addition, it should be noted that connection permits are not issued if there is not sufficient capacity in the system, and all new development projects are required to pay the District's connection fees to assure the continual expansion of district facilities. Therefore no cumulatively significant impacts to the sewerage system are anticipated. Thus, the Proposed Project's incremental increase in sewage generation is not considerable and impacts would be less than significant.

3. Solid Waste

No corrections or additions are provided.

O. Transportation

Page V.O-39 of the Draft EIR, the Existing Neighborhood Traffic discussion has been modified to read read:

Located east of the Proposed Project site is an existing residential development. Ermine Street is a local east-west roadway within the development, and it provides access to other local streets that connect to Whites Canyon Road.

Provided in this analysis are scenarios with and without a connection of Ermine Street to future Golden Valley Road. The Ermine Street intersection would be configured as a "T" intersection, with the project having two separate intersections on Golden Valley Road, north and south of the Ermine Street intersection. **It is proposed that the connection be limited to right-turn only and from Golden Valley Road.** This connection is designed to provide alternate access to areas west for residents of the existing development, and some traffic from the Proposed Project would use Ermine Street, primarily trips between the Proposed Project and Canyon High School. **The William S Hart School District has indicated that approximately 64 students from the Proposed Project would be attending Canyon High School, which is located just south of the existing neighborhood.**

Figure V.O-12 illustrates the residential neighborhood located east of the Proposed Project site. Vehicular entry and exit locations to this neighborhood were identified in traffic counts of existing conditions were collected in January 2005. These are shown on the graphic as AM and PM peak hour volumes and 24-hour average daily traffic (ADT) volumes.

Just north of the Proposed project site and just west of the existing residential neighborhood is a new residential development under construction by KB Homes (formerly SunCal Companies). This development, which is in unincorporated Los Angeles County,

will construct a new segment of Dorothy Street between the existing neighborhood and Golden Valley Road. With this connection to Golden Valley Road, the current travel patterns in the existing neighborhood are anticipated to change due to the new access provided via Golden Valley Road. The SunCal project will also result in some new traffic within the existing neighborhood, such as trips between the KB Home (formerly SunCal) project site and Sky View Mesa Elementary School. The Saugus School District has indicated that approximately 100 students from the KB homes project will be attending Sky View Mesa Elementary School, which is located within the existing neighborhood.

The change in existing travel patterns, together with the additional traffic anticipated to be generated by the new residential neighborhoods, will result in changes to traffic volumes within the existing neighborhood. Approximately 2,000 ADT from this the existing neighborhood that would is anticipated to redistribute to Golden Valley Road when the connection of Dorothy Street (and potentially if the connection of Ermine Street) to Golden Valley Road is provided. This volume represents approximately 18% of the total measured ADT of this neighborhood (existing conditions) and would result in a corresponding reduction in traffic volumes accessing Whites Canyon Road via Ashboro Drive and Steinway Street, and accessing Camp Plenty Road. The SunCal Project has been forecast to add approximately 400 ADT of new trips to the existing neighborhood and the Keystone project has been forecast to add approximately 100 new ADT to the existing neighborhood.

Figure V.O-13 illustrates the forecast neighborhood traffic volumes given the connection of Dorothy Street to Golden Valley Road and no connection of Ermine Street to Golden Valley Road. Figure V.O-14 illustrates the forecast neighborhood traffic volumes given both the connection of Dorothy Street and Ermine Street to Golden Valley Road. With just a connection at Dorothy Street, traffic volumes on the segment of Dorothy Street that is currently a cul-de-sac are forecast to increase to approximately 2,600 ADT. With a connection at Dorothy Street and a limited access connection at Ermine Street (only right-turns allowed to and from Golden Valley Road), traffic volumes on this same segment of Dorothy Street are forecast to increase to approximately 1,300 ADT and traffic volumes on the segment of Ermine Street that is currently a cul-de-sac are forecast to increase to approximately 1,300 ADT.

Figures V.O-13, Peak Hour and ADT Volumes with School Traffic, With Dorothy Street Connection to Golden Valley Road and V.O-14, Peak Hour and ADT Volumes with School Traffic with Dorothy Street and Ermine Street Connection to Golden Valley Road have been added to the Final EIR. These Figures are provided following this page.

Page V.O-53 of the Draft EIR, the following mitigation measure has been added:

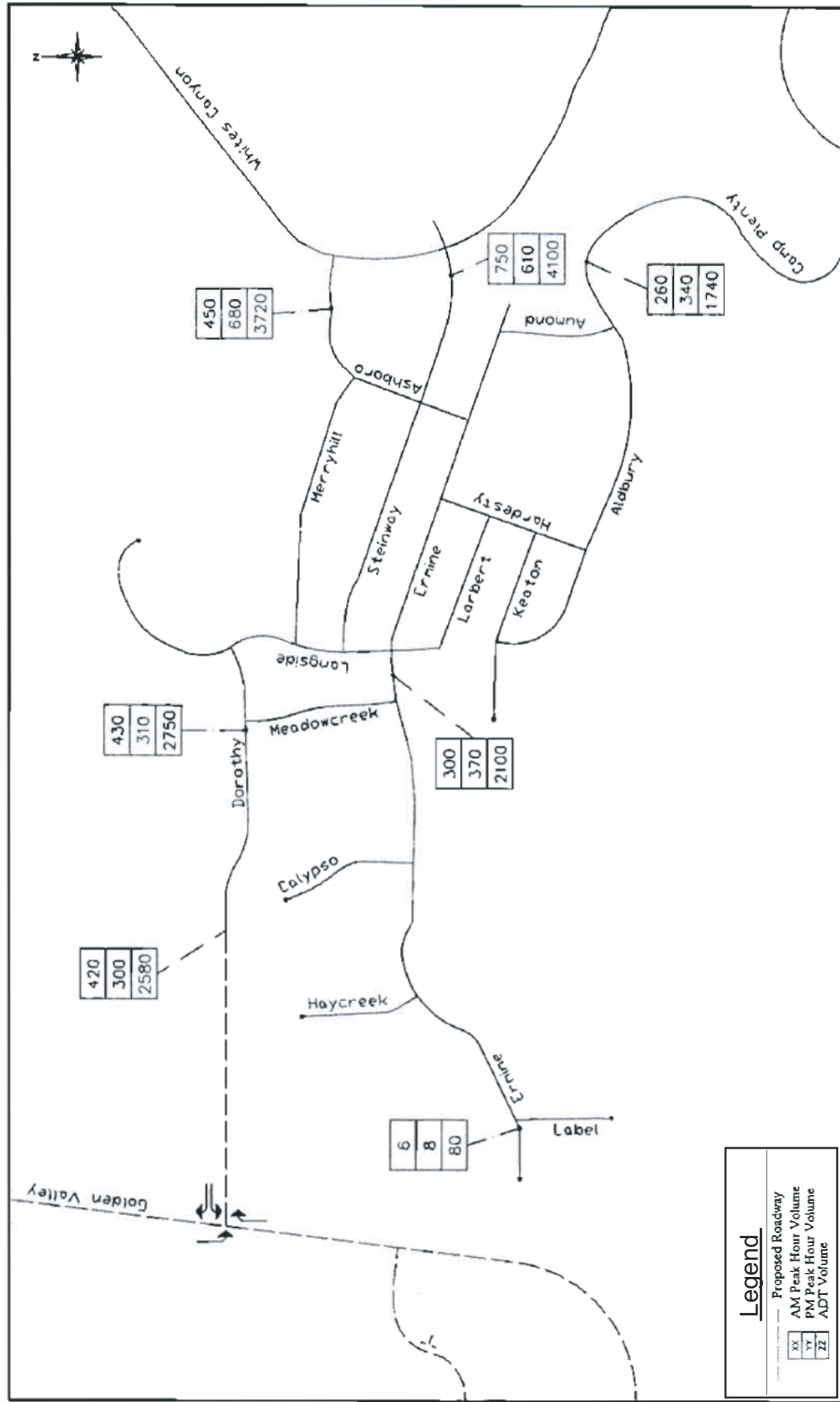
- 0-14 Prior to implementation of improvements to southbound ramps at SR-14/Sierra Highway interchange, the project developer shall obtain an encroachment permit from the Department of Transportation and the proposed improvements may require modifications based upon the encroachment permit review process.

Page V.O-53 of the Draft EIR, Mitigation Measure 0-14 has been revised to read:

- ~~O-14~~15 The project and related projects shall fund its calculated fair share of improvements to the Bouquet Canyon Bridge and Thoroughfare District to augment future improvements that are planned for the SR-14 freeway.

P. Energy Conservation

No corrections or additions are provided.

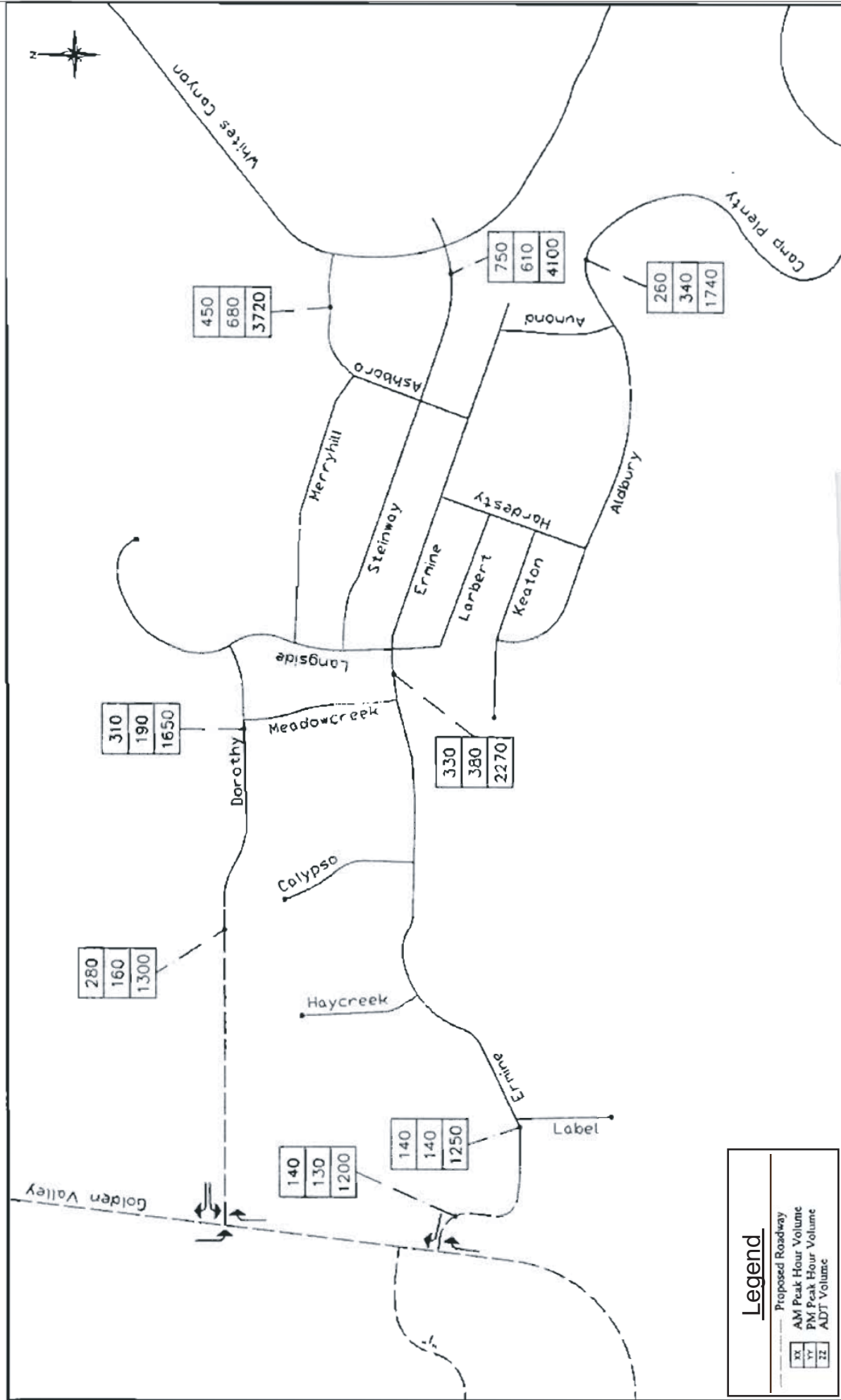


Source: Austin Foust Associates, 2006.



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Environmental Planning and Research

Figure V.O-13
Peak Hour ADT Volumes with School Traffic,
with Dorothy Street Connection to Golden Valley Road



Source: Austin Foust Associates, 2006.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

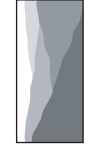


Figure V.O-14
Peak Hour ADT Volumes with School Traffic,
with Dorothy Street and Ermine Street Connection to Golden Valley Road

IV. MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Section 15097 of the CEQA Guidelines (Mitigation Monitoring or Reporting) provides additional direction on mitigation monitoring and reporting). The Santa Clarita Department of Community Development, Planning Division (“City Planning”) is the Lead Agency for the proposed project.

An EIR has been prepared to address the potential environmental impacts of the proposed project. Where appropriate, the EIR includes recommended mitigation measures to avoid or substantially lessen the significant environmental impacts associated with the proposed project. The EIR includes other recommended mitigation measures that would reduce further non-significant environmental impacts associated with the proposed project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of all mitigation measures that are adopted for the proposed project. As shown on the following pages, each required mitigation measure for the proposed project is listed and categorized by impact area, with accompanying discussion of:

- Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored:
 - Pre-Construction, including the design phase.
 - Construction.
 - Occupancy (post-construction).
- The Enforcement Agency, the agency with the power to enforce the mitigation measure.
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMP for the proposed project will be in place throughout all phases of the project. The project developer shall be responsible for implementing all mitigation measures unless otherwise noted. The project developer shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City’s existing planning, engineering, review and inspection processes will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to City Planning shall be at the discretion of the City. Generally, each report will be submitted to City Planning in a timely manner

following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. City Planning, in conjunction with the project developer, shall assure that project construction occurs in accordance with the MMP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed below are all departments of the City, unless otherwise noted.

AESTHETICS

- B-1** The Project Applicant shall prepare and implement a Lighting Mitigation Plan. The Plan shall be submitted to the City of Santa Clarita Department of Planning and Economic Development for reviewed and approval prior to issuance of grading permits.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
 Department of Community Development, Economic Development Division

- B-2** Project street lighting shall be the lowest intensity necessary for security and safety purposes, while still adhering to the recommended levels of the Illuminating Engineering Society of North America.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
 Department of Public Works, Street Maintenance Division

- B-3** In order to minimize illumination wash onto adjacent areas, street lighting shall utilize non-glare fixtures directed downward onto the project site and aimed away from the off-site viewers.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
 Department of Public Works, Street Maintenance Division

- B-4** Atmospheric light pollution shall be minimized by utilizing street lighting fixtures that cut off light directed to the sky.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
 Department of Public Works, Street Maintenance Division

B-5 The project developer shall distribute information to prospective home buyers recommending the use of motion detectors for private security, rather than continuous lighting systems.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

B-6 Project CC&Rs shall include the following restrictions on outdoor lighting for private residences:

- The use of exterior up lighting fixtures for building facades and trees shall be prohibited.
- Only down lighting for exterior-building mounted fixtures shall be permitted.
- Use of "glowing" fixtures that would be visible from existing communities or public roads shall be prohibited. A glowing fixture is a lantern style fixture, or any fixture that allows light through its vertical components.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

AIR QUALITY

C-1a The Applicant shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the project site throughout the project construction phases. The Applicant shall include in construction contracts the control measures required and recommended by the SCAQMD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Keep all construction equipment in proper tune in accordance with manufacturer’s specifications;
- Use late model heavy-duty diesel-powered equipment at the project site to the extent that it is readily available in the South Coast Air Basin;
- Use diesel-powered equipment that has been retrofitted with after-treatment products (e.g., engine catalyts or cooled exhaust gas recirculation technology) to the extent that it is readily available in the South Coast Air Basin;
- Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the

South Coast Air Basin (this does not apply to diesel-powered trucks traveling to and from the site);

- Utilize alternative fuel construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin;
- Limit truck and equipment idling time to five minutes or less;
- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.

Monitoring Phase: Construction
Enforcement Agency: SCAQMD
Monitoring Agency: SCAQMD/
 Department of Community Development, Planning Division/
 City Manager Office, Environmental Services Division

C-2 The Applicant shall include in construction contracts the following requirements or measures shown to be equally effective:

- Use solar or low-emission water heaters in the residential, school, and YMCA buildings.
- Provide energy-efficient heating, cooling, and other appliances, such as cooking equipment, refrigerators, and dishwashers.
- Provide energy-efficient and automated controls for air conditioning units.
- Install ozone destruction catalyst on air conditioning systems, in consultation with the SCAQMD.
- Use light colored roof materials to reflect heat.
- Install only gas-burning fireplaces in the residential units. Wood-burning fireplaces shall not be constructed.
- Require that commercial landscapers providing services at the project site use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Los Angeles County.

Monitoring Phase: Construction
Enforcement Agency: SCAQMD
Monitoring Agency: SCAQMD/
 Department of Public Works, Building and Safety Division/
 City Manager Office, Environmental Services Division

BIOLOGICAL RESOURCES

D-1 The project will impact 85.3 acres of coastal sage scrub, a special-status vegetation community and which is also within a designated critical habitat unit for the coastal California gnatcatcher. The loss of 85.3 acres of coastal sage scrub is considered a significant impact before mitigation. Mitigation would consist of restoration or purchase of 85.3 acres to replace the lost habitat or mitigation as determined by USFWS in conjunction with Mitigation Measure D-10.

Monitoring Phase: Construction, Occupancy
Enforcement Agency: USFWS
Monitoring Agency: USFWS/
 Department of Community Development, Planning Division

D-2 D-2 The project will impact 53.13 acres of chaparral, which is also within a designated critical habitat unit for the coastal California gnatcatcher. The loss of 53.13 acres of chaparral is considered a significant impact before mitigation. Mitigation would consist of restoration or purchase of 53.13 acres to replace the lost functions of the Critical Habitat or mitigation as determined by USFWS in conjunction with Mitigation Measure D-10.

Monitoring Phase: Construction, Occupancy
Enforcement Agency: USFWS
Monitoring Agency: USFWS/
 Department of Community Development, Planning Division

D-3 The project will impact 2.44 acres of Southern Cottonwood-Willow Riparian Habitat, a habitat designated as sensitive in the CNDDDB and that is also regulated by CDFG. The impact is therefore considered significant. The applicant shall develop a mitigation and monitoring plan to be prepared in accordance with the most Corps recent guidelines and shall receive approval of the plan by CDFG prior to impacts to jurisdictional waters on the site. A five-year monitoring plan shall be implemented as set forth in the mitigation and monitoring plan prepared for the project.

Monitoring Phase: Construction, Occupancy
Enforcement Agency: CDFG
Monitoring Agency: CDFG/
 Department of Community Development, Planning Division

D-4 While the majority of oak trees on the site will be retained in place, three oak trees (designated O-1, O-2, and O-8 in the TLC report) would be removed during grading; one (O-8) would be removed due to project construction and two would be removed due to construction of the Golden Valley Road extension from the project site boundary to Newhall Ranch Road. Appropriate approvals shall be obtained prior to oak trees being removed, subject to the Oak Tree Preservation Ordinance (Ordinance 89-1) and the City of Santa Clarita Oak Tree Preservation and maintenance Guidelines. The applicant shall develop a detailed mitigation program for approval by the City in accordance with the Ordinance. In addition, and prior to grading, oak trees near construction/grading area that will not be removed and will be protected during the grading and construction phases of the project by appropriate fencing that extends 5 feet beyond the tree canopy's dripline, or 15 feet from the trunk, whichever is greater.

Equipment damage to the limbs, trunks and roots must be avoided. Even slight trunk injuries can result in long-term, life threatening pathogenic maladies. No storage of equipment or debris within the Protective Zone (drip line plus 5 feet) will be allowed. No dumping of construction wastewater i.e., paint, stucco, concrete, clean-up, etc. Within Protective Zones, Generally, fencing shall be placed at the Protective Zone of any oak or groups of oaks within 50 feet of proposed construction activity. Protective Fencing must remain in place during construction projects and shall not be moved or removed without prior written approval from the Department of Planning and Economic Development under the direct supervision of the Project Consulting Arborist.

Protective Fencing shall be a least 4 feet in height with a visible sign attached a 50 feet intervals which reads: (WARNING- THIS FENCE IS FOR THE PROTECTION OF THIS TREE AND SHALL NOT BE REMOVED OR RELOCATED WITHOUT WRITTEN AUTHORIZATION FROM THE CITY OF SANTA CLARITA PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT)

Care should be taken to avoid placing any sprinklers within watering distance to the trunk of an oak tree. Generally, sprinklers should not reach within 15 feet of a mature oak trunk. Grass or ground covers must never be planted next to the trunks. Too much moisture near the base of an oak is generally believed to be their leading cause of death in residential settings. Oak Root Fungus is the result of over-watering. Oak trees survive and thrive on annual rainfall alone and generally do not need supplemental irrigation except during periods of drought. Watering should take place at or near the drip line. Landscape plans should leave the area within the drip line of an oak tree in a native or natural setting.

Care must be taken to limit grade changes near the trunk areas. The grade should not be lowered or raised around the trunks of trees. This can lead to plant stress from oxygen deprivation or Oak Root Fungus at the root collar.

Protective fencing shall be installed around all oaks not listed for removal. Place protective fencing at the Protected Zone (PZ) as shown on the TLM. The fencing can be repositioned as needed to allow for grading near the oaks listed as “impacted”. The project arborist must be present during the fence placement. Final fencing locations shall be inspected by the City prior to the commencement of development activities. Regular inspections of this fencing shall occur during site development.

An Oak Tree Information Packet including the City of Santa Clarita Oak Tree Protection and Preservation Guidelines must be available on site during construction. The property owner and contractor should be familiar with the contents of these documents.

Vehicle travel along dirt roadways to and from the site may create a heavy coating of dust on the foliage of nearby oaks. These oaks should be hosed off periodically during construction activities.

All work performed within the Protective Zone (drip line plus 5 feet) of any oak shall be accomplished by utilizing hand tools only and must be ‘monitored’ by the projects Oak Tree Consultant.

All roots over 1.5-inch diameter will be clean cut at a 45-degree angle and treated by the Consulting Arborist.

No oaks outside the property line (except for two oaks to be removed for construction of Golden Valley Road) are to be impacted by this construction project.

The leaf-litter build-up under the canopies of the oaks on this site is ideal for healthy tree growth and root development. Do not alter or remove if possible. A 3-inch layer of mulch may be advisable in settings where leaf-little has been lost.

Do not remove the aluminum tags numbering each oak on this site.

No construction materials are to be stored or discarded within the PZ of any oak. Rinse water, concrete residue, liquid contaminates (paint, thinners, gasoline, oils, etc.) of any type shall not be deposited in any form at the base of an oak.

No vehicles shall be parked within the PZ of an oak. No construction vehicles are to be parked under the shade (within the PZ) of an oak.

Monitoring Phase:	Prior to Issuance of Grading Permits, Construction
Enforcement Agency:	Department of Public Works
Monitoring Agency:	Department of Public Works, Building & Safety Division/ Department of Community Development, Planning Division

D-5 If grubbing or clearing of vegetation is scheduled to occur during the nesting season (January 31 to August 31), then prior to issuance of grading permits the project applicant shall have a qualified biologist survey the project site for the presence of any occupied raptor nests. If such a nest is found, then no construction work shall occur within a 300-foot radius from the nest until the nestlings have fledged, or as directed by the biological monitor to ensure compliance with Section 3503.5 of the California Fish and Game Code.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: CDFG
Monitoring Agency: CDFG/
Department of Community Development, Planning Division

D-6 If grubbing or clearing of vegetation is scheduled to take place during the nesting season for migratory birds (March 15-August 15), then three days prior to issuance of grading permits, the Project Applicant shall have a qualified biologist survey impact areas for the presence of occupied migratory bird nests. If active nests of migratory birds are located, then no construction work shall occur within a 300-foot radius from the nest until the nestlings have fledged, or as directed by the biological monitor.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: CDFG
Monitoring Agency: CDFG/
Department of Public Works, Building & Safety Division/ Department of Community
Development, Planning Division

D-7 The applicant shall obtain a Section 404 Permit from the Corps prior to discharging fill into waters of the United States. The loss of 1.22 acres of waters of the United States shall be mitigated at a minimum replacement of 1:1 on the project site or in the vicinity of the site in the Santa Clara River watershed as determined through processing of the Section 404 Permit. The applicant shall develop a mitigation and monitoring plan prepared in accordance with the most recent guidelines prepared by the Corps and shall receive approval of the plan prior to impacts to jurisdictional waters on the site. A five-year monitoring plan shall be implemented as set forth in the mitigation and monitoring plan prepared for the project.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction, Occupancy
Enforcement Agency: Army Corps of Engineers
Monitoring Agency: Army Corps of Engineers/
Department of Public Works, Building & Safety Division/ Department of Community
Development, Planning Division

D-8 The applicant shall obtain a Section 1602 Streambed Alteration Agreement from CDFG prior to impacting waters of the State. The loss of 4.26 acres of CDFG jurisdictional streambeds shall be mitigated at a minimum replacement of 1:1 on the project site or in the vicinity of the site in the Santa Clara River watershed or as determined in the Streambed Alteration Agreement. The applicant shall development a mitigation and monitoring plan prepared in accordance with the most recent guidelines prepared by the Corps and shall receive approval of the plan by CDFG prior to impacts to jurisdictional waters on the site. A five-year monitoring plan shall be implemented as set forth in the mitigation and monitoring plan prepared for the project.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction, Occupancy
Enforcement Agency: CDFG
Monitoring Agency: CDFG/
Department of Public Works, Building & Safety Division

D-9 Temporary project grading shall be allowed within a 100 foot buffer area adjacent to the Santa Clara River Riparian Area. Upon completion of grading, the project applicant shall re-vegetate the 100-foot buffer area with native habitat. The applicant shall delineate the 100-foot buffer prior to issuance of grading permits. A palette of site-appropriate native plant species shall be submitted to the Director of Planning & Economic Development for approval prior to issuance of grading permits.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
| Department of Community Development, Economic Development Division

D-10 The project shall require federal permits (i.e., a Section 404 Permit from the Corps) that would further require that impacts to designated critical habitat be addressed through a Section 7 Consultation with USFWS. Specific mitigation to compensate for impacts to designated gnatcatcher critical habitat will be addressed and developed in consultation with USFWS during the Section 7 Consultation.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Army Corps of Engineers & USFWS
Monitoring Agency: Army Corps of Engineers/
USFWS/
Department of Public Works, Building & Safety Division/ Department of Community
Development, Planning Division

D-11 The following measures shall be implemented to minimize impacts on remaining biological resources on the site as a result of construction and grading activities and to ensure that potential impacts on these resources will remain less than significant.

A qualified biologist shall be retained, as determined by the City of Santa Clarita, as a construction monitor to ensure that incidental construction impacts on biological resources are avoided, or minimized, and to conduct pre-grading field surveys for special-status plant and wildlife species that may be destroyed as a result of construction and/or site preparation activities. Responsibilities of the construction monitor include the following:

- a) The construction monitor shall attend pre-grade meetings to ensure that timing/location of construction activities do not conflict with mitigation requirements (e.g. seasonal surveys for plants and wildlife).
- b) Mark/flag the construction area in the field with contractor in accordance with the final approved grading plan. Haul roads and access roads shall only be sited within the grading areas analyzed in the project EIR.
- c) Supervise cordoning of preserved natural areas that lie outside grading areas identified in the project EIR (e.g., with temporary fence posts and colored rope).
- d) Conduct a field review of the staking (to be set by the surveyor) designating the limits of all construction activity. Any construction activity areas immediately adjacent to riparian areas or other special-status resources should be flagged or temporarily fenced by the monitor, at his/ her discretion.
- e) Conduct meetings with the contractor and other key construction personnel describing the importance of restricting work to designated areas. The monitor should also discuss procedures for minimizing harm/ harassment of wildlife encountered during construction.
- f) Periodically visit the site during construction to coordinate and monitor compliance with the above provisions.
- g) Construction personnel shall be prohibited from entry into areas outside the designated construction area, except for necessary construction related activities, such as surveying. All such construction activities shall be coordinated with the construction monitor.
- h) Standard dust control measures shall be implemented to reduce impacts on nearby plants and wildlife. This includes replacing ground cover in disturbed

areas as quickly as possible; water active sites at least twice daily; suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and restricting traffic speeds on all unpaved roads to 15 mph or less in areas within 200 feet of vegetation.

- i) Upon completion of construction, the contractor shall be held responsible to restore any haul roads and access roads that are outside of approved grading limits. This restoration shall be done in consultation with the construction monitor.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

- D-12** Pets and other domestic animals shall be prohibited with fencing and signage from the open space areas and in any revegetation areas on the project site unless restrained by leash and only in designated areas.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

- D-13** Fencing of sufficient height and design (i.e., ranch-rail) shall be constructed between the edge of the fuel modification zone and the river corridor to deter humans and domestic animals from entering open space habitat areas.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

- D-14** Native shrubs such as laurel sumac, California coffeeberry, toyon, and coast prickly-pear shall be planted along the fence to further deter access. Final fence design shall be approved by and the City Planning and Building Services Department.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

D-15 Human access into the open space areas shall only occur in designated locations (i.e., existing and future trails). All motorized vehicles are prohibited from entering the preserved natural open space areas with the exception of emergency or maintenance vehicles. Applicant shall post signage reflecting the above requirement.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

D-16 Prohibitions against human, domestic animal, and motorized vehicle use in preserved natural open space areas shall be established by the covenants conditions and restrictions (CC & Rs) recorded with the City Planning and Building Services Department.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

D-17 Interpretative signs shall be constructed and placed in appropriate areas, as determined by the City Planning and Building Services Department that explain the sensitivity of natural habitats and the need to minimize impacts on these natural areas. The signs will state that they are entering a protected natural area and that all pedestrians must remain on designated trails, all pets are to be restrained on leash, and that it is illegal to harm, remove, and/or collect native plants and animals. The project applicant shall be responsible for installation of interpretive signs and fencing.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
Department of Public Works, Building & Safety Division

D-18 All street, residential, and parking lot lighting shall be downcast luminaries or directional lighting with light patterns directed away from natural areas. Covenants, Codes and restrictions (CC&Rs) shall require the exterior lighting within the residential area be limited to low voltage unless such lights are shielded and pointed downward.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- D-19** The only potential impacts associated with an increase in non-native are along the interface of the Santa Clara River. Implementation of Mitigation Measures D-9 and D-17 above, would mitigate these potential impacts to a level that is less than significant.

Monitoring Phase: Construction, Prior to Issuance of Occupancy Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division/
 Department of Public Works, Building & Safety Division

CULTURAL RESOURCES

- E.1-1** Prior to excavation and construction on the Proposed Project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the project site.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- E.1-2** If during any phase of project construction, any cultural materials are encountered, construction activities within a fifty-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified historic archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- E.1-3** If any find were determined to be significant by the qualified historic archaeologist, the City, and the qualified historic archaeologist would meet to determine the appropriate course of action.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- E.1-4** All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

E.2-1 If human remains are discovered at the project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Santa Clarita Department of Planning and Economic Development and County coroner shall be immediately notified. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

Monitoring Phase: Construction
Enforcement Agency: NAHC
Monitoring Agency: NAHC/
Department of Community Development, Planning Division

E.3-1 Prior to construction, the project applicant shall retain the services of a qualified vertebrate paleontologist approved by the City of Santa Clarita and the Los Angeles County Vertebrate Paleontology Department (LACMVP) to implement the mitigation program during earth-moving activities in the parcel.

Monitoring Phase: Construction
Enforcement Agency: LACMVP
Monitoring Agency: LACMVP/
Department of Community Development, Planning Division

E.3-2 The paleontologist shall develop a formal agreement with a recognized museum repository, such as the LACMVP, regarding final disposition and permanent storage and maintenance of any fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the mitigation program, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.

Monitoring Phase: Construction
Enforcement Agency: LACMVP
Monitoring Agency: LACMVP/
Department of Community Development, Planning Division

E.3-3 Prior to the start of any earth-moving activity associated with development of the parcel, the paleontologist and/or monitor shall conduct an intensive survey of the parcel, including those

areas that would be buried but not otherwise disturbed by these activities. The survey, particularly with regard to areas of the parcel underlain by the Saugus Formation, shall allow for the discovery of any unrecorded fossil site and the recovery the fossil remains, the recording of associated specimen data and corresponding geologic and geographic site data, and the recognition of fine-grained strata suitable for containing smaller vertebrate fossil remains. The recovery of fossil remains during the survey might reduce the potential for a delay in earth-moving activities.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

E.3-4 The paleontologist or monitor shall coordinate with the appropriate grading contractor personnel to provide information regarding lead agency requirements for the protection of paleontological resources. Contractor personnel also shall be briefed on procedures to be followed in the event that a fossil site or remains are encountered by earth-moving activities, particularly when the monitor is not on site. The briefing shall be presented to new contractor personnel as necessary. Names and telephone numbers of the monitor and other appropriate mitigation program personnel shall be provided to the appropriate contractor personnel.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

E.3-5 Earth-moving activities shall be monitored by the monitor only in those areas of the parcel where these activities would disturb previously undisturbed strata. Monitoring shall be conducted on a full-time basis in areas underlain by Saugus Formation, half time where underlain by the low terrace remnants, and quarter time where underlain by the high terrace deposits, younger alluvium, and stream channel deposits (monitoring would not be conducted in areas underlain by younger alluvium or stream channel deposits, unless and until these activities have reached a depth at least 5 feet below grade, or in areas where exposed strata would be buried, but not otherwise disturbed). If fossil remains are encountered by these activities, monitoring shall be increased to full or half time, as appropriate, at least in the vicinity of the fossil site where the area is underlain by the fossil-bearing rock unit. With City of Santa Clarita approval, if no fossil remains are found once 50 percent of earth-moving activities have been completed in an area underlain by a particular rock unit, monitoring may be reduced or suspended in that area.

Monitoring shall consist of visually inspecting debris piles and freshly exposed strata for larger fossil remains, and periodically dry test screening sediment, rock, and debris for smaller fossil remains. As soon as practicable, the monitor shall recover all vertebrate fossil specimens, a representative sample of invertebrate or plant fossils, or any fossiliferous rock sample that can be

recovered easily. If recovery of a large or unusually productive fossil occurrence is warranted, earth-moving activities shall be diverted temporarily around the fossil site and a recovery crew shall be mobilized as necessary to remove the occurrence as quickly as possible. If not on site when a fossil occurrence is uncovered by these activities, the activities shall be diverted temporarily around the fossil site and the monitor called to the site to evaluate and, if warranted, remove the occurrence. If the fossil site is determined too unproductive or the fossil remains not worthy of recovery, no further action shall be taken to preserve the fossil site or remains, and earth-moving activities would be allowed to proceed through the site immediately. The location and proper geologic context of any fossil occurrence shall be documented, as appropriate. Any recovered rock sample shall be processed to allow for the recovery of smaller fossil remains.

Rock samples shall be processed to allow for the recovery of smaller fossil remains that normally are too small to be observed by the monitor. No more than 6,000 pounds (12,000 pounds total) of rock shall be processed from either the Saugus Formation or the low terrace remnants.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- E.3-6** All fossil specimens recovered from the parcel as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, shall be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock samples from the Saugus Formation and older alluvium shall be submitted to commercial laboratories for microfossil, pollen, or radiometric dating analysis.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

- E.3-7** The monitor shall maintain daily monitoring logs that include the particular tasks accomplished, the earth-moving activity monitored, the location where monitoring was conducted, the rock unit encountered, fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data. A final technical report of results and findings shall be prepared by the paleontologist in accordance with any City of Santa Clarita requirement.

Monitoring Phase: Construction
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

GEOLOGY AND SOILS

F-1 All project site development shall be performed according to the recommendations identified in the referenced report, (Allan E. Seward Engineering Geology, 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

F-2 Mitigation measures for geotechnical resources shall be implemented so as not to conflict with mitigation measures as section set forth in Section V.D, Biological Resources, of this EIR.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

F-3 All grading shall be accomplished under the observation and testing of the Project Soils Engineer, Engineering Geologist and/or their authorized representatives in accordance with the recommendations contained herein, the current Uniform Building Code requirements and “Recommended Earthwork Specifications” as presented in Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

F-4 During site preparation, the site shall be cleared and stripped of organics (vegetation), topsoil, roots, undocumented artificial fill, rubble, construction debris and other unsuitable materials, as applicable, and the site shall be graded to provide a firm base for compacted fill. All organics shall be removed from the site for proper disposal. The Geotechnical Engineer and/or his representatives shall observe the excavated areas prior to placing compacted fill.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

F-5 In order to provide a uniform firm bottom prior to placing fill, all unconsolidated alluvium, slopewash, colluvial soils and severely weathered terrace deposits and bedrock shall be removed from areas to receive fill. The estimated depths of removals (excluding landslides) range from 3 to 36 feet as shown on Figure V.F-1. The exact depth and extent of necessary removals will be determined in the field during the grading operations when observations and more location specific evaluations can be performed.

- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-6** All existing artificial fill (af) shall be removed and replaced with compacted fill. Removals at the locations of exploratory trenches shall be extended to the bottom of the trench backfill if the adjacent removal depths are shallower than the trench.
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-7** In areas to receive compacted fill where the surface gradient is steeper than 5:1 (h:v), the soil mantle, colluvium and unsuitable material shall be removed and such areas benched horizontally into competent material prior to or in conjunction with fill placement (see Appendix E, Fill Over Natural Slope, Figure E2 of the referenced report, Allan E. Seward Engineering Geology, 2004).
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-8** After the ground surface to receive fill has been exposed, it shall be ripped to a minimum depth of 6 inches, brought to optimum moisture content or above, thoroughly mixed to obtain a near uniform moisture condition and uniform blend of materials, and then compacted to the required relative compaction per the ASTM D 1557 laboratory maximum density.
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-9** Where recommended removals encounter groundwater, water levels shall be controlled by providing an adequate excavation bottom slope and sumps for pumping water out as the excavation proceeds, or groundwater may be lowered by installing shallow dewatering well points prior to grading. Partial removals of soils above the water table and soil improvement below the water table (e.g., shallow compaction grouting) may be another option. The determination as to which measures are to be used shall be made by the project Civil Engineer. Dewatering may be needed depending on the season when the removals are performed. All discharges from dewatering operations, if any, shall comply with the National Pollutant Discharge Elimination System Permit (NPDES) requirements of project construction.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works/
 LARWQCB
Monitoring Agency: Department of Public Works, Building & Safety Division/
 City Manager Office, Environmental Services Division/
 LARWQCB

- F-10** A minimum five-foot thick over-excavation shall be performed on all cut-lots, transitional lots (transitions between bedrock, fill, terrace deposits and alluvium), and streets. This overexcavation will result in reduction of potential differential settlements or differential material response to seismic events and provide a uniform base for structural support of buildings. If the maximum depth of fill exceeds 15 feet on a cut/fill transition lot, then the thickness of the fill cap shall be one-third of the deepest fill thickness below any proposed structure (see Appendix E, Cut Lot and Cut Fill Lot (Transitional), Figure E3, of the referenced report, Allan E. Seward Engineering Geology, 2004). If excavation of the native soils (i.e., bedrock) exposes expansive materials, then the lot over-excavation shall be deepened to at least eight feet.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-11** On-site soils that are free of debris, over-size rocks, topsoil and organic matter may be used as sources for compacted fills. Rock or similar irreducible material with a maximum dimension greater than eight inches may not be placed in the fill. Rocks or hard fragments larger than four inches shall not compose more than 25 percent of the fill and/or lift. Any large rock fragments over eight inches in size, may be incorporated into the fill as rockfill in windrows after being reduced to the specific maximum rock fill size, see Figure E4, Rock Disposal, in Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004). Where fill depths are too shallow to allow large rock disposal, special handling or removal may be required depending upon on-site field decisions made during grading operations by the project Geologist/Geotechnical Consultant see “Recommended Earthwork Specifications” in Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-12** All fill material shall be placed in uniform lifts not exceeding eight inches in its loose state and compacted to a minimum of 90 percent relative compaction as determined based on the latest ASTM Test Designation D-1557. Additional field compaction requirements are presented in Appendix E, “Recommended Earthwork Specifications” of the referenced report (Allan E.

Seward Engineering Geology, 2004). Appendix E also includes recommended specifications for placement of trench backfill.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-13** For fills deeper than 40 feet, the portion of fill below 40 feet depth shall be compacted to a minimum of 93 percent relative compaction. These areas shall be delineated at the Grading Plan stage.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-14** Fill slope inclinations shall not be steeper than 2:1 (h:v). The fill material within approximately one equipment width (typically 15 feet) of the slope face shall be constructed with cohesive material obtained from on-site soils. The finished fill-slope face shall be constructed by over-building the slope and cutting back to the compacted fill material. Stability fills are recommended where cut-slope faces will expose fill-over bedrock, alluvium over bedrock or Quaternary terrace deposits over bedrock conditions. These fills shall be constructed with a keyway at the toe of the fill slope with a minimum equipment width, but not less than 15 feet, and a minimum depth of 3 feet into the firm undisturbed earth. Following completion of the keyway excavations, the Project Engineering Geologist shall observe and approve the keyway bottom prior to backfilling with certified engineered fill.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-15** Where fill slopes are constructed above natural ground with a gradient of 5:1 (h:v) or steeper, all topsoil, colluvium, and unsuitable material shall be removed and a keyway shall be constructed at the toe of the fill slope with a minimum width of 15 feet, and a minimum depth of 3 feet into firm undisturbed earth (see Appendix E, Fill Slope Over Natural Slope diagram, Figure E5 of the referenced report, Allan E. Seward Engineering Geology, 2004). Following completion of the keyway excavations, the project Engineering Geologist/Geotechnical Engineer or designated representative shall observe and approve the keyway bottom prior to backfilling with compacted fill.

- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-16** Where fill slopes toe out on relatively level natural ground, the removals shall be performed to a minimum 1:1 (h:v) projection from the toe of slope to the recommended removal depth, (see Appendix E, Fill Slope Toeing Out on Flat Alluviated Canyon, Figure E6 of the referenced report, Allan E. Seward Engineering Geology, 2004).
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-17** Where sliver fill-slopes are proposed, the slope shall be constructed with a minimum 15-foot width Stability Fill throughout, which is keyed in at the toe of slope (see Appendix E, Stability/Buttress Fill and Backdrains Detail, Figure E7 the referenced report, Allan E. Seward Engineering Geology, 2004).
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-18** Three landslides are located within or in the vicinity of the proposed development area of the project. These landslides shall be mitigated as recommended in Table 1 of Geologic and Geotechnical Report – Addendum No. 1 Revised Tentative Tract Map of the referenced report, (Allan E. Seward Engineering Geology, 2004).
- Monitoring Phase:** Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division
- F-19** Landslides Qls-1, Qls-2 and Qls-3 shown in figure 4.1-1 should be included on the Final Map as Restricted Use Areas.
- Monitoring Phase:** Prior to Final Map Recordation
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division
- F-20** Eighteen proposed cut-slopes ranging in height from 25 feet to 120 feet are proposed on the project site and are designated as CS-1 through CS-18. Recommended mitigation, if necessary, for each slope as presented in Cut-Slope Summary (Table 2.1 of the referenced report, Allan E. Seward Engineering Geology, Inc., 2004), shall be followed. This determination shall be made

by the Geologist/Geotechnical Consultant prior to grading activities. It has been conservatively assumed for the purposes of stability analysis that weak bedding planes may occur anywhere in the proposed cut-slopes. If any of the smaller proposed cut-slopes (less than 25± feet in height) have adverse geologic grading configurations (fill over cut), they shall be mitigated, if necessary, with a standard 15- to 20-foot wide key (depending on the proposed cut-slope height) and benching similar to a Stability Fill. A “Typical Fill above Cut-Slope” detail is shown on Figure E8 within Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004). This determination shall be made by the project Geologist/Geotechnical Consultant prior to grading activities.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-21** All permanent cut-slopes shall be constructed at a slope ratio not steeper than 2:1 (h:v). All permanent cut-slopes exposing Terrace Deposits or Alluvium shall be constructed as a stability fill. Temporary cut slopes in competent rock may be constructed as steep as 1.5:1 (h:v). Potential unstable subsurface conditions exposed during construction, such as adverse bedding, joint planes, zones of weakness or exposed seepage, may require either flatter slopes than specified above or construction of benches. An Engineering Geologist shall observe all backcuts during the grading operations and provide appropriate recommendations, if necessary.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-22** Natural slopes within the proposed Tentative Tract 60258 have gradients ranging from 5:1 (h:v) to 1.1:1 (h:v). A 75-foot high approximately 1:1 (h:v) gradient slope located westerly of Lot 99 within the DWP easement was identified by the referenced report, (Allan E. Seward Engineering Geology, 2004) as the most critical slope. The referenced report illustrates the geologic conditions of this slope on Section 13 – 13’ and provides slope stability analysis indicating that this natural slope satisfies the City of Santa Clarita factor of Safety requirements. All natural slopes that are relatively steep and have accumulations of soil and slopewash are prone to debris flow hazard.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-23** A fill over natural condition is proposed along the southern edge of the proposed school site (Lot 102) above the Santa Clara River. The natural slope is approximately 90-feet in height with

gradients up to 1.1:1 (h:v). A fill slope up to 40 feet in height is proposed to ascend above the natural slope. The referenced report, (Allan E. Seward Engineering Geology, Inc., 2004), recommends a twenty foot horizontal bench to set back the fill slope from the descending natural slope. The horizontal bench is recommended to extend laterally a distance of approximately 450 feet. The recommended bench is color coded yellow on the Geologic/Geotechnical Map as well as on Cross Section 3-3' Plate II within the referenced report, (Allan E. Seward Engineering Geology, Inc., 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-24** All of the exploratory trenches and borings previously excavated for this project shall be overexcavated and backfilled with compacted fill in accordance with the earthworks recommendations of the referenced report, (Allan E. Seward Engineering Geology, Inc., 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-25** Wherever groundwater seepage is observed, the condition shall be evaluated by the Engineering Geologist and Geotechnical Engineer prior to covering with fill material.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-26** Surface drainage control design shall include provisions for positive surface gradients to ensure that surface runoff is not permitted to pond, particularly above slopes or adjacent to building foundations or slabs. Surface runoff shall be directed away from slopes and foundations and collected in lined ditches or drainage swales via non-erodible drainage devices, which shall discharge to paved roadways or existing watercourses. If these facilities discharge onto natural ground, means shall be provided, as directed by the project Civil Engineer, to control erosion and to create sheet flow.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-27** It should be expected that, even with the construction of carefully planned and designed erosion control measures, some erosion may occur during the first few wet seasons after the project is

completed. Site grading should be inspected, particularly after heavy, prolonged rainfall, to identify erosion areas at an early stage. Maintenance work shall be done as soon as practical to repair these areas and prevent their enlargement.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-28** Planting and irrigation standards within the City of Santa Clarita Grading Code shall be adhered to in order to prevent soil erosion.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-29** Fill slopes and stability fills, as applicable, shall be provided with subsurface drainage as necessary for stability as determined by the project Geologist/Geotechnical Consultant. A typical backdrain detail is shown on Figure E7, Appendix E of the referenced report (Allan E. Seward Engineering Geology, Inc, 2004). Also, subdrains along the bottom of canyon fills shall be constructed. A typical canyon subdrain detail is presented on Figure E9 of the referenced report.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-30** All final grades shall be sloped away from the building foundations to allow rapid removal of surface water runoff. No ponding of water shall be allowed adjacent to the foundations. Plants and other landscaped vegetation requiring excessive watering shall be avoided adjacent to the building foundations. Should landscaping be constructed, an effective water-tight barrier shall be provided to prevent water from affecting the building foundations.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-31** The Project Engineer shall design pad grades with sufficient flexibility to accommodate a possible shortage of fill of up to 10 percent of the total yardage graded due to potential shrinkage of fill and potential subsidence due to dewatering.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-32** The structural design shall include seismic geotechnical parameters in accordance with UBC requirements for Seismic Zone 4. These parameters will be provided at the Grading Plan stage.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-33** Shallow spread footings for foundation support of residential structures can adequately be placed on compacted engineered fill as stated in Mitigation Measures V.F-13 and V.F-14. Support for heavier structures, if applicable, shall be addressed at the Grading Plan stage. Minimum specifications for continuous (wall) foundation dimensions are 12 inches wide and 12 inches deep below lowest adjacent grade for single-story residential structures. Tentatively, an allowable bearing capacity of 1,500 pounds per square-foot can be used for (minimum-sized) shallow foundations constructed in certified compacted fill. This tentative allowable bearing value shall be confirmed by further field and laboratory testing by the Project Geologist of the site soils before use in design plans. Lateral resistance of footing walls shall be provided at the Grading Plan stage.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-34** If, during grading operations, the resulting cut-fill transition is steep, as determined by the project Geologist/Geotechnical Consultant, at depth below the building area, the geometry of the transition shall be reviewed during grading operations by the Soils Engineer on a site-specific basis to evaluate the need for additional over excavation removals and/or additional foundation reinforcement. As a general guideline, steep cut/fill transitions would include slope gradients steeper than 4:1 (h:v) and overall variations in fill thickness of greater than 15 feet, which occur within 20 feet of final pad grade. The determination of need for over excavation of materials shall be guided by Figure E3 (Appendix E), "Cut Lot (Transitional)" and "Cut-Fill Lot (Transitional)" of the referenced report, (Allan E. Seward Engineering Geology, Inc., 2004), which provides a foundation grading detail for locations where foundations will straddle transition zones between cut and fill materials.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-35** To minimize significant settlements, the upper soils in areas to receive fills shall be removed and replaced with compacted fill. Some minor settlements will be expected due to loads from high fills (e.g., thicker than 30 feet). Currently, locations of proposed high fills are in the vicinity of

Lots 10-21, 30-34, 38, 39, 42-56, 77, 97, 99, 102, and 102A. Most of the settlements due to the load of added fill will occur during and shortly after rough grading is complete. However, since lenses of relatively compressible clayey soils exist below recommended removal depths, some of the fill settlements will not occur until the ground water table is lowered below the compressible clay lenses. Ground water table lowering is usually the result of pumping from water wells. (Note: the Proposed Project would not directly withdraw groundwater.) Alternatively, the project site may be temporarily surcharged with earth fill sufficient to simulate the load increase on the compressible clay lenses due to lowering of the ground water table, as determined by the project Geologist/Geotechnical Consultant.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-36** At other alluvial removal areas, potential settlements in Alluvium shall be minimized by the removals and recompaction recommended in the referenced report, (Allan E. Seward Engineering Geology, Inc., 2004). Also, potential effects from localized seismically induced settlements will be attenuated by the recompacted upper layers and proposed additional fills, see Appendix C in the referenced report, (Allan E. Seward Engineering Geology, 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-37** Excavations deeper than 3.5 feet shall conform to safety requirements for excavations as set forth in the State Construction Safety Orders enforced by the State Division of Industrial Safety, CAL OSHA. Temporary excavations 12 feet or lower shall be no steeper than 3/4:1 (h:v). For excavations to 20 feet in height, the bottom 3.5 feet may be vertical and the upper portion between 3.5 and 20 feet shall be no steeper than 1.5:1 (h:v). Excavations not complying with these requirements shall be shored. Excavation walls in sands and dry soils shall be kept moist, but not saturated at all times.

Monitoring Phase: Construction
Enforcement Agency: State Division of Industrial Safety, CAL OSHA
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-38** Parameters for design of cantilever and braced shoring shall be provided at the Grading Plan stage.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-39** The bases of excavations or trenches shall be firm and unyielding prior to foundations or utility construction. On-site materials other than topsoil or soils with roots or deleterious materials may be used for backfilling excavations. Densification (compaction) by jetting may be used for on-site clean sands or imported equivalent of coarser sand provided they have a Sand Equivalent greater than or equal to 30 as determined by ASTM D2419 test method. Specifications for placement of trench backfill shall be adhered to and are presented in Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-40** The measures presented in Table E1, Minimum Foundation and Slab Recommendations for Expansive Soils, in Appendix E of the referenced report, (Allan E. Seward Engineering Geology, 2004), shall be implemented to minimize the effects of soil expansion potential. It is anticipated that compacted fill from the on-site materials will have a very low to medium expansion potential. The expansion potential of the site soils exposed at rough grade shall be tested again after site grading is complete and the final foundation design shall be based on those expansion test results.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- F-41** On-site soils classify as severely corrosive to corrosive to buried metals per County of Los Angeles classification. Sulfate concentrations are negligible per UBC (1997) classification, and pH was near-neutral (reported as 7.2 in the referenced report, Allan E. Seward Engineering Geology, Inc., 2004). Pending additional testing, either Type I or II cement may be considered for use in concrete placed in contact with the ground. Mitigating measures for soil corrosivity shall be finalized by the Project Engineer based on additional confirmatory tests that shall be performed at the Grading Plan stage. Final recommendations for concrete shall be in accordance with the latest UBC requirements, and a corrosion specialist shall provide mitigating recommendations for potential corrosion of metals in contact with on-site soils prior to issuance of a Grading Permit.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

HAZARDS AND HAZARDOUS MATERIALS

G-1 The services of properly trained and qualified hazardous waste handlers shall be used to perform hazardous waste cleanup or abatement, transportation and disposal prior to construction and appropriate protocol shall be followed to ensure that construction workers are not exposed to toxic substances.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

G-2 Prior to recordation of the Final Tract Map, initiation of rough grading or issuance of any subsequent permits, the applicant shall prepare a subsequent environmental assessment to document the exact location of the oil well. Re-abandonment of the oil well shall be performed to meet the current requirements of the State of California, Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR). Once re-abandoned, the oil well will not provide a significant impact to the Proposed Project.

Monitoring Phase: Prior to Final Map Recordation, Prior to Issuance of Grading Permits
Enforcement Agency: State of California, Department of Conservation,
 Division of Oil, Gas & Geothermal Resources
Monitoring Agency: Department of Public Works, Building & Safety Division

G-3 Prior to recordation of the Final Tract Map, initiation of rough grading or issuance of any subsequent permits, the applicant shall prepare a subsequent environmental assessment to document the exact location of the water well. Abandonment of the of the water well shall be performed to meet the current requirements regulatory requirements.

Monitoring Phase: Prior to Final Map Recordation, Prior to Issuance of Grading Permits
Enforcement Agency: State of California, Department of Conservation,
 Division of Oil, Gas & Geothermal Resources
Monitoring Agency: Department of Public Works, Building & Safety Division

HYDROLOGY AND WATER QUALITY

H-1 The Proposed Project shall comply with the RWQCB Municipal Permit (General MS4 Permit) Order No. 01-182, NPDES No. CAS004001 (adopted December 13, 2001) to reduce the discharge of pollutants to the maximum extent practicable.

Monitoring Phase: Construction, Occupancy
Enforcement Agency: LARWQCB
Monitoring Agency: LARWQCB/
City Manager Office, Environmental Services Division/
Department of Public Works, Building & Safety Division

H-2 The project applicant shall obtain authorization through the Regional Water Quality Control Board (RWQCB) for a National Pollution Discharge Elimination System (NPDES) permit for general construction activity. The applicant shall avoid and minimize potential temporary water quality impacts by including provisions in the final engineering plans and specifications of each project component together with associated instructions to the contractors, assuring compliance with applicable RWQCB and City of Santa Clarita requirements. The project engineer shall file a notice of intent to discharge stormwater, and an application for the NPDES stormwater permit for general construction activity with the RWQCB before starting construction. All construction activities shall be subject to this requirement.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: LARWQCB
Monitoring Agency: LARWQCB/
City Manager Office, Environmental Services Division/
Department of Public Works, Building & Safety Division

H-3 The project’s Drainage Concept Study and Hydrologic Analysis shall be reviewed and approved by the Los Angeles County Public Works Department prior to the issuance of any building permits. This analysis shall demonstrate that site drainage can adequately be collected and conveyed via the proposed drainage facilities without significantly impacting downstream hydrology, wetland functions, and/or water quality.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Los Angeles County Public Works Department
Monitoring Agency: Los Angeles County Public Works Department/
City Manager Office, Environmental Services Division/
Department of Public Works, Building & Safety Division

H-4 The project applicant shall prepare an Erosion and Sediment Control Plan to address construction impacts and long-term operational effects on downstream environments and watersheds. This plan shall be prepared by a qualified Civil Engineer. Proposed management efforts may include (but not be limited to) provisions for the use of vegetative filtering, preparation of detailed erosion control plans, appropriate use of temporary debris basins, silt fences, sediment traps and other erosion control practices. The proposed plan shall also address all relevant NPDES

requirements and recommendations for the use of best available technology. The erosion control plan shall be reviewed and approved by the City Engineer prior to issuance of grading permits.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: LARWQCB/
LARWQCB/
City Manager Office
Monitoring Agency: City Manager Office, Environmental Services Division/
Department of Public Works, Building & Safety Division

H-5 The project applicant shall submit a final drainage report including an evaluation of adequacy of all on-site drainage improvements. The final drainage report shall be based on final project plans and shall provide engineering detail on all proposed drainage improvements demonstrating that such improvements meet all County of Los Angeles requirements and design standards for stormwater infrastructure. The final drainage report shall be submitted to the City of Santa Clarita and County of Los Angeles Public Works Department for review and approval prior to issuance of any project permits.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works/
County of Los Angeles Public Works Department
Monitoring Agency:

H-6 All Best Management Practices (BMPs) proposed in the project's Storm Water Pollution Prevention Plan (SWPPP) shall be implemented prior to and during construction activities. The project contractor shall implement all Best Management Practices as described in the SWPPP to reduce potential water quality impacts. Final review and approval of this plan shall be completed by the City of Santa Clarita prior to issuance of grading permits. At a minimum, the BMPs shall address soil stabilization, sediment control, wind erosion control, tracking control, non-stormwater control, waste management and materials pollution control practices, and emergency spill control and response measures. Typical BMPs that shall be considered for inclusion in the SWPPP include:

- temporary sediment control: silt fencing, sandbagging, strawbale ground-covering, fiber roll barriers, and desilting basins;
- temporary soil stabilization: hydroseed straw or mulch, seeding, soil binders, erosion control mats or blankets;
- preservation of existing vegetation outside construction areas;

- construction scheduling outside of the rainy season;
- stockpile management: size restriction, runoff control, covers;
- sediment tracking control: street sweeping, cover hauling trailers; and
- waste management: spill prevention, concrete wash management, material delivery and storage, vehicle fueling and cleaning.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-7 The on-site storm drain (pipes and reinforced concrete boxes) and open channels shall be designed and constructed for either the 25-year or 50-year capital storm.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-8 Debris basins shall be constructed pursuant to Los Angeles County Department of Public Works requirements to intercept flows from undeveloped areas entering into the developed portions of the site.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles County Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-9 Energy dissipaters consisting of either rip-rap or larger standard impact type energy dissipaters shall be installed as required by LACDPW at outlet locations to reduce velocities of runoff into the channel where necessary to prevent erosion.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles County Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-10 All on- and off-site flood control improvements necessary to serve the project are to be constructed to the satisfaction of the City of Santa Clarita and/or County of Los Angeles Department of Public Works Flood Control Division.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles County Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-11 Per the April 26, 2001 modification to the General Construction Permit, a contingency “Sampling and Analysis Plan” shall be developed in the event that the BMPs implemented at the construction site fail to prevent non-visible pollutants from discharging from the site. BMPs shall be inspected prior to storm events, every 24 hours during extended events, and after the storm events to ensure proper function of the BMPs and to identify necessary repairs in a timely manner. A record of the inspections and repairs shall be documented in the SWPPP.

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-12 Following the completion of the construction project and when the site has been stabilized, a Notice of Termination shall be filed with the RWQCB.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: LARWQCB
Monitoring Agency: LARWQCB/
 Department of Public Works, Building & Safety Division

H-13 During all construction phases, temporary erosion control retain soil and sediment on the site shall be implemented, including:

- re-vegetating exposed areas as quickly as possible;
- minimizing disturbed areas;
- diverting runoff from downstream drainages with earth dikes, temporary drains, slope drains, etc.;
- velocity reduction through outlet protection, check dams, and slope roughening/terracing;
- dust control measures, such as sand fences, watering, etc.;
- stabilizing all disturbed areas with blankets, reinforced channel liners, soil cement, fiber matrices, geotextiles, and/or other erosion resistant soil coverings or treatments;
- stabilizing the construction entrance/exist with aggregate underdrain with filter cloth or other comparable method;

- placing sediment control BMPs at appropriate locations along the site perimeter and all operational internal inlets to the storm drain system at all times during the rainy season (sediment control BMPs may include filtration devices and barriers, such as fiber rolls, silt fence, straw bale barriers, and gravel inlet filters, and/or with setting devices, such as sediment traps or basins; and/or
- eliminating or reducing, to the extent feasible, non-storm water discharges (e.g., pipe flushing, and fire hydrant flushing, over-watering during dust control, vehicle and equipment wash down) from the construction site through the use of appropriate sediment control BMPS.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- H-14** All necessary permits, agreements, letters of exemption or a Verification Request Letter from the Army Corps of Engineers and/or the California Department of Fish and Game for Project related development are to be obtained prior to issuance of grading permits.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Army Corps of Engineers and/or CDFG
Monitoring Agency: Department of Public Works, Building & Safety Division

- H-15** By October 1st of each year, a separate erosion control plan for construction activities shall be submitted to the local municipality describing the erosion control measures that will be implemented during the rainy season (October 1 through April 15).

Monitoring Phase: Prior to Issuance of Grading Permits, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

- H-16** A final developed condition hydrology analysis shall be prepared in conjunction with final project design when precise engineering occurs. This final analysis will be done to confirm that the final project design is consistent with the analysis. Those final calculations shall establish design features for the project that satisfy the criterion that post development peak storm water runoff discharge rates, velocities, and duration in natural drainage systems mimic pre-development conditions. All elements of the storm drain system shall conform to the policies and standards of the Los Angeles County Department of Public Works, Flood Control Division, as applicable.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-17 Ultimate project hydrology and debris production calculations shall be prepared by a project engineer to verify the requirements for debris basins and/or desilting debris.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

H-18 To reduce debris being discharged from the site, debris basins shall be designed and constructed pursuant to LACDPW Flood Control to intercept flows from undeveloped areas entering into the developed portions of the site.

Monitoring Phase: Prior to Final Map Recordation, Construction
Enforcement Agency: Los Angeles County Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

LAND USE

No mitigation measures are necessary.

MINERAL RESOURCES

No mitigation measures are necessary.

NOISE

K-1 The Applicant should implement measures to reduce the noise levels generated by construction equipment operating at the project site during project grading and construction phases. The Applicant should include in construction contracts the following requirements or measures shown to be equally effective:

- All construction equipment shall be equipped with improved noise muffling, and have the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine isolators in good working condition.
- Stationary construction equipment that generates noise levels in excess of 65 dBA Leq shall be located as far away from existing residential areas as possible. If required to minimize potential noise conflicts, the equipment shall be shielded from noise sensitive receptors by using temporary walls, sound curtains, or other similar devices.

- Heavy-duty vehicle storage and start-up areas shall be located a minimum of 150 feet from occupied residences where feasible.
- All equipment shall be turned off if not in use for more than five minutes.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

K-2 Lot 97: Prior to the issuance of building permits for the multi family units of Lot 97 located along Golden valley Road (only those units that front Golden valley Road), the project developer shall submit environmental noise analyses that demonstrate that future exterior noise levels at ground floor porches and upper floor balconies will not exceed 65 dBA CNEL. Buildings that could be exposed to future exterior noise levels above 65 dBA CNEL shall either (1) have increased setbacks from Golden Valley Road (estimated to be approximately 145 feet from the centerline of Golden Valley Road) or (2) barriers shall be designed and constructed between the buildings and roadway (estimated to have a height of one foot above the roadway grade). The barriers could be in the form of earthen berms or solid masonry walls.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Community Development, Planning Division

K-3 Lot 98: Prior to the issuance of building permits for the multi family units of Lot 98 located along Golden Valley Road (only those units that front Golden Valley Road), the project developer shall submit environmental noise analyses that demonstrate that future exterior noise levels at ground floor porches and upper floor balconies will not exceed 65 dBA CNEL. Buildings that could be exposed to future exterior noise levels above 65 dBA CNEL shall either (1) have increased setbacks of the exterior porches or balconies from Golden Valley Road (estimated to be approximately 145 feet from the centerline of Golden Valley Road); (2) have barriers designed and constructed around the balconies; or (3) not provide balconies that face Golden Valley Road in the affected residential units. The barriers could be in the form of 3/8-inch glass or 5/8-inch plexiglass to a height of six feet above the floor elevation. It is not expected that earthen berms or solid masonry wall built to a standard height of six feet along the edge of the property could reduce noise levels at the second and third floor balconies.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
 Department of Community Development, Planning Division

K-4 Lot 100: Prior to the issuance of building permits for the multi family units of Lot 100 located along Golden Valley Road (only those units that front Golden Valley Road), the project developer shall submit environmental noise analyses that demonstrate that future exterior noise levels at ground floor porches and upper floor balconies will not exceed 65 dBA CNEL. Buildings that could be exposed to future exterior noise levels above 65 dBA CNEL shall either (1) have increased setbacks of the exterior porches or balconies from Golden Valley Road (estimated to be approximately 150 feet from the centerline of Golden Valley Road); (2) have barriers designed and constructed around the balconies; or (3) not provide balconies that face Golden Valley Road in the affected residential units. The barriers could be in the form of 3/8inch glass or 5/8-inch plexiglass to a height of six feet above the floor elevation. It is not expected that earthen berms or solid masonry wall built to a standard height of six feet along the edge of the property could reduce noise levels at the second and third floor balconies.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
 Department of Community Development, Planning Division

POPULATION AND HOUSING

No mitigation measures are necessary.

PUBLIC SERVICES

Police Protection

M.1-1 During construction, private security patrols shall be utilized to protect the project site and temporary fencing would also be installed around the construction site to keep out the curious.

Monitoring Phase: Construction
Enforcement Agency: Santa Clarita Sheriff's Department
Monitoring Agency: Department of Community Development, Planning Division

M.1-2 As final building plans are submitted to the City for approval in the future, Sheriff's Department design requirements which reduce demands for service and ensure adequate public safety (such as those pertaining to site access, site security lighting), shall be incorporated into building designs.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Santa Clarita Sheriff's Department
Monitoring Agency: Department of Community Development, Planning Division

M.1-3 Project design shall provide lighting, to the satisfaction of the Sheriff's Department, around and throughout the development to enhance crime prevention and enforcement efforts.

Monitoring Phase: Occupancy
Enforcement Agency: Santa Clarita Sheriff's Department
Monitoring Agency: Department of Community Development, Planning Division

M.1-4 Project design shall provide clearly visible (during the day and night) address signs and/or building numbers for easy identification during emergencies.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Santa Clarita Sheriff's Department
Monitoring Agency: Department of Community Development, Planning Division

M.1-5 Project design shall provide visibility of doors and windows from the street and between buildings.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Santa Clarita Sheriff's Department
Monitoring Agency: Department of Community Development, Planning Division

M.1-6 Project site design shall include adequate parking spaces in the parking lots to accommodate residents, per the Unified Development Code.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

Fire Protection

M.2-1 The project developer shall contribute funds to the Los Angeles County Fire Department Developer Fee Program. The exact contribution shall be determined by the Los Angeles County Fire Department before a building permit is issued.

Monitoring Phase: Prior to Issuance of Building Permits
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division

M.2-2 The project shall prepare a Fuel Modification Plan, landscape plan and irrigation plan as required for projects located with a Very High Fire Hazard Severity Zone. The Fuel Modification Plan shall be submitted and approved by the County Fire Department prior to final map recordation. The Fuel Modification Plan shall depict a fuel modification zone in conformance with the Fuel Modification Ordinance in effect at the time of subdivision. The fuel modification plan shall not conflict with any revegetation plans as discussed in Section V.D (Biological Resources).

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

M.2-3 The project shall provide water mains, fire hydrants and fire flows as required by the County of Los Angeles Fire Code.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division/
Department of Public Works, Building & Safety Division

M.2-4 Fire Department access shall be extended to within 150 feet distance of any exterior portion of all structures.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

M.2-5 Access shall comply with Section 902 of the Fire Code, which requires all weather access. All weather access may require paving.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

M.2-6 Access roads shall be maintained with a minimum of ten feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky.

Monitoring Phase: Occupancy
Enforcement Agency: Los Angeles County Fire Department

Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

M.2-7 All fire lanes must not be less than 26 feet paved width (clear to sky and unobstructed) and posted and red curbed “NO PARKING - FIRE LANE”. Any proposed reduction in fire lane shall be subject to written acceptance by the County Fire Department.

Monitoring Phase: Construction
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

M.2-8 All private gates shall comply with Regulation 5 of the Fire Code. Prior to the approval of the Tentative Tract Map, the applicant shall receive approval of the gates from the Los Angeles County Fire Department.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Los Angeles County Fire Department
Monitoring Agency: Department of Community Development, Planning Division /
Department of Public Works, Building & Safety Division

Schools

M.3-1 Compliance with the provisions of SB 50 is deemed to be complete and adequate mitigation of Proposed Project impacts to school facilities. In addition, project participation in School Facilities Funding Agreements with the SUSD and HUSD would further mitigate project specific impacts on these districts. These agreements would provide for a ‘Fair Share’ fee to be paid to the SUSD and the HUSD in order to house the additional students generated by the project. No further mitigation is required.

Monitoring Phase: Prior to Issuance of Occupancy Permits
Enforcement Agency: California Department of Education
Monitoring Agency: Department of Community Development, Planning Division

Libraries

No mitigation measures are necessary.

Parks and Recreation

M.5-1 Developer shall construct all trails (within the Proposed Project site and off-site to the west) and shall be in accordance with the City of Santa Clarita Department of Parks, Recreation and Community Services trail system standards.

Monitoring Phase: Construction, Occupancy
Enforcement Agency: Department of Parks, Recreation & Community Services
Monitoring Agency: Department of Parks, Recreation & Community Services/
 Department of Community Development, Planning Division

UTILITIES AND SERVICE SYSTEMS

Water Supply

N.1-1 The project developer shall ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.

Monitoring Phase: Construction/Occupancy
Enforcement Agency: Department of Public Works, Building & Safety Division
Monitoring Agency: Department of Community Development, Planning Division

N.1-2 The project developer shall install either a “smart sprinkler” system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.

Monitoring Phase: Construction/Occupancy
Enforcement Agency: Department of Public Works, Building & Safety Division
Monitoring Agency: Department of Community Development, Planning Division

N.1-3 The project developer shall select and use drought-tolerant, low-water consuming plant varieties to reduce irrigation water consumption.

Monitoring Phase: Construction/Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

N.1-4 The project developer shall install ultra-low flush water toilets and water-saving showerheads in new construction. Low-flow faucet aerators should be installed on all sink faucets.

Monitoring Phase: Construction/Occupancy
Enforcement Agency: Department of Public Works, Building & Safety Division
Monitoring Agency: Department of Public Works, Building & Safety Division

Wastewater

N.2-1 Applicant shall obtain a will-serve letter from the County Sanitation Districts of Los Angeles County prior to issuance of building permits in order to verify that there is sufficient capacity in the receiving trunk lines and the reclamation plant to serve the project.

Monitoring Phase: Prior to Issuance of Building Permits
Enforcement Agency: County Sanitation Districts of Los Angeles County
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Public Works, Capital Improvement Project Division

N.2-2 All local wastewater lines within the project boundaries are to be constructed by the applicant and dedicated to the City of Santa Clarita Transportation and Engineering Services Department.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Public Works, Capital Improvement Project Division

N.2-3 Prior to the issuance of building permits, the applicant shall pay wastewater connection fees.

Monitoring Phase: Prior to Issuance of Building Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
Department of Public Works, Capital Improvement Project Division

Solid Waste

N.3-1 Solid waste collection/recycling areas are to be compatible with nearby structures, secure, protected against adverse environmental conditions, clearly marked, adequate in capacity, number and distribution, and contain a sufficient number of bins to serve the recycling and solid waste needs of the development. (Model Ordinance).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-2 Design and construct collection/recycling areas to accommodate front-loader packing trucks, including maneuvering room. (Model Ordinance).

Monitoring Phase: Prior to Final Map Recordation, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-3 Design and construct driveways and/or travel aisles with adequate width and maneuverability space of unobstructed garbage collection, trash container storage and vehicle access and clearance. (Model Ordinance).

Monitoring Phase: Prior to Final Map Recordation, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-4 Post signs at all access points of the recycling areas that clearly identify all recycling and solid waste collection and loading areas and the materials accepted therein. (Model Ordinance).

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-5 The applicant shall comply with all applicable state and Los Angeles County regulating and procedure for the use, collection and disposal of solid and hazardous wastes.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-6 The construction contractor shall only contract for waste disposal services with a company that recycles construction related wastes.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-7 To facilitate the on-site separation and recycling of construction related wastes, the construction contractor shall provide temporary waste separation bins, which shall be prominently placed on each construction site.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-8 All construction documents shall specify that building materials shall be made of recycled materials, or materials with the highest content possible of recycled materials, to the extent feasible.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-9 The Project Applicant shall locate recycling / separation areas in close proximity to dumpsters for non-recyclables, elevators, loading docks, and primary internal and external access points.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-10 The Project Applicant shall locate recycling / separation areas such that they are not in conflict with any applicable federal, State or local laws.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-11 The Project Applicant shall locate recycling / separation areas so they are convenient for those persons who deposit collect, and load the recyclable material.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-12 The Project Applicant shall place recycling containers / bins so that they do not block access to one another.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-13 The project shall employ the use of xeriscape techniques and plant drought tolerant and native vegetation in common landscaped areas, wherever possible, to reduce yard waste.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division
City Manager Office, Environmental Services Division

N.3-14 For commercial and institutional developments and residential buildings having five or more dwelling units, no refuse collection or recycling areas are to be located between a street and the front of a building.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-15 The project shall install on-site trash compactors for non-recyclables in all commercial (YMCA and junior high school) food service areas.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-16 If possible, kitchen, garage and garden design shall accommodate trash and recyclable components to assist the City's recycling efforts. This includes a design to accommodate a minimum of three 90-gallon containers in locations allowable under the development's CC&Rs.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division/
City Manager Office, Environmental Services Division

N.3-17 First time buyers shall receive educational material on the City’s waste management efforts, including information concerning curbside recycling, used motor oil recycling, and hazardous waste collection programs. Education material shall be passed on to consecutive buyers using the development’s CC&Rs.

Monitoring Phase: Occupancy
Enforcement Agency: Department of Community Development
Monitoring Agency: Department of Community Development, Planning Division

TRANSPORTATION/TRAFFIC

O-1 The project applicant shall construct all on-site roadways and intersections to City of Santa Clarita standards.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-2 The Proposed Project shall install a four-lane roadway on Golden Valley Road from the project’s eastern boundary to the northern project boundary.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-3 The project applicant shall install traffic signals at the following project site intersections:

- Golden Valley Road and “I” Street North (tee int.)
- Golden Valley Road and “I” Street South (four-way int.)
- Golden Valley Road and Ermine Street

On Golden Valley Road, a four-way intersection with “I” Street is planned approximately 0.40 miles north of the future extension of Newhall Ranch Road. This intersection will serve both the project’s residential development located west of Golden Valley Road and the YMCA and junior high school site located on the east. The second intersection with Golden Valley Road at Ermine Street will be configured as a “T” intersection and will be located approximately 0.50

miles north of the four-way intersection at “I” Street. The third intersection with Golden Valley Road (the second connection to “I” street) will be located approximately 0.10 miles north of the Ermine Street intersection.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-4 The project applicant shall coordinate with the local transit provider to identify appropriate bus/stop turnout locations on the project site roadways (Golden Valley Road and/or “I” Street).

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-5 (57.) Valencia Boulevard & Magic Mountain Parkway. Add second WBL turn lane. Implementation of this measure would require restriping, median modification and widening of Valencia Boulevard.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-6 (65.) Bouquet Canyon Road and Soledad Canyon Road. Add fourth NBT lane. Implementation of this measure would require widening of Bouquet Canyon Road northbound approach.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-7 (66.) Bouquet Canyon Road & Newhall Ranch Road.

- Add second SBL turn lane. Implementation of this measure would require restriping with potential median modification.

- Add second SBR turn lane. Implementation of this measure would require widening of Bouquet Canyon Road southbound approach.
- Add third EBT lane. Implementation of this measure would require restriping.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-8 (145.) Sierra Highway & Placerita Canyon Road.

- Restripe one WBT lane to a WBR turn lane. Implementation of this measure would require restriping.
- Restripe one WBT lane to a shared thru/right turn lane. Implementation of this measure would require restriping.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-9 (162.) Sierra Highway and Golden Valley Road. Add third WBT lane. Implementation of this measure would require widening of west leg (Golden Valley Road) to accommodate three lanes.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
Department of Public Works, Street Maintenance Division/
Department of Public Works, Capital Improvement Project Division

O-10 (177.) Whites Canyon Road and Soledad Canyon Road. Restripe separate WBR turn lane to a shared thru/right lane. Implementation of this measure would require restriping. This mitigation measure is only necessary for the “With Golden Valley Road extension to Plum Canyon Road” scenario, with or without the Ermine Street connection to Golden Valley Road.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works

Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

O-11 (163.) Golden Valley Road & Via Princessa. No requirements of the project applicant. Future intersection to be built out to achieve LOS D.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

O-12 (166.) Golden Valley Road & Newhall Ranch Road.

- Install traffic signal.
- Add second WBR turn lane or construct WBR as a free-flow turn lane. This mitigation measure is only necessary for the “With Golden Valley Road extension to Plum Canyon Road” scenario, with or without the Ermine Street connection to Golden Valley Road.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

O-13 (144.) Sierra Highway & SR-14 SB Ramps.

- Add separate NBR turn lane. Implementation of this measure would require restriping.
- Add second SBL turn lane. Implementation of this measure would require restriping with potential widening of Sierra Highway.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

O-14 Prior to implementation of improvements to southbound ramps at SR-14/Sierra Highway interchange, the project developer shall obtain an encroachment permit from the Department of

Transportation and the proposed improvements may require modifications based upon the encroachment permit review process.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

O-15 The project and related projects shall fund its calculated fair share of improvements to the Bouquet Canyon Bridge and Thoroughfare District to augment future improvements that are planned for the SR-14 freeway.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Traffic Division/
 Department of Public Works, Street Maintenance Division/
 Department of Public Works, Capital Improvement Project Division

ENERGY CONSERVATION

Electricity

P.1-1 In the event of full or partial road closures, the project developer shall employ flagmen during the construction of the electrical distribution system to facilitate the flow of traffic.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

P.1-2 During the design process, the project developer shall consult with the Southern California Edison's, Energy Design Resources program or SCE's Savings by Design program, regarding additional possible energy efficiency measures.

Monitoring Phase: Prior to Final Map Recordation
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

Natural Gas

P.2-1 Prior to the start of construction, the Proposed Project's energy engineer shall consult with SCG for an energy analysis regarding efficiency and conservation measures.

Monitoring Phase: Prior to Issuance of Grading Permits
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division

P.2-2 The project developer shall hire flagmen to facilitate traffic flow during installation of the natural gas main extensions.

Monitoring Phase: Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works, Building & Safety Division