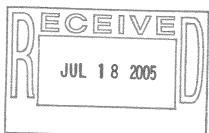


# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000 • www.aqmd.gov

July 14, 2005



Dr. Hsiao-ching Chen, AICP County of Los Angeles Regional Planning Dept. Impact Analysis Section 320 W. Temple Street, Room 1348 Los Angeles, CA 90012

Dear Dr. Chen:

#### Notice of Preparation of a Draft Environmental Impact Report for <u>The Lyons Canyon Ranch Project</u>

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files.

#### Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the CARB Website at: www.arb.ca.gov.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Consistent with the SCAQMD's environmental justice enhancement I-4, in October 2003, the SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts and localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <u>http://www.aqmd.gov/ceqa/handbook/LST/LST.html</u>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address:

http://www.aqmd.gov/ceqa/handbook/mobile\_toxic/mobile\_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

#### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address:

http://www.aqmd.govlej/aq\_planning.htm. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

#### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<u>http://www.aqmd.gov</u>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Steve Smith

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

SS:CB:li

LAC050712-02LI Control Number

July 27, 2005



Carolee K. Krieger president

Dorothy Groon secretary

Joan H. Wells treasurer

Malinda Cheulnard slimator

Nion Chaulmard

Hap Durning director

Michael Jackson director

Huay Johnson Sirector

Imaging Sperice

Dr. Hsiao-ching Chen, AIOP County of Los Angeles Regional Planning Department Impact Analysis Section 320 W. Temple Street, Rm 1348 LA, CA 90012 FAX: (213) 626-0434

#### RE: NOP for Lyons Canyon Ranch Project, County Project No. TR53653

Dear Dr. Chen:

The California Water Impact Network (C-WIN) objects to the proposed Lyons Canyon Ranch Project relying on a contested transfer of 41,000 acre feet (AF) of SWP allocation from the Kern County Water Agency to the Castaic Lake Water Agency (CLWA) as a reliable source of water supply as indicated in the SB610 Water Assessment Report. The analysis is inappropriately relying on the permanence of a non-final and highly contested transfer of 41,000 acre feet of SWP water from the Kern County Water Agency. This 41,000 acre foot transfer continues to be clouded by ongoing litigation and its very validity is one of the subjects of the forthcoming and very complex EIR known as "Monterey Plus", to be prepared by the state Department of Water Resources.

C-WIN is currently a plaintiff in several cases against CLWA opposing proposed transfers that depend on the 41,000 AF transfer mentioned above. Any transfer that is dependent on a water source that is not free and clear is not reliable. C-WIN hereby incorporates our January 1, 2004 objection letter to the CLWA on the Negative Declaration for a proposed 35,000 AF transfer for a Groundwater Banking Project that depends on this same 41,000 AF transfer and the C-WIN February 3, 2004 objection letter to the LA County Regional Planning Department on the proposed West Creek Project #98-008 (2,545 units) that depends on this same 41,000 AF transfer. We also incorporate our February 26, 2004 objection letter to the County of Los Angeles Regional Planning Department regarding the proposed River Valley Project No.00-196 (1,444 units & 1.5 million square feet of mixed non-residential) that also relies on this 41,000 acre foot transfer. Further, we incorporate our letter to the City of Santa Clarita on May 4, 2004 objecting to the River Park Project, Project No. 02-175 (1,183 units), our etter of December 16, 2004 objecting to the Northlake Project No. 98-047 (specific plan of approximately 3,000 units) and our letter of June 15, 2005 to the City of Santa Clarita opposing the Synergy Project (946 units). Also, we incorporate our comments on the Mission Village Project No. 04-181 (5,331 units, 1,299,000 million square feet commercial/mixed use, etc) submitted June 15, 2005 to the County of LA Reg onal Planning Department. Added to these is the June 20, 2005 comment letter or the Soledad Townhouse Project (437 units) All of these projects, depending upon this same questionable 41,000 AF water transfer, must be looked at cumulatively, not as individual projects depending on the same source of water. Urban Water Management Plans require that cumulative impacts must be assessed; cumulative impacts must be addressed here as well.

P.O. Box 5452, Santa Barbara, CA 93156, email: caroleekrieger@cox.net. Phone: 805.969.0824, Fax. 805.555.3394

p.2

The Lyons Canyon Ranch Project, along with many other developments in California, is dependent on the analysis by DWR and its State Water Project Delivery Reliability Report, Final 2002. This Reliability Report has been seriously criticized for overstating actual available supply, questionable modeling and simulations, and lack of proper peer review. C-WIN hereby incorporates this Final Report, including all of the published comment letters in Appendix E. Please make a special note of those letters submitted by Senator Michael Machado, Robert Wilkinson, Arve Sjovold, Joan Wells, Dr. Peter Gleick and myself.

C-WIN also incorporates "A Strategic Review of CALSIM II and its Use for Water Planning, Management, and Operations in Central California" submitted by the California Bay Delta Authority Science Program Association of Bay Governments, December 4, 2003. This document raises significant questions as to the reliability of DWR's Delivery Reliability Report.

Global warming has not been factored in to the reliability of the water supply being considered. The consensus of scientists who are studying global warming concludes that it will snow less, rain more and the snow will melt sooner giving us a rush of water in the Spring rather than the snow pack acting as a reservoir as it has in the past.

Please reject the proposed Lyons Canyon Ranch Project consisting of 190 dwelling units on the grounds that the proposed water supply is inadequate and unsubstantiated at this time and cumulative impacts have not been assessed.

Please address all the above issues in the forthcoming Environmental Impact Report. If you are unable to obtain any of the above documents, please contact us and we will provide them.

Please send me any relevant documents that may come out in the future regarding this project.

C-WIN hereby incorporates all other comments by reference opposing the proposed Lyons Canyon Ranch Project.

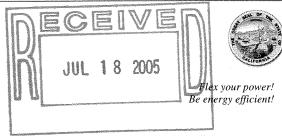
Sincerely,

volce R. Arieges

Carolee K. Krieger President, C-WIN 808 Romero Canyon Road Santa Barbara, CA 93108 PH: (805) 969-0824

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION DISTRICT 7, REGIONAL PLANNING IGR/CEQA BRANCH 100 MAIN STREET, MS # 16 LOS ANGELES, CA 90012-3606 PHONE: (213) 897-3747 FAX: (213) 897-1337



IGR/CEQA No. 050713AL, Revised NOP Referenced to IGR/CEQA No. 020850AL, 030338AL, 040105AL The Lyons Ranch Canyon Project Vic. LA-05 / R49.03–R50.33 SCH # 2003031086

July 13, 2005

Dr. Hsiao-ching Chen, AICP County of Los Angeles Regional Planning Department Impact Analysis Section 320 W. Temple Street, Room 1348 Los Angeles, CA 90012

Dear Dr. Chen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project includes the development of 112 lots comprised of 95 single-family detached single family lots, 5 senior housing lots, 1 condominium lot proposed for development with approximately 90 senior condominium units, 4 open space lots, 5 debris/detention basin lots, and 1 park lot.

To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a traffic study in advance of the DEIR should be prepared. We wish to refer the project's traffic consultant to our traffic study guideline Website:

## http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf

and we list here some elements of what we generally are expecting in the traffic study:

- 1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 05.
- 2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.
- 3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future

conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

- 4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
- 5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - Description of Transportation Infrastructure Improvements
  - Financial Costs, Funding Sources and Financing
  - Sequence and Scheduling Considerations
  - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as selectzone travel forecast modeling might be used.

The Department as commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore State Route(s) mentioned in item #1 and its facilities must be analyzed per the Department's Traffic Impact Study Guidelines. We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 050713AL.

Sincerely,

Bavel cheng

CHERYL J. POWELL IGR/CEQA Branch Chief

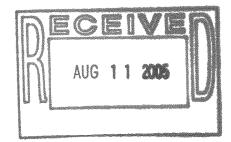
cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL 28648 The Old Road Valencia, CA 91355 (661)294-5540 (800) 735-2929 (TT/TDD) (800) 735-2922 (Voice)

August 2, 2005

File No.: 540.10868.11701





Mr. Hsiao-ching Chen Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012

Dear Mr. Chen:

This is in response to the Notice of Preparation (NOP) for the Lyons Canyon Ranch Project, dated July 11, 2005, for County Project Number, TR 53653 draft Environmental Impact Report (EIR). After review, we have a concern with this project. The proposed project will be located within the unincorporated area of Los Angeles County; which will be within the jurisdiction of the California Highway Patrol. Therefore, traffic enforcement, emergency incident management, public service, assistance and accident investigation will be the responsibility of our agency.

Our concern is what effect this project will have on traffic safety and congestion. This project proposes a subdivision of 112 lots comprised of 95 single-family lots, five senior housing lots, one condominium lot (for approximately 90 senior condominium units), four open space lots, five debris/detention basin lots, one park lot, and one fire station lot. The project will increase recurrent traffic congestion on The Old Road and nearby on and off ramps to I-5. This added congestion could increase response times for emergency services in the community.

Lieutenant M. T. Hoose will be our Department's contact person for the project. If you have any questions or concerns, he may be reached at the above address or telephone number. Thank you for allowing us the opportunity to comment on this project.

Sincerely,

E. CONLEY, Captain Commander Newhall Area

Cc: Southern Division, CHP Special Projects Section, CHP

Safety, Service, and Security

23920 Valencia Blvd. Suite 300 Santa Clarita California 91355-2196 Website: www.santa-clarita.com



August 17, 2005

Dr. Hsaio-Ching Chen, AICP Impact Analysis Section Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012

Subject: Response To Notice Of Preparation Of Lyons Canyon Residential Project Environmental Impact Report (Project Number TR53653)

Dear Dr. Chen:

Thank you for allowing the City of Santa Clarita to comment on the Lyons Canyon project. While the Notice of Preparation (NOP) addresses a number of issues that should be analyzed, the City of Santa Clarita would encourage the following items to be addressed in the Environmental Impact Report (EIR) which is being prepared for the project. These issues include:

- 1. The site is not currently served by public transit. The site could be served by Santa Clarita Transit which is managed by the City of Santa Clarita. The nearest transit stop is located approximately two miles from the project site. Due to the proposed housing type and the distance to services, an increase in transit demand is expected to be associated with this project. In addition, the project contains a large senior housing component which traditionally has an increased demand on public transit, especially for "dial a ride" functions. The EIR should include a discussion on the impacts and additional needs for public transit.
- 2. The project site is located in an area with limited public park and recreation facilities. It is envisioned that residents of the project will use the City of Santa Clarita for programmed recreation facilities and programs (i.e. youth sports and summer camps). The Santa Clarita Valley is currently well below state standards for active parkland. The EIR should include a discussion on the impacts to City parks and recreation programs and identify any mitigation measures that are required.

#### City of Santa Clarita

Dr. Hsaio-Chin Chen, AICP August 17, 2005 Page 2

- 3. The NOP acknowledges the presence of Significant Ecological Areas for Lyons Canyon (#64) and the Santa Susanna Mountains (#20). These are identified in both the City and County General Plans as a biological resource. The project proposes construction in a portion of the Lyons Canyon SEA. In addition, a previous Biota study prepared for the site indicated species of concern on-site. The EIR should include a detailed Biota report indicating the impacts to the SEA's, oak trees and the other biological resources. The preparer of the EIR is encouraged to contact the City of Santa Clarita for biological information prepared prior to the 2003 Simi Fire.
- 4. The project site contains approximately five acres of jurisdictional wetlands according to the applicant. A portion of these wetlands were modified and damaged earlier this year. The NOP does not discuss the presence of this resource. The EIR should include a discussion of the wetlands and any impacts associated with the project.
- 5. The project site contains a number of prominent ridgelines, a number of which are being altered. The aesthetics section of the EIR should address this issue and should include a number of photo simulations from various vantage points including the Santa Monica Mountains Conservancy lands to the south and the residential areas to the north.
- 6. The proposed project includes a trail serving a portion of the site. However, the site plan does not show the trail linking to any off-site trails. In addition, a portion of the property south of the project site is currently owned by and within the city limits of the City of Santa Clarita. The EIR should address the need for the connectivity of the trails and impacts to City facilities.

Dr. Hsaio-Chin Chen, AICP August 17, 2005 Page 3

Thank you for the opportunity to submit these comments. Please note that these comments are in response to the Notice of Preparation only and should not be considered a statement of the City's position either for or against the project. If you have any questions, please contact Kai Luoma, Senior Planner at (661) 255-4330.

Sincerely,

Paul D. Brotzman, Director of Planning and Economic Development

PDB:FLF:lep s:\pbs\current\county monitoring\Lyons Canyon Ranch\nop response 0805

cc: Mayor Smyth and Members of the City Council Chair Ostrum and Members of the Planning Commission Chair Longshore and Members of the Parks, Recreation and Community Services Commission Millie Jones, Senior Deputy Paul Novak, AICP, Planning Deputy, Fifth District Kenneth R. Pulskamp, City Manager Lisa Hardy, AICP, Planning Manager Michael Murphy, Intergovernmental Relations Officer Kai Luoma, AICP, Senior Planner Fred Follstad, AICP, Senior Planner



# DEPARTMENT OF CONSERVATION

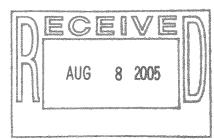
## DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

1000 S. Hill Road, Suite 116 • Ventura, CALIFORNIA 93003

PHONE 805 / 654-4761 • FAX 805 / 654-4765 • WEB SITE conservation.ca.gov

August 3, 2005

Dr. Hsiao-ching Chen, AICP County of Los Angeles Regional Planning Department Impact Analysis Section 320 W. Temple St., Room 1348 Los Angeles, CA 90012



## Subject: NOP for Lyon Canyon Project County Project No. TR53653

Dear Dr. Chen:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Department offers the following comments for your consideration.

Based on information in the NOP and the project map provided, there is one plugged and abandoned well within the project boundaries, Sun Drilling Co. well "Ayers" 1.

If any structure is to be located over or in close proximity of a previously plugged and abandoned well, the well may need to be plugged to current Division specifications. Section 3208.1 of the Public Resources Code (PRC) authorizes the State Oil and Gas Supervisor (Supervisor) to order the reabandonment of any previously plugged and abandoned well when construction of any structure over or in close proximity of the well could result in a hazard. The cost of reabandonment operations is the responsibility of the owner of the property upon which the structure will be located.

Furthermore, if any plugged or abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

The Division also recommends the wells within or in close proximity to project boundaries be accurately plotted on all future maps of this project, and a legible copy of the final project map be submitted to the Division. NOP for Lyon Canyon Project County Project No. TR53653 Page 2 of 2

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division suggests that a diligent effort be made to avoid building over any plugged and abandoned well. If construction over an abandoned well is unavoidable, an adequate gas venting system should be placed over the well.

To ensure proper review of building projects, the Division has available an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the local building department or our office for a copy of the site-review packet.

Prior to commencing operations, the project applicant should consult with our office for information on the wells located in the project area.

Thank you for the opportunity to comment on the NOP. If you have any questions, please contact me or Steve Fields, Operations Engineer, at (805) 654-4761.

Sincerely,

Bruce H. Hesson, P.E. District Deputy – Ventura

cc: DOGGR-HQ

Department of Toxic Substances Control



Alan C. Lloyd, Ph.D Agency Secretary Cal/EPA

1011 North Grandview Avenue Glendale, California 91201

July 26, 2005

Dr. Hsiao-ching Chen, AICP County of Los Angeles Regional Planning Department Impact Analysis Section 320 West Temple Street, Room 1348 Los Angeles, California 90012

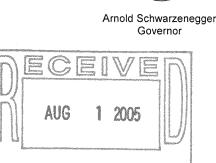
NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT FOR COUNTY PROJECT NO.TR53653, "THE LYONS CANYON RANCH PROJECT"

Dear Dr. Chen:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of Environmental Impact Report (EIR) for the Project mentioned above.

Based on the review of the document, DTSC comments are as follows:

- 1. The EIR needs to identify and determine whether current or historic uses at the Project area have resulted in any release of hazardous wastes/substances.
- 2. The EIR needs to identify any known or potentially contaminated site within the Project area. For all identified sites, the EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3. The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4. If during construction of the Project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.









Dr. Hsiao-ching Chen July 26, 2005 Page 2

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2973.

Sincerely,

JeMnifer Jones Unit Chief Southern California Cleanup Operations Branch – Glendale Office

cc: Governor's Office of Planning and Research State Clearinghouse P.O. Box 3044 Sacramento, California 95812-3044

> Mr. Guenther W. Moskat, Chief Planning and Environmental Analysis Section CEQA Tracking Center Department of Toxic Substances Control P.O. Box 806 Sacramento, California 95812-0806



## **COUNTY OF LOS ANGELES**

## DEPARTMENT OF PARKS AND RECREATION

"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

August 23, 2005

TO: Hsiao-ching Chen Department of Regional Planning Impact Analysis Section FROM: Bryan Moscardini Park Project Coordinator

### SUBJECT: NOTICE OF PREPARATION- LYONS CANYON RANCH COUNTY PROJECT NO. TR 53653

The Department of Parks and Recreation has reviewed the Notice of Consultation for the proposed project. The proposed project requires new or expandec recreational facilities for future residents. Some of our specific concerns are as follows.

- Proposed County Trails (#69 Gavin Canyon Trail and #70-Pice Canyon Trail may traverse the proposed project which would require 12-foot-wide trail easements outside of the County road right of way
- The developer's Quimby obligation is 1.54 net acres or \$404,313 of in-lieu fees.
- Provide regional park facilities for the enjoyment of the residents in the Santa Clarita Valley area by meeting the standard of six (6) acres per thousand population\* as established in the County's General Plan. This could take several forms including but not limited to trails, trail heads, and additional facilities for the Santa Clarita Valley.

If you have any questions, please contact me at (213) 351-5098. For trail inquiries please contact Mr. Jeremy Bok, Acting Park Planner, at 213 351-5137.

LH:bm(c:response-Lyons Canyon)

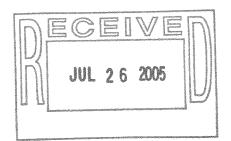
c: Parks and Recreation (James Barber, Patrick Reynolds, Jeremy Bok. Joan Rupert, Bryan Moscardini)

\*Population (approximately 513) based on the anticipated growth relating to the number of projected dwelling units within the development.

Planning and Development Agency • 510 Vermont Ave • Los Angeles CA 90020 • (213) 351-5198

One Gateway Plaza Los Angeles, CA 90012-2952 213.922.2000 Tel metro.net





July 22, 2005

Dr. Hsiao-ching Chen, AICP Los Angeles County Department of Regional Planning Impact Analysis Section 320 West Temple Street - Room 1348 Los Angeles, CA 90012

Dear Dr. Chen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Lyons Canyon Ranch Project, No. TR53653. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with both highway and freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix B. The geographic area examined in the TIA must include the following, at a minimum:

- 1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
- 2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

- 1. Evidence that in addition to Metro, all affected municipal transit operators received the NOP for the Draft EIR;
- 2. A summary of the existing transit services in the area;
- 3. Estimated project trip generation and mode assignment for both morning and evening peak periods;
- 4. Documentation on the assumptions/analyses used to determine the number of percentage of trips assigned to transit;

- 5. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
- 6. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination One Gateway Plaza MS 99-23-2 Los Angeles, CA 90012-2952 Attn: Susan Chapman

Sincerely,

AuntChym

Susan F. Chapman Program Manager, Long Range Planning

County of Los Angeles Public Library
 7400 East Imperial Hwy., P.O. Box 7011, Downey, CA 90241 7011
 (562) 940-8461, TELEFAX (562) 803-3032



MARGARET DONNELLAN TODD COUNTY LIBRARIAN

August 17, 2	2005
TO:	Dr. Hsiao-ching Chen Los Angeles County Department of Regional Planning
FROM:	Malou Rubic M Head, Staff Services
SUBJECT:	NOTICE OF PREPARATION LYONS CANYON RANCH

This is in response to your invitation to submit comments on the Notice of Preparation for the Lyons Canyon Ranch Project.

The demand for library services is typically determined based on the size of the resident population. Increase in population results in the need for additional facility space and library materials. The cumulative effect of new housing and infill development, such as the Lyons Canyon Ranch Project, will have significant impact on the ability of the Public Library to serve existing and future population in the service area. Payment of the County Library's developer fee would reduce the impact to a less than significant level.

This project is located in the County Library's Developer Fee Planning Area 1. The current County Library Developer Fee for Planning Area 1 is \$704 per dwelling unit. This would result in a total fee obligation of \$133,760 (190 x \$704) at the current rate. The County Library Developer Fee is subject to an annual CPI adjustment, and the actual amount of the fee will be that in effect at the time the building permits for the project are issued. Therefore, the total fee obligation for this project may be higher.

If you have any questions or require additional information regarding this matter, please contact Malaisha Hughes at (562) 940-8455.

MR:MH:mh

UNSTAFFSERVICES/DEVELOPER FEE/EIR/Lyons Conyon Ranch.doc

c: David Flint, Assistant Director, Finance and Planning, Public Library

Serving the unincorporated areas of Los Angeles County and the cities of: Agoura Hills = Artesia = Avalon + Baldwin Park = Bet = Bell Gardens = Bellflower + Bradbury = Carson = Claremont + Compton = Cudahy = Culver City = Dramend Bar = Dirarte + El Monte = Gardena + Hawaiian Gardens = Hawthome + Hermosa Beach + Hidden Hills + Huntington Park = La Canada Flintrioge - La Hatra Heights + Lakewood = La Mirada + Lancaster = La Puente + La Verne + Lawndale + Lomita = Lynwood + Malibu + Manhattan Beach = Maywood + Montebelle + Norwalk + Peramount - Pico Rivera = Resemead + San Dinas + San Fernande = San Gabriet + Santa Clarita + South Fl Monte = South Gate + Temple City + Walnut + West Covina + West Hollywood + Westlake Village



DONALD L. WOLFE, Director

# **COUNTY OF LOS ANGELES**

## **DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (626) 458-5100 www.ladpw.org

ADDRESS ALL CORRESPONDENCE TO: P.O. BOX 1460 ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE:

August 18, 2005

TO: Daryl Koutnik Department of Regional Planning

Attention Hsiao-Ching Chen

FROM: Rossana D'Antonio (VG) Land Development Division

## RESPONSE TO NOTICE OF PREPARATION FOR A DRAFT ENVIRONMENTAL IMPACT REPORT THE LYONS CANYON RANCH PROJECT TENTATIVE TRACT NO. 53653 UNINCORPORATED COUNTY AREA OF SANTA CLARITA

We reviewed the Notice of Preparation for this project and concur that an Environmental Impact Report is the appropriate document. We offer the following comments for your consideration in completing the Draft Environmental Impact Report (DEIR).

#### Geotechnical Hazards

We concur that a geotechnical report is required and should be submitted to Public Works for review and approval.

#### Flood Hazards/Water Quality

We concur that to adequately assess/address the flood hazards and water quality concerns a drainage concept and a Standard Urban Stormwater Mitigation Plan are required and should be submitted for review and approval by Public Works. When approved, the drainage concept and the Standard Urban Stormwater Mitigation Plan should be included in the DEIR.

Daryl Koutnik August 18, 2005 Page 2

#### Traffic/Transportation

The proposed project has the potential to significantly impact the County and County/City roadways and intersections in the area. A traffic study is required and should be submitted to Public Works for review and approval. The County's methodology shall be used when evaluating the County and/or County/City intersections. The study shall also address the cumulative impacts generated by this and nearby developments and include the level of service analysis for the affected intersections. If traffic signals or other mitigation measures are warranted at the affected intersections, the developer shall determine its proportionate share of traffic signal or other mitigation costs and submit this information to Public Works for review and approval. Our Traffic Impact Analysis Report Guidelines may be obtained from our website at <a href="http://ladpw.org/Traffic">http://ladpw.org/Traffic</a>.

Also, based on the review by the Interdepartmental Engineering Committee, The Old Road requires 40 feet of right of way from the centerline plus necessary slope easements. All new alignments shall be approved by Public Works and/or the County's Interdepartmental Engineering Committee.

#### <u>Sewer</u>

As part of the tentative tract review, a sewer area study is being prepared. Once approved, a copy of the sewer area study shall be included in the DEIR.

The proposed development will be required to annex to the Consolidated Sewer Maintenance District for the operation and maintenance of the local sewers. Public Works administers the Consolidated Sewer Maintenance District and sewer improvements shall comply with Public Works sewer design standards. This will be in addition to compliance with County Sanitation District design standards. Page 4 (Utilities) and page 6 (Sewage Disposal) of the Notice of Preparation should be expanded to include the above requirements.

#### <u>Water</u>

We concur that the project proponent will need to demonstrate that adequate water supply exists to support the proposed development considering all known proposed projects in the vicinity of the subject project.

Daryl Koutnik August 18, 2005 Page 3

#### Solid Waste

Solid waste generated in Los Angeles County currently exceeds the available permitted daily landfill capacity. The construction of the proposed project will increase the generation of solid waste and negatively impact the solid waste management infrastructure in the County. Therefore, the proposed DEIR should identify what measures will be implemented to mitigate the impact. Mitigation measures may include waste reduction, recycling programs and development of infrastructure within the project to facilitate recycling.

The proposed project is required to recycle or reuse 50 percent of the construction and demolition debris generated per the County's Construction and Demolition Debris Recycling and Reuse Ordinance. A Recycling and Reuse plan must be prepared and submitted to our Environmental Programs Division for review and approval.

Based on the findings of the Initial Study, the project site contains abandoned oil and gas operations. Buildings or structures adjacent to or within 200 feet (60.96 m) of active, abandoned, or idle oil or gas well(s) must be provided with methane gas protection systems. Our Environmental Programs Division must be contacted for issuance of necessary permits.

Should any operation within the subject project include the construction, installation, modification, or removal of storage tanks, industrial waste treatment or disposal facilities, and/or storm water treatment facilities, our Environmental Programs Division must be contacted for required approvals and operating permits.

If you have any questions regarding the above comments, please contact Juan Sarda at (626) 458-7151.

JMS:ca P:\ldpub\CEQA\Juan\TR53653-Lyons Canyon Ranch Project.doc



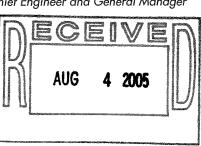
## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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

JAMES F. STAHL Chief Engineer and General Manager

August 3, 2005

File No: 32-00.00-00



Ms. Hsiao-ching Chen Impact Analysis Section Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012

Dear Ms. Chen:

#### Project No. TR53653, The Lyons Canyon Ranch Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on July 11, 2005. We offer the following comments regarding sewerage service:

- 1. The area in question is outside the jurisdictional boundaries of the Districts and will require annexation into the Santa Clarita Valley Sanitation District before sewerage service can be provided to the proposed development. For specific information regarding the annexation procedure and fees, please contact Ms. Margarita Cabrera at extension 2708. Copies of the Districts' Annexation Information and Processing Fees sheets are enclosed for your convenience.
- 2. Because of the project's location, the flow originating from the proposed project would have to be transported to the Districts' trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer. The nearest local sewer line, north of the project area in The Old Road, conveys wastewater to the Districts' District No. 32 Main Trunk Sewer, located in a right of way northeast of the intersection of Wiley Canyon Road and Orchard Village Road. This 18-inch diameter trunk sewer has a design capacity of 3.3 million gallons per day (mgd) and conveyed a peak flow of 0.2 mgd when last measured in 2003. Downstream of the connection point, the sewerage system is nearing capacity. Availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments in the area, the availability of trunk sewer capacity should be verified as the project advances. Please submit a copy of the project's build-out schedule to the undersigned to ensure the project is considered in planning future sewerage system relief and replacement projects.
- 3. The Districts operate 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 19.7 mgd.

Ms. Hsiao-ching Chen

- 4. The expected average wastewater flow from the project site is approximately 50,000 gallons per day.
- 5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is required to construct an incremental expansion of the Sewerage System to accommodate the proposed project, which will mitigate the impact of this project on the present Sewerage System. Payment of a connection fee will be required before a permit to connect to the sewer is issued. A copy of the Connection Fee Information Sheet is enclosed for your convenience. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
- 6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into the Air Quality Management Plan, which is prepared by the South Coast Air Quality Management District in order to improve air quality in the South Coast Air Basin as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.
- 7. The Districts encourage distribution of large environmental documents in electronic format in order to reduce paper waste. Whenever possible, please submit these documents on CD (pdf files) or provide Notices of Availability that include website information for downloading environmental documents.

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

Very truly yours,

James F. Stahl

Ruth d. Fracen

Ruth I. Frazen Engineering Technician Planning & Property Management Section

RIF:rf Enclosure c: M. Cabrera T. Sung S. Espinoza C. Salomon 519161.1

## INFORMATION SHEET FOR APPLICANTS REQUESTING ANNEXATION TO A COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY

## A. ELIGIBILITY CRITERIA FOR ANNEXATION TO A COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY

- 1. The property is contiguous to said County Sanitation District or, if not contiguous, may be drained by gravity to a trunk sewer of that District,
- 2. The property is not included in whole or in part in any other agency providing services similar to those of the said County Sanitation District, and
- 3. The property is to be benefited by its inclusion in the said County Sanitation District.

## B. HOW DO I INITIATE THE ANNEXATION APPLICATION PROCESS?

1. <u>WRITE TO:</u> County Sanitation Districts of Los Angeles County P.O. Box 4998, Whittier, CA 90607 Attn: Annexation Fee Program

The letter should contain the following information and support documentation about the property involved:

- a) Property location (street address, city, zip and Thomas Brothers map, page, grid)
- b) In case of a recorded single lot, include the County Assessor's map book-page-parcel map with the parcel highlighted.
- c) In case of a tract or parcel map, include a copy of the tentative or final map plus a closedsurvey engineering traverse around the boundary to be annexed to the centerline of any public street.
- CALL:County Sanitation Districts of Los Angeles County<br/>(562) 699-7411, Extension 2708<br/>7:00 a.m. through 4:30 p.m., Monday through Thursday<br/>7:00 a.m. through 3:30 p.m., Fridays, except holidays
- 2. Districts' staff will calculate the acreage involved and will provide the applicant with a quote of annexation fees to be paid. At this time, the applicant will also be provided with a "*Request for Annexation*" form along with necessary instructions.
- 3. An annexation application file will be opened upon submittal by applicant of all the required documents (refer to Section C) along with a check for the annexation fee made payable to:

County Sanitation Districts of Los Angeles County

## C. WHAT DOCUMENTS DO I NEED TO FILE?

- 1. "Request for Annexation" Form (4 pages): All applicants must complete, in detail, and return the Request for Annexation form signed by the legal owner whose name appears on the current Los Angeles County assessment roll. See C5) for assistance in completing page 4 of this form.
- 2. Los Angeles County Local Agency Formation Commission Party Disclosure Form: All applicants must complete and return the Party Disclosure Form pursuant to the Local Agency Formation Commission Party Disclosure Form Information Sheet.
- 3. Annexation Fee payment as stated in the quotation letter. Cash will not be accepted.

- 4. **Copy of Grant Deed** (Applicants must submit a copy of the Grant Deed which includes the legal description. Disregard this request if the proposed project is a tract/parcel map.)
- 5. California Environmental Quality Act (CEQA): All applications are subject to CEQA. If you are applying for a single-family home on septic tank, your project is exempt and the Notice of Exemption will be prepared by this office. As required by LAFCO, all other applicants must provide twenty six (26) copies of the Initial Study, Final Negative Declaration, Final Mitigated Negative Declaration, Notice of Determination, and Mitigation Monitoring and Reporting Program approved by a city or County Regional Planning Commission, or five (5) copies each of the Final Environmental Impact Report (EIR) and the Notice of Determination approved by a city or County Regional Planning Commission, whichever is applicable
- 6. **Radius Map and Corresponding Mailing Labels for LAFCO:** All developers are required to submit a radius map within a 300-foot radius of the exterior boundaries of the project area and each parcel of land lying entirely or partially within a 300-foot radius. A set of mailing labels of those landowners that are within a 300-foot radius of the exterior boundaries of the subject area is also required. Provide a list of the Assessor's parcel number, name, and address of each landowner.
- 7. *Please Note:* The annexation fees and application will not be accepted until *all* of the required items have been submitted.

#### D. HOW MUCH DO I HAVE TO PAY?

The annexation fee consists of three processing fees. The Annexation Processing Fees table is attached. The Sanitation Districts, as the lead agency for the annexation, will collect the processing fees at time of annexation application. The three processing fees are for: 1) County Sanitation Districts of Los Angeles County (CSD), 2) Local Agency Formation Commission (LAFCO), and 3) State Board of Equalization (SBE). The LAFCO and SBE processing fees are subject to change without notice. If their fees increase before your application is processed by this office for submittal to these agencies, then you will be notified and the additional monies must be paid before the annexation procedure can be finalized.

## E. HOW LONG DOES IT TAKE TO PROCESS MY ANNEXATION APPLICATION?

If the project is a recorded single family lot, Districts' staff will begin processing the annexation application as soon as the required forms are submitted and the annexation fees paid. Upon payment of the annexation fees, for all Sanitation Districts except the Santa Clarita Valley Sanitation District, the applicant may pay the connection fees and proceed with the project.

If the project is a tract or parcel map, Districts' staff will begin processing the annexation application as soon as the required forms, annexation fees and a copy of the recorded tract/parcel map blueline are submitted. Upon payment of annexation fees, the applicant may have the original sewer map signed off. Also, for all Sanitation Districts except the Santa Clarita Valley Sanitation District, the applicant may pay the connection fees. The annexation procedure cannot be completed until after receipt, in this office, of the recorded tract/parcel blueline map.

#### F. WHERE CAN I GET ADDITIONAL INFORMATION?

For additional information, please call:

County Sanitation Districts of Los Angeles County (562) 699-7411, Extension 2708 7:00 a.m. through 4:30 p.m., Monday through Thursday 7:00 a.m. through 3:30 p.m., Fridays, except holidays

## **ANNEXATION PROCESSING FEES FOR THE** COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

COUNTY SANITATION DISTRICTS' PROCESSING FEE		ACREAGE		FEE
	0.0	to	1.5	\$800
	>1.5	to	5.0	\$1,075 \$215/Acre
	>5.0	to	20.0	\$215/Acre \$4,300 Plus \$35/Additional Acre
		Over 20.0		And Every Fraction Thereof
LOCAL AGENCY FORMATION COMMISSION FILING FEE <sup>17</sup>		ACREAGE		FEE
ANNEXATIONS AND DETACHMENTS	0.0	to	1.0	\$2,500
	>1.0 >5.0	to	5.0 10.0	\$3,000 \$3,500
	>10.0	to to	25.0	\$5,000
	>25.0	to	50.0	\$6,000
	>50.0	to	160.0	\$7,000
	160.0+ Acres			\$8,000
OTHER PROPOSALS	<b>T</b>		becial Reorganization oration/Consolidation	\$10,000
	Incorpo	oration/Disincorpo	\$7,500 \$7,500	
	District Formation			\$7,500
	District Dissolution/Consolidation/Merger			\$4,000
	Establishment of Subsidiary District Reorganizations			Basic Fee*+ 20%
	Amend Existing Sphere of Influence for an Annexation			\$500
	Amend Existing			
	than an Ai	20% of Basic Fee		
	Amend/Update Existing Sphere of Influence Without other Action			
	0.0	to	1.0	\$2,500
	>1.0	to to	5.0 10.0	\$3,000 \$3,500
	>10.0	to	25.0	\$5,000
	>25.0	to	50.0	\$6,000
	>50.0	to	160.0	\$7,000
	Deed	160.0+ Acres	\$7,000 50% of Basic Fee	
territy (CD) is TP 11 is a City of Constrained	Reconsideration of LAFCO Determinations			Actual Cost
*The "Basic Fee" is the filing fee charged for the underlying change of organization	Special District Study Out-of-Agency Service Agreements			\$2,000
associated with the action indicated. If		Out-of-Agene	Actual Cost	
more than one change of organization is	Petition Verification Notice/Radius Map			Actual Cost
proposed, it is the higher fee.	State Controller Review			\$2,000 + Actual Cost
STATE BOARD OF EQUALIZATION <sup>2/</sup>		ACREAGE		FEE
SINGLE AREA TRANSACTIONS	0.0	to	1.0	\$300
	1.0	to	5.0	\$350
	6.0	to	10.0	\$500
	<u> </u>	to to	20.0 50.0	\$800 \$1,200
	51.0	to	100.0	\$1,200
	101.0	to	500.0	\$2,000
	501.0	to	1,000.0	\$2,500
	1,001.0 to 2,000.0 2,001.0 and Above			\$3,000 \$3,500
OTHER PROPOSALS	2,001.0 and Above Deferral of Fees			\$35
	Additional County per Transaction Consolidation per District or Zone			\$250
		\$300		
		\$300 \$300		
	Coterminous Transaction Dissolution or Name Change			\$0

<sup>1</sup>/Most recent LAFCO fee increase effective June 1, 2003. <sup>2</sup>/Most recent SBE fee increase effective December 2, 1998.

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## INFORMATION SHEET FOR APPLICANTS PROPOSING TO CONNECT OR INCREASE THEIR DISCHARGE TO THE COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY SEWERAGE SYSTEM

## THE PROGRAM

The County Sanitation Districts of Los Angeles County are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting to a Sanitation District's sewerage system. Your connection to a City or County sewer constitutes a connection to a Sanitation District's sewerage system as these sewers flow into a Sanitation District's system. The County Sanitation Districts of Los Angeles County provide for the conveyance, treatment, and disposal of your wastewater. PAYMENT OF A <u>CONNECTION FEE TO THE COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY WILL BE REQUIRED BEFORE A CITY OR THE COUNTY WILL ISSUE YOU A PERMIT TO CONNECT TO THE SEWER.</u>

## I. WHO IS REQUIRED TO PAY A CONNECTION FEE?

- 1. Anyone connecting to the sewerage system for the first time for any structure located on a parcel(s) of land within a County Sanitation District of Los Angeles County.
- 2. Anyone increasing the quantity of wastewater discharged due to the construction of additional dwelling units on or a change in land usage of a parcel already connected to the sewerage system.
- 3. Anyone increasing the improvement square footage of a commercial or institutional parcel by more than 25 percent.
- 4. Anyone increasing the quantity and/or strength of wastewater from an industrial parcel.
- 5. If you qualify for an Ad Valorem Tax or Demolition Credit, connection fee will be adjusted accordingly.

## II. HOW ARE THE CONNECTION FEES USED?

The connection fees are used to provide additional conveyance, treatment, and disposal facilities (capital facilities) which are made necessary by new users connecting to a Sanitation District's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The Connection Fee Program insures that all users pay their fair share for any necessary expansion of the system.

## III. HOW MUCH IS MY CONNECTION FEE?

Your connection fee can be determined from the Connection Fee Schedule specific to the Sanitation District in which your parcel(s) to be connected is located. A Sanitation District boundary map is attached to each corresponding Sanitation District Connection Fee Schedule. Your City or County sewer permitting office has copies of the Connection Fee Schedule(s) and Sanitation District boundary map(s) for your parcel(s). If you require verification of the Sanitation District in which your parcel is located, please call the Sanitation Districts' information number listed under Item IX below.

## IV. WHAT FORMS ARE REQUIRED\*?

The Connection Fee application package consists of the following:

- 1. Information Sheet for Applicants (this form)
- 2. Application for Sewer Connection

3. Connection Fee Schedule with Sanitation District Map (one schedule for each Sanitation District)

\*Additional forms are required for Industrial Dischargers.

#### V. WHAT DO I NEED TO FILE?

- 1. Completed Application Form
- 2. A complete set of architectural blueprints (not required for connecting one single family home)
- 3. Fee Payment (checks payable to: County Sanitation Districts of Los Angeles County)
- 4. Industrial applicants must file additional forms and follow the procedures as outlined in the application instructions

#### VI. WHERE DO I SUBMIT THE FORMS?

Residential, Commercial, and Institutional applicants should submit the above listed materials either by mail or in person to:

County Sanitation Districts of Los Angeles County Connection Fee Program, Room 130 1955 Workman Mill Road Whittier, CA 90601

Industrial applicants should submit the appropriate materials directly to the City or County office which will issue the sewer connection permit.

## VII. HOW LONG DOES IT TAKE TO PROCESS MY APPLICATION?

Applications submitted by mail are generally processed and mailed within three working days of receipt. Applications brought in person are processed on the same day provided the application, supporting materials, and fee is satisfactory. Processing of large and/or complex projects may take longer.

## VIII. HOW DO I OBTAIN MY SEWER PERMIT TO CONNECT?

An approved Application for Sewer Connection will be returned to the applicant after all necessary documents for processing have been submitted. Present this approved-stamped copy to the City or County Office issuing sewer connection permits for your area at the time you apply for actual sewer hookup.

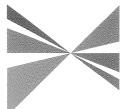
## IX. HOW CAN I GET ADDITIONAL INFORMATION?

If you require assistance or need additional information, please call the County Sanitation Districts of Los Angeles County at (562) 699-7411, extension 2727.

## X. WHAT ARE THE DISTRICTS' WORKING HOURS?

The Districts' offices are open between the hours of 7:00 a.m. and 4:00 p.m., Monday through Thursday, and between the hours of 7:00 a.m. and 3:00 p.m. on Friday, except holidays. When applying in person, applicants must be at the Connection Fee counter at least 30 minutes before closing time.

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

#### www.scag.ca.gov

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Orange County: Christ Norby, Orange County -Christine Barnes, La Palma - John Beauman, Brea - Jou Bone, Tustin - Art Brown, Buena Park - Richard Chavez, Anaheim - Debbie Cook, Huntington Beach - Cathryn DeYoung, Laguna Niguel - Richard Dixon, Lake Forest - Mariiynn Poe, Los Alamitos - Tod Ridgeway, Newport Beach

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

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

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

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

559-5/24/05

Ventura County Transportation Commission: Keith Millhouse, Moorpark August 3, 2005

Dr. Hsiao-ching Chen, AICP County of Los Angeles Regional Planning Department Impact Analysis Section 320 W. Temple Street, Room 1348 Los Angeles, CA 90012

#### RE: SCAG Clearinghouse No. I 20050451 The Lyons Canyon Ranch Project

Dear Dr. Chen:

Thank you for submitting the Lyons Canyon Ranch Project or 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 Lyons Canyon Ranch Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **July 1-15, 2005** Intergovernmental Review Clearinghouse Report for public review and comment.

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

Sincerely,

BRIAN WALLACE Associate Regional Planner Intergovernmental Review



AUG



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



Sean Walsh Director

**Notice of Preparation** 

July 11, 2005



To: Reviewing Agencies

Re: The Lyons Canyon Ranch Project, County Project No. TR 53653 SCH# 2003031086

Attached for your review and comment is the Notice of Preparation (NOP) for the The Lyons Canyon Ranch Project, County Project No. TR 53653 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Hsiao-ching Chen Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

oprime

Scott Morgan Project Analyst, State Clearinghouse

Attachments cc: Lead Agency

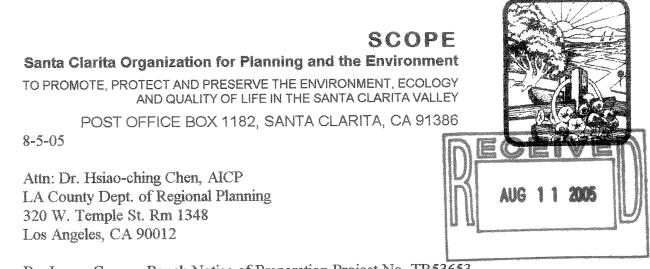
### Document Details Report State Clearinghouse Data Base

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SCH# Project Title Lead Agency	<b>2003031086</b> The Lyons Canyon Ranch Project, County Project No. TR 53653 Los Angeles County Department of Regional Planning					
Туре	NOP Notice of Preparation					
Description	The project proposes a subdivision of 112 lots comprised of 95 single-family detar gle-family lots, 5 senior housing lots, 1 condominium lot (for approximately 90 senior condominium units), 4 open space lots, 5 debris/detention basin lots, 1 park lot, and 1 fire station lot.					
Lead Agenc	cy Contact					
Name	Hsiao-ching Chen					
Agency	Los Angeles County Department of Regional Planning					
Phone	(213) 974-6461 <i>Fax</i>					
email						
Address	320 West Temple Street					
City	Los Angeles State CA Zip 90012					
Project Loc	ation					
County	Los Angeles					
City						
Region						
Cross Streets	The Old Road, Sagecrest Circle					
Parcel No.	2826-022-025 to 027, 026-014					
Township	3N Range 16W Section 4 Base SB					
Proximity to						
Highways	1-5					
Airports						
Railways						
Waterways						
Schools						
Land Use	A-2 (Agricultural)					
	SP (Specific Plan)					
Project Issues	Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption;					
, 0,000,000,000	Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing;					
	Landuse; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks;					
	Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste;					
	Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian;					
	Wildlife					
<b>.</b>						
Reviewing	Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Office of Historic					
Agencies						
	Preservation; Department of Forestry and Fire Protection; Department of Fish and Game, Region 5;					
	Department of Water Resources; California Highway Patrol; Department of Toxic Substances Control;					
	Santa Monica Mountains Conservancy; Caltrans, District 7					
Date Received	07/11/2005 Start of Review 07/11/2005 End of Review 08/09/2005					

<b>`````````````````````````````````````</b>	Regional Water Quality Control Board (RWQCB)         north Coast Region (1)         Rwace 2         Environmental Document Condinator         San Francisco Bay Region (2)         Rwace 3         Condinator         San Francisco Bay Region (2)         Rwace 3         Continator         San Francisco Bay Region (2)         Rwace 3         Contral Coast Region (3)         Rwace 3         Contral Valley Region (5)         Rwace 55         Central Valley Region (5)         Rwace 6         Lahontan Region (6)         Victorville Branch Office         Rwace 6         Lahontan Region (6)         Victorville Branch Office         Santa Ana Region (6)         Rwace 9         Santa Ana Region (9)         Rwace 9         Santa Ana Region (9)         Laborated 0         Rwace 9         Santa Ana Region (9)
A/D/0	Caltrans, District 8         Dan Kopulsky         Caltrans, District 9         Gayle Rosander         Caltrans, District 10         Tom Dumas         Caltrans, District 11         Mario Orso         Caltrans, District 12         Bob Joseph         Caltrans, District 12         Mike Tolistup         Im Lerrer         Mike Tolistup         Mike Tolistup         Mike Tolistup         Board         Jim Hockenberry         Baard         Jim Hockenberry         Baard         Jim Hockenberry         Board
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<b>,</b>	Fish & Game Region 3         Robert Floerke         Fish & Game Region 5         Mike Multigan         Fish & Game Region 5         Don Chadwick         Habitat Conservation Program         Habitat Conservation Program         Habitat Conservation Program         Habitat Conservation Program         Don Chadwick         Habitat Conservation Program         Habitat Conservation Program         Prish & Game Region 6         Gabrina Gatchel         Habitat Conservation         Program         Dept. of Fish & Game M         George Isaac         Marine Region         Marine Region         Dept. of Food and Agriculture         Steve Shaffer         Dept. of Food and Agriculture         Steve Shaffer         Dept. of General Services         Public School Construction         Dept. of Health Services         Public School Construction         Dept. of Health Services         Pept. of Health Services         Public School Construction         Dept. of Health Services         Veronica Rameriz         Dept. of Health Services         Veronica Rameriz         Dept. of Healt
אכר בופעווטמווטון בופו	Resources Agency         Nadell Gayou         Dept. of Boating & Waterways         David Johnson         California Coastal         Commission         Elizabeth A. Fuchs         Colorado River Board         Gerald R. Zimmerman         Dept. of Conservation         Roseanne Taylor         Roger Johnson         Dept. of Conservation         Roseanne Taylor         California Energy         California Energy         California Energy         Mayne Donaldson         Mayne Donaldson         Mayne Donaldson         Mayne Donaldson         Mayne Donaldson         B. Noah Tilghman         Environmental Stewardship         Section         Wayne Donaldson         Bept of Farks & Recreation         Section         Section



Re: Lyons Canyon Ranch Notice of Preparation Project No. TR53653

Dear Dr. Hsiao-ching:

We wish to express our concern regarding this proposed development due to the sensitive area in which it is located. We request that the environmental impact report address the following issues.

## Fire

This area has been subject to several major fires over the last en years. Fires are, unfortunately, easily ignited in this location because it is adjacent to a freeway and brush area. Also, fires have traveled over the natural areas from great distances and burned this project site. Housing proposed in this location would be in grave danger of wild fire. Therefore extensive clearing to reduce fire danger will be required. Impacts of this clearing on the surrounding natural areas must be addressed. This project should not be approved without adequate access roads for emergency evacuation.

## <u>Habitat</u>

It appears that his project would impact two significant ecological areas, Lyon Canyon, SEA 63 and the Santa Susanna Mountains SEA 20. However, only one SEA seems to be referenced in the NOP. Please indicate in the environmental document whether this project will impact Lyons Canyon, SEA 63, either directly or indirectly. Also, please indicate any negative impacts the project will have on wildlife movement, and adjacent natural areas (Towsley Canyon Park). A thorough survey for endangered and threatened species should be conducted.

Also, the oak woodlands in this area have been designated as a significant hardwood forest. Please address the cumulative impacts of the loss of over two hundred oaks on this resource. Please include the loss of over 3000 oaks from the BFI landfill and the proposed loss of 2900 oaks from the Las Lomas project. Please address the impacts of this cumulative loss on bird and animal species that depend on oak woodlands.

#### Viewshed

The view along a designated scenic highway should not be impacted. Project design should address this issue. This position is consistent with the strong stand SCOPE took on the Westridge project and its impact on the views from I-5 in the area of SEA 64, the Valley Oaks Savannah. This view is enjoyed by thousands of motorists on their way to and from work each day. It provides a moment of peace in an otherwise stressful world. Please provide information in the EIR as to how this project will affect the view (computer generated models) and how this project will comply with laws regarding scenic highway designation.

### **Traffic**

Please indicate how this project will mitigate the additional trip load on the I-5 freeway, especially through the Newhall Pass area.

#### Air Quality

The Santa Clarita Valley is already in a non-attainment zone foe ozone pollution and particulate matter. This project will require extensive grading, Please indicate how this project will affect air quality, especially addressing cumulative impacts generated by grading and additional car trips. Please indicate how the project proponent will mitigate these impacts.

#### Water Supply

We note that DWP is designated to serve this project. Please include information from DWP as to the environmental impacts of expanding a water pipeline to this area. These impacts should be addressed as part of this project to comply with CEQA's prohibition against piece-mealing project impacts.

#### Hydromodification

As you are aware, SCOPE opposes the concreting of streams and hydromodifications that would affect the natural functioning of water courses. Such modifications reduce badly needed ground water recharge and unnecessarily harm wildlife. We suggest that this project be designed to provide a more natural proposal for the existing blueline stream area. Impacts to loss of ground water re-charge and to wildlife should be addressed in the EIR. Also, the project proponent should be aware of Resolution 2005-002 (attached), passed Jan 27, 2005 by the Los Angeles Regional Water Quality Board. This resolution discourages modifications such as those proposed in this project. Please indicate how this project will obtain a 401 Water Quality permit.

Thank-you in advance for addressing our concerns. We look forward to reviewing the EIR when it becomes available.

Sincerely. Nnne Plambeck

President

## State of California California Regional Water Quality Control Board, Los Angeles Region

#### RESOLUTION NO. 2005-002 January 27, 2005

## Reiteration of Existing Authority to Regulate Hydromodifications within the Los Angeles Region, and Intent to Evaluate the Need for and Develop as Appropriate New Policy or Other Tools to Control Adverse Impacts from Hydromodification on the Water Quality and Beneficial Uses of Water Courses in the Los Angeles Region

WHEREAS, the California Regional Water Quality Control Board, Los Angeles Region, finds that:

- 1. Protecting beneficial uses within the Los Angeles Region consistent with the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) requires careful consideration of projects that result in hydrogeomorphic changes and related adverse impacts to the water quality and beneficial uses of waters of the State. The alteration *away* from a natural state of stream flows or the beds or banks of rivers, streams, or creeks, including ephemeral washes, which results in hydrogeomorphic changes, is generally referred to in this resolution as a hydromodification.
- 2. This resolution is intended to reiterate the existing authority the Regional Board relies upon to regulate hydromodifications within the Los Angeles Region. As such, it has no regulatory effect. This resolution represents a initial step in the process of first, heightening awareness about the potential impacts of hydromodification on water quality and beneficial uses and evaluating existing laws and regulations and the current methods employed by Regional Board staff when reviewing proposed hydromodification projects and, second, strengthening, if necessary, controls and policies governing hydromodifications that negatively affect water quality and beneficial uses. As a first step, it sets forth a process to achieve one of the Regional Board's highest priorities, which is to maintain and restore, wherever feasible, the physical and biological integrity of the Region's water courses. Secondarily, maintaining the natural functions of water courses maximizes opportunities for stormwater conservation and groundwater makes up half of the Region's water supply.
- 3. In addition to the process outlined in this resolution, the Regional Board has and will continue to strongly support restoration efforts in and along the Region's urbanized, highly modified water courses. The Regional Board also strongly supports preservation efforts geared toward ensuring long-term protection for the Region's remaining natural water courses.
- 4. Section 101(a) of the Clean Water Act, sets forth a national objective "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." (33 U.S.C. § 1251(a).) Chapter 1 of the Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) recognizes this national goal and specifies that the Basin Plan is designed to implement the Clean Water Act and its goals. As a result, a regional priority of maintaining and restoring, wherever feasible, the physical and biological integrity of the Region's water courses is firmly grounded in federal and state law.

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- 5. To realize this objective, the Clean Water Act (33 U.S.C. § 1313(c)) and federal regulations (40 C.F.R. § 131.10(a)) direct States to specify appropriate designated uses to be achieved and protected. The classification of the waters of the State must take into consideration the use and value of water for public water supplies, protection and propagation of fish, shellfish and wildlife, recreation in and on the water, agricultural, industrial and other purposes including navigation. The standards must explicitly be designed to "protect the public health or welfare and enhance the quality of the water." (33 U.S.C. § 1313(c).)
- 6. The Basin Plan designates the beneficial uses of the Region's water bodies consistent with the California Water Code, federal Clean Water Act, federal regulations, and with the national "fishable/swimmable" goal of the CWA forming the broad basis for the beneficial use designations of surface waters throughout the Region. Some of the beneficial uses most benefited by preserving water courses in a natural state include aquatic life [WARM and COLD among others], wetland habitat, and groundwater recharge. In addition, the Basin Plan establishes water quality objectives for the protection of these beneficial uses. An important provision of the Basin Plan, which is required by federal law (40 C.F.R. § 131.12) and state law (SWRCB Resolution No. 68-16), is an anti-degradation policy designed to maintain existing, high quality waters. The beneficial uses of water bodies, water quality objectives and anti-degradation policies, together, constitute a State's water quality standards.
- 7. The Regional Board primarily relies upon a three-pronged approach to regulating hydromodifications. The first two are (1) waste discharge requirements issued pursuant to Water Code section 13263 and waivers issued pursuant to Water Code section 13269 to protect waters of the State and (2) certifications issued in accordance with Clean Water Act section 401 to protect waters of the U.S. These two approaches are not mutually exclusive. (Cal. Code Regs., tit. 23, § 3857.) The third prong consists of municipal stormwater permits issued pursuant to section 402 (p) of the Clean Water Act to address stormwater related problems including stormwater quality and increased flows.
- 8. "Waters of the State" include all waters of the U.S. In addition, waters of the State include waters that are not "navigable waters" under the federal Clean Water Act, including certain intermittent and ephemeral streams, wetlands, lakes, reservoirs, and other isolated non-navigable waters.
- 9. Human civilization has attempted to alter the environment through hydromodifications for centuries. In the Los Angeles Region, beginning in the early part of the 20<sup>th</sup> century. hydromodifications were constructed by public agencies to protect residents from floods and to collect and conserve stormwater for drinking water purposes and recreation. In addition, extensive urban development, and the corresponding increase in impervious area within the watershed and decrease in the width of natural floodplains, has often resulted in significantly altered patterns of surface runoff and infiltration and, consequently, stream flow. This, in turn, has necessitated further in-stream hydromodification in order to stabilize banks and constrain the stream to the channel to prevent flooding. The sequence of events is discussed extensively in the Basin Plan and in the Regional Board's municipal storm water permit for Los Angeles County. (Regional Board Order No. 01-182.)
- 10. Many hydromodifications were undertaken with laudable goals often for public safety and welfare, but have later been shown to de-stabilize and enlarge stream channels as well as degrade habitat and reduce species abundance and diversity. As a result, when reviewing

hydromodification projects it is important to carefully consider whether the immediate improvements sought are designed in such a way as to avoid unintended adverse consequence on the character of the receiving water and its beneficial uses in the vicinity, and downstream of the hydromodification.

- 11. Activities that alter natural stream flows may include increasing the amount of impervious land area within the watershed, altering patterns of surface runoff and infiltration, and channelizing natural water courses. Activities that alter the natural stream channel include but are not limited to human-induced straightening, narrowing or widening, deepening, lining, piping/under-grounding, filling or relocating (i.e. channelization); bank stabilization; instream activities (e.g. construction, mining, dredging); dams, levees, spillways, drop structures, weirs, and impoundments.
- 12. Hydromodifications may impair beneficial uses such as warm and cold water habitat, spawning habitat, wetland habitat, and wildlife habitat in a variety of ways. Modifications to stream flow and the stream channel may alter aquatic and riparian habitat and affect the tendency of aquatic and riparian organisms to inhabit the stream channel and riparian zonc. As a result of these hydromodifications, the biological community (aquatic life beneficial uses) may be significantly altered, compared to the type of community that would inhabit an unaltered, natural stream.
- 13. For example, channelization usually involves the straightening of channels and hardening of banks and/or channel bottom with concrete or riprap. These modifications may impair beneficial uses by disturbing vegetative cover, removing habitat; modifying or eliminating instream and riparian habitat; degrading or eliminating benthic communities; increasing scour and erosion as a result of increased velocities, and increasing water temperature when riparian vegetation is removed. The regular maintenance of modified channels may impair beneficial uses by disturbing instream and riparian habitats if not managed properly. These modifications may also, if not managed properly, impair beneficial uses by depriving wetlands and estuarine shorelines of enriching sediments or by excessive deposition in downstream environments; changing the ability of natural systems to both absorb hydraulic energy and filter pollutants from surface waters; and altering habitat for spawning and other critical life stages of aquatic organisms. Hardening of channels may also eliminate opportunities for groundwater recharge in some areas. Furthermore, some hydromodifications may reduce recreation in and around the water body.
- 14. As a result of past hydromodifications, there are few natural stream systems remaining in the region. Water bodies that have not undergone extensive hydromodification such as portions of the Santa Clara River, upper San Gabriel and Los Angeles Rivers, Malibu Creek, Topanga Canyon, coastal streams in the Santa Monica Mountains, and tributaries to these larger rivers provide immeasurable benefits to the Region. These benefits include high quality warm and cold-water aquatic habitat, spawning habitat, migratory pathways, wildlife corridors, wildlife and riparian habitat, wetland habitat, recreational and aesthetic enjoyment, and groundwater recharge. Yet, many of these water bodies and their tributaries continue to be threatened by expanding urban development.
- 15. The Regional Board acknowledges that there is a wide array of hydromodification projects. Some result in positive environmental impacts such as stream restoration projects. Others result in negligible or temporary adverse environmental impacts if managed properly. These may include widening bridges and installing flow measuring devices, such as weirs, or energy

dissipating devices where a constructed channel meets a natural channel. On the other end of the continuum are large hydromodification projects or multiple projects with cumulative impacts that permanently alter the hydrologic and ecological functions of a stream and, thus, adversely affect the beneficial uses described above. These include, but are not limited to, projects that bury natural stream channels, channelize natural water courses, or involve instream activities such as mining or construction. Regional Board staff evaluates the severity of adverse environmental impacts on a project-by-project basis.

- 16. The Regional Board recognizes that maintenance activities are required in modified channels in order to ensure continued flood protection and vector control. The Regional Board has authorized such activities through the issuance of Section 401 certifications in the past and would expect to continue to authorize such activities. The Regional Board also recognizes that maintenance activities may need to be carried out on an emergency basis due to various exigencies, including brush fires and flooding. The Board through the issuance of Section 401 certifications has also authorized these emergency maintenance activities. Nothing in this resolution is intended to alter the ability of these local agencies to continue ongoing maintenance activities.
- 17. The Regional Board also recognizes the value of the spreading grounds that have been constructed along many of the Region's larger water courses. These spreading grounds serve a valuable function by recharging storm water into the Region's groundwater to bolster local water supplies. Nothing in this resolution is intended to alter the ability of local and regional agencies to conserve stormwater within existing regulations with the goal of increasing local water supplies.
- 18. The Regional Board and local agencies have undertaken or sponsored hydromodification field assessments and studies to develop peak flow design criteria to minimize or eliminate adverse impacts from urbanization for water courses in the counties of Ventura and Los Angeles. These studies include the 'Urbanization and Channel Stability Assessment in the Arroyo Simi Watershed of Ventura County, CA' (2004), and the 'Peak Impact Discharge Study' sponsored by the County of Los Angeles, which is in progress. The results from these studies will be used to develop objective criteria to reduce or eliminate the adverse impacts of hydromodification in the Los Angeles Region from new development and redevelopment.
- 19. Though the Regional Board does not have authority to regulate land use, the Regional Board strongly encourages land use planning agencies and developers to carefully consider, early in the development planning process, the potential impacts on water quality and beneficial uses of hydromodification projects proposed as part of new development. The Regional Board strongly discourages direct hydromodification of water courses except in limited circumstances where avoidance or other natural alternatives are not feasible. In these limited circumstances, project proponents must clearly demonstrate that a range of alternatives, including avoidance of impacts, has been thoroughly considered, hydromodification has been minimized to the extent practicable, and adequate in situ and/or off site mitigation measures have been incorporated to offset related impacts. Project proponents must also document that there will be no adverse effects to water quality or beneficial uses. This approach is consistent with the California Environmental Quality Act (CEQA), federal regulations and State and federal antidegradation policies.
- 20. Chapter 4 of the Basin Plan, "Strategic Planning and Implementation", outlines the suite of regulatory tools available to the Regional Board to maintain and enhance water quality. One of these tools is the 401 Certification Program. This federally required program regulates

most hydromodification projects to ensure that the projects will not violate State water quality standards of which beneficial uses are an essential component. Section 401 Certifications may include conditions to minimize impacts from hydromodification activities by implementing Best Management Practices such as working in the dry season or out of the water, among many others. Certifications may also include monitoring requirements in order to ensure that the project is completed as specified and any proposed mitigation is successful.

- 21. Under section 401 of the Clean Water Act, the State Water Resources Control Board and the Regional Boards have a time limit as prescribed by applicable laws and regulations, from the receipt of a complete application, to certify that a project will comply with applicable state water quality standards prior to issuance of a federal 404 dredge and fill permit for any activity that may result in a discharge to a surface water of the United States. In the event that a project will not comply with applicable water quality standards, even with all conditions proposed, then the certification may be denied. (Cal. Code Regs., tit. 23, § 3837, subd. (b).)
- 22. Under section 402 (p) of the federal Clean Water Act, the State Water Resources Control Board and the Regional Boards are required to issue storm water permits to owners and operators of municipal separate storm sewer systems (MS4s). On a permit-by-permit basis, MS4 permits may identify storm water-related problems and include provisions requiring municipalities to implement measures to reduce adverse impacts of hydromodification, primarily increased flows, on beneficial uses.
- 23. Under separate authority granted by State law (see Article 4 (commencing with section 13260) of Chapter 4 of the Porter-Cologne Act), a Regional Board may regulate discharges of dredge or fill materials as necessary to protect water quality and the beneficial uses of waters of the State by issuing or waiving waste discharge requirements, a type of State discharge permit. For projects that may result in a discharge to a surface water of the U.S., waste discharge requirements may be issued in addition to the 401 certification. (Cal. Code Regs., tit. 23, § 3857.) Issuance of waste discharge requirements may be the only option for the Regional Board in situations where the proposed discharge is to waters of the state (e.g. isolated waters, vernal pools, etc.) rather than waters of the U.S., or in situations where the federal agency does not claim jurisdiction. All discharges of waste, including dredged and fill material, to waters of the State are privileges and not rights.
- 24. With certain exceptions, the California Environmental Quality Act (CEQA) requires the preparation of environmental documents for all projects requiring certifications by the state or state-law-only waste discharge requirements from the Regional Board. Hydromodification activities discussed above that require certification under section 401 of the Clean Water Act or that require waste discharge requirements for dredging and filling of State waters may be subject to CEQA. For projects that may have a significant effect on the environment that cannot be mitigated, an environmental impact report must be prepared that requires consideration of feasible alternatives to the project. (Pub. Resources Code, § 21061.)

# THEREFORE, be it resolved that

Maintaining and restoring, where feasible, the physical, chemical and biological integrity of the Region's watercourses is one of the Regional Board's highest priorities.

guidelines, additional municipal stormwater permit requirements and amendments to the Basin Plan.

Regulatory tools may incorporate specific criteria and evaluation requirements to be used by Regional Board staff when evaluating projects for water quality certification or waste discharge requirements, and setting conditions for certification or for Standard Urban Stormwater Mitigation Plan (SUSMP) or Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) approval by the local agency. If a Basin Plan amendment is necessary, the Regional Board further directs staff to bring said amendment to the Board for its consideration in the near future. Any proposed criteria and evaluation requirements should ensure that developers avoid, minimize or, as a last course, compensate for both the on-site and downstream adverse impacts of development on the water quality and beneficial uses of watercourses.

- 6. When evaluating the issue of hydromodification and identifying specific actions to be taken if necessary, the Regional Board shall consider at a minimum the following:
- Existing federal and state law and regulation; state and regional policies; and current methods employed by Regional Board staff related to hydromodification of water courses.
- Consistency and coordination with other agencies' authorities over hydromodifications.
- Existing staff resources available to implement current Regional Board programs and regulations related to hydromodification of water courses.
- The local and regional value of maintaining water courses in their natural state.
- Federal guidelines including, but not limited to, section 404(b)(1), which constitutes the substantive federal environmental criteria that are used in evaluating applications for certain discharges of dredge or fill material;
- Statewide General Waste Discharge Requirement for certain dredge and fill activities not requiring a Section 404 Permit or a Section 401 Certification under the federal Clean Water Act (State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ);
- State Water Resources Control Board, "Regulatory Steps Needed to Protect and Conserve Wetlands not subject to the Clean Water Act," Report to the Legislature, Supplemental Report of the 2002 Budget Act, April 2003.
- The State Water Resources Control Board Workplan: Filling the Gaps in Wetlands Protection (Sept. 24, 2004);
- State Water Resources Control Board Guidance for Regulation of Discharges to "Isolated" Waters (June 25, 2004);
- National Research Council, "Riparian Areas: Functions and Strategies for Management, Committee on Riparian Zone Functioning and Strategies for Management," National Academy Press, Washington, D.C., 2002.
- State guidance including, but not limited to, "A Primer on Stream and River Protection for the Regulator and Program Manager" (by Ann L. Riley) and the "California Rapid Assessment Method for Wetlands" for evaluating mitigation sites:
- "Stream Corridor Restoration: Principles, Processes, and Practices." Prepared by the Federal Interagency Stream Restoration Working Group (FISRWG) (10/1998);
- General principles of low impact development (various sources);
- The findings of the study commissioned by the Los Angeles County Department of Public Works through the Storm Water Monitoring Coalition in order to satisfy a requirement of the Los Angeles County Municipal Storm Water Permit (Regional Board Order No. 01-182), which calls for a study to evaluate peak flow control and determine numeric criteria to prevent or minimize erosion of natural stream channels and banks caused by urbanization, and to protect stream habitat:

- The findings of the study "Urbanization and Channel Stability Assessment in the Arroyo Simi Watershed of Ventura County, CA – Final Report" (2004) completed by the Ventura County Watershed Protection District. in order to satisfy a requirement of the Ventura County Municipal Storm Water Permit (Regional Board Order No. 00-108), which calls for the development of criteria to prevent or minimize erosion of natural channels and banks caused by urbanization and protect stream habitat; and
- Additional data collected or initiated by municipalities, dischargers and developers on stream stability for study sites in Los Angeles and Ventura Counties to reduce statistical uncertainty and/or improve model predictability when establishing stream stability protective criteria.
- 7. If a Basin Plan amendment is deemed necessary, staff is directed to consult with affected state and local agencies prior to formulating the draft amendment(s).
- 8. During the evaluation process, staff is directed to seek input from:
- the Department of Fish and Game and the U.S. Army Corps of Engineers, the United States Fish and Wildlife Service and other agencies with jurisdiction over hydromodification projects to ensure that any future policies and requirements to be proposed do not conflict with the jurisdiction and regulatory authority of these agencies; and
- stakeholders, including flood control agencies, agricultural interests, the building and construction industry, and environmental groups.
- Pursuant to section 13224 and 13225 of the California Water Code, the Regional Board, after considering the entire record, including oral testimony at the hearing, hereby adopts the Resolution.

I. Jonathan Bishop. Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a resolution adopted by the California Regional Water Quality Control Board. Los Angeles Region, on January 27, 2005.

ORIGINAL SIGNED BY

2 23 05

Jonathan S. Bishop, P.E. Executive Officer

Final Version

Date



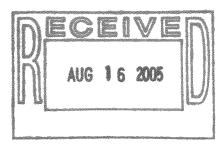
# County of Los Angeles Sheriff's Department Headquarters

4700 Ramona Boulevard Monterey Park, California 91754-2169



Leroy D. Baca, Sheriff

August 11, 2005



Hsiao-ching Chen, Ph.D., AICP Impact Analysis Section County of Los Angeles Department of Regional Planning 320 West Temple Street, Room 1348 Los Angeles, California 90012

Dear Ms. Chen:

#### REVIEW OF ENVIRONMENTAL DOCUMENT NOTICE OF PREPARATION THE LYONS CANYON RANCH PROJECT COUNTY PROJECT NO. TR53653

This is response to your letter dated July 7, 2005, requesting our Department's review of the above identified project. Our Department has completed its review of the project description and plans. Attached is the letter from Patti A. Minutello, Captain of the Santa Clarita Sheriff's Station.

We would like to emphasize Captain Patti A. Minutello's concern regarding the rapid growth of the community. While the proposed project by itself will not create a demand for additional staffing, the cumulative impact of this project in addition to many other current and proposed projects may significantly affect the ability to provide an adequate level of law enforcement services. To reduce the impact of this concern, suggested crime prevention measures have been included to promote a safer community.

Should you have any questions regarding this matter, please contact Mr. Mike Kameya, of my staff at (626)300-3013.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director Facilities Planning Bureau

A Tradition of Service Since 1850



LEROY D. BACA. SHERIFF

County of Oos Angeles Sheriff's Aepartment Headquarters 4700 Ramona Boulevard Monterey Park, California 91754-2169 (661) 255-1121



July 28, 2005

Mr. Gary T.K. Tse, Director Facilities Planning Bureau 1000 South Fremont Avenue Building A-9 East 5<sup>th</sup> Floor North Alhambra, California 91803

Dear Mr. Tse:

#### NOTICE OF PREPARATION TENTATIVE TRACT NO. 53653 LYONS CANYON RANCH

The proposed Project consisting of 190 residential units located adjacent to The Old Road, west of Interstate 5, just south of Sagecrest Circle, and north of Towsley Canyon State Park is within the jurisdiction of the Los Angeles County Sheriff's Department, Santa Clarita Valley Station, 23740 Magic Mountain Parkway, Valencia, California. The station is located approximately 3-4 miles from the project site.

It is anticipated that the non-emergent response time to a request for service would be approximately 20-30 minutes. The priority response time would be approximately 8-10 minutes and the response time under emergent circumstances would be approximately 5-8 minutes. All response times are approximations, only, and would be dependent on both the deployment of area radio cars and traffic conditions.

This station serves an area of 656 square miles, which is made up of the City of Santa Clarita and unincorporated County area between the Los Angeles City Limits to the South, the Kern County Line to the North and involving all area between the Ventura County Line to the West and the township of Agua Dulce to the East. The population served by our station is approximately 200,000 residents.

A Tradition of Service

#### NOTICE OF PREPARATION TENTATIVE TRACT NO. 53653, LYONS CANYON RANCH

- - -

Our ideal officer to population ratio is one deputy per 1,000 residents and with our current staffing of 171 sworn deputies currently assigned, our ratio is less than ideal at one deputy per every 1,169 residents. Assuming a residential density of 3.01 persons per dwelling unit, this proposed project will generate a population increase of 571. Based on the above, this project located in the unincorporated area, would not require additional deputies to the station compliment.

Our primary concern is our ability to provide an adequate level of protection and service to all areas we police. Due to the rapidly expanding population of the Santa Clarita Valley and its record-setting home building, it is difficult to project the impact of this project on law enforcement.

Adding this project and other projects in progress, either proposed, approved or committed, it is certain they will all significantly strain our resources to the breaking point. Additionally, the increase in required field personnel will necessitate a concomitant increase in support resources such as detectives, complaint desk officers, vehicles and portable radios. While not directly a builder's matter, our ability to provide a sufficient level of law enforcement services must be considered when applications for new projects such as these are considered.

While we do not oppose this project, we are seriously concerned about our ability to adequately police this area. Without a commitment from the Board of Supervisors to provide sufficient funding, we may face a situation where we cannot provide timely emergency services.

It is suggested, for the security and safety of the residents, that the following crime prevention measures be implemented during site and building layout design:

- Provide lighting in open areas and parking lots;
- Ensure the visibility of doors and windows from the street and between buildings;
- Provide adequate parking spaces in the parking lots to accommodate shoppers, employees and residents;
- Ensure that the required building address numbers are lighted and readily apparent from the street for emergency response agencies.

#### NOTICE OF PREPARATION TENTATIVE TRACT NO. 53653, LYONS CANYON RANCH

Should you have further questions, please feel free to call me at (661) 255-1121 extension 5102, or Deputy Patrick Rissler at extension 5159.

Sincerely,

LEROY D. BACA, SHERIFF

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Patti A. Minutello, Captain Santa Clarita Valley Station

PAM:par

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

July 25, 2005

Hsiao-ching Chen, AICP Impact Analysis Section Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, California 90012

#### **Notice of Preparation Comments** for The Lyons Canyon Ranch Project Tentative Tract Map No. 53653 - SCH No. 2003031086

Dear Ms. Chen:

The proposed Lyons CanyonRanch development project is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Conservancy is concerned about the proposed project generating significant adverse impacts to the biological and visual resources and growth-inducing impacts.

#### **Importance of Including Regional Open Space Context**

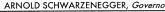
The project site is located immediately north of Towsley Canyon Park owned by the Mountains Recreation and Conservation Authority (MRCA). Towsley Canyon Park is part of over 5,000 acres of parkland surrounding the proposed development. The Draft Environmental Impact Report (DEIR) must address both the proximity of nearby parkland and the fact that much of the 232-acre project site is integral to one of the most ecologically rich portions of the Santa Susana Mountains core habitat area.

The site poses many constraints to development including extensive floodplain acreage, dense oak groves where there is buildable terrain, and a single means of access. Surrounding terrain makes it quite unlikely that any substantial portions of the offsite private property to the east and west will be developed. In which case, development of the back (western) section of the subject property would inevitably represent a deep intrusion into what otherwise in all probability will remain a wilderness recreation area.

#### **Selection of DEIR Alternatives**

Any project approved on the site should reflect the highest possible level of avoidance relative to drainage and oak tree resources. In addition, any approved project should leave ecologically functional sized habitat areas, as opposed to steep slopes surrounding large cut





Los Angeles County Impact Analysis Section NOP Comments on Tentative Tract Map No. 53653 - SCH No. 2003031086 July 25, 2005 Page 2

and fill areas with islands of "saved" oak trees. The existing project proposal does not provide the type of ecologically functional habitat block that should be protected on a 232-acre property.

In the case of land use in Lyon Canyon, the need for housing should not result in a mass graded project being forced into steep, ecologically valuable landscapes. The DEIR alternatives analysis must include a project that limits development to the easternmost 80 acres, closest to Interstate 5(I5). However, the same alternative should include no grading on any slope visible from the I5 except for several hundred feet interior to the site if necessary. If small oak groves, that are not visible from the Old Road or I5, and would otherwise be completely cutoff from any other contiguous habitat, need to be sacrificed to achieve such an alternative project, that action should be explored in the alternatives analysis.

If the applicant rejects such a project both as not meeting his objectives and being economically infeasible, the County should hold firm with existing General Plan protections of which the applicant is obligated to be aware. The ecological and watershed significance of the subject property warrant the County holding the line with the existing zoning. The lure of a few senior housing units should not trigger the permanent loss of what amounts to an entire watershed.

The DEIR should include at least one economically feasible alternative that impacts less than 100 oak trees (the proposal destroys 226).

As currently designed the project has a high edge to interior area ratio. The result would be scores of acres of required brush clearance and resulting habitat degradation in perpetuity. The DEIR should include at least one economically feasible alternative that impacts less than 100 oak trees and requires less than 20 acres of fuel modification.

#### **Growth-Inducing Potential to Interior Parcels**

A substantial block of private land is located interior (west) of the site. Both the proposed project, and potential alternative projects, pose the potential of supplying both utility and road access to this block of private land. The DEIR must disclose whether such potential exists based on title information. If any easements to any adjoining properties are recorded, they must be disclosed and accurately plotted in the DEIR for decision makers to understand. Any potential prescriptive easements must also be addressed. The DEIR must disclose all existing access agreements with adjoining and near-adjoining landowners. Without this information the growth inducing potential of the project would not be

Los Angeles County Impact Analysis Section NOP Comments on Tentative Tract Map No. 53653 - SCH No. 2003031086 July 25, 2005 Page 3

adequately disclosed. To ensure that no such undisclosed growth-inducing actions occur after a project approval, the DEIR must include a conservation easement or fee simple dedication to a public agency other than Los Angeles County that essentially seals the project from providing utilities or access to any property outside of the 232-acre project boundary.

#### **Issues Related to Offsite Brushing**

As proposed the project appears that it would required more than 20 acres of brush clearance <u>outside</u> of the project boundary. None of that would be on public land. However we are sensitive to such actions and suggest that the DEIR both call out such offsite fuel modification and include a mitigation measure requiring a permanent irrevocable funding source for the future HOA to do that brushing. It is much cleaner when projects are designed to have all brushing occur within the subject ownership.

#### **Additional Requests for DEIR Information**

Every attempt must be made to keep open space lighting impacts to a minimum. The DEIR must include measurable levels of light allowable at all open space interface areas.

The DEIR must also identify all of the permanent surface water sources located on the project site. Every attempt must be made to protect and avoid permanent water sources.

The DEIR must include an analysis of what percentage of the remaining oak trees in each DEIR alternative would be located within 75 feet of a house, yard, road, or parking lot. This information is imperative for decision makers to assess the ecological value the remaining oaks on site. Proximity to development decreases the ecological value of an oak tree.

#### **Ecologically Functional Debris Basins**

We challenge the County and the project applicant to design innovative debris basins for the subject project. The key factor to design into the basins is to minimize or eliminate maintenance. Reduced maintenance (disturbance) equates to greater permanent habitat value. The preservation of existing flood plain area (to maximize area for sediment management) is the key. In the case of the subject property, that may require a section of elevated road.

## **Need for Fee Simple Open Space and Conservation Easement Dedications**

The ungraded portions of the property should be dedicated in fee to the Mountains Recreation and Conservation Authority (MRCA), the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), or a similar public entity. To pay for management

Los Angeles County Impact Analysis Section NOP Comments on Tentative Tract Map No. 53653 - SCH No. 2003031086 July 25, 2005 Page 4

of the open space the funds must be ensured through the establishment of a community facilities district (CFD). Both the MRCA and SCWRCA have the authority to be the local agency sponsor for such a CFD.

Please direct any questions or future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above Ramirez Canyon Park address.

Sincerely,

Elizabeth A. Cheadle

ELIZABETH A. CHEADLE Chairperson

# COUNCE MANAGEMENT AGENCY

**Planning Division** 

Christopher Stephans Director

August 17, 2005

Date 7671 MRS pages Post-it\* Fax Note From To 1 north in her Co Co./Dept. Phone # Phone # Fax # 213 6260434 Fax #

320 West Temple Street Los Angeles, CA 90012 FAX #: (213) 626-0434

Department of Regional Planning Impact Analysis Section, Room 1348

Dr. Hsiao-ching Chen, AICP

County of Los Angeles

SUBJECT: The Lyons Canyon Ranch Project, NOP of Draft EIR

Thank you for the opportunity to review and comment on the above subject document. Attached are the comments that we have received resulting from an intra-county review of the projects.

Any responses to these comments should be sent directly to the commenter, with a copy to Carl Morehouse, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Carl Morehouse at (805) 654-2476.

Sincerely,

Christopher Stephens County Planning Director

Attachment

County RMA Reference Number 05-049





### PUBLIC WORKS AGENCY TRANSPORTATION DEPARTMENT Traffic, Advance Planning & Permits Division M E M O R A N D U M

DATE: August 3, 2005

- TO: Resource Management Agency, Planning Division Attention: Carl Morehouse
- FROM: Nazir Lalani, Deputy Director
- SUBJECT: Review of Document 05-049 The Lyons Canyon Ranch Project. Notice of Preparation of an EIR for the Lyons Canyon Ranch Project. The project consist of mixed use single family dwelling, senior housing, public facility uses and open space located in the Santa Clarita Valley in the unincorporated area of Los Angeles County Lead Agency – County of Los Angeles

The Public Work Agency -- Transportation Department has reviewed the Notice of Preparation of an EIR for the Lyons Canyon Ranch Project. The project proposes to construct 95 single family dwelling, five senior housing lots, one condominium lot with 90 senior units, four open space lots, five debris basin lots, one park lot and one fire station. The project is located in the Sarita Clarita Valley area plan in the unincorporated area of Los Angeles County. The project site is bounded to the north by residential uses on Sagecrest Circle and the Stevenson Ranch and to the east by The Old Road and Interstate 5. The site is located in the northwestern portion of Antelope Valley in Los Angeles County.

The Environmental Study should be required to analyze and address the traffic impacts of this project to the Ventura County Regional Road Network. We would like to review the Environmental Study as it becomes available.

Our review is limited to the impacts this project may have on Ventura County's Regional Road Network.

Please call me at 654-2080 if you have questions.

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