# FINAL EIR

## Bouquet Canyon Project

Master Case 18-089 / Tentative Tract Map No. 82126

November 2020

**PREPARED FOR:**
*City of Santa Clarita*

**PREPARED BY:**
*Michael Baker International, Inc.*

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# SECTION 1:
## INTRODUCTION

## Section 1 - INTRODUCTION

This document is the Final Environmental Impact Report (Final EIR) for the Bouquet Canyon Project, prepared in accordance with Section 15132 of the California Environmental Quality Act (CEQA) Guidelines. The Final EIR incorporates the entire Draft EIR by reference, including all appendix materials. It consists of four sections, described below:

**Section 1: Introduction.** This section provides an introduction to the scope and content of the Final EIR and identifies the persons and organizations who submitted comments on the Draft EIR.

**Section 2: Comments and Response to Comments on the Draft EIR.** This section presents the comments on the Draft EIR and responses to each of the comments. Comments and responses for each author are provided, followed by a copy of their letter or email with brackets and numbers corresponding to the sequence of comments and responses that precede the actual comments.

### *Draft EIR Public Review Process*

The Draft EIR was circulated for a 60-day public review and comment period between April 6 – June 5, 2020. This time period exceeds the 45 days that is standard for a Draft EIR that has been submitted to the State Clearinghouse, as required by Section 15105 of the State CEQA Guidelines. This extended period was established by the City, in recognition of the extraordinary circumstances associated with the worldwide pandemic known as "COVID-19" and related difficulties in accessing, reviewing and commenting on the Draft EIR materials. A Notice of Availability (NOA) and a copy of the Draft EIR were sent to 7 public agencies, published on the City's website, and placed at Santa Clarita City Hall. The NOA was also published in the Signal newspaper on April 4, 2020. The Draft EIR and technical appendices were submitted to the State Clearinghouse, in the Governor's Office of Planning and Research, for a 60-day review period, as mentioned above, for review and comment by State agencies.

A total of 11 comment letters and two emails were submitted to the City during this public review period, and 1 letter was submitted after the time period had expired (by the California Department of Fish and Wildlife). Section 2 of this document includes copies of these comments and the City's responses to these comments. The list of commenters is provided in the table below.

**LIST OF COMMENTS SUBMITTED TO THE CITY OF SANTA CLARITA**

| *Comment Letter* | *Authors* |
|---|---|
| 1 | Jason Davenport |
| 2 | Santa Monica Mountains Conservancy |
| 3 | Roger A Haring |
| 4 | Caltrans, District 7 |
| 5 | Thomas Hart |
| 6 | Jim Crowley |

| | |
|---|---|
| 7 | Los Angeles County Department of Public Works |
| 8 | Rita Maphis |
| 9 | George Brodt |
| 10 | Santa Clarita Valley Water Agency |
| 11 | Los Angeles County Fire Department |
| 12 | California Department of Fish and Wildlife |
| 13 | Roy Cole |
| 14 | Susan Maness |

**Section 3: Errata and Revisions to Draft EIR.** This section provides corrections, clarifications and updates to the information presented in the Draft EIR. A supplemental analysis of the project's effects on groundwater recharge is provided in this section. Updated project plans that reflect additional information to illustrate the proposed Copper Hill Drive Extension to Bouquet Canyon Road and the reconfiguration of the existing intersection of David Way and Bouquet Canyon Road are included in this section. Additional changes to the proposed development plan include a new street connection from Planning Area 1 to the new Bouquet Canyon Road, relocation of the main entrance from new Bouquet Canyon Road, and a modification to the low-flow pipe outlet design near the new Bouquet Canyon Road bridge. Please note that these changes do not represent significant new information that would result in a different finding regarding the project's environmental impacts or the severity thereof.

**Section 4: Mitigation Monitoring and Reporting Program**. Pursuant to Section 15097 of the State CEQA Guidelines, this section presents the Mitigation Monitoring and Reporting Program (MMRP) to be followed to implement the mitigation measures identified in the Draft EIR. The MMRP lists all of the mitigation measures, with corresponding actions to be taken, timing for monitoring of those actions, and the parties responsible for implementing the mitigation measures and monitoring those efforts to ensure they are accomplished as intended.

# SECTION 2:

# COMMENTS AND RESPONSE TO COMMENTS

*Jason Davenport*

*Santa Monica Mountains Conservancy*

*Roger A Haring*

*Caltrans District 7*

*Thomas Hart*

*Jim Crowley*

*Los Angeles County Department of Public Works*

*Rita Maphis*

*George Brodt*

*Santa Clarita Valley Water Agency*

*Los Angeles County Fire Department*

*California Department of Fish and Wildlife*

# JASON DAVENPORT

SECTION 2

**Responses to Comment Letter Number 1 by Jason Davenport, dated May 4, 2020**

**Comment 1:** *The new road construction from the Copper Hill Dr/David Way intersection is proposed to bend around the westerly tip of my property. From my understanding, this will be a two-lane road as it is currently proposed which directly affects the way in which I enter and exit my driveway. The "bending" of the road will create a blind corner that will make it extremely difficult to exit my driveway heading in the east direction onto Old Bouquet Canyon Rd/New Copper Hill Dr. In addition, it will be extremely dangerous to enter my driveway (left turn) heading in the east direction on Old Bouquet Canyon Rd/New Copper Hill Dr. I know this was a concern of nearby residents heading south down David Way because a median is being proposed to restrict a left-hand turn onto Copper Hill Dr heading east. Also, there is no indication of what the proposed speed limit will be on this road between Kathleen Ave and the New Bouquet Canyon Rd. Will there be lighting for the street? A bike lane? A sidewalk for pedestrians?*

**Response 1:** The new roadway will be approximately 40 feet curb to curb. There will be an adequate width for a two-way left-turn lane or left-turn pocket to enter the driveway in the eastbound direction. Sight distance will be provided at the existing driveway through the construction of a retaining wall. The current speed limit on Copper Hill Drive is 45 mph. The new roadway segment is anticipated to have a similar speed limit. Since Copper Hill Drive/Bouquet Canyon Road will be a signalized three-way T intersection, actual speeds near this property may be reduced from the current condition. Speed limits are set by the City through the established Engineering and Traffic Survey process after the roadway is built. Street lighting will be provided on the new roadway segment. A bike lane will not be provided at this time. A sidewalk would be constructed along the south side of the roadway adjacent to PA-4.

**Comment 2:** *Page 3.1-30 states that new homes from viewing location 4 will be set back from the new road approximately 25-40' from Bouquet Canyon Rd. What are the city's requirements for setbacks? Safety is my concern related to the current or future infrastructure that will be in close proximity to this new road constructed around the westerly tip of my property. What is the setback for the current road proposal?*

**Response 2:** Residential structures within Planning Area 4, opposite Mr. Davenport's property, would be required to maintain a minimum setback of 20 feet from the future right-of-way of Bouquet Canyon Road in this area. The proposed project would widen the existing segment of this road by 14 feet along the site frontage. With the proposed building setback of 20 feet behind the right-of way, the new homes would rest a minimum 26 feet from the future southern edge (curb) of the new Copper Hill Road connector and a minimum of 60 feet from the existing northern edge of Bouquet Canyon Road. The typical PA-4 structural setback ranges between 30 and 40 feet from the new Copper Hill Road connector southern curb and 70+ feet from the existing northern edge of Bouquet Canyon Road.

**Comment 3:** *I am also concerned about the driveway that is proposed to service the residents in PA4. It appears that the location will be directly across from my property and slightly off set from my personal driveway. Again, this will pose a hazard to vehicles entering and exiting in both westerly and easterly directions on Copper Hill Dr. I can see a scenario where four directions of traffic meet together in an uncontrolled intersection. Vehicles currently travel at speeds of up to 45-60+ mph in both directions regularly. The addition of a blind "sharp" curve and a new driveway that will service 85 multi-family units, can only create an unsafe intersection and must be corrected. What mitigation measure(s) will be created to correct this condition?*

**Response 3:** The new roadway will be approximately 40 feet curb to curb and will have adequate width to provide a two-way left-turn lane or left-turn pockets that can be used to enter the driveways. The driveway serving residents in PA-4 will be under stop control.

**Comment 4:** *Referencing page 3-12.9 the City of Santa Clarita and LA County desire a LOS of C or better in residential areas. Is Copper Hill Rd, between Kathleen Ave and the proposed New Bouquet Canyon Rd, considered a residential area? Furthermore, is it part of the Santa Clarita General Plan Circulation Element to convert this section of road from a 2-lane to 4-lane (secondary highway) in the future?*

**Response 4:** The segment of Copper Hill Road between Kathleen Avenue and New Bouquet Canyon Road is designated in the City General Plan as a secondary highway, which is intended to service through traffic, and to collect traffic from collector and local streets. The standard section for a Secondary is 4-lanes and the decision to widen it from 2-lanes to 4-lanes would be determined by the City based on various factors, such as traffic volumes. With the estimated traffic counts of a fully developed-Bouquet Canyon Project, specifically at PA-4, it does not warrant the widening of this segment of Copper Hill Road.

**Comment 5:** *Policy C1.17: "Consider the safety and convenience of the traveling public, including pedestrians and cyclists, in design and development of all transportation systems."* ***If the goal of the city is to maintain a "residential" area that promotes safety and convenience to the traveling public, what mitigation measures will be made to ensure this policy is met in the subject area?***

**Response 5:** Mitigation measures have been proposed that improve the current roadway conditions for motorists as well as pedestrians and bicyclists. These include lane improvements at intersections, installation of traffic controls (i.e., traffic signals, stop signs), crosswalks, ADA-compliant curb ramps, and street lighting. Refer to Mitigation Measures 3.12-1 to 3.12-12 for mitigation measures at intersections and page 3.12-18 in the Draft EIR, for the local circulation pattern discussion.

**Comment 6:** *Policy C 1.2.8: "Provide safe pedestrian connections across barriers, which may include but are not limited to major traffic corridors, drainage and flood control facilities, utility easements, grade separations, and walls."* ***By eliminating the intersection at Bouquet Canyon Rd and David Way and creating a sharp curve, there are no safe pedestrian connections to cross the street to access the Saugus area on foot or bike. What will be done to ensure this objective will be met?***

**Response 6:** Marked crosswalks will be provided at the new traffic signal to be installed at the New Copper Hill Drive/New Bouquet Canyon Road intersection and at the new traffic signal to be installed at the Kathleen Avenue/Copper Hill Drive intersection where pedestrians can cross the street to access the Saugus area on foot or bike. The new intersection at New Copper Hill Drive/New Bouquet Canyon Road will be designed to City standards to include a traffic signal with pedestrian crossing phases, marked crosswalks, and safety lighting. Intersection modifications at Kathleen Avenue /Copper Hill Drive will also be designed per City Standards.

**Comment 7:** *Policy C 1.2.11: "Reduce vehicle miles traveled (VMT) through the use of smart growth concepts."* ***This objective will not be met, in that the proposed traffic mitigation measures are flawed. More to follow regarding this.***

**Response 7:** This comment does not specify which traffic mitigations are allegedly "flawed" as ways to reduce vehicle miles traveled; therefore, no response can be provided. It is also noted that no significant impacts related to the project's vehicle miles traveled were identified in the Draft EIR or in this comment. As discussed on p. 3.12-28 of the Draft EIR, the proposed new segment of Bouquet Canyon Road would provide a one-quarter mile shorter and more direct route, compared to the existing segment, thus reducing the total distances of vehicles traveling along Bouquet Canyon Road in this area. The proposed project is located in an area where neighborhoods of single family homes already exist that are served by existing local commercial uses and recreation opportunities. As such, the project would not create housing in an area that would require longer than typical driving distances for various commuting, shopping, dining or recreation purposes.

**Comment 8:** *Policy C 2.1.4: "Ensure that future dedication and acquisition of right-of-way is based on the adopted Circulation Plan, proposed land uses, and projected demand."* ***If the Circulation Plan calls for a secondary (4-lane) highway to be created between Kathleen Ave and the New Bouquet Canyon Rd, is this proposal of a two-lane residential road in compliance with this policy? With the knowledge of future development of both residential and commercial property north on Bouquet Canyon Rd, will the City of Santa Clarita adhere to the adopted Circulation Plan that proposes Copper Hill Dr to be constructed through my property?***

**Response 8:** The Circulation Element was developed based on analysis of existing conditions in the Valley, future development in both City and County areas, and anticipated growth. Roadway infrastructure improvements are made as growth occurs in the Valley and needs are assessed continually by the City. The growth of both

residential and commercial property is driven by the market and the development of the Circulation Element (from the General Plan) is driven by the community's mobility needs. As stated on in Response 4, future needs in improving Copper Hill Drive to its designated 4-lane secondary highway configuration will be assessed by the City as conditions evolve; however, the traffic impact analysis prepared for the Draft EIR determined that with a fully-built Bouquet Canyon Project, the need for a four-lane segment is not indicated.

**Comment 9:** *Policy C 2.1.5: "At the time of project level review, monitor levels of service, traffic accident patterns, and physical conditions of the existing street system, and upgrade roadways as needed through the Capital Improvement Program."* ***I have concerns about the traffic study that was completed and the data that was used in this EIR. More to follow regarding this.***

**Response 9:** This comment indicates unspecified concerns about the traffic study included in the EIR as it relates to Circulation Element Policy C 2.15. Without specific statements of these concerns, no response can be provided.

**Comment 10:** *Policy C 7.1.8: "Upgrading streets that are not pedestrian-friendly due to lack of sidewalk connections, safe street crossing points, vehicle sight distance, or other design deficiencies."* ***I touched on this above, but this policy specifically calls out vehicle sight distance as a design deficiency. What mitigation measure will be taken to the proposed road construction to correct this deficiency?***

**Response 10:** Adequate sight distance will be provided at the existing driveway through the construction of a retaining wall. Also, refer to Responses 5 and 6, above.

**Comment 11:** *The proposed road extension from the intersection at Copper Hill Dr and David Way around the westerly tip of my property to the existing Bouquet Canyon Rd would substantially increase hazards due to a geometric design feature. This proposal creates both a "sharp" blind curve and a dangerous intersection. Both of which violate the thresholds stated above and both create a significant environmental impact related to transportation. What mitigation measure(s) will be taken to correct these impacts?*

**Response 11:** Adequate line of sight will be provided based on the design speed with the construction of a retaining wall.

**Comment 12:** ***There is no account for turn pocket overflow***. *If vehicles are spilling out of a turn pocket or through vehicles are blocking a turn pocket (right or left turns onto David Way north bound from Bouquet Canyon Rd or right turns onto David Way south*

*bound from Copper Hill Dr to a left hand turn on Bouquet Canyon Rd in the east bound direction), the delay that would occur in the field is not included in the models output.*

**Response 12:** The delay that is reported in the traffic study represents the average vehicle delay at the intersection. It considers the delay of each movement and accounts for queuing delay as shown in the traffic study worksheet calculations provided in the DEIR Appendix J. The movements noted above (right or left turns onto David Way northbound from Bouquet Canyon Road or right turns onto David Way southbound from Copper Hill Drive to a left hand turn on Bouquet Canyon Road in the eastbound direction) would be eliminated. The traffic study utilizes industry standard methodologies and is consistent with the City's preferred methodology.

**Comment 13:** ***There is no account of spillback and starvation delay caused by closely spaced intersections.*** *The HCM Delay model does not include any delay for queue spillback or starvation. The area in question contains two closely spaced intersections (Bouquet Canyon Rd/David Way and David Way/Copper Hill Dr). Did the HMC method that was used model the delays caused by the two closely spaced intersections?*

**Response 13:** The delay calculation presented in the traffic study account for both vehicle stopped delay and queue delay as shown as shown in the traffic study worksheet calculations provided in the DEIR Appendix J. The analysis was prepared utilizing Synchro software which accounts for model delay when intersections are close to each other and accounts for spillback and starvation delay that is caused by closely spaces intersections. The proposed mitigation measures would close the Bouquet Canyon Road/David Way intersection, thereby eliminating the two existing closely space intersections.

**Comment 14:** *Does the traffic study take into consideration external factors that might have been present during October 2018? During this time, there was an ongoing city Road Rehab initiative that specifically targeted a section of Plum Canyon Rd south of the proposed project between Santa Catarina Rd and Via Joyce. Did this road construction have any bearing on the study? Additionally, there was a fire that occurred during the month in question in the Saugus area. Were potential road closures caused by the fire factored into the study?*

**Response 14:** The traffic study evaluated traffic conditions under multiple scenarios, existing, existing plus project, and future cumulative conditions. Therefore, the identification of traffic related impacts is not solely reliant on existing traffic counts. Traffic counts were collected mid-October, which was before the October 31, 2018 2-acre brush fire near Soledad Canyon Road and Bouquet Canyon Road. Therefore, there were no road closures caused by the fire at that time.

**Comment 15:** *In summary, the HCM Methodology is a macroscopic model that contains flaws and does not accurately reflect the current, or future, LOS of the areas in question. I would recommend a microscopic simulation model be used to gain a better and more accurate understanding of the current and future traffic levels in the area north of the proposed project.*

**Response 15:** The HCM delay-based methodology is the preferred methodology of the City when evaluating traffic operations at signalize intersections and is consistent with the methodology used for this analysis. Synchro software was used in the traffic study, which includes enhancements over the basic HCM methodology, such as a method to model delay when intersections are close to each other and accounts for spillback and starvation delay that is caused by closely spaces intersections.

**Comment 16:** *With all of that said, even after the use of a macroscopic model, the data has confirmed that the David Way/Bouquet Canyon intersection will be drastically impacted by the addition of this project. This data is confirmed in table 3.12-5. To mitigate the forecasted level F LOS, it has been proposed to eliminate the intersection in question. In my opinion eliminating an intersection will not deter commuters traveling in the east/west directions across the SCV. Copper Hill Dr is the preferred route of travel across the north part of the SCV, and realigning Bouquet Canyon Rd will not change or alter this.*

**Response 16:** The purpose of closing the David Way/Bouquet Canyon Road intersection is not to deter commuters traveling in the east/west direction across the SCV. The roadways are being redesigned to better accommodate commuter and local traffic and the redesign is consistent with the General Plan Circulation Element.

**Comment 17:** *Tables 3.12-7 and 3.12-8 summarize traffic data for future (cumulative) conditions (2028) with and without project and, with and without mitigation. It is clear that an increase of traffic is expected with or without the project. As I stated above, one of the mitigation measures to deal with the increase in traffic is to delete the intersection of David Way/Bouquet Canyon. However, in table 3.12-7 (Intersection 21) there is mention of a level of LOS F is to be expected if this intersection is under stop control. There will be a significant increase in left hand turns onto Copper Hill Dr (heading in the east direction) for north bound traffic on the New Bouquet Cy Rd. Additionally, as mentioned above, the east/west commuters are far more likely to be turning right, heading southbound on Bouquet Canyon Rd, onto Copper Hill Dr to commute around congested city traffic and multiple stop lights to access Interstate 5 in the A.M. The same can be said for the P.M. commute but in the opposite direction. What is the city's plan for controlling the intersection in question? Will there be a traffic signal? Will south bound traffic on Bouquet Canyon Rd be required to stop when making a turn onto Copper Hill Dr or will it be a yield?*

**Response 17:** A traffic signal is proposed at the New Copper Hill Drive and New Bouquet Canyon Road intersection. Southbound traffic will be required to stop if there is a red light. Mitigation Measures 3.12-3 describes the intersection control.

**Comment 18:** *Page 13.12-28 details mitigation measure of Impact 3.12c as "None."*

> *'Mitigation Measures*
>
> *None.*
>
> *Impact 3.12c: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*
>
> *Project roadways would be constructed in accordance with the City's design standards. The project also includes the realignment of Bouquet Canyon Road in accordance with the General Plan designation of a Secondary Highway. With the realignment, any existing design features that are hazardous would be corrected. The project would construct street improvements that provide space for pedestrians, motorists, and bicyclists. Furthermore, the Project would not construct any incompatible uses that are not consistent with the surrounding area. Therefore, the project would not substantially increase hazards due to the Project's geometric design features. Impacts in this regard are less than significant."*
>
> *I would argue that the sharp curve that will be created by converting two 90-degree intersections (David Way/Copper Hill and David Way/Bouquet Canyon) into an extreme bend will substantially increase hazardous traffic conditions. As you can imagine, this is of the utmost importance to me and the safety of my family. If the road is to be constructed in the manner being proposed, the only route that my family will have to access to/from our property is by way of an uncontrolled intersection in extremely close proximity to a blind, sharp curve. This impact must be corrected and not dismissed so easily or without appropriate mitigation measures.*

**Response 18:** Line of sight from the existing driveway will be provided with the construction of a retaining wall to hold back the existing natural slope.

**Comment 19:** *On page 3.15-17 information is offered regarding evacuation possibilities during a potential wildfire with the project being constructed. Once again, the road directly north of the development is in question and the following quote is alarming considering how prevalent wildfires have become in the recent past.*

> *"If the hypothetical "worst-case" condition involving 375 homes evacuating and all drivers electing to escape to the north, via existing two-lane Bouquet Canyon*

*Road to the north of the project, the peak hour V/C would increase to 1.06, indicating more than the capacity of the northbound lane. This represents severely congested conditions with difficult and highly constrained traffic flow and would represent a serious constraint to evacuating motorists."*

*As a concerned resident, who lives directly north of the development and on the street in question, what mitigation measures will be taken to ensure that a "severely congested condition" will not occur in the event of a "worst-case" condition? The following quote is subjective and provides no real plan of evacuation other than "it is unlikely."*

*"The two hypothetical worst-case conditions noted above where project residents evacuating the site could encounter and complicate congested peak hour roadway conditions are unlikely to occur, since it is unlikely that all of the escaping motorists would select the same routes after exiting the project site. It is more likely that motorists would select the route and direction that they believe would take them most quickly away from whatever direction a wildfire might be approaching."*

*The hypothetical of this "worst-case condition" could easily become a reality with one road closure on Bouquet Canyon Rd, south of the development. Furthermore, to dismiss this scenario as not needing any mitigation measures is subjective and irresponsible. This is the direct quote:*

*"Mitigation measures would not be required.*

***Impact 3.15-b**: The project would not exacerbate wildfire risks, and therefore would not create conditions that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire."*

**Response 19:** The first part of this comment refers to hypothetical worst-case emergency evacuation conditions where all of the project's residents would depart by vehicle to escape to the north via Bouquet Canyon Road, at the same time, during the highest peak hour volume traffic conditions. The comment further states that this hypothetical condition could occur if Bouquet Canyon Road to the south of the project were to be closed during this emergency scenario. It is possible that Bouquet Canyon Road, south of the project site, could be closed due to some extraordinary circumstances, e.g., a wildfire obstructing that part of the road. Should that occur, residents of the 78 homes in Planning Area 4 could elect to escape to the west, via the proposed Copper Hill Drive extension or to Alaminos Drive, via the existing Bouquet Canyon Road segment. Further, as noted on p. 3.15-17, the existing emergency response and evacuation command structure is expected to be able to guide the directions and timing of emergency evacuations to direct fleeing residents in the optimum directions and to manage conditions to prevent or minimize bottlenecks from occurring.

The last part of this comment refers to the Draft EIR finding concerning Impact 3.15b and states a disagreement with the conclusion that the project would not exacerbate

wildfire hazards and thus would not require mitigation measures. This particular impact threshold is focused on potential secondary impacts from a wildfire that could expose project residents or others to harmful pollution concentrations. As discussed on page 3.15-18 of the Draft EIR, the project would reduce potential wildland fire hazards compared to existing conditions, due to removal of flammable vegetation, construction of an on-site pressurized water system and improved site access plus a paved internal street system to support fire suppression efforts, build structures with ignition resistant materials, and provide extensive non-flammable 'fuel modification' landscape zones to inhibit the spread of wildfire through the project site. Given these features, which are required for this and any other projects to be built in a high fire hazard severity zone, the project would not exacerbate wildland fire hazards. Further, the new residential community would not introduce unique or more pollutant-intensive building materials that could provide a significant source of air pollution in the event of wide-spread burning within the built environment.

**Comment 20:** *The last topic of concern regarding Transportation are the Cumulative impacts mentioned on pages 4.0-19 through 4.0-23. There are 66 ongoing/proposed projects in the Santa Clarita surrounding area that are going to have significant traffic impacts to city and county roadways. The projects directly north of the development in question, (#61: Overland 1 and #62: Overland 2) appear to be of concern and mitigation measures have been proposed to address this. Additionally, projects #41 and #46 have direct impacts to future traffic in the area. With this said, will the City of Santa Clarita be proactive in converting the stretch of Copper Hill Rd between Kathleen Ave and the New Bouquet Canyon Rd into a four-lane secondary highway? What does the Santa Clarita General Plan Circulation Element call for and will it be strictly adhered to now or in the future, considering there are multiple developments on the horizon?*

**Response 20:** The Circulation Element was developed based on analysis of existing conditions in the Valley, future development in both City and County areas, and anticipated growth. Refer to Response 4.

**Comment 21:** *On page 5.0-3 the EIR states:*

> ***"Transportation and Traffic***
>
> *The fully developed and occupied residential community would generate approximately 3,092 vehicle trips a day, including 215 in the morning peak hour and 290 in the late afternoon peak hour.* ***This traffic would result in significant congestion impacts at two intersections in the existing conditions scenario, and significant congestion impacts at nine intersections in the 2028 scenario. A variety of intersection improvements such as new traffic signals, traffic signal synchronization, and increased capacity for through and turning movements would be required to improve levels of service to meet the City's performance standards."***

*Given both the cumulative and the direct impacts mentioned above, what mitigation measures will be taken to meet the City's performance standards?*

**Response 21:** Mitigation measures that would achieve the City's level of service (LOS) performance standards for the impacted intersections are listed in the Draft EIR as measures 3.12-1 thru 3.12-12, in Section 3.12 Transportation of the Draft EIR. The improvements in LOS resulting from these measures were calculated in the Traffic Study provided as Appendix J of the Draft EIR and are shown in Tables 3.12-6 (Existing-Plus Project) and 3.12-8 (Interim Year 2028 With Project) in the Draft EIR.

**Comment 22:** *A Sensitive Receptor is defined as follows:*

> ***"3.2.1.3 SENSITIVE RECEPTORS***
>
> *Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive populations (sensitive receptors) that are in proximity to localized sources of toxics and CO are of particular concern. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The following types of people are most likely to be adversely affected by air pollution, as identified by CARB: children under 14, elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. Locations that may contain a high concentration of these sensitive population groups are called sensitive receptors and include residential areas, hospitals, day-care facilities, elder-care facilities, elementary schools, and parks."*

*The neighborhoods around the proposed project contain multiple sensitive receptors and according to the City's General Plan the following goals and policies have been created to protect said individuals.*

> *"Ensure adequate spacing of sensitive land use from the following sources of air pollution: high traffic freeways and roads; distribution centers; truck stops; chrome plating facilities; dry cleaners using perchloroethylene; and large gas stations, as recommended by CARB."*
>
> *These guidelines have been established to protect sensitive receptors now and in the future. In addition to these guidelines CEQA guidelines have been developed in order to identify thresholds that determine the significance of the environmental effects of a project. Accordingly, a project may create a significant adverse environmental impact if it would:*
>
> *c) Expose sensitive receptors to substantial pollutant concentrations"*

*I understand that mitigation measures MM 3.2-a and MM 3.2-b are being recommended to reduce emissions caused by the construction of the development. What is the City of Santa Clarita's stance on these measures, knowing that prior to these measures being potentially implemented, the data supports that sensitive receptors will*

*be at risk of exposure to particles and potential pollutants? Will there be a plan in place to have the air quality surrounding the project tested to ensure mitigation measures are, in fact, working and being reported regularly? Will the surrounding public be notified of the results of such a test?*

**Response 22:** The referenced construction air quality mitigation measures are required to reduce the daily levels of diesel exhaust emissions from on-site construction machinery and grading haul trucks to below the South Coast Air Quality Management District regional threshold for oxides of Nitrogen (NOx), an ozone precursor, and local significance thresholds for coarse and fine-grained particulate matter (PM10 and PM2.5). Regional thresholds pertain to the release of pollutants that disperse into the atmosphere and travel well beyond the vicinity of the project site to interact with other air pollutants across the air basin. Local thresholds pertain to concentrations of air pollutants in the immediate vicinity of the construction source of such emissions. The City's Public Works Department would require documentation providing evidence of compliance with these measures, prior to commencement of any grading activities. These measures would be included in the construction specifications and grading permit and construction contractors would be obligated to implement these measures throughout the entire grading program. Grading activities would be regularly monitored by the City's Engineering Services Division. Failure to adhere to these measures could result in work stoppages or other penalties.

**Comment 23: NOISE**

*Table 3.10-2 illustrates Noise Measures. However, the data used was collected in March - April 2019 during non-peak traffic hours. The time of day when data was collected was 10:00 a.m. - 11:30 a.m. If the data were collected during normal commute hours (6:00 - 9:00 a.m. or 3:00 -6:00 p.m., M - F) the noise results would be more accurate and most likely prove higher levels of noise. Regardless of this non-accurate sample, the results still show high levels of noise. The threshold of 70 CNEL was exceeded 69 times on Bouquet Canyon Rd between Plum Canyon and Northeast of David way. According to Table 3.10-4, the residential land use categories show unacceptable community noise conditions when CNEL reaches 70 or higher.*

**Response 23:** The ambient noise level measurements referred to in this comment, which are noted in Table 3.10-2 of the Draft EIR, were taken near sensitive receptor locations around the project site, to identify typical outdoor noise levels affecting these receptors. These measurements were not used to calculate exiting or future roadway noise levels. Instead, as discussed in Section 3.10.2. of the Draft EIR, roadway noise levels were calculated with the Federal Highway Administration's Highway Noise Prediction Model, based on traffic volumes, average speeds represented by the posted speed limit, roadway geometry, and site environmental conditions. The model does not account for ambient noise levels.

The statement that "the threshold of 70 CNEL was exceeded 69 times on Bouquet Canyon Rd between Plum Canyon and Northeast of David way" is not referenced and this information does not appear in the Draft EIR chapter on noise impacts. Table 3.10-6 in the Draft EIR identifies existing and existing-plus project roadway noise levels on the surrounding street network. As shown therein, there are no roadway segments in the traffic study area network where existing or existing plus project traffic levels result in roadway noise levels above 70 dBA at a distance of 100 feet from the roadway centerline. Roadway noise levels of 70 dBA CNEL would occur within 100 feet or less of the roadway centerline, in all locations. Further, the project related increase in roadway noise would be a maximum of 0.7 dBA, well below the 3.0 dBA increase considered significant. Based on these roadway noise modeling results, the project would not result in a significant impact on roadway noise levels.

**Comment 24:** *According to The City of Santa Clarita Municipal Code (SCMC) Noise Ordinance provides exterior noise standards within the City.*

*Standard 11.44.040 Noise Limits states:*

*"A. It shall be unlawful for any person within the City to produce or cause or allow to be produced noise which is received on property occupied by another person within the designated region, in excess of the following levels…sound levels dB of 65 (day) and 55 (night) in any residential areas."*

*As stated above, the sound levels recorded are already above the standards set forth by the SCMC without the addition of 3,092 vehicle trips/day (215 in the AM and 290 in the PM) according to the flawed traffic study cited above.*

*Furthermore, the EIR cites goals and policies from The City of Santa Clarita General Plan Noise Element that are applicable to the project.*

> *Goal N 1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.*
>
> *Objective N 1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels*

**Response 24:** The Santa Clarita Municipal Code section referenced in this comment pertains to noise sources generated within one property and the noise level those sources create on adjoining properties. This does not apply to roadway noise generated by vehicular traffic, which is addressed in the preceding comment/response 23. The reference to Santa Clarita General Plan Noise Element Goal N 1 and Objective N 1.1 are noted.

**Comment 25:** *Policy N 1.1.1: Use the Noise and Land Use Compatibility Guidelines [see Table 3.10-4], which are consistent with State guidelines, as a policy basis for decisions on land use and development proposals related to noise."* ***As mentioned above the noise levels are already above the CNEL threshold as stated in the Table 3.10-4. What mitigation measures will the City take to correct these conditions?***

**Response 25:** As discussed in the response to comment 23, the project would not result in significant changes in roadway noise levels and would not cause existing noise sensitive land uses to be exposed to exterior noise levels considered unacceptable as defined in General Plan Policy N 1.1.1. As such, mitigation measures are not required.

**Comment 26:**

> *Goal N 2: Protect residents and sensitive receptors from traffic-generated noise.*
> *o Objective N 2.1: Prevent and mitigate adverse effects of noise generated from traffic on arterial streets and highways through implementing noise reduction standards and programs.*

*Policy N 2.1.1: Encourage owners of existing noise-sensitive uses, and require owners of proposed noise sensitive land uses, to construct sound barriers to protect users from significant noise levels, where feasible and appropriate."* ***What sound barriers are going to be constructed to prevent the increase in traffic noise of the proposed 2-lane road that wraps around the west and south perimeters of my property? How will these barriers affect egress and ingress? Will these barriers add to the danger of the blind, "sharp" curve proposed? The City certainly cannot expect the property owner to take on the financial responsibility and burden of constructing sound barriers?***

**Response 26:** As discussed in the response to comment 23, the project would not result in significant changes in roadway noise levels and would not cause existing noise sensitive land uses to be exposed to exterior noise levels considered unacceptable as defined in General Plan Policy N 1.1.1. As such, mitigation measures such as sound barriers along the adjacent roadway segments are not required.

**Comment 27:** *Policy N 2.1.2: Encourage the use of noise absorbing barriers, where appropriate."* ***What sort of "encouragement" will the City recommend in constructing the appropriate noise absorbing barriers around my property? Again, is the City expecting the property owner to take on this responsibility?***

**Response 27:** Please refer to the preceding response to comment 26.

**Comment 28:** *The westerly tip of my property contains a fully functional well. In addition to this, I have both a city water supply source and a natural gas source that I am extremely concerned about. What sort of mitigation measures are going to be*

*implemented to ensure that I do not have interruptions in service for any utilities? What guarantee will be given that the road construction will not damage the vitality of my well and/or other utilities?*

**Response 28:** As with any new construction project, contractors would be obligated under existing regulations and industry standards to determine locations of underground and overhead utility lines prior to construction, and to devise construction alignments and methods to avoid damage to existing facilities. These are routine requirements and will be enforced through the City's plan check and construction inspection procedures.

**Comment 29:** *Again, I do appreciate the opportunity to comment on this draft EIR. However, I do trust my legitimate concerns as a homeowner, resident, and parent will be taken into serious consideration well before this project is approved, finalized and construction begins.*

*As mentioned earlier, I am most concerned about the safety of my family - my son in particular - who will be getting his driver's license in the near future. Bouquet Canyon Rd is the only way to exit and enter my property. I currently have three access points on the southern border to access this road, two of which are extremely close to the western tip of my property. I want to make sure that the people I love and care about can access and exit our home and property safely.*

*Additionally, my son who I mentioned above, has cystic fibrosis, a life-threatening lung disease, which classifies him in the "sensitive receptor" group defined in this report. So, you can see why I am extremely concerned about the air quality, too, that will be compromised during the construction and future development of the project directly across the street from my home.*

**Response 29:** This comment provides concluding statements that reference concerns expressed and responded to earlier and highlight the author's concerns about protecting his family during construction and as result of development of the project. These comments are noted and have been provided to the City's Planning Commission and City Council for their consideration.

# Comment Letter Number 1

May 4, 2020

Hai Nguyen, Associate Planner
City of Santa Clarita
Community Development Department
23920 Valencia Blvd, Suite 302
Santa Clarita, CA 91355

**RE: Bouquet Canyon Project EIR**
**SCH No. 201812009**

Dear Hai Nguyen:

I appreciate the opportunity to review and respond to the Draft EIR for the subject property. The main concerns I have with the Environmental Impact Analysis are directly related to the Transportation, Air Quality and Noise sections of which I have addressed below.

## 1. TRANSPORTATION

The new road construction from the Copper Hill Dr/David Way intersection is proposed to bend around the westerly tip of my property. From my understanding, this will be a two-lane road as it is currently proposed which directly affects the way in which I enter and exit my driveway. The "bending" of the road will create a blind corner that will make it extremely difficult to exit my driveway heading in the east direction onto Old Bouquet Canyon Rd/New Copper Hill Dr. In addition, it will be extremely dangerous to enter my driveway (left turn) heading in the east direction on Old Bouquet Canyon Rd/New Copper Hill Dr. I know this was a concern of nearby residents heading south down David Way because a median is being proposed to restrict a left-hand turn onto Copper Hill Dr heading east. Also, there is no indication of what the proposed speed limit will be on this road between Kathleen Ave and the New Bouquet Canyon Rd. Will there be lighting for the street? A bike lane? A sidewalk for pedestrians? 1

Page 3.1-30 states that new homes from viewing location 4 will be set back from the new road approximately 25-40' from Bouquet Canyon Rd. What are the city's requirements for setbacks? Safety is my concern related to the current or future infrastructure that will be in close proximity to this new road constructed around the westerly tip of my property. What is the setback for the current road proposal? 2

I am also concerned about the driveway that is proposed to service the residents in PA4. It appears that the location will be directly across from my property and slightly off set from my personal driveway. Again, this will pose a hazard to vehicles entering and exiting in both westerly and easterly directions on Copper Hill Dr. I can see a scenario where four directions of traffic meet together in an uncontrolled intersection. Vehicles currently travel at speeds of up to 45-60+ mph in both directions regularly. The addition of a blind "sharp" curve and a new driveway that will service 85 multi-family units, can only create an unsafe intersection and must be corrected. What mitigation measure(s) will be created to correct this condition? 3

Referencing page 3-12.9 the City of Santa Clarita and LA County desire a LOS of C or better in residential areas. Is Copper Hill Rd, between Kathleen Ave and the proposed New Bouquet Canyon Rd, considered a residential area? Furthermore, is it part of the Santa Clarita General Plan Circulation Element to convert this section of road from a 2-lane to 4-lane (secondary highway) in the future? 4

Directly referencing pages 3.12-9, 3.12-10 and 3.12-12, the goals and objectives to create a Multi-Modal Circulation Network, Street and Highway System and Pedestrian Circulation are as follows:

- Goal C 1: An inter-connected network of circulation facilities that integrates all travel modes, provides viable alternatives to automobile use, and conforms with regional plans.
  - Objective C 1.1: Provide multi-modal circulation systems that move people and goods efficiently while protecting environmental resources and quality of life.
- Goal C 2: A unified and well-maintained network of streets and highways which provides safe and efficient movement of people and goods between neighborhoods, districts, and regional centers, while maintaining community character.
  - Objective C 2.1: Implement the Circulation Plan (as shown on Exhibit C-2) for streets and highways to meet existing and future travel demands for mobility, access, connectivity, and capacity.
- Goal C 7: Walkable communities, in which interconnected walkways provide a safe, comfortable and viable alternative to driving for local destinations.
  - Objective C 7.1: continuous, integrated system of safe and attractive pedestrian walkways, paseos and trails linking residents to parks, open space, schools, services, and transit."

It is my opinion that the proposed changes to roadways north of proposed development do not satisfactorily meet the goals or objectives above.

- Policy C1.17: "Consider the safety and convenience of the traveling public, including pedestrians and cyclists, in design and development of all transportation systems." **If the goal of the city is to maintain a "residential" area that promotes safety and convenience to the traveling public, what mitigation measures will be made to ensure this policy is met in the subject area?** 5
- Policy C 1.2.8: "Provide safe pedestrian connections across barriers, which may include but are not limited to major traffic corridors, drainage and flood control facilities, utility easements, grade separations, and walls." **By eliminating the intersection at Bouquet Canyon Rd and David Way and creating a sharp curve, there are no safe pedestrian connections to cross the street to access the Saugus area on foot or bike. What will be done to ensure this objective will be met?** 6
- Policy C 1.2.11: "Reduce vehicle miles traveled (VMT) through the use of smart growth concepts." **This objective will not be met, in that the proposed traffic mitigation measures are flawed. More to follow regarding this**. 7
- Policy C 2.1.4: "Ensure that future dedication and acquisition of right-of-way is based on the adopted Circulation Plan, proposed land uses, and projected demand." **If the Circulation Plan calls for a secondary (4-lane) highway to be created between Kathleen Ave and the New Bouquet Canyon Rd, is this proposal of a two-lane residential road in compliance with this policy? With the knowledge of future development of both residential and commercial property north on Bouquet Canyon Rd, will the City of Santa Clarita adhere to the adopted Circulation Plan that proposes Copper Hill Dr to be constructed through my property?** 8
- Policy C 2.1.5: "At the time of project level review, monitor levels of service, traffic accident patterns, and physical conditions of the existing street system, and upgrade roadways as needed through the Capital Improvement Program." **I have concerns about the traffic study that was completed and the data that was used in this EIR. More to follow regarding this.** 9
- Policy C 7.1.8: "Upgrading streets that are not pedestrian-friendly due to lack of sidewalk connections, safe street crossing points, vehicle sight distance, or other design deficiencies." **I touched on this above, but this policy specifically calls out vehicle sight distance as a design deficiency. What mitigation measure will be taken to the proposed road construction to correct this deficiency?** 10

Page 3.12-13 details Thresholds of Significance. The direct quote is as follows:

"The CEQA Guidelines, Appendix G, as amended through December 31, 2019, serve as the basis for identifying thresholds determining the significance of the environmental effects of a project. **Accordingly, a project will have a significant environmental impact related to transportation if it would:**

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).
**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**
d) Result in inadequate emergency access."

The proposed road extension from the intersection at Copper Hill Dr and David Way around the westerly tip of my property to the existing Bouquet Canyon Rd would substantially increase hazards due to a geometric design feature. This proposal creates both a "sharp" blind curve and a dangerous intersection. Both of which violate the thresholds stated above and both create a significant environmental impact related to transportation. What mitigation measure(s) will be taken to correct these impacts? 11

**ISSUES WITH THE TRAFFIC STUDY**

The HCM Delay Methodology used during the traffic study was for the period of October 2018. This method has the following limitations:

- **There is no account for turn pocket overflow**. If vehicles are spilling out of a turn pocket or through vehicles are blocking a turn pocket (right or left turns onto David Way north bound from Bouquet Canyon Rd or right turns onto David Way south bound from Copper Hill Dr to a left hand turn on Bouquet Canyon Rd in the east bound direction), the delay that would occur in the field is not included in the models output. 12
- **There is no account of spillback and starvation delay caused by closely spaced intersections.** The HCM Delay model does not include any delay for queue spillback or starvation. The area in question contains two 13

closely spaced intersections (Bouquet Canyon Rd/David Way and David Way/Copper Hill Dr). Did the HMC method that was used model the delays caused by the two closely spaced intersections? 13

Does the traffic study take into consideration external factors that might have been present during October 2018? During this time, there was an ongoing city Road Rehab initiative that specifically targeted a section of Plum Canyon Rd south of the proposed project between Santa Catarina Rd and Via Joyce. Did this road construction have any bearing on the study? Additionally, there was a fire that occurred during the month in question in the Saugus area. Were potential road closures caused by the fire factored into the study? 14

In summary, the HCM Methodology is a macroscopic model that contains flaws and does not accurately reflect the current, or future, LOS of the areas in question. I would recommend a microscopic simulation model be used to gain a better and more accurate understanding of the current and future traffic levels in the area north of the proposed project. 15

With all of that said, even after the use of a macroscopic model, the data has confirmed that the David Way/Bouquet Canyon intersection will be drastically impacted by the addition of this project. This data is confirmed in table 3.12-5. To mitigate the forecasted level F LOS, it has been proposed to eliminate the intersection in question. In my opinion eliminating an intersection will not deter commuters traveling in the east/west directions across the SCV. Copper Hill Dr is the preferred route of travel across the north part of the SCV, and realigning Bouquet Canyon Rd will not change or alter this. 16

Tables 3.12-7 and 3.12-8 summarize traffic data for future (cumulative) conditions (2028) with and without project and, with and without mitigation. It is clear that an increase of traffic is expected with or without the project. As I stated above, one of the mitigation measures to deal with the increase in traffic is to delete the intersection of David Way/Bouquet Canyon. However, in table 3.12-7 (Intersection 21) there is mention of a level of LOS F is to be expected if this intersection is under stop control. There will be a significant increase in left hand turns onto Copper Hill Dr (heading in the west direction) for north bound traffic on the New Bouquet Cy Rd. Additionally, as mentioned above, the east/west commuters are far more likely to be turning right, heading southbound on Bouquet Canyon Rd, onto Copper Hill Dr to commute around congested city traffic and multiple stop lights to access Interstate 5 in the A.M. The same can be said for the P.M. commute but in the opposite direction. What is the city's plan for controlling the intersection in question? Will there be a traffic signal? Will south bound traffic on Bouquet Canyon Rd be required to stop when making a turn onto Copper Hill Dr or will it be a yield? 17

Page 13.12-28 details mitigation measure of Impact 3.12c as "None."

- **'Mitigation Measures**
  None.

  **Impact 3.12c:** The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

  Project roadways would be constructed in accordance with the City's design standards. The project also includes the realignment of Bouquet Canyon Road in accordance with the General Plan designation of a Secondary Highway. With the realignment, any existing design features that are hazardous would be corrected. The project would construct street improvements that provide space for pedestrians, motorists, and bicyclists. Furthermore, the Project would not construct any incompatible uses that are not consistent with the surrounding area. Therefore, the project would not substantially increase hazards due to the Project's geometric design features. Impacts in this regard are less than significant." 18

I would argue that the sharp curve that will be created by converting two 90-degree intersections (David Way/Copper Hill and David Way/Bouquet Canyon) into an extreme bend will substantially increase hazardous traffic conditions. As you can imagine, this is of the utmost importance to me and the safety of my family. If the road is to be constructed in the manner being proposed, the only route that my family will have to access to/from our property is by way of an uncontrolled intersection in extremely close proximity to a blind, sharp curve. This impact must be corrected and not dismissed so easily or without appropriate mitigation measures.

On page 3.15-17 information is offered regarding evacuation possibilities during a potential wildfire with the project being constructed. Once again, the road directly north of the development is in question and the following quote is alarming considering how prevalent wildfires have become in the recent past. 19

> "If the hypothetical "worst-case" condition involving 375 homes evacuating and all drivers electing to escape to the north, via existing two-lane Bouquet Canyon Road to the north of the project, the peak hour V/C would increase to 1.06, indicating more than the capacity of the northbound lane. This represents severely congested conditions with difficult and highly constrained traffic flow and would represent a serious constraint to evacuating motorists."

As a concerned resident, who lives directly north of the development and on the street in question, what mitigation measures will be taken to ensure that a "severely congested condition" will not occur in the event of a "worst-case" condition? The following quote is subjective and provides no real plan of evacuation other than "it is unlikely."

> "The two hypothetical worst-case conditions noted above where project residents evacuating the site could encounter and complicate congested peak hour roadway conditions are unlikely to occur, since it is unlikely that all of the escaping motorists would select the same routes after exiting the project site. It is more likely that motorists would select the route and direction that they believe would take them most quickly away from whatever direction a wildfire might be approaching."

19

The hypothetical of this "worst-case condition" could easily become a reality with one road closure on Bouquet Canyon Rd, south of the development. Furthermore, to dismiss this scenario as not needing any mitigation measures is subjective and irresponsible. This is the direct quote:

> "Mitigation measures would not be required.
>
> **Impact 3.15-b:** The project would not exacerbate wildfire risks, and therefore would not create conditions that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire."

The last topic of concern regarding Transportation are the Cumulative impacts mentioned on pages 4.0-19 through 4.0-23. There are 66 ongoing/proposed projects in the Santa Clarita surrounding area that are going to have significant traffic impacts to city and county roadways. The projects directly north of the development in question, (#61: Overland 1 and #62: Overland 2) appear to be of concern and mitigation measures have been proposed to address this. Additionally, projects #41 and #46 have direct impacts to future traffic in the area. With this said, will the City of Santa Clarita be proactive in converting the stretch of Copper Hill Rd between Kathleen Ave and the New Bouquet Canyon Rd into a four-lane secondary highway? What does the Santa Clarita General Plan Circulation Element call for and will it be strictly adhered to now or in the future, considering there are multiple developments on the horizon?

20

On page 5.0-3 the EIR states:

> ***"Transportation and Traffic***
>
> The fully developed and occupied residential community would generate approximately 3,092 vehicle trips a day, including 215 in the morning peak hour and 290 in the late afternoon peak hour. **This traffic would result in significant congestion impacts at two intersections in the existing conditions scenario, and significant congestion impacts at nine intersections in the 2028 scenario. A variety of intersection improvements such as new traffic signals, traffic signal synchronization, and increased capacity for through and turning movements would be required to improve levels of service to meet the City's performance standards**."

21

Given both the cumulative and the direct impacts mentioned above, what mitigation measures will be taken to meet the City's performance standards?

## 2. AIR QUALITY

A Sensitive Receptor is defined as follows:

> **"3.2.1.3 SENSITIVE RECEPTORS**

22

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive populations (sensitive receptors) that are in proximity to localized sources of toxics and CO are of particular concern. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The following types of people are most likely to be adversely affected by air pollution, as identified by CARB: children under 14, elderly over 65, athletes, and **people with cardiovascular and chronic respiratory diseases**. Locations that may contain a high concentration of these sensitive population groups are called sensitive receptors and include residential areas, hospitals, day-care facilities, elder-care facilities, elementary schools, and parks."

The neighborhoods around the proposed project contain multiple sensitive receptors and according to the City's General Plan the following goals and policies have been created to protect said individuals.

"Ensure adequate spacing of sensitive land use from the following sources of air pollution: high traffic freeways and roads; distribution centers; truck stops; chrome plating facilities; dry cleaners using perchloroethylene; and large gas stations, as recommended by CARB."

These guidelines have been established to protect sensitive receptors now and in the future. In addition to these guidelines CEQA guidelines have been developed in order to identify thresholds that determine the significance of the environmental effects of a project. Accordingly, a project may create a significant adverse environmental impact if it would:

c) Expose sensitive receptors to substantial pollutant concentrations"

I understand that mitigation measures MM 3.2-a and MM 3.2-b are being recommended to reduce emissions caused by the construction of the development. What is the City of Santa Clarita's stance on these measures, knowing that prior to these measures being potentially implemented, the data supports that sensitive receptors will be at risk of exposure to particles and potential pollutants? Will there be a plan in place to have the air quality surrounding the project tested to ensure mitigation measures are, in fact, working and being reported regularly? Will the surrounding public be notified of the results of such a test?

22

## 3. NOISE

Table 3.10-2 illustrates Noise Measures. However, the data used was collected in March - April 2019 during non-peak traffic hours. The time of day when data was collected was 10:00 a.m. - 11:30 a.m. If the data were collected during normal commute hours (6:00 - 9:00 a.m. or 3:00 -6:00 p.m., M - F) the noise results would be more accurate and most likely prove higher levels of noise. Regardless of this non-accurate sample, the results still show high levels of noise. The threshold of 70 CNEL was exceeded 69 times on Bouquet Canyon Rd between Plum Canyon and Northeast of David way. According to Table 3.10-4, the residential land use categories show unacceptable community noise conditions when CNEL reaches 70 or higher.

23

According to The City of Santa Clarita Municipal Code (SCMC) Noise Ordinance provides exterior noise standards within the City.

Standard 11.44.040 Noise Limits states:

"A. It shall be unlawful for any person within the City to produce or cause or allow to be produced noise which is received on property occupied by another person within the designated region, in excess of the following levels…sound levels dB of 65 (day) and 55 (night) in any residential areas."

As stated above, the sound levels recorded are already above the standards set forth by the SCMC without the addition of 3,092 vehicle trips/day (215 in the AM and 290 in the PM) according to the flawed traffic study cited above.

24

Furthermore, the EIR cites goals and policies from The City of Santa Clarita General Plan Noise Element that are applicable to the project.

- Goal N 1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.
  - o Objective N 1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels.

Policy N 1.1.1: Use the Noise and Land Use Compatibility Guidelines [see **Table 3.10-4**], which are consistent with State guidelines, as a policy basis for decisions on land use and development proposals related to noise." **As mentioned above the noise levels are already above the CNEL threshold as stated in the Table 3.10-4. What mitigation measures will the City take to correct these conditions?**

25

- Goal N 2: Protect residents and sensitive receptors from traffic-generated noise.
  - o Objective N 2.1: Prevent and mitigate adverse effects of noise generated from traffic on arterial streets and highways through implementing noise reduction standards and programs.

Policy N 2.1.1: Encourage owners of existing noise-sensitive uses, and require owners of proposed noise sensitive land uses, to construct sound barriers to protect users from significant noise levels, where feasible and appropriate." **What sound barriers are going to be constructed to prevent the increase in traffic noise of the proposed 2-lane road that wraps around the west and south perimeters of my property? How will these barriers affect egress and ingress? Will these barriers add to the danger of the blind, "sharp" curve proposed? The City certainly cannot expect the property owner to take on the financial responsibility and burden of constructing sound barriers?**

26

Policy N 2.1.2: Encourage the use of noise absorbing barriers, where appropriate." **What sort of "encouragement" will the City recommend in constructing the appropriate noise absorbing barriers around my property? Again, is the City expecting the property owner to take on this responsibility?**

27

## 4. MISCELLANEOUS CONCERNS

The westerly tip of my property contains a fully functional well. In addition to this, I have both a city water supply source and a natural gas source that I am extremely concerned about. What sort of mitigation measures are going to be implemented to ensure that I do not have interruptions in service for any utilities? What guarantee will be given that the road construction will not damage the vitality of my well and/or other utilities?

28

## 5. CONCLUSION

Again, I do appreciate the opportunity to comment on this draft EIR. However, I do trust my legitimate concerns as a homeowner, resident, and parent will be taken into serious consideration well before this project is approved, finalized and construction begins.

As mentioned earlier, I am most concerned about the safety of my family - my son in particular - who will be getting his driver's license in the near future. Bouquet Canyon Rd is the only way to exit and enter my property. I currently have three access points on the southern border to access this road, two of which are extremely close to the western tip of my property. I want to make sure that the people I love and care about can access and exit our home and property safely.

29

Additionally, my son who I mentioned above, has cystic fibrosis, a life-threatening lung disease, which classifies him in the "sensitive receptor" group defined in this report. So, you can see why I am extremely concerned about the air quality, too, that will be compromised during the construction and future development of the project directly across the street from my home.

Sincerely,

Jason Davenport
28601 Bouquet Canyon Rd

# SANTA MONICA MOUNTAINS CONSERVANCY

SECTION 2

**Responses to Comment Letter Number 2 by Santa Monica Mountains Conservancy dated June 1, 2020**

**Comment 1:** *The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed project to build 375 residential units and realign Bouquet Canyon Road by:*

1. *Eliminating over 2 million cubic yards of earth from a City-designated Significant Ridgeline and moving them onsite to create flat terrain.*
2. *Permanently losing 10 acres of non-wetland Waters of the United States*
3. *Eliminating 26 oak trees with four different oak species*
4. *Permanently impacting 84 acres-- including beyond the property boundary*
5. *Providing no natural open space and no connectivity to natural open space*

*The DEIR conclusions that these impacts are mitigated below a level of significance is troubling. The DEIR provides no substantive on the ground mitigation for these natural resources because there will be no ungraded area with native soil conditions remaining onsite to implement biological mitigation that provides commensurate resources for natural communities. Offsite streambed mitigation is deferred mitigation. The project completely butchers all the natural land forms and biological resources on the site. The project as proposed cannot avoid or mitigate significant biological impacts which requires a statement of overriding considerations.*

**Response 1:** This comment expresses disagreement with the Draft EIR findings and conclusions regarding the significance of impacts related to grading of the significant ridgeline, removal of biological resources and loss of natural open space. This opinion is noted and this comment and all of the comments in this letter have been provided to the City Planning Commission and City Council for their consideration.

The first impact noted in this comment, involving grading of over 2 million cubic yards "from a City-designated Significant Ridgeline and moving them onsite to create flat terrain," is not accurate with respect to the proposed grading plan or the analysis of impacts involving alterations to the City-designated Significant Ridgeline presented in the Draft EIR. The proposed grading plan entails approximately 2.07 million cubic yards of earth work, across the entire 74.66 acres of the project development footprint. That footprint area incorporates all proposed grading, including manufactured slopes beyond (to the south of) the new segment of Bouquet Canyon Road as well as other engineered facilities such as infiltration, detention and debris basins also located beyond (to the south of) the new section of Bouquet Canyon Road. The 74.66 acre project footprint also includes all required fuel modification areas that extend beyond the limits of the proposed residential planning areas and would require removal of existing flammable vegetation. The figure of 84 acres of project disturbance area identified in this comment is not supported with any source, whereas the 74.66 acre was calculated with a computerized measuring tool by the project civil engineer.

It is roughly estimated that no more than 1/3 of the total grading would impact a portion of the on-site Significant Ridgeline and adjoining hillside flanks. A substantial portion of the ridgeline to be graded is necessary to construct the proposed realignment of Bouquet Canyon Road, along the preferred alignment identified in the Circulation Element of the Santa Clarita General Plan. In Section 3.1 of the Draft EIR, the aesthetic impacts of this ridgeline alteration were analyzed, and it was determined that because this ridgeline is lower in elevation than several other nearby Significant Ridgelines, it is not considered as prominent as those other, higher ridgelines. Furthermore, the primary public viewing audience with views of this ridgeline feature are motorists and occasional pedestrians and bicyclists who travel along the adjacent segment of Bouquet Canyon Road. Their viewing experience is momentary and changes constantly as the view proceeds along that street. It is different and less important than a viewing experience from a stationary viewing site where the public can remain to enjoy a scenic view for an extended period of time. The Draft EIR concluded that while the project would substantially modify this important landform, the aesthetic impact would be less than significant, due to the two factors just cited. There is no need, therefore, to adopt a Statement of Overriding Considerations, which is required only for impacts determined to be both significant and unavoidable.

This comment erroneously states the project would permanently eliminate 10 acres of non-wetland Waters of the U.S. The biological surveys and analysis prepared for the Draft EIR determined that the project would have a permanent impact to 0.19 acre of non-wetland Water of the U.S., at the upstream and downstream ends Bouquet Creek, within the project development footprint. As discussed on pages 3.3-21 to 3.3-22 of the Draft EIR, this impact would be sufficiently mitigated through issuance of regulatory permits by the U.S. Army Corps of Engineers, in accordance with Section 404 of the Clean Water Act, and the California Regional Water Quality Control Board, pursuant to Section 401 of the Clean Water Act. There is no need, therefore, to adopt a Statement of Overriding Considerations for the impact to non-wetland Waters of the U.S., which is required only for impacts determined to be both significant and unavoidable.

This comment also suggests that offsite streambed mitigation is "deferred mitigation." Mitigation measure 3.3-3 requires the developer to enter into a Streambed Alteration Agreement with the California Department of Fish and Wildlife, to identify specific on and/or off-site measures to offset the loss of streambed resources due to project construction. As noted on p. 3.3-20, a majority of the impacted streambed vegetation is giant reed, a common invasive species with low and sometimes harmful biological value. Only small areas of native-dominated habitat would be permanently impacted, while the remaining impacts would affect mostly unvegetated river wash. Securing a CDFW Streambed Alteration Agreement to offset impacts to streambed resources is a common mitigation measure applied throughout California. Specific locations and components of enhancement, restoration, and/or creation of suitable streambed habitat, either on or off-site, cannot be determined until the terms of that Agreement are established. Since the project impacts to California streambed resources would be sufficiently mitigated through compliance with a Streambed Alteration Agreement

enforced by CDFW, the impact would be less than significant. As such, adoption of a Statement of Overriding Considerations would not be required for this impact.

As discussed on pages 3.3-26 to 3.3-28 of the Draft EIR, project impacts to oak (Quercus spp.) trees would be fully mitigated through compliance with the City's Oak Tree Preservation Ordinance, which requires replacement trees to be planted on-site, donation of trees to the City, or an equivalent monetary value to be paid to the City (City 2013). Additionally, no oak woodlands or sensitive oak communities were mapped on the project site. The majority of oaks observed on the project site were shrubs, including scrub oak (*Quercus berberidifolia*) and Tucker oak (*Quercus john-tuckeri*). Areas dominated by these species were mapped as scrub oak chaparral (MCV scrub oak chaparral; CaCode 37.407.02) and southern north slope chaparral (MCV Tucker oak chaparral; CaCode 37.418.04), respectively (see Figure 5 of the BTR). Neither of these communities are designated by CDFW as sensitive natural communities, and therefore impacts to these communities do not warrant mitigation pursuant to CDFW (CDFW 2019). Since the project's impacts to oak trees would be fully mitigated through compliance with the City's oak tree ordinance, the impact is considered to be less than significant. As such, there is no need to adopt a Statement of Overriding Considerations for this impact.

The fifth and last impact identified in the comment expresses a concern about the project's lack of preservation of natural open space or providing connectivity to such open spaces. There is no threshold of impact significance in the State CEQA Guidelines Appendix G checklist that is based on criteria to preserve a certain amount of natural open space or connectivity to such open spaces. Such criteria are pertinent to consideration of the significance of impacts to habitat supporting sensitive plants and wildlife species, if the impact would seriously threaten such species. Although there are natural hillside open spaces to the south of the project site, there are neighborhoods of developed homes just beyond those spaces. Furthermore, the project site is not presently connected to large natural open spaces in any direction, as there are established residential neighborhoods to the west, north and south, and rural residential and institutional land uses to the north and east. Bouquet Canyon Road acts as a barrier to wildlife movement and Bouquet Creek flows into a fully channelized continuation of the creek, just north of the project site. As discussed on page 3.3-8 in the Draft EIR, the project site is not part of a regional wildlife movement corridor since it does not directly connect two or more large blocks of habitat that would otherwise be fragmented from one another. Further, the project would preserve existing natural open space including the western- and northern-facing hillsides along the Significant Ridgeline, in the northern part of the site, and adjacent lowlands along the southern side of existing Bouquet Canyon Road, between Pam Court and the proposed high flow flood control channel. Based on the project site's location and landscape character, there would not be a significant impact due to a loss of connectivity between significant natural open spaces that support important habitat. As such, there is no need to adopt a Statement of Overriding Considerations for this less than significant impact.

**Comment 2:** *The Conservancy hopes that the City concurs that this level of biological loss and land form modification on Bouquet Creek next to public youth facilities is not in the public interest in regard to retaining natural green space, retaining natural water courses and their recharge capability, and not facilitating growth that further exacerbates traffic congestion. The Conservancy hopes that the City does not make the decision to sacrifice the above level of biological resources just to facilitate the road realignment. If the City makes the decision to go with a road realignment, the Conservancy recommends patience and a much better natural lands outcome from the proposed development project. Unfortunately, the DEIR spells out the linkage between the 2 million cubic yards of grading and the road realignment because one of the project objectives is: Minimize grading of a significant ridgeline, while providing the necessary amount of grading to construct the new segment of Bouquet Canyon Road in the preferred alignment.*

**Response 2:** This comment expresses opposition to the proposed scale of landform modifications and suggests an alternative design that would reduce the level of impact to natural lands, groundwater recharge and traffic congestion. This opposition and the opinions expressed therein are noted and have been provided to the City's Planning Commission and City Council for their consideration.

**Comment 3:** *The twisted logic of the DEIR is demonstrably illustrated by the below conclusion on Page 5.0-2 in the Alternatives section:*

> *"The proposed alterations to the significant ridgeline in the western part of the site, while extensive, would not be considered a significant impact, because this is not the most visually prominent ridgeline feature in this area and the visible changes would be limited to motorists along the adjacent segment of old Bouquet Canyon Road and nearby homes, as opposed to changing a scenic feature within a scenic vista that is enjoyed by a large mobile or stationary viewing audience located along a scenic travel corridor. The project would substantially change the visual character of the site through topographical alterations and removal of natural open space features that would be replaced by a new community of low-scale homes, with highly visible manufactured slopes, a variety of building masses, a different and more extensive landscape palette, and outdoor lighting fixtures that do not presently exist."*

*In essence the DEIR above concludes that replacing a natural significant ridgeline with homes, manufactured slopes, non-native landscaping, and lighting is a one to one visual equivalency. Fortunately, the Draft Environmental Impact Report (DEIR) includes one alternative that respects the landscape and its biological resources. For an EIR to be valid all of its alternatives must be feasible. Thereby, Alternative 3 is feasible for the City to approve and implement. The Conservancy supports Alternative 3: Reduced Alterations to Bouquet Creek, Oak Trees, and Sensitive Habitat. The DEIR concurs that Alternative 3 is the environmentally superior alternative. Alternative 3 follows the science*

*of conservation biology - all other development alternatives completely ignore it and maximize the demise of natural resources in the City. Alternative 3 meets every Project Objective in the Project Description except the one in italics above that requires enough grading to generate the dirt to realign the Bouquet Canyon Road with mass cut and fill grading.*

**Response 3:** This comment erroneously states that the Draft EIR presents a discussion that portrays a "visual equivalency" between the existing conditions and the as-built conditions. The quoted excerpt from the Draft EIR does not provide any such evaluation or determination. Rather, it explains there would be a significant change in the visual character of the site, but that the grading of the significant ridgeline would not be considered a significant visual impact because it is not the most prominent ridgeline feature in this area and is primarily visible to motorists along the adjacent segments of Bouquet Canyon Road and surrounding homes, neither of which constitute conditions for a scenic vista along a recognized scenic route.

This comment also expresses support for Alternative 3, as presented in the Draft EIR. This opinion is noted and has been provided to the City Planning Commission and City Council for their consideration.

**Comment 4:** *In all cases, in regard to the loss of riparian habitat in Bouquet Creek, the Conservancy concurs with the CDFW recommendation to require the creation of similar habitat (including full hydrologic and geomorphic function) at a ratio not less than 6:1.*

**Response 4:** This comment indicates concurrence with an unsubstantiated CDFW recommendation to provide mitigation for loss of riparian habitat at a ratio of not less than 6:1. CDFW submitted comments concerning this Draft EIR, in a letter dated June 10, 2020, and none of those comments recommend such a mitigation measure for loss of riparian habitat.

**Comment 5:** *Multiple questions raised in the Conservancy's Notice of Preparation comments were not addressed in the DEIR–such as--the following question. The use of County correctional facility land to facilitate the proposed development appears to be a gift of public funds. What compensation will the County receive for the loss of its land to private uses and other public uses? How will a new major boulevard next to a youth correctional facility affect the youth?*

**Response 5:** This comment consists of questions that do not address the adequacy of the Draft EIR or any specific provisions of the Draft EIR; therefore, a response is not warranted. This comment, and the entire letter has been provided to the City Planning Commission and City Council, for their consideration.

It is noted that the Draft EIR evaluated effects of roadway noise associated with the built project, including the new segment of Bouquet Canyon Road, and no significant

impacts were identified for any sensitive land uses nearby, including the youth correctional facility. Please refer to pages 3.10-16 to 3.10-17 of the Draft EIR.

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

June 1, 2020

Hai Nguyen
City of Santa Clarita
23920 Valencia Boulevard, Suite 302
Santa Clarita, California 91355

**Bouquet Canyon Residental Development**
**and Bouquet Canyon Road Realignment**
**Draft Environmental Impact Report Comments**
**SCH No. 2018121009**

Dear Mr. Nguyen:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed project to build 375 residential units and realign Bouquet Canyon Road by:

1. Eliminating over 2 million cubic yards of earth from a City-designated Significant Ridgeline and moving them onsite to create flat terrain.
2. Permanently losing 10 acres of non-wetland Waters of the United States.
3. Eliminating 26 oak tree with four different oak species.
4. Permanently impacting 84 acres--including beyond the property boundary
5. Providing no natural open space and no connectivity to natural open space.

The DEIR conclusions that these impacts are mitigated below a level of significance is troubling. The DEIR provides no substantive on the ground mitigation for these natural resources because there will be no ungraded area with native soil conditions remaining onsite to implement biological mitigation that provides commensurate resources for natural communities. Offsite streambed mitigation is deferred mitigation. The project completely butchers all the natural land forms and biological resources on the site. The project as proposed cannot avoid or mitigate significant biological impacts which requires a statement of overriding considerations. 1

The Conservancy hopes that the City concurs that this level of biological loss and land form modification on Bouquet Creek next to public youth facilities is not in the public interest in regard to retaining natural green space, retaining natural water courses and their recharge capability, and not facilitating growth that further exacerbates traffic congestion. The Conservancy hopes that the City does not make the decision to sacrifice the above level 2

of biological resources just to facilitate the road realignment. If the City makes the decision to go with a road realignment, the Conservancy recommends patience and a much better natural lands outcome from the proposed development project. Unfortunately, the DEIR spells out the linkage between the 2 million cubic yards of grading and the road realignment because one of the project objectives is: *Minimize grading of a significant ridgeline, while providing the necessary amount of grading to construct the new segment of Bouquet Canyon Road in the preferred alignment*. 2

The twisted logic of the DEIR is demonstrably illustrated by the below conclusion on Page 5.0-2 in the Alternatives section:

> "The proposed alterations to the significant ridgeline in the western part of the site, while extensive, would not be considered a significant impact, because this is not the most visually prominent ridgeline feature in this area and the visible changes would be limited to motorists along the adjacent segment of old Bouquet Canyon Road and nearby homes, as opposed to changing a scenic feature within a scenic vista that is enjoyed by a large mobile or stationary viewing audience located along a scenic travel corridor. The project would substantially change the visual character of the site through topographical alterations and removal of natural open space features that would be replaced by a new community of low-scale homes, with highly visible manufactured slopes, a variety of building masses, a different and more extensive landscape palette, and outdoor lighting fixtures that do not presently exist."

In essence the DEIR above concludes that replacing a natural significant ridgeline with homes, manufactured slopes, non-native landscaping, and lighting is a one to one visual equivalency.

Fortunately, the Draft Environmental Impact Report (DEIR) includes one alternative that respects the landscape and its biological resources. For an EIR to be valid all of its alternatives must be feasible. Thereby, Alternative 3 is feasible for the City to approve and implement.

The Conservancy supports Alternative 3: <u>Reduced Alterations to Bouquet Creek, Oak Trees, and Sensitive Habitat</u>. The DEIR concurs that Alternative 3 is the environmentally superior alternative. Alternative 3 follows the science of conservation biology - all other 3

development alternatives completely ignore it and maximize the demise of natural resources in the City. Alternative 3 meets every Project Objective in the Project Description except the one in italics above that requires enough grading to generate the dirt to realign the Bouquet Canyon Road with mass cut and fill grading. 3

In all cases, in regard to the loss of riparian habitat in Bouquet Creek, the Conservancy concurs with the CDFW recommendation to require the creation of similar habitat (including full hydrologic and geomorphic function) at a ratio not less than 6:1. 4

Multiple questions raised in the Conservancy's Notice of Preparation comments were not addressed in the DEIR–such as--the following question. The use of County correctional facility land to facilitate the proposed development appears to be a gift of public funds. What compensation will the County receive for the loss of its land to private uses and other public uses? How will a new major boulevard next to a youth correctional facility affect the youth? 5

Please direct questions and future documents to Paul Edelman of our staff at the above letterhead address, at edelman@smmc.ca.gov, and 310-589-3200 ext. 128.

Sincerely,

IRMA MUÑOZ
Chairperson

# ROGER A HARING

SECTION 2

**Responses to Comment Letter Number 3 by Roger A Haring dated June 1, 2020**

**Comment 1:** *This Comment Letter would like to address the* ***Draft EIR: Bouquet Canyon Project; Chapter "5.0 Alternatives" and Chapter "3.0 Geology and Soils."***

*After an overview of the entire Draft EIR entitled: The Bouquet Canyon Project, from the City's website [https://www.santaclarita.com/cityhall/departments/communitydevelopment/planning/environmental-impact-reports-under-review], it has come to the attention of the Bouquet Canyon Network (BCN) that the Alternatives proposed for this particular property site would have a much greater "net benefit" to the local community and environmental resources of this region of Santa Clarita Valley, then the project currently proposed!*

*Under the EIR Chapter 5.0 Alternatives, the analysis performed by the CEQA Guidelines, suggests that the "No Project/ No Development Alternative" would have the least impact on the project site location. Of the various Alternatives examined for the project site, two categories were defined; as either: "considered and rejected" or "selected for evaluation." Those Alternatives that were "considered and rejected" include:* ***5.3.1*** *Fewer Homes,* ***5.3.2*** *Other Types of Land Uses, and* ***5.3.3*** *Alternative Locations. The question(s) presented below examines the* ***Alternative 5.3.2 Other Types of Land Uses****, which in reality, should be seriously considered and forthrightly questioned:*

*Why would the Alternative* ***5****.3.2 Other Types of Land Uses for this particular property not be considered? Even if* ***5.3.2*** *is outside the objectives of the City's land use policies, it should be seriously vetted for this particular location because of the natural resource of water that is endowed at this site. What must be studied, and thoroughly understood by the city's planning commission is that the location of this proposed project can and will have impacts on water resources of the region. A city planning commission must utilize a variety of both scientific and analytical approaches to determine where development projects should be developed, and where it should not be developed. In this case "a new road, a new home track, and a new concrete channel" is being proposed on top of an important floodplain and aquifer directly connected to the EASTERN SUB-BASIN in the Santa Clarita Valley! Would developing this location with the proposed project cause alterations, diminishment, and compression a significant aquifer that helps recharge a portion of the Upper Santa Clara River Water Valley? Yes, it will.*

*Why is development of "roads, homes, and hardscapes" permitted to take place atop of a "groundwater recharge confluence"? Is it beneficial, in both the short-term and long-term, to consider that "our local water resources" as limited they may be, are as valuable to our "safety and health," as adding more and more "roads, homes and hardscapes" to our finite canyons and hills??? This concept of utilizing land appropriately for development, based on the natural resources available, must be taken very seriously, and added to the planning commission's decision protocol. All*

*properties with unique watershed characteristics, especially those endowed with particular water recharge capacities, must be conserved for future generations in order to conserve those natural resources for the well-being of the Santa Clarita Valley.*

*The Bouquet Canyon Watershed has for centuries supported the Eastern Sub-Basin of the Santa Clarita Valley, and continues to serve as a "diverse biological reserve" to more than just a few endemic species of plants and animals that rely on these local water resources. Only a few of those species were mentioned in this particular DRAFT EIR. As described in the current DRAFT EIR, under Chapter 3.0 Geology and Soils (3.6.1.3 Local Groundwater Conditions, pp. 200); the report acknowledges this site is located on the "periphery of the East Subbasin of the Upper Santa Clara River Groundwater Basin." The groundwater in this particular site is reported (according to the California Division of Mines and Geology (CDMG), 1998) to exist at depths of "40 feet or less below the ground surface." Furthermore, the CDMG Report goes onto indicate that "historical high groundwater depth of the site varies from approximately 40 to 10 feet below the surface." Hence, this particular property site has a history of a "high watertable," and would be likely to function as an "ephemeral recharge zone" now and into the future. By developing this site, permanently altering and compressing the landscape and aquifer, it will simply lead to less water captured and less water recharged to the East Subbasin. The present DRAFT EIR goes on to note that in the recent field investigations into the alluvial sediments, "groundwater levels are significantly lower than reported in the literature." Ironically; however, "two water levels were measured at depths of 45 and 50 feet below ground surface." So, what does this mean?*

*In short, there is a <u>high probability</u> for this particular property to "capture and store" water. The Upper Santa Clara River Watershed, has many tributaries that feed and replenish its aquifers, but some of these particular tributaries are more capable of providing this ecological service of "capture and storage," then others. The Bouquet Canyon Watershed does and will continue to provide a significant "ecological service" for the Santa Clarita Valley basins. Additionally, this particular property site has both a unique topography and geology, with landscape and soil properties able to channel water below ground efficiently and support an unique microclimate. Even without the current "contractual release" of the upper Bouquet Canyon watershed stream flow (5 cfs per year), the decade's long-drought (2009-2018), and lower precipitation in region over the last few years, this particular alluvial floodplain is still showing a relatively high-water-holding capacity (40-50ft below the surface) as the DRAFT EIR indicates. Hence, it should be obvious to all planning stakeholders involved in the development projects of this nature, that there are regions of the Santa Clarita Valley which should be seriously protected for preserving water resources. This is one of those property sites.*

*In conclusion, there are many ways in which property owners, planning commissioners, and public agencies can creatively and equitably develop property in the Santa Clarita Valley. What must be taken to task here at this moment, and at this particular property site for development, is knowing what is the best, safest, and healthiest of*

*outcome of developing this property in a responsible and sustainable manner. It is something, we believe, we can all agree upon: Water is the best resource to conserve.*

**Response 1:**

***Rationale for Proposed Design of High Flow Concrete-Lined Channel***

The initial approach to this project was to provide a hardened embankment protection along both sides of Bouquet Wash and leave the area between as a natural soft bottom stream. It was assumed that the embankment protection would be placed at the County floodway limits. The hydraulic calculations for this concept showed that, using a standard County roughness coefficient (n=0.060 to n=0.085) which assumes vegetation will be allowed to grow uninhibited in the soft bottom, the water surface in the channel would be significantly higher (up to 11') than existing Bouquet Canyon Road. Adjustments were then made to widen the bottom to account for raise in water surface. Even by eliminating all development on the north side of the channel and expanding the soft bottom 300' to the south, the water surface would still be up to 3' higher than Bouquet Canyon Road. These results indicated that an exclusively soft bottom channel would not be an acceptable alternative for this project.

Another alternative was to consider using a soft bottom channel with no vegetation allowed in the entire invert similar to the existing downstream channel. This would reduce the roughness coefficient to 0.035. This would require a top width of at least 240' or more to convey the flow. Point stabilizers and or drop structures would be needed to prevent erosion in the bottom due to the steepness of the channel. This would eliminate the existing jurisdictional area and not allow for revegetation in order to maintain the n value. The size of the footprint of this alternative, the elimination of jurisdictional vegetation and the County's reluctance to rely on the ability of a channel to be cleared on a regular basis to maintain its ability to safely transmit flood flows led the project's civil engineer to conclude that this would not be an acceptable alternative.

The next alternative evaluated was a hard bottom channel for flood control with a natural low flow channel running parallel. This allows for a natural area within the existing jurisdictional flow line areas and provides the opportunity for ground water recharge during these higher frequency lower intensity storm events. The hydraulics for this system showed that existing Bouquet Canyon Road was no longer lower than the water surface in the channel and this was decided to be the preferred alternative.

Within the project footprint, including the offsite improvements required for the construction on new Bouquet Canyon Road, there is currently a total of 8.2 acres within the 100 year FEMA Zone A floodplain. The FEMA floodplain has been established using flow rates based on a hydrologic analysis which relies on actual stream gage data. The 100 year flood is defined as a flood that has 1/100 or 1% chance of occurring within any given year. Of these 8.2 acres, approximately 2.6 acres would remain as either landscaped slopes or revegetated jurisdictional area. The remaining area would be utilized for the hard bottom channel. The revegetated jurisdictional areas would be designed with a flat longitudinal slope to provide a greater opportunity for off season

dry weather and lower intensity rainy season flows to infiltrate and recharge the groundwater table.

In addition to the groundwater recharge opportunities within the low flow channel, this project has also proposed two infiltration basins. These basins are adjacent to the wash and were proposed to address LID requirements. These basins will take the runoff from our newly created impervious areas and infiltrate both non-storm (irrigation water, etc.) as well as low intensity storms (typically the first ¾" of rainfall which includes 85% of the rainfall events in our region). This will provide additional groundwater recharge opportunities, as discussed in the Supplemental Groundwater Recharge Analysis, below.

Overall, this project covers approximately 1,900 linear feet of Bouquet Creek. This represents 3.6% of the approximately 52,000 linear foot total length of the creek from Bouquet reservoir to the existing flood control channel. As such, in addition to the recharge provided by the project, the existing natural streambed upstream to the reservoir will continue to act to recharge the groundwater as well.

There will also be areas within the project that are not being developed and will remain in their current condition. The oak grove area near the downstream boundary of the project in particular will remain and continue to provide groundwater recharge of runoff from the adjacent hillside.

The proposed drainage concept has been shown on the tentative map and the hydrology / LID map and study. The hydrology and LID was reviewed and approved by Los Angeles County Department of Public Works, prior to publication of the Draft EIR.

***Supplemental Analysis of Groundwater Recharge***

A supplemental analysis of the project's effects on groundwater recharge within the project site was conducted, to help determine whether the proposed concrete-lined high flow channel would have a significant adverse impact on the volume of annual groundwater recharge, compared to existing conditions. This analysis was prepared by Thomas Harder & Co., a hydrogeological firm that specializes in groundwater consulting, with extensive experience evaluating projects in the Santa Clarita Valley.[1] A copy of the Harder & Co. report is included in the Final EIR, within the Errata section.

*Approach to Analysis*

The methodology used to quantify pre- and post-Project recharge involves quantifying recharge in Bouquet Creek and recharge in the retention basins. The former relies on the streamflow data whereas the latter relies on the precipitation data (to quantify runoff into the retention basins) along with an estimate of infiltration rate at the two subarea basins most likely to influence the calculations (i.e. 100A and 300A as noted on the "LID Exhibit" within the Urban Stormwater Mitigation Plan, which is provided as

[1] Thomas Harder & Co., *Hydrogeologic Investigation of Groundwater Recharge for Multifamily Residential Development Project (Tentative Tract 82126), Bouquet Canyon, Santa Clarita, California*. July 28, 2020.

Appendix G of the Draft EIR). Recharge associated with high intensity rainfall events that could result in flow from the retention basins into Bouquet Creek are not accounted for in our methodology, primarily due to the uncertainty associated with precisely where such an exchange would occur and expected low frequency of such events.

*Methodology to Estimate Bouquet Creek Recharge*

Infiltration within Bouquet Creek was estimated based on historical streamflow records, estimated stream width, stream length, and infiltration rate. Daily infiltration is the product of stream width, stream length, and infiltration rate. The stream width was based on the stream profile from SIKAND at three stages, 0, 100, and 200 cfs (see Figure 4 in Harder & Co. report). The flows between each stage were assumed to be proportional to the area. Using these proportions, the daily stream profile (including width) was calculated based the daily streamflow data. The width of the stream when flows were greater than 200 cfs were assumed to be equal to the maximum width of the stream profile.

The length of the Bouquet Creek within the Project area is approximately 2,000 ft. The infiltration rate was based on three infiltration tests conducted near Bouquet Creek as reported in the Urban Stormwater Mitigation Plan. As shown in Figure 2 of the Harder & Co. report, two of the tests were conducted at drainage subarea basin100A whereas the third was conducted at drainage subarea basin 300A. The average of the adjusted infiltration rates (as presented in the original report) was 8.0 ft/day.

Recharge for flows less than 200 cfs were assumed to be the same for pre-Project and Project conditions. Infiltration for flows greater than 200 cfs was limited to that which is calculated for the primary, low flow channel. As noted above, based on the available data daily streamflow exceeded 200 cfs 11 times.

*Methodology to Estimate Captured Runoff*

Captured runoff was estimated based on historical precipitation data, runoff volumes from SIKAND, the size of the stormwater retention basin, and the estimated infiltration rate within subareas 100A 300A, and 400A retention basins. Precipitation runoff was calculated by SIKAND for Subareas 100A, 300A, and 400A as presented in the Urban Stormwater Mitigation Plan. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

The basins will be unlined and located on the canyon floor alluvium. Based on the available infiltration data noted above, the basins are assumed to have an infiltration rate of 8.0 ft/day, which translates to a combined recharge capacity for both basins of 5.0 acre-ft/day when full.

Based on a peak flow hydrologic analysis by SIKAND, a 0.85-inch precipitation event within Subareas 100A, 300A, and 300A would generate 0.86, 0.38, and 0.07 acre-ft of water under Project conditions, respectively. Estimated runoff was based on the proportion of measured daily rainfall to the 0.85-inch baseline. Due to the high recharge rates of the basins, the total capture volume was limited to the total recharge capacity.

*Results of Pre-Project and Project Recharge Conditions Analysis*

Based on the analyses described above, the estimated annual recharge within the project area from Bouquet Creek and captured runoff is summarized in the following table:

| Recharge within the Project Area | Pre-Project | Project |
|---|---|---|
| Bouquet Creek Recharge | 114 acre-ft/yr | 109 acre-ft/yr |
| Subbareas 100A and 300A Captured Runoff | 0 acre-ft/yr | 14 acre-ft/yr |
| Total | 114 acre-ft/yr | 123 acre-ft/yr |

Based on the results of this analysis, the project would result in an increase in annual groundwater recharge within the project site; therefore, the project would have a less than significant impact to groundwater recharge associated with proposed site improvements, including the proposed concrete channel to carry high storm flows.

**Hai Nguyen** **Comment Letter Number 3**

**From:** rah <rah@agricultureaccess.com>
**Sent:** Tuesday, June 2, 2020 5:27 PM
**To:** Hai Nguyen
**Subject:** 6.2.2020: Submission on Comment Letter on DRAFT EIR
**Attachments:** BCN COMMENT LETTER ON DRAFT EIR Bouquet Canyon Project 2020.pdf

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Good afternoon Hai Nguyen,

Please find the ATTACHMENT to this email (above) for public comment on the *Draft EIR: Bouquet Canyon Project.*

Please include it in the project record.

Please CONFIRM receipt of this email and ATTACHMENT.

Thank you,

R.A. Haring

Bouquet Canyon Network

> On June 2, 2020 10:50 AM Hai Nguyen <hnguyen@santa-clarita.com> wrote:
>
> Good morning,
>
> Yes, we are still accepting comment letters on the Draft EIR for the Bouquet Canyon Project. Please feel free to email any letters to me directly and I will include it in the project record.
>
> Have a great day,
>
> Hai
>
> _____
>
> Hai Nguyen
> Associate Planner
> Planning Division
> City of Santa Clarita
>
> Phone: (661) 255-4365
> Email: hnguyen@santa-clarita.com

Web: http://www.santa-clarita.com

City of SANTA CLARITA

**From:** rah <rah@agricultureaccess.com>
**Sent:** Tuesday, June 2, 2020 7:26 AM
**To:** Hai Nguyen <HNGUYEN@santa-clarita.com>
**Cc:** Ken Striplin <KSTRIPLIN@santa-clarita.com>
**Subject:** 6.2.2020: Submission on Comment Letter on DRAFT EIR

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Good morning!

*Mr. Hai Nguyen*, Associate Planner- Bouquet Canyon Draft EIR Manager

Today, June 2, 2020 at 6pm the *City of Santa Clarita* Planning Commission is scheduled to meet and discuss the DRAFT EIR: Bouquet Canyon Project (State Clearinghouse Number: 2018121009)

I would like to confirm that you are still receiving public review and comments on this DRAFT EIR (April 6 to June 5, 2020), and would like ensure that proper submission protocol is followed.

Please confirm receipt of this email, and I will follow-up with a Comment Letter via email.

Thank you,

***June 1, 2020***

***Hai Nguyen*,**
**Associate Planner**
**City of Santa Clarita Community Development Department**
**23920 Valencia Boulevard, Suite 302 Santa Clarita, CA 91355**
**Email**: HNGUYEN@santa-clarita.com
**Phone**: (661) 255-4365

**COMMENT LETTER TO THE SANTA CLARITA COMMUNITY DEVELOPMENT DEPARTMENT**

Dear *Hai Nguyen*, Associate Planner of the City of Santa Clarita

This *Comment Letter* is for the ***Draft EIR: The Bouquet Canyon Project***

This *Comment Letter is* submitted within the 60-day review period (April 6, 2020 to June 5, 2020).

This Comment Letter would like to address the **Draft EIR*: Bouquet Canyon Project; Chapter "5.0 Alternatives"*** *and* ***Chapter "3.0 Geology and Soils."***

After an overview of the entire Draft EIR entitled: *The Bouquet Canyon Project*, from the City's website[https://www.santaclarita.com/cityhall/departments/communitydevelopment/planning/environmental-impact-reports-under-review], it has come to the attention of the *Bouquet Canyon Network* (BCN) that the *Alternatives* proposed for this particular property site would have a much greater "net benefit" to the local community and environmental resources of this region of Santa Clarita Valley, then the project currently proposed!

Under the *EIR Chapter 5.0 Alternatives,* the analysis performed by the CEQA Guidelines, suggests that the "*No Project/ No Development Alternative"* would have the least impact on the project site location. Of the various *Alternatives* examined for the project site, two categories were defined; as either: "considered and rejected" or "selected for evaluation." Those Alternatives that were "*considered and rejected*" include: **5.3.1** Fewer Homes, **5.3.2** Other Types of Land Uses, and **5.3.3** Alternative Locations. The question(s) presented below examines the ***Alternative 5.3.2 Other Types of Land Uses***, which in reality, should be seriously considered and forthrightly questioned:

1

Why would the *Alternative **5**.3.2 Other Types of Land Uses* for this particular property not be considered? Even if **5.3.2** is outside the objectives of the City's land use policies, it should be seriously vetted for this particular location because of the natural resource of water that is endowed at this site. What must be studied, and thoroughly understood by the city's planning commission is that the location of this proposed project can and will have impacts on water resources of the region. A city planning commission must utilize a variety of both scientific and analytical approaches to determine where development projects *should be developed*, and where it *should not be developed*. In this case "a new road, a new home track, and a new concrete channel" is being proposed on top of an important floodplain and aquifer directly connected to the EASTERN SUB-BASIN in the Santa Clarita Valley! Would developing this location with the proposed project cause alterations, diminishment, and compression a significant aquifer that helps recharge a portion of the Upper Santa Clara River Water Valley? Yes, it will.

Why is development of "roads, homes, and hardscapes" permitted to take place atop of a "*groundwater recharge confluence*"? Is it beneficial, in both the short-term and long-term, to consider that "our local water resources" as limited they may be, are as valuable to our "safety and health," as adding more and more "roads, homes and hardscapes" to our finite canyons and hills??? This concept of utilizing land appropriately for development, based on the natural resources available, must be taken very seriously, and added to the planning commission's decision protocol. All properties with unique watershed characteristics, especially those endowed with particular water recharge capacities, must be conserved for future generations in order to conserve those natural resources for the well-being of the Santa Clarita Valley.

The *Bouquet Canyon Watershed* has for centuries supported the Eastern Sub-Basin of the Santa Clarita Valley, and continues to serve as a "diverse biological reserve" to more than just a few endemic species of plants and animals that rely on these local water resources. Only a few of those species were mentioned in this particular DRAFT EIR. As described in the current DRAFT EIR, under Chapter 3.0 Geology and Soils (3.6.1.3 Local Groundwater Conditions, pp. 200); the report acknowledges this site is located on the "*periphery of the East Subbasin of the Upper Santa Clara River Groundwater Basin.*" The groundwater in this particular site is reported (according to the California Division of Mines and Geology (CDMG), 1998) to exist at depths of "*40 feet or less below the ground surface*." Furthermore, the CDMG Report goes onto indicate that "*historical high groundwater depth of the site varies from approximately 40 to 10 feet below the surface."* Hence, this particular property site has a history of a "high water-table," and would be likely to function as an "ephemeral recharge zone" now and into the future. By developing this site, permanently altering and compressing the landscape and aquifer, it will simply lead to less water captured and less water recharged to the *East Subbasin*. The present DRAFT EIR goes on to note that in the recent field investigations into the alluvial sediments, "*groundwater levels are significantly lower than reported in the literature*." *Ironically*; however, "*two water levels were measured at depths of 45 and 50 feet below ground surface."* So, what does this mean? 1

In short, there is a high probability for this particular property to "capture and store" water. The Upper Santa Clara River Watershed, has many tributaries that feed and replenish its aquifers, but some of these particular tributaries are more capable of providing this ecological service of "capture and storage," then others. The *Bouquet Canyon Watershed* does and will continue to provide a significant "ecological service" for the Santa Clarita Valley basins. Additionally, this particular property site has both a unique topography and geology, with landscape and soil properties able to channel water below ground efficiently and support an unique microclimate. Even without the current "contractual release" of the upper Bouquet Canyon watershed stream flow (5 cfs per year), the decade's long-drought (2009-2018), and lower precipitation in region over the last few years, this particular alluvial floodplain is still showing a relatively high-water-holding capacity (40-50ft below the surface) as the DRAFT EIR indicates. Hence, it should be obvious to all planning stakeholders involved in the development projects of this nature, that there are regions of the Santa Clarita Valley which should be seriously protected for preserving water resources. This is one of those property sites.

In conclusion, there are many ways in which property owners, planning commissioners, and public agencies can creatively and equitably develop property in the Santa Clarita Valley. What must be taken to task here at this moment, and at this particular property site for development, is knowing what is the best, safest, and healthiest of outcome of developing this property in a responsible and sustainable manner. It is something, we believe, we can all agree upon: *Water is the best resource to conserve*.

# California Department of Transportation, District 7

SECTION 2

**Responses to Comment Letter Number 4 by the California Department of Transportation District 7 dated June 1, 2020**

**Comment 1:** *Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's Draft Environmental Impact Report (DEIR). Development of 375 for-sale homes is proposed in five distinct neighborhoods, along with extensive site improvements including internal streets and driveways, storm drainage, water, and sewer facilities, electrical and natural gas facilities, private recreation areas, public parkland and trails, and a reconfiguration of Bouquet Creek and its adjacent floodplain to provide flood control within the project and maintain regular stream flows already occurring. This project also includes construction of a new segment of Bouquet Canyon Road, to follow the general alignment identified in the Santa Clarita General Plan Circulation Element. This is intended to facilitate local and regional travel through a more direct route, compared to the existing long curve that forms the northern and western borders of the site. The total development footprint would cover approximately 67.57 acres. Land clearance, grading, and the construction of all site improvements and homes is tentatively estimated to occur over a period of five years, with homes to be sold in phases in response to market demand. For purposes of the analyses conducted for this EIR, it is presumed that all homes will be sold and occupied, and all elements of the project completed and functional by approximately 2025.*

**Response 1:** This comment is a summary of the Project Description as provided in the Draft EIR. As such, no response is required.

**Comment 2:** *Caltrans has reviewed the Draft Environmental Impact Report (DEIR) and does not expect the proposed project to result in a direct adverse impact to state facilities.*

**Response 2:** This comment states that the proposed project is not expected to result in a direct adverse impact to state highway facilities. This comment is noted.

**Comment 3:** *Greenhouse gas reduction by way of reduced vehicle miles traveled (VMT) is critical. The essential component of walkable communities is mixed-use zoning. Residential and appropriate commercial uses should be intertwined to increase accessibility and allow residents to utilize active transportation modes.*

*Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. These methods include, but are not limited to, the construction of physically separated facilities such as wide sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing*

*distances through roadway narrowing. These suggestions can reduce pedestrian and bicyclist exposure to vehicles ensuring safety by lessening the time that the user is in the likely path of a motor vehicle.*

*Signal timing can be adjusted to include Leading Pedestrian Intervals, giving pedestrians a seven second head start. Pedestrian and bicyclist warning signage, flashing beacons, high-visibility continental crosswalks, scramble crossings, flashing yellow turn signals, high-visibility green bike lanes, other signage and buffer striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists.*

*Any development should keep livability in mind by providing shade trees, native landscaping, bioswales, street furniture, bicycle parking, bus shelters and trash cans. Bus bulb-outs can reduce conflict between bicycles and buses on busy roads. Bus only lanes are encouraged to reduce travel times and make public transit more appealing to discretionary users. Any gated communities should provide pedestrian paths and doors to ensure access to transit, shopping centers, schools and main roads. Whenever possible, a grid pattern with short blocks is recommended to promote walking. Permeable paving materials could also be incorporated whenever possible.*

*If significant earth-moving activities will take place during construction Caltrans recommends vehicles are covered when hauling dirt/sediment. Please be cautious of lost sediment spilling onto roads and state facilities during this process as this can adversely impact state facilitates.*

*As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.*

**Response 3:** This comment consists of a variety of recommendations concerning various aspects of the project's construction and design that are generic in nature. It does not address the adequacy of the Draft EIR or any specific aspect of the project design; therefore, no response is required. These recommendations have been provided to the City Planning Commission and City Council for their consideration. The reminder that a Caltrans transportation permit is required for the use of oversized-transport vehicles on State highways is noted.

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

**Comment Letter Number 4**

*Making Conservation a California Way of Life.*

June 1, 2020

Hai Nguyen
City of Santa Clarita
23920 Valencia Boulevard, Suite 302
Santa Clarita

RE: Bouquet Canyon Project – Draft Environmental Impact Report (DEIR)
GTS # 07-LA-2018-03226
SCH# 2018121009
Vic. LA / 14 / 29.681

Dear Hai Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's Draft Environmental Impact Report (DEIR). Development of 375 for-sale homes is proposed in five distinct neighborhoods, along with extensive site improvements including internal streets and driveways, storm drainage, water, and sewer facilities, electrical and natural gas facilities, private recreation areas, public parkland and trails, and a reconfiguration of Bouquet Creek and its adjacent floodplain to provide flood control within the project and maintain regular stream flows already occurring. This project also includes construction of a new segment of Bouquet Canyon Road, to follow the general alignment identified in the Santa Clarita General Plan Circulation Element. This is intended to facilitate local and regional travel through a more direct route, compared to the existing long curve that forms the northern and western borders of the site. The total development footprint would cover approximately 67.57 acres. Land clearance, grading, and the construction of all site improvements and homes is tentatively estimated to occur over a period of five years, with homes to be sold in phases in response to market demand. For purposes of the analyses conducted for this EIR, it is presumed that all homes will be sold and occupied, and all elements of the project completed and functional by approximately 2025. 1

Caltrans has reviewed the Draft Environmental Impact Report (DEIR) and does not expect the proposed project to result in a direct adverse impact to state facilities. 2

Additional information included for your consideration:

Greenhouse gas reduction by way of reduced vehicle miles traveled (VMT) is critical. The essential component of walkable communities is mixed-use zoning. Residential and appropriate commercial uses should be intertwined to increase accessibility and allow residents to utilize active transportation modes.

Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. These methods include, but are not limited to, the construction of physically separated facilities such as wide sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in 3

crossing distances through roadway narrowing. These suggestions can reduce pedestrian and bicyclist exposure to vehicles ensuring safety by lessening the time that the user is in the likely path of a motor vehicle.

Signal timing can be adjusted to include Leading Pedestrian Intervals, giving pedestrians a seven second head start. Pedestrian and bicyclist warning signage, flashing beacons, high-visibility continental crosswalks, scramble crossings, flashing yellow turn signals, high-visibility green bike lanes, other signage and buffer striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists.

Any development should keep livability in mind by providing shade trees, native landscaping, bioswales, street furniture, bicycle parking, bus shelters and trash cans. Bus bulb-outs can reduce conflict between bicycles and buses on busy roads. Bus only lanes are encouraged to reduce travel times and make public transit more appealing to discretionary users. Any gated communities should provide pedestrian paths and doors to ensure access to transit, shopping centers, schools and main roads. Whenever possible, a grid pattern with short blocks is recommended to promote walking. Permeable paving materials could also be incorporated whenever possible. 3

If significant earth-moving activities will take place during construction Caltrans recommends vehicles are covered when hauling dirt/sediment. Please be cautious of lost sediment spilling onto roads and state facilities during this process as this can adversely impact state facilitates.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2018-03226

Sincerely,

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

# THOMAS HART

SECTION 2

**Responses to Comment Letter Number 5 by Thomas Hart dated May 24, 2020**

**Comment 1:** *With regards to the environmental impact report, I'm concerned that there is no mention of California's Desert Native Plants Act. There are Yucca nearby the site in question. Yucca are protected by CDNPA. See FAC, Division 23, Chapter 3, section (a); number 80073. See here: http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FAC&division=23.&title=&part=&chapter=3.&article=*

**Response 1:** As discussed in Section 3.3 Biological Resources, pages 3.3-3 to 3.3-7 of the Draft EIR, biological surveys conducted at the project site identified 20 distinct vegetation communities, none of which contained any yucca plants, shrubs or trees (species Agavoideae). Focused site surveys for rare plants did not identify this species on site and yucca was not identified among rare plants known to occur in the vicinity of the project, or having a potential to occur on site, in the research of biological resources databases conducted as part of the biological resources technical report.

**Comment 2:** *Beyond this, I'm disturbed by the cavalier nature with which the oaks within the area are to be treated. Our oaks are part of the valley's heritage, and like all of Bouquet Canyon, represents resources that, once destroyed, will likely never be recovered.*

**Response 2:** This comment is a statement of opinion and does not address the adequacy of the Draft EIR; therefore, no response is required. This letter has been provided to the City Planning Commission and City Council, for their consideration.

**Comment 3:** *Finally, I think the planned ridge grading, given that it is a prominent ridge, would be a significant environmental loss. These ridges have aesthetic beauty, even when they are not the most prominent in a region. If all of Santa Clarita was left with one ridge, it would be a significant loss. While the environmental impact may seem insignificant, the city and developer should take into consideration what would occur should all other developers take the same approach.*

**Response 3:** This comment is a statement of opinion and does not address the adequacy of the Draft EIR; therefore, no response is required. This letter has been provided to the City Planning Commission and City Council, for their consideration.

**Comment 4:** *In general, I think the developer should pursue, and the city should encourage the developer to pursue, an alternative which retains to the greatest extent the current landscape, plant life, and the like - the environmental character of the area. For those who live nearby, and grew up hiking the ridges, it is not enough to*

*relocate plants to somewhere else or to keep the most prominent one. Aesthetics and environmental impacts matter close-up, not just from a distance.*

*I understand that the land is privately owned and that non-development is not an option from the perspective of the developer. It should be done in a way, nevertheless, that retains the environmental character of the area.*

**Response 4:** This comment is a statement of opinion and does not address the adequacy of the Draft EIR; therefore, no response is required. This letter has been provided to the City Planning Commission and City Council, for their consideration.

**Hai Nguyen**

# Comment Letter Number 5

**From:** Thomas Hart <thomasemeryhart@gmail.com>
**Sent:** Sunday, May 24, 2020 4:11 PM
**To:** Hai Nguyen
**Subject:** Comments on Draft EIR for Bouquet Canyon, State Clearinghouse No. 2018121009

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Hello,

With regards to the environmental impact report, I'm concerned that there is no mention of California's Desert Native Plants Act. There are Yucca nearby the site in question. Yucca are protected by CDNPA. See FAC, Division 23, Chapter 3, section (a); number **80073.** See here: http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FAC&division=23.&title=&part=&chapter=3.&article= 1

Beyond this, I'm disturbed by the cavalier nature with which the oaks within the area are to be treated. Our oaks are part of the valley's heritage, and like all of Bouquet Canyon, represents resources that, once destroyed, will likely never be recovered. 2

Finally, I think the planned ridge grading, given that it is a prominent ridge, would be a significant environmental loss. These ridges have aesthetic beauty, even when they are not the most prominent in a region. If all of Santa Clarita was left with one ridge, it would be a significant loss. While the environmental impact may seem insignificant, the city and developer should take into consideration what would occur should all other developers take the same approach. 3

In general, I think the developer should pursue, and the city should encourage the developer to pursue, an alternative which retains to the greatest extent the current landscape, plant life, and the like - the environmental character of the area. For those who live nearby, and grew up hiking the ridges, it is not enough to relocate plants to somewhere else or to keep the most prominent one. Aesthetics and environmental impacts matter close-up, not just from a distance.

I understand that the land is privately owned and that non-development is not an option from the perspective of the developer. It should be done in a way, nevertheless, that retains the environmental character of the area. 4

Sincerely,

Thomas Hart
661-478-4913
thomasemeryhart@gmail.com
28276 Timothy Drive,
Santa Clarita, CA 91350

# JIM CROWLEY

SECTION 2

**Responses to Comment Letter Number 6 by Jim Crowley dated June 4, 2020**

**Comment 1:** *As I understand it the next step will be to present the information and public input proposal to the Santa Clarita City Council for review. May I start with a basic question related to the process. Do the council members and Planning Commission have access to the comments and letters such as this to read before city council meeting? And are they required to read them? And most importantly, will the Planning Commission or City Council respond to the individual public concerns? Are they required to respond? Your letter regarding the meeting of June 2 seems to answer my questions as it basically squashes all written public input with the statement "Comments will be made part of the meeting record, but not read into the record." Does anyone read them?*

**Response 1:** This letter has been provided to the City Planning Commission and City Council for their consideration. Since the comment does not address the adequacy of the Draft EIR or any aspect of the proposed project design, no response is required.

**Comment 2:** *This project brings a lot of thoughts to mind for planning considerations for project 18-089. I find it difficult to address them all so I will try to highlight a few thoughts and examples.*

*As a resident of the area in question for 49 years I have watched the area expand, resulting in increased needs of the community and resultant environmental impacts. As we go ahead, we need to be sensitive to creating future negative impacts on thousands of people.*

*This project violates many of the EIR concerns as it addresses those elements. Many times, it mentions how it would not meet a standard. While it would not present a problem, it presented a condition with less than significant impact, or similar wording. Adding all the exceptions and waivers presents a development not meeting the local community standards as required. In addition, if it did not meet a standard or regulation, an exception was being requested in the form of a waiver or exception to the standard. In one case the offer was to pay a fee to the city where they did not or could not meet city guidelines. In the big city picture, it moves the process ahead. Where is City's integrity? It is sad that a development can relegate regulations and standards to the trash. Why did we ever set standards or regulations? The ridge line ordinance comes to mind. I was particularly offended by the proposal's concern for maintaining the views for "travelers." If the project violates the ordinance to not change the ridge line, then it fails. End of discussion. What about the views of the residents across and above the development? Residents on Contessa Ave (zip 91350) come to mind. They will now be looking down on rooftops and congestion in lieu of ridgelines or wildlife….and see polluting bright lights in their bedrooms at night. Also, the removal of local Oak trees was passed over like it was no big deal. It is a big deal.*

**Response 2:** This comment expresses several opinions of disagreement with the determinations of impact significance in the Draft EIR, particularly where the project, as proposed, would require approval of some sort of variance or exception from the applicable development regulations and where payment of a fee is considered to be an adequate form of mitigation. These disagreements are noted.

This comment also questions the consideration of factors related to the significance of aesthetics impacts associated with grading and removal of a portion of the on-site significant ridgeline and the effects of night lighting within the proposed residential neighborhoods. One such consideration pertains to the importance of changes in views by "travelers." The Draft EIR focuses on the changes in views of the site's prominent landform on the western side of the site from the perspective of traveling motorists, because impacts to public views are of concern under CEQA, rather than impacts to private views. The viewing experience of motorists is momentary, for a matter of seconds, and quickly shifting as the motorist moves along Bouquet Canyon Road. Further, Bouquet Canyon Road in this area is not designated or recognized in the City's General Plan as a scenic route where protection of scenic natural landforms is required. The level of impact significance associated with modifications to the landforms as viewed from this road, therefore, were determined to be less than significant. Concerning the impact of night lighting on neighboring residents, the discussion on page 3.1-31 of the Draft EIR describes the scope of anticipated outdoor lighting and the required control measures under the City's existing development standards (Section 17.50.050 of the Santa Clarita Municipal Code) to ensure that the nighttime illumination is located, oriented and confined to targeted areas within the project site. This will prevent uplighting and off-site glare into existing homes surrounding the project site, including homes along Contessa Avenue, which are located more than 1,500 feet to the west of the nearest proposed home within the project site, separated by other existing homes between that street and Bouquet Canyon Road.

**Comment 3:** *Other issues have been sent to you by many people and friends such as Susan Maness who beautifully addressed many I have not. I agree with Susan 100%.*

*In closing, I am opposed to this project and will be contacting the City Council members so the Mayor doesn't just ask the question, at the public meeting, of you and staff, "Do I hear a motion…Should the project be approved since everything was answered?" Hardly, issues and concerns were just added to the file and everybody says Yea and life goes on.*

**Response 3:** Please refer to the responses to comments by Susan Maness, later in this section of the Final EIR. The second part of this comment indicates opposition to the project. This is noted.

# Comment Letter Number 6

City of Santa Clarita Planning Division
Attn: Hai Nguyen, Associate Planner- Bouquet Canyon Draft EIR
23920 Valencia Blvd, Suite 302
Santa Clarita, CA 91355

June 4, 2020

I want to thank you for your fine presentation during the zoom meeting of Jun 2, 2020.
However, after consideration, I am in opposition to the Bouquet Canyon High Density home development and road realignment designated as project 18-089. Please included this letter as part of in the EIR written inputs.

As I understand it the next step will be to present the information and public input proposal to the Santa Clarita City Council for review. May I start with a basic question related to the process. Do the council members and Planning Commission have access to the comments and letters such as this to read before city council meeting? And are they required to read them? And most importantly, will the Planning Commission or City Council respond to the individual public concerns? Are they required to respond? Your letter regarding the meeting of June 2 seems to answer my questions as it basically squashes all written public input with the statement "Comments will be made part of the meeting record, but not read into the record." Does anyone read them? 1

This project brings a lot of thoughts to mind for planning considerations for project 18-089. I find it difficult to address them all so I will try to highlight a few thoughts and examples.

As a resident of the area in question for 49 years I have watched the area expand, resulting in increased needs of the community and resultant environmental impacts. As we go ahead, we need to be sensitive to creating future negative impacts on thousands of people.

This project violates many of the EIR concerns as it addresses those elements. Many times, it mentions how it would not meet a standard. While it would not present a problem, it presented a condition with less than significant impact, or similar wording. Adding all the exceptions and waivers presents a development not meeting the local community standards as required. In addition, if it did not meet a standard or regulation, an exception was being requested in the form of a waiver or exception to the standard. In one case the offer was to pay a fee to the city where they did not or could not meet city guidelines. In the big city picture, it moves the process ahead. Where is City's integrity? It is sad that a development can relegate regulations and standards to the trash. Why did we ever set standards or regulations? The ridge line ordinance comes to mind. I was particularly offended by the proposal's concern for maintaining the views for "travelers." If the project violates the ordinance to not change the ridge line, then it fails. End of discussion. What about the views of the residents across and above the development? Residents on Contessa Ave (zip 91350) come to mind. They will now be looking down on rooftops and congestion in lieu of ridgelines or wildlife….and see polluting bright lights in their bedrooms at night. Also, the removal of local Oak trees was passed over like it was no big deal. It is a big deal. 2

Other issues have been sent to you by many people and friends such as Susan Maness who beautifully addressed many I have not. I agree with Susan 100%.

In closing, I am opposed to this project and will be contacting the City Council members so the Mayor doesn't just ask the question, at the public meeting, of you and staff, "Do I hear a motion…Should the project be approved since everything was answered?" Hardly, issues and concerns were just added to the file and everybody says Yea and life goes on. 3

Sincerely,

Electronically signed
Jim Crowley
20946 Alaminos Dr
Saugus, CA 91350
(661) 755-7377

# Los Angeles County Department of Public Works

SECTION 2

**Responses to Comment Letter Number 7 by Los Angeles County Department of Public Works dated June 4, 2020**

**Comment 1:**

*1.1. Clarify that the project is responsible for all increased mitigation requirements over the years, if any, from all local, State, and Federal agencies for any proposed facility that may be transferred to the Los Angeles County Flood Control District (LACFCD). The LACFCD will not be responsible for ongoing or future mitigations resulting from this project for any transferrable infrastructure.*

*1.2. Clarify that the City of Santa Clarita has jurisdiction for all water quality infrastructures resulting from this project. Water quality infrastructures within the boundaries of the City of Santa Clarita are not transferrable to the LACFCD for operation and maintenance.*

*1.3. Disclose that permit and approval are also required from the LACFCD (through Public Works) for all proposed storm drain connection and facilities to be transferred.*

*For questions regarding comment 1, please contact Jason Rietze of Public Works, Stormwater Planning Division at (626) 300-3248 or jrietze@pw.lacounty.gov.*

**Response 1:** A Drainage Benefit Assessment District would be established to fund long-term maintenance of the on-site drainage facilities by the City of Santa Clarita. The project developer would be responsible for maintenance of all storm drainage facilities until such time as the District is formed and generates sufficient funding to support the City's maintenance efforts. This District would also fund any ongoing mitigation measures associated with the drainage facilities that may be imposed by state or federal water resources permits. It is noted that any proposed storm drain connections and facilities that are to be transferred to LACFCD would require permitting and approval from LACFCD, through the Department of Public Works.

Please refer to the next response, where anticipated maintenance responsibilities for all elements of the project's proposed storm drainage and water quality facilities are identified.

**Comment 2:** *"The infiltration basins, biofiltration basins, and two debris/desilting basins south of Bouquet Canyon Road would be maintained by LACFCD."*

*This statement is not factually correct regarding:*

- *Water quality infrastructures, such as the infiltration basins and biofiltration basins, within the boundaries of the City of Santa Clarita are not transferrable to the LACFCD for operation and maintenance. Clarify that only transferrable facility would be accepted for operation and maintenance by the LACFCD.*

**Response 2:**

The proposed maintenance responsibilities for the project's storm drainage and water quality facilities have been updated, as follows:

**Tentative Tract 82126 Drainage Facility Maintenance Responsibility Chart**

| Description | Location | Maintenance Responsibility |
|---|---|---|
| Flood control channel | Bouquet Creek within project limit including inlet upstream of bridge | Los Angeles County Flood Control District |
| Debris basins and storm drains within public street right of way | New Bouquet Canyon Road, existing Bouquet Canyon Road and Copper Hill Drive | Los Angeles County Flood Control District |
| LID infiltration and biofiltration basins | 5 locations at downstream limits of storm drains | City of Santa Clarita with funding provided by Drainage Benefit Assessment District |
| Low flow channel | Along existing Bouquet Creek flow line parallel to flood control channel | Homeowner's Association |
| Low flow pipe | Goes from upstream limit of inlet east of proposed bridge to low flow channel | City of Santa Clarita with funding provided by Drainage Benefit Assessment District |
| Pipes to LID basin crossing public right of way | New Bouquet Canyon Road near proposed bridge | City of Santa Clarita with funding provided by Drainage Benefit Assessment District |
| On-site storm drains | Pipes within individual planning areas | Homeowner's Association |

**Comment 3:** *The two debris/desilting basins should be constructed to both standards set by the City of Santa Clarita and the LACFCD. Clarify that the City of Santa Clarita is responsible for the storm drain infrastructures operation and maintenance until they are transferred and accepted by the LACFCD.*

**Response 3:** It is acknowledged that the project's debris/desilting basins are to be designed and constructed in accordance with both the City and LACFCD standards. Please refer to the preceding response to comment 2, regarding maintenance responsibilities by the developer and a future homeowners association and that the LACFCD would only accept transferrable facilities for operation and maintenance.

**Hai Nguyen** **Comment Letter Number 7**

**From:** Toan Duong <TDUONG@dpw.lacounty.gov>
**Sent:** Thursday, June 4, 2020 3:18 PM
**To:** Hai Nguyen; scovington@integralcommunities.com
**Cc:** Phoenix Khoury; Jose Suarez; Justin Dulay; Jose Cruz
**Subject:** RE: Bouquet Canyon -- TTM re-submittal

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Hello Hai,

**DRAFT ENVIRONMENTAL IMPACT REPORT (RPPL2020001927)**
**BOUQUET CANYON PROJECT**
**CITY OF SANTA CLARITA**

Thank you for the opportunity to review the subject projects Draft Environmental Impact Report. The City of Santa Clarita proposes a development of 375 homes and construction to reconfigure the Bouquet Creek and Bouquet Canyon Road.

The following comments are for your consideration:

**1. General**

1.1. Clarify that the project is responsible for all increased mitigation requirements over the years, if any, from all local, State, and Federal agencies for any proposed facility that may be transferred to the Los Angeles County Flood Control District (LACFCD). The LACFCD will not be responsible for ongoing or future mitigations resulting from this project for any transferrable infrastructure.

1.2. Clarify that the City of Santa Clarita has jurisdiction for all water quality infrastructures resulting from this project. Water quality infrastructures within the boundaries of the City of Santa Clarita are not transferrable to the LACFCD for operation and maintenance.

1.3. Disclose that permit and approval are also required from the LACFCD (through Public Works) for all proposed storm drain connection and facilities to be transferred.

For questions regarding comment 1, please contact Jason Rietze of Public Works, Stormwater Planning Division at (626) 300-3248 or jrietze@pw.lacounty.gov.

1

**2. 3.14 Utilities and Service Systems, Pages 3.14-16**

"The infiltration basins, biofiltration basins, and two debris/desilting basins south of Bouquet Canyon Road would be maintained by LACFCD."

This statement is not factually correct regarding:

- Water quality infrastructures, such as the infiltration basins and biofiltration basins, within the boundaries of the City of Santa Clarita are not transferrable to the LACFCD for operation and

2

maintenance. Clarify that only transferrable facility would be accepted for operation and maintenance by the LACFCD.




- The two debris/desilting basins should be constructed to both standards set by the City of Santa Clarita and the LACFCD. Clarify that the City of Santa Clarita is responsible for the storm drain infrastructures operation and maintenance until they are transferred and accepted by the LACFCD.




For questions regarding comment 2, please contact Alex Mikhailpoor of Public Works, Land Development Division at (626) 458-4921 or amikhailpoor@pw.lacounty.gov.

If you have any questions or require additional information, please contact me or Jose Suarez of Public Works, Land Development Division, at (626) 458-4921 or jsuarez@pw.lacounty.gov.

Toan Duong
Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921

# RITA MAPHIS

SECTION 2

**Responses to Comment Letter Number 8 by Rita Maphis dated June 5, 2020**

**Comment 1:** *All around this Project parcel are farms and ranches. On one side a single family homes. I don't see how the Project blends in with the existing homes. The photos in this section show the current theme of the area, and the Project completely changes it. The Project also proposes changes to the ridgeline which will most certainly affect the aesthetics of the area. The single home that currently is in a rural open space will now be surrounded by the city-like Project. If this were my home, I would be deeply saddened that my property was so changed.*

**Response 1:** This comment expresses opinions regarding the aesthetic impacts of the project but does not comment on the adequacy of the Draft EIR. This comment is noted and has been provided to the City Planning Commission and City Council for their consideration.

**Comment 2:** *It does not seem logical that adding 370 homes and possibly 1400 cars to this rather remote area will not have a significant effect on the air quality here.*

*The Report lists several "sensitive receptors" located near the Project, but does not seem to address what is to be done about it. Also, what about all the residents that individually sensitive to a decrease in the air quality?*

**Response 2:** Section 3.2 of the Draft EIR provides a comprehensive analysis of the project's short term and long term air quality impacts, in accordance with the methodologies and significance thresholds recommended by the South Coast Air Quality Management District. This analysis included identification of a variety of sensitive receptors surrounding the project site and the assessment of localized concentrations of construction emissions and emissions from long-term site activities was focused on the nearest sensitive receptor, a single family home located outside of the project site, on land located directly east of Benz Road at Bouquet Canyon Road near the proposed cul de sac of homes in the northwestern most part of Planning Area 1A. Pollutant concentrations would be lower at all other, more distant sensitive receptors. As discussed therein, the construction related impacts would be less than significant, with mitigation measures MM 3.2-1 and 3.2-2, to require cleaner diesel engines powering grading machinery and smaller diesel haul trucks, which would substantially reduce the exhaust emissions to below localized and regional significance thresholds. No significant long-term air quality impacts have been identified.

**Comment 3:** *How is our wildlife affected? Coyotes are already a problem with less natural space for them to hunt and live. People are always complaining about the danger to their pets, but the coyotes have had so much of their environment encroached upon, they're squeezed into our backyards where they find "Fluffy".*

*There are so many eagles, hawks, roadrunners, and owls. We keep taking away their trees. Cutting down the trees and then "paying off" the city for the ones that "couldn't" be replaced is not a good solution.*

**Response 3:** A comprehensive survey of biological resources and assessment of project impacts on those resources at the project site were conducted and the results are reported in Section 3.3 of the Draft EIR. The specific research methods and findings are also documented in Appendix C of the Draft EIR. No significant impacts to sensitive wildlife species were identified, except for potential impacts to burrowing owls or other protected migratory bird species that might be present at the time of construction. Mitigation measure 3.3-2 requires site surveys to look for burrowing owls prior to construction, and if any active burrows are identified, construction must avoid those areas until appropriate owl relocation efforts have been completed, in accordance with guidance provided by California Department of Fish and Wildlife. Mitigation measure 3.3-5 requires avoidance of active bird nests throughout construction that occurs during the migratory bird breeding season.

As discussed on page 3.3-27 of the Draft EIR, the project would comply with the provisions of the City's oak tree regulations, which allows for removal of native oak trees if suitable replacement oaks are planted and/or fees equivalent to the monetary value of the replacement trees are paid to the City. This is considered sufficient mitigation to offset the impact of removing or significantly encroaching on 27 native oak trees. A total of 91 replacement oaks would be required to offset the impact to 27 oak trees.

**Comment 4:** *We have been routinely plagued by droughts. Though we have had a couple of good rainfall years, this is not the norm, and we have to expect more shortages in the near future. Building any large project on an area that currently is open to collect and absorb large amounts of rain water is increasing the chance of shortage, and adding 370 homes (1400 residents) to the demand is dangerous.*

**Response 4:** Section 3.14.1 in the Draft EIR discusses impacts to the water supply resources in the Santa Clarita Valley, which are governed by the Santa Clarita Valley Water Agency (SCVWA). As discussed therein, the project's water demand for potable water and irrigation supplies was calculated and evaluated by the SCVWA, who determined that the project's water demand is accounted for in the most recent Urban Water Management Plan for the SCVWA service area and would not have a significant impact on water supplies.

***Supplemental Analysis of Groundwater Recharge***

A supplemental analysis of the project's effects on groundwater recharge within the project site was conducted, to help determine whether the proposed concrete-lined high flow channel would have a significant adverse impact on the volume of annual groundwater recharge, compared to existing conditions. This analysis was prepared by Thomas Harder & Co., a hydrogeological firm that specializes in groundwater

consulting, with extensive experience evaluating projects in the Santa Clarita Valley.[1] A copy of the Harder & Co. report is included in the Final EIR, within the Errata section.

*Approach to Analysis*

The methodology used to quantify pre- and post-Project recharge involves quantifying recharge in Bouquet Creek and recharge in the retention basins. The former relies on the streamflow data whereas the latter relies on the precipitation data (to quantify runoff into the retention basins) along with an estimate of infiltration rate at the two subarea basins most likely to influence the calculations (i.e. 100A and 300A as noted on the "LID Exhibit" within the Urban Stormwater Mitigation Plan, which was provided as Appendix G of the Draft EIR). Recharge associated with high intensity rainfall events that could result in flow from the retention basins into Bouquet Creek are not accounted for in our methodology, primarily due to the uncertainty associated with precisely where such an exchange would occur and expected low frequency of such events.

*Methodology to Estimate Bouquet Creek Recharge*

Infiltration within Bouquet Creek was estimated based on historical streamflow records, estimated stream width, stream length, and infiltration rate. Daily infiltration is the product of stream width, stream length, and infiltration rate. The stream width was based on the stream profile from SIKAND at three stages, 0, 100, and 200 cfs (see Figure 4 in Harder & Co. report). The flows between each stage were assumed to be proportional to the area. Using these proportions, the daily stream profile (including width) was calculated based the daily streamflow data. The width of the stream when flows were greater than 200 cfs were assumed to be equal to the maximum width of the stream profile.

The length of the Bouquet Creek within the Project area is approximately 2,000 ft. The infiltration rate was based on three infiltration tests conducted near Bouquet Creek as reported in the Urban Stormwater Mitigation Plan. As shown in Figure 2 of the Harder & Co. report, two of the tests were conducted at drainage subarea basin100A whereas the third was conducted at drainage subarea basin 300A. The average of the adjusted infiltration rates (as presented in the original report) was 8.0 ft/day.

Recharge for flows less than 200 cfs were assumed to be the same for pre-Project and Project conditions. Infiltration for flows greater than 200 cfs was limited to that which is calculated for the primary, low flow channel. As noted above, based on the available data daily streamflow exceeded 200 cfs 11 times.

*Methodology to Estimate Captured Runoff*

Captured runoff was estimated based on historical precipitation data, runoff volumes from SIKAND, the size of the stormwater retention basin, and the estimated infiltration

[1] Thomas Harder & Co., *Hydrogeologic Investigation of Groundwater Recharge for Multifamily Residential Development Project (Tentative Tract 82126), Bouquet Canyon, Santa Clarita, California*. July 28, 2020.

rate within subareas 100A 300A, and 400A retention basins. Precipitation runoff was calculated by SIKAND for Subareas 100A, 300A, and 400A as presented in the Urban Stormwater Mitigation Plan. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

The basins will be unlined and located on the canyon floor alluvium. Based on the available infiltration data noted above, the basins are assumed to have an infiltration rate of 8.0 ft/day, which translates to a combined recharge capacity for both basins of 5.0 acre-ft/day when full.

Based on a peak flow hydrologic analysis by SIKAND, a 0.85-inch precipitation event within Subareas 100A, 300A, and 300A would generate 0.86, 0.38, and 0.07 acre-ft of water under Project conditions, respectively. Estimated runoff was based on the proportion of measured daily rainfall to the 0.85-inch baseline. Due to the high recharge rates of the basins, the total capture volume was limited to the total recharge capacity.

*Results of Pre-Project and Project Recharge Conditions Analysis*

Based on the analyses described above, the estimated annual recharge within the project area from Bouquet Creek and captured runoff is summarized in the following table:

| Recharge within the Project Area | Pre-Project | Project |
|---|---|---|
| Bouquet Creek Recharge | 114 acre-ft/yr | 109 acre-ft/yr |
| Subbareas 100A and 300A Captured Runoff | 0 acre-ft/yr | 14 acre-ft/yr |
| Total | 114 acre-ft/yr | 123 acre-ft/yr |

Based on the results of this analysis, the project would result in an increase in annual groundwater recharge within the project site; therefore, the project would have a less than significant impact to groundwater recharge associated with proposed site improvements, including the proposed concrete channel to carry high storm flows.

**Comment 5:** *During the June 2 meeting I understood that two channels were being built through the Project; one concrete bottomed and one dirt bottomed. In reading the EIR I only see the part about the "soft-bottomed" channel. Also at the meeting, I believe we were told that the concrete channel would connect to the existing concrete channel. To my knowledge the channel is dirt-bottomed all the way down past Seco Canyon Road. Is this where a new channel is connecting?*

**Response 5:** The proposed concrete-lined trapezoidal channel that would carry 100-year storm flows through the project site would connect to the existing channelized /soft-bottom segment of Bouquet Creek located directly north of the project site, west of Hob Avenue, opposite Kathleen Avenue. This is shown conceptually on Figures 2-1 and 2-5 in the Project Description section of the Draft EIR.

**Comment 6:** *One benefit of having Bouquet Creek channel here is to help ameliorate the flooding of our canyon should there be any catastrophic break at Bouquet Dam. How does changing the flow of that creek make it safer for those of us living in the canyon?*

**Response 6:** The proposed flood control improvements within the project site would benefit the proposed project but would have no effect on possible flooding conditions outside of the project site.

**Comment 7:** *This many homes could add ~700 children to our school system. Where would they go? How would they get there. More cars. More traffic.*

**Response 7:** Potential impacts on local public schools are discussed in Section 3.11.3 of the Draft EIR. As shown in Table 3.11-2, based on factors provided by the local school districts, the project would generate approximately 177 elementary, 37 middle school and 66 high school students annually, over the course of the fully developed project life. As discussed on page 3.11-11, there is currently sufficient capacity at the affected elementary and high school campuses to absorb the students from this project; however, there is a shortage of classroom space for junior high school students. This project must pay development impact fees to the districts to help finance construction of additional school facilities and offset the incremental impact of this project on school facilities. As such, the project's impact to public schools would be less than significant.

Students would travel to elementary, middle and high school campuses via private automobiles and school busses. This traffic would mingle with other project traffic during morning peak hours, and in afternoons, would occur earlier than the peak hour. Traffic associated with transporting students from the project site to local schools was accounted for in the traffic impact analysis prepared for this EIR.

**Comment 8:** *Residents who now access Old Bouquet Canyon north of Benz and south of Hob, will be unduly impacted as will those who live on upper Alaminos. Currently those on Bouquet can simply turn to go up(north) on Bouquet Canyon; they will now be forced to drive south to Benz, then north on Alaminos to enter Bouquet Canyon going north. This seems like a strange place to create a park, in the middle of a well-used road.*

**Response 8:** The project proposes to abandon an existing segment of Bouquet Canyon Road, between Hob Court and Pam Court, because the proposed new segment of Bouquet Canyon Road would provide a more direct north/south connection than the existing sweeping curve alignment. This abandoned segment would be removed and replaced with a landscaped, passive recreation area and a walking path that would be available to the public. All existing neighborhoods near the segment to be abandoned would continue to have sufficient access to Bouquet Canyon Road and sufficient opportunities for emergency vehicle access. Please refer to the discussion of proposed changes to local circulation patterns provided on page 3.12-18 of the Draft EIR.

While the new alignment of Bouquet Canyon will ultimately result in new routes being taken by residents, the improvements are anticipated to provide benefits to the neighborhood such as reduced commuter cut-through traffic on Benz Road.

**Comment 9:** *Where are the traffic signals going to be?*

**Response 9:** A traffic signal is to be installed at the new intersection of the new segment of Bouquet Canyon Road and the existing segment, at the northeastern corner of the project site. This would provide adequate level of service for Existing-Plus-Project and interim Year 2028 traffic conditions. This signal is identified in Mitigation Measure 3.12-3. In addition, a traffic signal would be installed at the intersection of Kathleen Avenue and Copper Hill Drive, together with widening of Copper Hill to 4 lanes, between Benz Road and Kathleen Avenue. This is required to achieve adequate level of service for interim year 2028 traffic conditions. This signal is identified in Mitigation Measure 3.12-7.

**Comment 10:** *At the June meeting I understood that the changes to Bouquet would eliminate the traffic issues at Copper Hill/David Way/Bouquet. Figure 2-5 does not show Copper Hill merging into Old Bouquet Canyon, but still going through two T's one at David Way, and one at Old Bouquet. Will this complex intersection continue to be controlled by the Stop sign at the first T and a signal at Bouquet?*

**Response 10:** Proposed modifications to the existing configurations of Copper Hill/David Way/Bouquet Canyon Road are described on page 3.12-18 of the Draft EIR, as stated below:

> "To mitigate the Project's impact at David Way at Old Bouquet Canyon Road, the traffic signal at this intersection would be removed and David Way between Old Bouquet Canyon Road and Copper Hill Drive would be closed. The roadway closure would eliminate the south leg of the David Way and Copper Hill Drive intersection and a new east leg would be constructed to connect with Old Bouquet Canyon Road.

At the David Way and Copper Hill Drive intersection, a median island to restrict the left-turn movement (southbound left) from David Way to eastbound Copper Hill Drive would be constructed and David Way would be under stop control with right-in/right-out and left-in movements allowed (no left-turn out allowed)."

These modifications were being finalized as the Draft EIR was being prepared for publication and distribution for public review and comment and were not identified on Figures 2-1 or 2-5. Figures 2-1 and 2-5 will be updated to reflect the proposed reconfiguration of David Way/Copper Hill Drive/Bouquet Canyon Road.

**Comment 11:** *Will there be pedestrian walkways and bike paths to allow residents from the existing homes to access the trails/bike paths created in the project?*

**Response 11:** Sidewalks and bicycle lanes would be provided along both sides of the new Bouquet Canyon Road. The proposed trail network within the project area would be accessible to the public. The following proposed park areas would be accessible to the public: the linear park, ridgeline line park, trailhead, and park areas within Planning Area 4. The only private park areas are the recreation center and a park area within Planning Area 2.

All potential crosswalk locations will be analyzed and determined by the City during the road design phase of the project.

**Comment 12:** *How does the merge of Old Bouquet and New Bouquet work both north and southbound?*

- *Northbound: is it a signal-controlled intersection?*
- *Southbound:??*

**Response 12:** As discussed on page 3.12-18 of the Draft EIR, the new intersection (referred to as "merge" in the comment) of New Copper Hill Road /Old Bouquet Canyon Road and New Bouquet Canyon Road (north of Project), will be configured as a "T" intersection and a traffic signal would provide traffic control at the new intersection of Old and New Bouquet Canyon Road at the northeastern edge of the project site. On the westerly side of the Project site, the new intersection (referred to as "merge" in the comment) of Old Bouquet Canyon Road and New Bouquet Canyon Road (south of Project) will be configured as a "T" intersection with Old Bouquet Canyon Road under stop control. A median island at the Old Bouquet Canyon Road (West) and New Bouquet Canyon Road intersection would be constructed. The median island would restrict southbound left-turn movements from Old Bouquet Canyon Road (West) to eastbound New Bouquet Canyon Road.

**Comment 13:** *Will Old Bouquet Canyon Road be open for the entire duration of the construction (until New Bouquet is completed and available)?*

**Response 13:** Yes. This requirement will be included in the construction specifications for the new Bouquet Canyon Road segment.

**Comment 14:** *I'm not sure which section this comment belongs to, but I am certainly concerned about evacuation in case of fire, flood, earthquakes, etc. We currently have 2 evacuation routes, south on Bouquet or north east over Vasquez to Sierra Highway. Vasquez has a reputation of slides and other causes for closure. This leaves us reliant on Bouquet as our only escape route. Adding more traffic here is certainly a concern. Also during construction will our egress be compromised at all?*

**Response 14:** Emergency evacuation scenarios are discussed in Section 3.15.4 in the Draft EIR, as part of the consideration of wildfire-related emergencies under Impact 3.15-a. As discussed therein, there would be multiple evacuation routes available in the event of roadway closures due to wildfire or other emergency conditions. While Bouquet Canyon Road would remain a key evacuation route, there are several other routes that could be taken to the west by residents of the proposed project as well as existing residents in those neighborhoods to the north and west of the project site.

During project construction, the contractors will be required to maintain thru traffic flow and emergency vehicle access to all surrounding land uses, which is a routine requirement for all construction projects in Santa Clarita.

**Hai Nguyen**

# Comment Letter Number 8

**From:** rita maphis <ritamaphis@yahoo.com>
**Sent:** Friday, June 5, 2020 4:25 PM
**To:** Hai Nguyen
**Subject:** EIR Comments

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Rita Maphis

20057 Terrace Court

Santa Clarita, CA 91390

ritamaphis@yahoo.com

Hai Nguyen,

Associate Planner Bouquet Cyn Project 18-089

23920 Valencia Blvd. Suite 302

Santa Clarita, Ca 91355

HNGUYEN@santa-clarita.com

Mr. Nguyen,

First of all I would like to apologize for any comments/questions that have already been covered in the EIR.

I first heard about this on this last Monday, and attended the virtual meeting on Tuesday. I was overwhelmed by the amount of data being presented. I tried to take some quick notes and after the meeting have spent many hours plodding through the EIR to find the answers to my questions. I simply ran out of time.

Perhaps you would consider extending the deadline to allow anyone to further read this extremely detailed report.

I appreciate your help and anxiously await some response.

Sincerely,

Rita Maphis

**COMMENTS:**

**3.1 Aesthetics**

All around this Project parcel are farms and ranches. On one side a single family homes. I don't see how the Project blends in with the existing homes. The photos in this section show the current theme of the area, and the Project completely changes it. The Project also proposes changes to the ridgeline which will most certainly affect the aesthetics of the area. The single home that currently is in a rural open space will now be surrounded by the city-like Project. If this were my home, I would be deeply saddened that my property was so changed. 1

**3.2 Air Quality**

It does not seem logical that adding 370 homes and possibly 1400 cars to this rather remote area will not have a significant effect on the air quality here.

The Report lists several "sensitive receptors" located near the Project, but does not seem to address what is to be done about it. Also, what about all the residents that individually sensitive to a decrease in the air quality? 2

**3.3 Biological Resource**

How is our wildlife affected? Coyotes are already a problem with less natural space for them to hunt and live. People are always complaining about the danger to their pets, but the coyotes have had so much of their environment encroached upon, they're squeezed into our backyards where they find "Fluffy".

There are so many eagles, hawks, roadrunners, and owls. We keep taking away their trees. Cutting down the trees and then "paying off" the city for the ones that "couldn't" be replaced is not a good solution. 3

**3.9 Hydrology**

We have been routinely plagued by droughts. Though we have had a couple of good rainfall years, this is not the norm, and we have to expect more shortages in the near future. Building any large project on an area that currently is open to collect and absorb large amounts of rain water is increasing the chance of shortage, and adding 370 homes (1400 residents) to the demand is dangerous. 4

During the June 2 meeting I understood that two channels were being built through the Project; one concrete bottomed and one dirt bottomed. I reading the EIR I only see the part about the "soft-bottomed" channel. Also at the meeting, I believe we were told that the concrete channel would connect to the existing concrete channel. To my knowledge the channel is dirt-bottomed all the way down past Seco Canyon Road. Is this where a new channel is connecting? 5

One benefit of having Bouquet Creek channel here is to help ameliorate the flooding of our canyon should there be any catastrophic break at Bouquet Dam. How does changing the flow of that creek make it safer for those of us living in the canyon? 6

**3.11 Public Services**

This many homes could add ~700 children to our school system. Where would they go? How would they get there. More cars. More traffic. 7

**3.12 Transportation**

Residents who now access Old Bouquet Canyon north of Benz and south of Hob, will be unduly impacted as will those who live on upper Alaminos. Currently those on Bouquet can simply turn to go up(north) on Bouquet Canyon; they will now be forced to drive south to Benz, then north on Alaminos to enter Bouquet Canyon going north. This seems like a strange place to create a park, in the middle of a well-used road. 8

Where are the traffic signals going to be? 9

At the June meeting I understood that the changes to Bouquet would eliminate the traffic issues at Copper Hill/David Way/Bouquet. Figure 2-5 does not show Copper Hill merging into Old Bouquet Canyon, but still going through two T's one at David Way, and one at Old Bouquet. Will this complex intersection continue to be controlled by the Stop sign at the first T and a signal at Bouquet? 10

Will there be pedestrian walkways and bike paths to allow residents from the existing homes to access the trails/bike paths created in the project? 11

How does the merge of Old Bouquet and New Bouquet work both north and southbound? 12

Northbound: is it a signal-controlled intersection?

Southbound:??

Will Old Bouquet Canyon Road be open for the entire duration of the construction (until New Bouquet is completed and available)? 13

I'm not sure which section this comment belongs to, but I am certainly concerned about evacuation in case of fire, flood, earthquakes, etc. We currently have 2 evacuation routes, south on Bouquet or north east over Vasquez to Sierra Highway. Vasquez has a reputation of slides and other causes for closure. This leaves us reliant on Bouquet as our only escape route. Adding more traffic here is certainly a concern. Also during construction will our egress be compromised at all? 14

# GEORGE BRODT

SECTION 2

**Responses to Comment Letter Number 9 by George Brodt dated June 5, 2020**

**Comment 1:** *I read the draft EIR for the subject project and have a concern about the high density of the homes in PA-3 and PA-4. This is inconsistent with the single family homes in the surrounding neighborhoods.*

**Response 1:** This comment expresses a concern with the development density of the proposed homes in Planning Areas 3 and 4, compared to the density of existing homes in surrounding neighborhoods. The homes proposed in these planning areas are being designed for households that may not be able to afford larger, detached homes on private lots. As such, they are arranged closer together, to spread construction costs over a smaller area which helps reduce final pricing of the homes. The project's overall residential density is well below the maximum allowable under the City's general plan and zoning designations for the project site and represents a suitable combination of the Urban Residential 2 (UR2), Urban Residential 5 (UR5) and Neighborhood Commercial (CN) zone standards that apply across the site. This is explained on page 2.0-7 of the Draft EIR. The proposed project design clusters homes within the proposed planning areas to reduce the scope of required grading and landform alterations across the site. The proposed residential densities, in and of themselves, would not result in any specific significant environmental impacts. There is no requirement in the City's general plan or zoning regulations that a new residential development project provide identical densities or home siting layouts as surrounding neighborhoods.

**Comment 2:** *As a registered Civil and Geotechnical engineer, it is my opinion that the connection of the new Bouquet Canyon and the existing Bouquet Canyon trapezoidal channels will require training walls in the confluence to prevent extreme flood flows from backing up into the project area and flooding the homes in PA-4. The confluence of Haskell Canyon with Bouquet Canyon channel is a good example of what I am talking about.*

**Response 2:** This confluence of the new Bouquet Canyon channel and the existing channel will be designed to ensure that all flows are contained within both channels, including freeboard. The ultimate flood control channel design will be reviewed and approved by LA County Dept. of Public Works.

**Hai Nguyen**

# Comment Letter Number 9

**From:** George Brodt <gbrodt@earthlink.net>
**Sent:** Friday, June 5, 2020 1:22 PM
**To:** Hai Nguyen
**Subject:** Comments on the Bouquet Canyon Project DEIR

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Mr. Nguyen,

I read the draft EIR for the subject project and have a concern about the high density of the homes in PA-3 and PA-4. This is inconsistent with the single family homes in the surrounding neighborhoods. 1

As a registered Civil and Geotechnical engineer, it is my opinion that the connection of the new Bouquet Canyon and the existing Bouquet Canyon trapezoidal channels will require training walls in the confluence to prevent extreme flood flows from backing up into the project area and flooding the homes in PA-4. The confluence of Haskell Canyon with Bouquet Canyon channel is a good example of what I am talking about. 2

Sincerely,

George W Brodt
California RCE 19647
California RGE 167

# SANTA CLARITA VALLEY WATER AGENCY

SECTION 2

**Comment 1:** *The DEIR project description is unclear and inconsistent with regard to the design of the drainage structures which are to accommodate the storm drainage for the Project. In Section 2.0, the DEIR describes the concrete drainage channel to be soft bottomed and in Section 3.9 the channel is proposed to be designed with concrete lined sides and grade control structures on the invert. It is our understanding that the current design proposes to construct a solid bottom channel due to the need to manage storm water flows. The project description should be revised to clearly describe the proposed facilities.*

**Response 1**: The description of the proposed "soft-bottom" flood control channel through the project site presented in Section 2.0 of the Draft EIR is incorrect. As described in Section 3.9 (see page 3.9-17), this channel would be designed as a trapezoidal-shaped concrete channel, including a concrete lined-bottom, to carry high intensity rainstorms through the project site quickly and without inundating land or homes outside of the channel. The description of this channel that appears on page 2.0-16 will be corrected in the Final EIR Errata section.

**Comment 2:** *SCV Water has concerns about the drainage facilities proposed in the DEIR. SCV Water recommends that to the extent possible, floodplains remain undeveloped, and if creeks and rivers are channelized, they should remain soft bottomed. The Santa Clara River and its tributaries provide a vital water resource to the Santa Clarita Valley through the percolation of water into the local groundwater basins. Section 3.9 states that Bouquet Creek will be maintained as a natural, unpaved and vegetated drainage course and provide groundwater recharged as it does today. However, the size of the proposed natural channel will be substantially smaller than it is today and indeed smaller than the concrete lined channel that we understand is now being proposed for the concrete lined channel.*

**Response 2:**

***Rationale for Proposed Design of High Flow Concrete-Lined Channel***

The initial approach to this project was to provide a hardened embankment protection along both sides of Bouquet Wash and leave the area between as a natural soft bottom stream. It was assumed that the embankment protection would be placed at the County floodway limits. The hydraulic calculations for this concept showed that, using a standard County roughness coefficient (n=0.060 to n=0.085) which assumes vegetation will be allowed to grow uninhibited in the soft bottom, the water surface in the channel would be significantly higher (up to 11') than existing Bouquet Canyon Road. Adjustments were then made to widen the bottom to account for raise in water surface. Even by eliminating all development on the north side of the channel and expanding the soft bottom 300' to the south, the water surface would still be up to 3'

higher than Bouquet Canyon Road. These results indicated that an exclusively soft bottom channel would not be an acceptable alternative for this project.

Another alternative was to consider using a soft bottom channel with no vegetation allowed in the entire invert similar to the existing downstream channel. This would reduce the roughness coefficient to 0.035. This would require a top width of at least 240' or more to convey the flow. Point stabilizers and or drop structures would be needed to prevent erosion in the bottom due to the steepness of the channel. This would eliminate the existing jurisdictional area and not allow for revegetation in order to maintain the n value. The size of the footprint of this alternative, the elimination of jurisdictional vegetation and the County's reluctance to rely on the ability of a channel to be cleared on a regular basis to maintain its ability to safely transmit flood flows led the project's civil engineer to conclude that this would not be an acceptable alternative.

The next alternative evaluated was a hard bottom channel for flood control with a natural low flow channel running parallel. This allows for a natural area within the existing jurisdictional flow line areas and provides the opportunity for ground water recharge during these higher frequency lower intensity storm events. The hydraulics for this system showed that existing Bouquet Canyon Road was no longer lower than the water surface in the channel and this was decided to be the preferred alternative.

Within the project footprint, including the offsite improvements required for the construction on new Bouquet Canyon Road, there is currently a total of 8.2 acres within the 100 year FEMA Zone A floodplain. The FEMA floodplain has been established using flow rates based on a hydrologic analysis which relies on actual stream gage data. The 100 year flood is defined as a flood that has 1/100 or 1% chance of occurring within any given year. Of these 8.2 acres, approximately 2.6 acres would remain as either landscaped slopes or revegetated jurisdictional area. The remaining area would be utilized for the hard bottom channel. The revegetated jurisdictional areas would be designed with a flat longitudinal slope to provide a greater opportunity for off season dry weather and lower intensity rainy season flows to infiltrate and recharge the groundwater table.

In addition to the groundwater recharge opportunities within the low flow channel, this project has also proposed two infiltration basins. These basins are adjacent to the wash and were proposed to address LID requirements. These basins will take the runoff from our newly created impervious areas and infiltrate both non-storm (irrigation water, etc.) as well as low intensity storms (typically the first ¾" of rainfall which includes 85% of the rainfall events in our region). This will provide additional groundwater recharge opportunities, as discussed in the Supplemental Groundwater Recharge Analysis, below.

Overall, this project covers approximately 1,900 linear feet of Bouquet Creek. This represents 3.6% of the approximately 52,000 linear foot total length of the creek from Bouquet reservoir to the existing flood control channel. As such, in addition to the

recharge provided by the project, the existing natural streambed upstream to the reservoir will continue to act to recharge the groundwater as well.

There will also be areas within the project that are not being developed and will remain in their current condition. The oak grove area near the downstream boundary of the project in particular will remain and continue to provide groundwater recharge of runoff from the adjacent hillside.

The proposed drainage concept has been shown on the tentative map and the hydrology / LID map and study. The hydrology and LID was reviewed and approved by Los Angeles County Department of Public Works, prior to publication of the Draft EIR.

***Supplemental Groundwater Recharge Analysis***

A supplemental analysis of the project's effects on groundwater recharge within the project site was conducted, to help determine whether the proposed concrete-lined high flow channel would have a significant adverse impact on the volume of annual groundwater recharge, compared to existing conditions. This analysis was prepared by Thomas Harder & Co., a hydrogeological firm that specializes in groundwater consulting, with extensive experience evaluating projects in the Santa Clarita Valley.[1] A copy of the Harder & Co. report is included in the Final EIR, within the Errata section.

*Approach to Analysis*

The methodology used to quantify pre- and post-Project recharge involves quantifying recharge in Bouquet Creek and recharge in the retention basins. The former relies on the streamflow data whereas the latter relies on the precipitation data (to quantify runoff into the retention basins) along with an estimate of infiltration rate at the two subarea basins most likely to influence the calculations (i.e. 100A and 300A as noted on the "LID Exhibit" within the Urban Stormwater Mitigation Plan, which was provided as Appendix G of the Draft EIR). Recharge associated with high intensity rainfall events that could result in flow from the retention basins into Bouquet Creek are not accounted for in our methodology, primarily due to the uncertainty associated with precisely where such an exchange would occur and expected low frequency of such events.

*Methodology to Estimate Bouquet Creek Recharge*

Infiltration within Bouquet Creek was estimated based on historical streamflow records, estimated stream width, stream length, and infiltration rate. Daily infiltration is the product of stream width, stream length, and infiltration rate. The stream width was based on the stream profile from SIKAND at three stages, 0, 100, and 200 cfs (see Figure 4 in Harder & Co. report). The flows between each stage were assumed to be proportional to the area. Using these proportions, the daily stream profile (including width) was calculated based the daily streamflow data. The width of the stream when

[1] Thomas Harder & Co., *Hydrogeologic Investigation of Groundwater Recharge for Multifamily Residential Development Project (Tentative Tract 82126), Bouquet Canyon, Santa Clarita, California*. July 28, 2020.

flows were greater than 200 cfs were assumed to be equal to the maximum width of the stream profile.

The length of the Bouquet Creek within the Project area is approximately 2,000 ft. The infiltration rate was based on three infiltration tests conducted near Bouquet Creek as reported in the Urban Stormwater Mitigation Plan. As shown in Figure 2 of the Harder & Co. report, two of the tests were conducted at drainage subarea basin100A whereas the third was conducted at drainage subarea basin 300A. The average of the adjusted infiltration rates (as presented in the original report) was 8.0 ft/day.

Recharge for flows less than 200 cfs were assumed to be the same for pre-Project and Project conditions. Infiltration for flows greater than 200 cfs was limited to that which is calculated for the primary, low flow channel. As noted above, based on the available data daily streamflow exceeded 200 cfs 11 times.

*Methodology to Estimate Captured Runoff*

Captured runoff was estimated based on historical precipitation data, runoff volumes from SIKAND, the size of the stormwater retention basin, and the estimated infiltration rate within subareas 100A 300A, and 400A retention basins. Precipitation runoff was calculated by SIKAND for Subareas 100A, 300A, and 400A as presented in the Urban Stormwater Mitigation Plan. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

The basins will be unlined and located on the canyon floor alluvium. Based on the available infiltration data noted above, the basins are assumed to have an infiltration rate of 8.0 ft/day, which translates to a combined recharge capacity for both basins of 5.0 acre-ft/day when full.

Based on a peak flow hydrologic analysis by SIKAND, a 0.85-inch precipitation event within Subareas 100A, 300A, and 300A would generate 0.86, 0.38, and 0.07 acre-ft of water under Project conditions, respectively. Estimated runoff was based on the proportion of measured daily rainfall to the 0.85-inch baseline. Due to the high recharge rates of the basins, the total capture volume was limited to the total recharge capacity.

*Results of Pre-Project and Project Recharge Conditions Analysis*

Based on the analyses described above, the estimated annual recharge within the project area from Bouquet Creek and captured runoff is summarized in the following table:

| Recharge within the Project Area | Pre-Project | Project |
|---|---|---|
| Bouquet Creek Recharge | 114 acre-ft/yr | 109 acre-ft/yr |
| Subbareas 100A and 300A Captured Runoff | 0 acre-ft/yr | 14 acre-ft/yr |
| Total | 114 acre-ft/yr | 123 acre-ft/yr |

Based on the results of this analysis, the project would result in an increase in annual groundwater recharge within the project site; therefore, the project would have a less than significant impact to groundwater recharge associated with proposed site improvements, including the proposed concrete channel to carry high storm flows.

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SCV WATER

Water Resources & Outreach 26501 Summit Circle, Santa Clarita, CA 91350-3049

(661) 297-1600 | yourSCVwater.com

# Comment Letter Number 10

June 3, 2020

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

RE: Response to Notice of Availability of a Draft Environmental Impact Report for Bouquet Canyon Project, State Clearinghouse No. 2018121009

Dear Mr. Nguyen

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Bouquet Canyon Project (Project). The Santa Clarita Valley Water Agency (SCV Water) provides groundwater and imported water to the residences and businesses of the Santa Clarita Valley. As such, we have concerns with the Project's potential impacts on the regions groundwater supplies and offer the following comments:

The DEIR project description is unclear and inconsistent with regard to the design of the drainage structures which are to accommodate the storm drainage for the Project. In Section 2.0, the DEIR describes the concrete drainage channel to be soft bottomed and in Section 3.9 the channel is proposed to be designed with concrete lined sides and grade control structures on the invert. It is our understanding that the current design proposes to construct a solid bottom channel due to the need to manage storm water flows. The project description should be revised to clearly describe the proposed facilities. 1

SCV Water has concerns about the drainage facilities proposed in the DEIR. SCV Water recommends that to the extent possible, floodplains remain undeveloped, and if creeks and rivers are channelized, they should remain soft bottomed. The Santa Clara River and its tributaries provide a vital water resource to the Santa Clarita Valley through the percolation of water into the local groundwater basins. Section 3.9 states that Bouquet Creek will be maintained as a natural, unpaved and vegetated drainage course and provide groundwater recharged as it does today. However, the size of the proposed natural channel will be substantially smaller than it is today and indeed smaller than the concrete lined channel that we understand is now being proposed for the concrete lined channel. 2

SCV Water requests the City have the developer explore additional solutions to reduce impacts to the floodplain and that do not include hard-bottomed channels.

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SCV Water appreciates your consideration of these comments.

Very truly yours,

DocuSigned by:
Dirk Marks
51456A03D78A4A9...

Dirk Marks
Director of Water Resources

cc: Stephen L. Cole – Assistant General Manager

# LOS ANGELES COUNTY FIRE DEPARTMENT

SECTION 2

**Responses to Comment Letter Number 11 by the County of Los Angeles Fire Department dated April 28, 2020**

**Comment 1:** *Under 2.11.1.1 Existing Conditions, sentence two should be corrected to state that there are 15 fire stations with 14 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serving the Santa Clarita Valley.*

*Sentence six should be updated to state that during 2019, Station 108 had an average emergency response time of 6 minutes and 37 seconds.*

**Response 1:** Sentences two and six in the referenced subsection of the EIR will be amended pursuant to this comment.

**Comment 2:** *The Land Development Unit has reviewed the proposed project. The Land Development Unit recommends that the proposed project not to proceed to the public hearing process until the following corrections have been addressed.*

1. *Provide a second means of access for Planning Area's 1, 2 and 3. Indicate compliance on the revised tentative tract map and site plan.*
2. *The private streets in Planning Areas 2 (Lot 4) and 3 (Lot 5) are required to be on-site Fire Apparatus Access Roads and shall be labeled as "Private Driveway and Fire Lane" on the tentative tract map along with the widths clearly depicted on the plan. Indicate compliance on the revised tentative tract map and site plan.*
3. *Provide a minimum of 20 feet on each side of the roadway for "F" Street where the Fire Apparatus Access Road consists of a divided roadway, the gate width shall be not less than 20 feet. Each side of the roadway shall be clear-to-sky. Indicate compliance on the revised tentative tract map and site plan.*
4. *Indicate the location of the Fire Department Turnarounds on the revised tentative tract map and site plan.*
5. *Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside, and outside turning radii for each change in direction on the plan. Indicate compliance on the revised tentative tract map and site plan.*
6. *Clearly identify firefighter walkway access routes on the site plan and indicate the required width along with the slope. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Indicate compliance on the revised tentative tract map and site plan.*
7. *Clearly identify firefighter walkway access routes on the site plan and indicate the required width along with the slope and walking surface material.*

8. *Indicate the location of all proposed gates within the proposed development and provide a gate detail in compliance of "Condition of Approval" comment 18.*
9. *Provide the type of construction and total square footage for the proposed multi-family buildings, along with written verification of an approved automatic fire sprinkler system in conformance of NFPA 13.*
10. *Indicate location of all existing public fire hydrant with 200 feet of the proposed development. Indicate compliance on the revised plans.*
11. *Provide the elevations for the proposed single and multi-family buildings.*
12. *Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 36 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.*

**Response 2:** This comment lists routine design standards and terms of approval to be incorporated during the plan check process. It does not address the adequacy of the Draft EIR. Therefore, no further response is required. However, the Draft EIR does address item 1 of this comment, which concerns a second means of access to Planning Areas 1, 2, and 3. Mitigation Measure 3.12-13 found in Section 3.12 Transportation of the Draft EIR, specifically provides for a secondary access for the homes in Planning Areas 1, 2, and 3. The mitigation measure requires the access to be identified on the project plans and to be approved by the County Fire Department and the City prior to approval of a Final Tract Map.

**Comment 3: Submittals to the Fire Department-Land Development Unit:**

1. *The revised tentative tract map and site plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire-Land Development-City Request-Tentative Map-Tract.*

**Response 3:** This comment explains requirements for submittal of the revised tentative tract map to the Land Development Unit of the Los Angeles County Fire Department, as part of the post-project approval plan check process. This comment is noted.

**Comment 4:** *FINAL MAP REQUIREMENTS*

1. *A copy of the Final Map shall be submitted to the Fire Department for review and approval prior to recordation.*
    a. *The Final Parcel Map shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will*

*need to apply for the following Plan Type: Fire-Land Development-City Request-Final Map-Tract. The applicant shall follow the steps and upload the required digital information. The appropriate fee will be addressed.*

2. *Access as noted on the Tentative and the Exhibit Maps shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 503 of the Title 32 (County of Los Angeles Fire Code), which requires an all-weather access surface to be clear to sky.*
3. *The driveways required for Fire Apparatus Access Roads shall be indicated on the Final Map as "Private Driveway and Fire Lan" with the widths clearly depicted. The areas for parking shall be designated outside of the fire lanes.*
4. *A common access agreement is required for the private driveway since multiple units are sharing the same access. Such language shall be included in the Covenant, Conditions and Restricts (CC&R) document and shall be submitted to the Fire Department prior to Final Map clearance.*
5. *Submit a copy of the Grading Plan to the Fire Department for review and approval.*
   *Compliance required prior to Final Map clearance.*
   a. *The Grading Plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire-Land Development-City Request-Grading. The applicant shall follow the steps and upload the required digital information. The appropriate fee(s) will be addressed.*
6. *Submit the water plans indicating the new fire hydrant locations to the Land Development Unit for review. The required public fire hydrants shall be installed prior to construction of the proposed buildings.*
   a. *The water plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire-Land Development-City Request-Fire Hydrant. The applicant shall follow the steps and upload the required digital information. The appropriate fee will be addressed.*
7. *Prior recordation, provide written verification that the required fire hydrants have been bonded for in lieu of installation.*

*ACCESS REQUIREMENTS:*

1. *The proposed project is required to provide a second means of access. The fire code official is authorized to require more than one Fire Apparatus Access Road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions, or other factors that could limit access. Such additional access must comply with Title 21 of the Los Angeles County Code.*

2. *All on-site Fire Apparatus Access Roads shall be labeled as "Private Driveway and Fire Lan" on the site plan along with the widths clearly depicted on the plan. Labeling designation allows for appropriate signage prohibiting parking.*
3. *Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.*
4. *All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, Count of Los Angeles Fire Code.*
5. *The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.*
6. *Fire Apparatus Access Road Width Requirements. The private on-site streets shall be incompliance of the Los Angeles Public Works "Private Driveway and Traffic Calming Design Guidelines Manual.*
    a. *For the Detached Single-Family Residential, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the buildings, as measured by an approved route around the exterior of the building.*
    b. *For the Attached Multi-Family Residential, provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.*
7. *The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.*
8. *Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround.*
9. *Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds and shall be surfaces so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.*
10. *Fire Apparatus Access Roads shall not exceed 15 percent in grade.*
11. *Provide approved signs or other approved notices or markings that include the words "NO PARKING – FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.*
12. *Fire Apparatus Access Roads shall not be obstructed in any manners, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths of clearances established in Section 503.2.1 and Section 503.2.2 shall be maintained at all times.*
13. *Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.*

14. *A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes.*
15. *Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.*
16. *Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1*
17. *Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 36 inches from the top of the parapet to the roof surface on more than two sides.*
18. *The fire code official is authorized to require more than one Fire Apparatus Access Road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions, or other factors that could limit access. Such additional access must comply with Title 21 of the Los Angeles County Code.*
19. *Gate Requirements – The method of gate control shall be subject to review by the Fire Department, prior to clearance to proceed to public hearing. All gates, to control vehicular access, shall be in compliance with the following:*
    a. *The keypad location shall be located a minimum of 50 feet from the public right-of-way.*
    b. *Provide a minimum 32-foot turning radius beyond the keypad, prior to the gate entrance at a minimum width of 20' for turnaround purposes.*
    c. *The gated entrance design with a single access point (ingress and egress) shall provide for a minimum width of 26 feet, clear-to-sky, with all gate hardware is clear of the access way.*
    d. *Where the Fire Apparatus Access Road consists of a divided roadway, the gate width shall be not less than 20 feet. Each side of the roadway shall be clear-to-sky.*
    e. *Construction of gates shall be materials that allow manual operations by one person.*
    f. *Gates shall be of the swinging or sliding type.*
    g. *The security gate shall be provided with an approved means of emergency operation, and shall be maintained operational at all times and replaced or repaired when defective.*
    h. *Electric gate operators, where provided, shall be listed in accordance with UL 325.*

i. *Gates intended for automatic operations shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.*
j. *All locking devices shall comply with the County of Los Angeles Fire Department Regulation 5, Compliance for Installation of Emergency Access Devices.*
k. *An approved key box, listed in accordance with UL 1037 shall be provided as required by Fire Code 506. The location of each key box shall be determined by the Fire Inspector.*

**Response 4:** This comment consists of standard requirements for incorporation into the Final Tract Map, which will be prepared and reviewed for approval, after the City takes action on the proposed project. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

**Comment 5:** *WATER SYSTEM REQUIREMENTS:*

1. *All fire hydrants shall measure 6"x 4" x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.*
2. *All required public fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4*
3. *The required fire flow for the public fire hydrants for this project is 4,000 GPM at 20 pounds psi residual pressure for 4 hours. Three (3) public fire hydrants flowing simultaneously may be used to achieve the required fire flow.*
    a. *The fire flow is subject to reduction with the submittal of additional information.*
4. *An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.*
5. *The public fire hydrant locations will be addressed with submittal of the revised plans.*

**Response 5:** This comment consists of standard requirements for the project's Water System. Since this comment does not address the adequacy of the Draft EIR, no further response is required.

**Comment 6:** *FUEL MODIFICATION*

*This property is located within the area described by the Fire Department as a Fire Hazard Severity Zone. A "Fuel Modification Plan" shall be submitted to the Fuel Modification for review by the Fuel Modification Unit prior to the issuance of the building permits. Please contact the Department's Fuel Modification Unit for details. The Fuel Modification Plan Review Unit is located at 605 North Angeleno Avenue in the City of Azusa CA 91702-2904.*

*They may be reached at (626) 969-5205 or visit https://www.fire.lacounty.gov/forestry-division/forestry-fuel-modification/*

*For any questions regarding the Land Development Unit report, please contact FPEA Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.*

**Response 6:** A detailed description of the Los Angeles County Fire Department's Fuel Modification Plan is found on page pages 3.15-9 and 3.15-10. A Preliminary Fuel Modification Plan was submitted to the Department on October 23, 2019 and deemed adequate by the Department.

**Comment 7:** ***FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:***

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

*Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 ½ feet above mean natural grade.*

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

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

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

**Response 7:** The entirety of the project site is within the jurisdictional limits of the City of Santa Clarita. As such, the County's oak tree regulations do not apply to this project. Erosion controls and watershed management are addressed in Section 3.9 Hydrology and Water Quality of this Draft EIR. Rare and endangered species and vegetation impacts are addressed in Section 3.3 Biological Resources of this Draft EIR. Compliance with countywide standards for fuel modification and construction in a Very High Fire Hazard Severity Zone is addressed in Section 3.15 Wildfire. Potential impacts to protected oak trees are addressed in both Section 3.1 Aesthetics and 3.3 Biological Resources.

**Comment 8:** ***HEALTH HAZARDOUS MATERIALS DIVISION:***

*The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that an abandoned petroleum oil/gas well is located on the project site. Petroleum oil wells that pose a potential health hazard or environmental impact to the project site should be evaluated, assessed, and/or mitigated per the requirements of the California Department of Conservation, Geologic Energy Management Division (CalGEM, formerly known as DOGGR). Any contaminated soil (resulting from past petroleum oil well activities) that is discovered at the site would potentially require environmental oversight by the appropriate authorized government agencies, such as CalGEM, the Los Angeles Regional Water Quality Control Board, and the California Department of Toxic Substances Control. The HHMD Site Mitigation Unit is currently not available at this time to conduct environmental oversight for the project (on a contract, cost-recovery, basis).*

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

**Response 8:** The existence of an abandoned oil/gas well is disclosed in Draft EIR Section 3.8 Hazards and Hazardous Materials, on pages 3.8-7 to 3.8-8. As noted therein, this well was properly abandoned in accordance with then-current DOGGR standards. Mitigation Measure 3.8-1 requires the project applicant to test the well for leakage and the soil around the well for the presence of significant amounts of hydrocarbons, prior to the issuance of a grading permit, so that any need for further remediation can be determined and accomplished at that time.

# COUNTY OF LOS ANGELES
## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
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FIFTH DISTRICT


**Comment Letter Number 11**

April 28, 2020

Hai Hguyen, Associate Planner
City of Santa Clarita
Planning Division
23920 Valencia Boulevard
Santa Clarita, CA 91355

Dear Ms. Nguyen:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "BOUQUET CANYON PROJECT," WOULD DEVELOP 375 FOR-SALE HOMES PROPOSED FOR FIVE DISTINCT NEIGHBORHOODS, ALONG WITH EXTENSIVE SITE IMPROVEMENTS INCLUDING INTERNAL STREETS AND DRIVEWAYS, STORM DRAINAGE, WATER, AND SEWER FACILITIES, ELECTRICAL AND NATURAL GAS FACILITIES, PRIVATE RECREATION AREAS, PUBLIC PARKLAND AND TRAILS, AND RECONFIGURATION OF BOUQUET CREEK AND ITS ADJACENT FLOODPLAN TO PROVIDE FLOOD CONTROL, SANTA CLARITA, FFER 2020001950**

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

The following are their comments:

**PLANNING DIVISION:**

Under 3.11.1.1 Existing Conditions, sentence two should be corrected to state that there are 15 fire stations with 14 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serving the Santa Clarita Valley.

Sentence six should be updated to state that during 2019, Station 108 had an average emergency response time of 6 minutes and 37 seconds.

1

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

**LAND DEVELOPMENT UNIT:**

The Land Development Unit has reviewed the proposed project. The Land Development Unit recommends that the proposed project not to proceed to the public hearing process until the following corrections have been addressed.

1. Provide a second means of access for Planning Area's 1, 2 and 3. Indicate compliance on the revised tentative tract map and site plan.

2. The private streets in Planning Areas 2 (Lot 4) and 3 (Lot 5) are required to be on-site Fire Apparatus Access Roads and shall be labeled as "Private Driveway and Fire Lane" on the tentative tract map along with the widths clearly depicted on the plan. Indicate compliance on the revised tentative tract map and site plan.

3. Provide a minimum of 20 feet on each side of the roadway for "F" Street where the Fire Apparatus Access Road consists of a divided roadway, the gate width shall be not less than 20 feet. Each side of the roadway shall be clear-to-sky. Indicate compliance on the revised tentative tract map and site plan.

4. Indicate the location of the Fire Department Turnarounds on the revised tentative tract map and site plan.

5. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside, and outside turning radii for each change in direction on the plan. Indicate compliance on the revised tentative tract map and site plan.

6. Clearly identify firefighter walkway access routes on the site plan and indicate the required width along with the slope. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Indicate compliance on the revised tentative tract map and site plan.

7. Clearly identify firefighter walkway access routes on the site plan and indicate the required width along with the slope and walking surface material.

8. Indicate the location of all proposed gates within the proposed development and provide a gate detail in compliance of "Condition of Approval" comment 18.

9. Provide the type of construction and total square footage for the proposed multi-family buildings, along with written verification of an approved automatic fire sprinkler system in conformance of NFPA 13.

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10. Indicate location of all existing public fire hydrant with 200 feet of the proposed development. Indicate compliance on the revised plans.

11. Provide the elevations for the proposed single and multi-family buildings.

12. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 36 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.

2

**Submittals to the Fire Department-Land Development Unit:**

1. The revised tentative tract map and site plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire–Land Development–City Request–Tentative Map–Tract.

3

**The following are "Conditions of Approval" for the proposed project.**

FINAL MAP REQUIREMENTS:

1. A copy of the Final Map shall be submitted to the Fire Department for review and approval prior to recordation.

    a. The Final Parcel Map shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire–Land Development–City Request–Final Map–Tract. The applicant shall follow the steps and upload the required digital information. The appropriate fee will be addressed.

2. Access as noted on the Tentative and the Exhibit Maps shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 503 of the Title 32 (County of Los Angeles Fire Code), which requires an all-weather access surface to be clear to sky.

3. The driveways required for Fire Apparatus Access Roads shall be indicated on the Final Map as "Private Driveway and Fire Lane" with the widths clearly depicted. The areas for parking shall be designated outside of the fire lanes.

4. A common access agreement is required for the private driveway since multiple units are sharing the same access. Such language shall be included in the Covenant, Conditions and Restrictions (CC&R) document and shall be submitted to the Fire Department for review prior to Final Map clearance.

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5. Submit a copy of the Grading Plan to the Fire Department for review and approval.

   Compliance required prior to Final Map clearance.

   a. The Grading Plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire–Land Development–City Request–Grading. The applicant shall follow the steps and upload the required digital information. The appropriate fee(s) will be addressed.

6. Submit the water plans indicating the new fire hydrant locations to the Land Development Unit for review. The required public fire hydrants shall be installed prior to construction of the proposed buildings.

   a. The water plan shall be submitted online to the Land Development Unit for review. The applicant shall upload a digital copy of the appropriate plans into EPIC-LA, epicla.lacounty.gov. The applicant will need to apply for the following Plan Type: Fire–Land Development–City Request–Fire Hydrant. The applicant shall follow the steps and upload the required digital information. The appropriate fee will be addressed.

7. Prior recordation, provide written verification that the required fire hydrants have been bonded for in lieu of installation.

ACCESS REQUIREMENTS:

1. The proposed project is required to provide a second means of access. The fire code official is authorized to require more than one Fire Apparatus Access Road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions, or other factors that could limit access. Such additional access must comply with Title 21 of the Los Angeles County Code.

2. All on-site Fire Apparatus Access Roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.

3. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.

4. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

5. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.

4

6. Fire Apparatus Access Road Width Requirements. The private on-site streets shall be incompliance of the Los Angeles Public Works "Private Driveway and Traffic Calming Design Guidelines Manual.

   a. For the Detached Single-Family Residential, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.

   b. For the Attached Multi-Family Residential, provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Apparatus Access Roads to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.

7. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.

8. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround.

9. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.

10. Fire Apparatus Access Roads shall not exceed 15 percent in grade.

11. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.

12. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 and Section 503.2.2 shall be maintained at all times.

13. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.

14. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes.

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15. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.

16. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.

17. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 36 inches from the top of the parapet to the roof surface on more than two sides.

18. The fire code official is authorized to require more than one Fire Apparatus Access Road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions, or other factors that could limit access. Such additional access must comply with Title 21 of the Los Angeles County Code.

19. Gate Requirements – The method of gate control shall be subject to review by the Fire Department, prior to clearance to proceed to public hearing. All gates, to control vehicular access, shall be in compliance with the following:

    a. The keypad location shall be located a minimum of 50 feet from the public right-of-way.

    b. Provide a minimum 32-foot turning radius beyond the keypad, prior to the gate entrance at a minimum width of 20' for turnaround purposes.

    c. The gated entrance design with a single access point (ingress and egress) shall provide for a minimum width of 26 feet, clear-to-sky, with all gate hardware is clear of the access way.

    d. Where the Fire Apparatus Access Road consists of a divided roadway, the gate width shall be not less than 20 feet. Each side of the roadway shall be clear-to-sky.

    e. Construction of gates shall be materials that allow manual operations by one person.

    f. Gates shall be of the swinging or sliding type.

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g. The security gate shall be provided with an approved means of emergency operation, and shall be maintained operational at all times and replaced or repaired when defective.

h. Electric gate operators, where provided, shall be listed in accordance with UL 325.

i. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.

j. All locking devices shall comply with the County of Los Angeles Fire Department Regulation 5, Compliance for Installation of Emergency Access Devices.

k. An approved key box, listed in accordance with UL 1037 shall be provided as required by Fire Code 506. The location of each key box shall be determined by the Fire Inspector.

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WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.

2. All required public fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4

3. The required fire flow for the public fire hydrants for this project is 4,000 GPM at 20 pounds psi residual pressure for 4 hours. Three (3) public fire hydrants flowing simultaneously may be used to achieve the required fire flow.

   a. The fire flow is subject to reduction with the submittal of additional information.

4. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

5. The public fire hydrant locations will be addressed with submittal of the revised plans.

5

FUEL MODIFICATION:

This property is located within the area described by the Fire Department as a Fire Hazard Severity Zone. A "Fuel Modification Plan" shall be submitted to the Fuel Modification for review by the Fuel Modification Unit prior to the issuance of the building permits. Please contact the Department's Fuel Modification Unit for details. The Fuel Modification Plan Review Unit is located at 605 North Angeleno Avenue in the City of Azusa CA 91702-2904.

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They may be reached at (626) 969-5205 or visit https://www.fire.lacounty.gov/forestry-division/forestry-fuel-modification/

For any questions regarding the Land Development Unit report, please contact FPEA Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

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**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

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

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

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

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

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

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**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that an abandoned petroleum oil/gas well is located on the project site. Petroleum oil wells that pose a potential health hazard or environmental impact to the project site should be evaluated, assessed, and/or mitigated per the requirements of the California Department of Conservation, Geologic Energy Management Division (CalGEM, formerly known as DOGGR). Any contaminated soil (resulting from past petroleum oil well activities) that is discovered at the site would potentially require environmental oversight by the appropriate authorized government agencies, such as CalGEM, the Los Angeles Regional Water Quality Control Board, and the California Department of Toxic Substances Control. The HHMD Site Mitigation Unit is currently not available at this time to conduct environmental oversight for the project (on a contract, cost-recovery, basis).

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

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

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Very truly yours,

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

RMD:ac

# California Department of Fish and Wildlife

SECTION 2

**Responses to Comment Letter Number 12 by the California Department of Fish and Wildlife dated June 10, 2020**

**Comment 1: CDFW's Role**

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

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

**Response 1:** This comment explains CDFW's status and responsibilities as a Trustee Agency and as a Responsible Agency, under CEQA and does not address the sufficiency of any part of the Draft EIR. This comment is noted.

**Comment 2: Project Description and Summary**

*Objective: The proposed Project will include the development of 375 homes in five distinct neighborhoods. The development of the site will include extensive alterations to the existing landscape and topography, with substantial site improvements to support a residential community. A major element is the reconfiguration of Bouquet Creek and its adjacent floodplain. Other improvements include internal streets, storm drainage, water, sewer, electrical and natural gas infrastructure. This includes off-site connections to existing distribution mains for water, sewer, energy and telecommunications services, private recreation areas, and public parkland and trails. An additional facet of the Project is the realignment of a segment of Bouquet Canyon Road. It would involve abandoning a portion of the existing Bouquet Canyon Road between Hob Avenue and Pam Court and constructing a new segment starting 1,500 feet north of Plum Canyon Road and extending to 700 feet south of Shadow Valley Lane. The new portion of*

*Bouquet Canyon Road would be a four-lane roadway with bicycle lanes and parkways on both sides.*

*Location: The Project site is approximately 67.6 acres of undeveloped land located in the Saugus area of the City of Santa Clarita, approximately 0.2 miles to the north of the junction of Bouquet Canyon Road and Plum Canyon Road. The site is currently undeveloped and is covered by a mixture of natural and altered landscapes, prominent hills on the west, and Bouquet Creek, which flows along the northern portion of the site from east to west.*

**Response 2:** This comment presents a summary of the project description provided in the Draft EIR, and does not address the sufficiency of any part of the Draft EIR. This comment is noted.

**Comment 3: Comments and Recommendations**

*CDFW offers the comments and recommendations below to assist the City of Santa Clarita (City) in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).*

**Response 3:** This comment is an introductory statement to specific comments on various parts of the Draft EIR analysis of impacts to biological resources. It does not address the sufficiency of the Draft EIR. This comment is noted.

**Comment 4: Impacts to Unarmored Threespine Stickleback (Gasterosteus aculeatus williamsoni)**

***Issue:*** *CDFW is concerned that the Project is impacting Bouquet Creek, which is occupied by unarmored threespine stickleback. According to CNDDB, there are numerous historical records of unarmored threespine stickleback, a state fully protected species, in Bouquet Creek. Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any fully protected species is prohibited and cannot be authorized by CDFW (Fish and Game Code § 5515 and § 3511). "Take" is defined in Section 86 of Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."*

*CDFW cannot authorize the take of any fully protected species as defined by State law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee*

*that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully protected species are documented to occur on, or in, the vicinity of the project area, or that such species have some potential to occur on, or in, the vicinity of the project area, due to the presence of suitable habitat.*

***Specific impacts**: The Project may result in the loss of streams, associated watershed function, and biological diversity that could directly or indirectly impact the local population of unarmored threespine stickleback.*

***Why impacts would occur:** Unarmored threespine stickleback is a small, freshwater fish inhabiting slow-moving reaches or quiet-water microhabitats of streams and rivers. Unarmored threespine stickleback feed primarily on benthic insects, small crustaceans, and snails, and to a lesser degree on flatworms, nematodes, and terrestrial insects. Unarmored threespine stickleback typically prefer a lower stream gradient, slower water velocity, broader channel, and lack of native or invasive aquatic predators. Juveniles and sub-adults also tend to be found in the protection of vegetation, in slow moving or standing water. Adults are found in all areas of the stream. They tend to gather in areas of slower moving or standing water. In places where water is moving rapidly, they tend to be found behind obstructions or at the edge of the stream, especially under the edge of algal mats (Sasaki, 1977). Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream and upstream areas and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.*

*Water diversions can cause changes in flow regimes of streams. Thus, diversions can impact unarmored threespine stickleback by:*

- *Reducing the transport of fine sediment downstream causing streams to become graded or buried (Poff et al., 1997, Bauer et al., 2015);*
- *Disconnecting channels from still or slow-moving backwaters that are used by UTS, leading to reductions in reproduction and recruitment (Junk et al., 1989, Sparks, 1995, Poff et al., 1997);*
- *Wash-out and stranding of fish (Cushman, 1985);*
- *Changing benthic food sources;*
- *Altering habitat cover and algae;*
- *Dewatering small streams used by unarmored threespine stickleback; and Increasing water temperatures of streams that can slow growth, increase predation risk, and increase susceptibility to disease (Moore and Townsend, 1998, Marine and Cech, Jr., 2004).*

***Evidence impacts would be significant:** Unarmored threespine stickleback is an endangered species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 et seq.) and CESA (Fish & G. Code, § 2050 et seq.) and a Fully Protected species (Fish &*

*G. Code § 5515). Therefore, this species qualifies as an endangered, rare, or threatened species under CEQA consistent with CEQA Guidelines, Section 15380.*

*Unarmored threespine stickleback, once widespread in streams in southern California, are now only found in the upper Santa Clara River and its tributaries. The species is threatened by loss.*

**Response 4:** It is acknowledged that *(Gasterosteus aculeatus williamsonii*; UTS*)* has historically been documented in Bouquet Canyon Creek. However, there is documentation that the historical occupation of UTS in Bouquet Creek upstream of the project site has been extirpated due to introduction of low-plated threespine stickleback (*Gasterosteus aculeatus microcephalus*; San Marino Environmental Associates 2008, Richmond et al. 2014). Additionally, the portion of Bouquet Canyon Creek that occurs within the project site does not support suitable live-in habitat for stickleback due to its ephemeral nature. Downstream movement of stickleback is not likely due to channel alteration at the base of Bouquet Canyon (i.e., approximately 3.2 miles upstream of the project site; Richmond et al. 2015). Upstream movement of stickleback from the Santa Clara River to Bouquet Canyon Creek and into the project site is restricted as a result of the channelization of Bouquet Canyon Creek just downstream of the project site. Existing drop structures would prohibit stickleback movement upstream into the project site. Therefore, there is no potential of UTS occurring on the project site and there would be no direct impacts to this species or occupied habitat. Please see detailed discussion on pages 3.3-15 of the DEIR and pages 14-15 and 23 of the project's Biological Technical Report (BTR; HELIX 2019; see Appendix C to the project's DEIR).

As discussed above, the project would not directly impact UTS or occupied habitat. The project was designed to avoid indirect impacts to UTS or occupied habitat downstream of the project site in the Santa Clara River. Please see discussion on pages 3.3-15 of the DEIR and page 23 of the BTR.

Complete avoidance of Bouquet Canyon Creek was determined infeasible by the project proponent. In order to provide adequate conveyance of high flow events required to comply with Los Angeles County Flood Control District (LACFCD) and City of Santa Clarita (City) requirements, the engineer determined that Bouquet Canyon Creek would need to be replaced by a concrete-lined trapezoidal channel intended to convey the 100-year storm event through the project site, and into the existing maintained trapezoidal channel downstream. Although the project proponent designed the project to avoid the low-flow channel and an upland buffer, the entire extent of Bouquet Canyon Creek must be graded to construct the concrete trapezoidal channel. In addition, the Los Angeles County (County) Fire Department requires a 200-foot fuel modification zone from structures (Los Angeles County Fire Department 2020). This would require the development to setback a minimum of 200 feet from the outer limit of Bouquet Canyon Creek in order to avoid impacts to CDFW jurisdiction, resulting in a significant loss of developable acreage. The fuel modification activities would still be viewed as a permanent impact to CDFW jurisdiction due to the

need for modification and maintenance of vegetation fuel within jurisdictional "waters of the State." Implementation of the project requires impacts to a low function and value giant reed (*Arundo donax*) infested portion of the Bouquet Canyon Creek floodplain. Impacts will be adequately mitigated for as a permanent impact to CDFW jurisdictional waters pursuant to MM 3.3-3 in the DEIR and the pending Section 1602 Streambed Alteration Agreement for the project.

The project proposes to minimize impacts to the Bouquet Canyon floodplain and return the mainstem channel of Bouquet Canyon Creek to pre-project topographic contours, which will reduce impacts to U.S. Army Corps of Engineers (USACE) required to qualify for a Section 404 Nationwide Permit. With regard to CDFW jurisdiction, the re-contoured and revegetated portion of the Bouquet Canyon Creek mainstem will be fully and adequately mitigated for off-site. As such, the revegetation area is not a streambed mitigation area and is not subject to meet performance standards generally required for mitigation sites. However, CDFW will be provided a draft revegetation plan for review and comment during the Section 1602 Lake and Streambed Alteration Agreement process for the project. The areas adjacent to the flowline of the creek will be revegetated with appropriate native species. An adjacent transitional buffer will be vegetated with native upland species.

With regard to UTS, the project will not directly impact this species or suitable habitat for this species as detailed in Response 1 above. Moreover, the project was designed to avoid indirect impacts to potential populations of UTS downstream of the project site in the Santa Clara River. Therefore, no impacts to UTS would result from the project.

**Comment 5: Recommended Potentially Feasible Mitigation Measure(s):**

***Mitigation Measure:*** *CDFW recommends the City fully avoid all impacts to Bouquet Creek and unarmored threespine stickleback.*

***Issue #1****: Section 3.9.4 of the DEIR states "a new engineered channel would be constructed parallel to and on the southern side of the Bouquet Creek alignment within the project site".*

***Issue #2:*** *The Project also proposes enhance "flood control protection along Bouquet Creek, which would eliminate much of the existing floodplain conditions…Bouquet Creek would be channelized and designed to contain 100-year and other higher intensity storm flows."*

*CDFW is concerned that this new landscape feature and creek channelization will permanently alter the existing drainage pattern of Bouquet Creek and its surrounding riparian area.*

***Specific impacts:*** *Direct loss of stream and riparian habitat directly affect water and habitat quality downstream. Additionally, piping and undergrounding streams cause*

*changes in the hydrograph of the stream, altering geomorphic processes within the site and the potential listed species that depend on them.*

***Why impact would occur:*** *Project implementation includes grading, vegetation clearing, building construction, paved surfaces, and extensive landscaping. All these activities have potential to impact the hydrograph and geomorphic processes on site as well as the wildlife that depend on these processes.*

***Evidence impact would be significant:*** *The Project may substantially adversely affect the existing stream pattern and geomorphologic processes of the Project site through the alteration or diversion of a stream. Absent specific mitigation, the Project could result in substantial erosion or siltation on-site or off-site of the Project.*

*In addition, a review of The Nature Conservancy's Groundwater Dependent Ecosystem (GDE) Pulse Map and California Department of Water Resources' Natural Communities Commonly Associated with Groundwater (NCCAG) dataset, indicates the presence of coast live oak, a groundwater dependent ecosystem, on the Project site. Channelization of Bouquet Creek will have impacts on fish and wildlife beneficial uses and users of groundwater, including GDEs and interconnected surface water habitats, that are impacted disproportionately by shallow groundwater trends. Therefore, channelization of Bouquet Creek may result in the removal of sensitive vegetation communities and listed species associated with them.*

**Recommended Potentially Feasible Mitigation Measure(s):**

*Mitigation Measure #1: CDFW recommends redesigning the Project to avoid impacts to the existing, natural extent of Bouquet Creek and its floodplain. This is important, especially given that this segment of drainage facilitates regional wildlife movement and provides an ephemeral source of water to terrestrial wildlife.*

*Mitigation Measure #2: CDFW recommends the Project proponent actively implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into ephemeral stream beds during Project activities. BMPs should be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent should prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site should be free of nonnative plant materials. Fiber rolls or erosion control mesh should be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other projects without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.*

**Response 5:** Revegetation with appropriate native species adjacent to the flowline of Bouquet Canyon Creek will provide cover for the temporarily impacted "avoided" drainage referred to by CDFW as the "new landscape feature." The mainstem channel

to be revegetated will retain its historic alignment and contours and will not be altered. Bouquet Canyon Creek in its current condition is dominated by non-native invasive giant reed habitat that provides a continuous source of infestation to downstream portions of Bouquet Canyon Creek and the Santa Clara River. Typical flows that dominate Bouquet Canyon Creek on-site will continue to be conveyed through the mainstem channel and will be routed to the flood control channel only during significant storm events. The routing of only low flows into the mainstem channel will protect the revegetated drainage area by limiting erosion during high storm events or from large releases from the Bouquet Reservoir Dam located approximately 11 miles northeast of the project site. The discharge leaving the site post-project will be consistent with existing conditions and ensuring that downstream existing drainage patterns will not be adversely affected. It is important to note that the project will continue to discharge into Bouquet Canyon Creek downstream. This portion of Bouquet Canyon Creek is a channelized and maintained trapezoidal channel until its confluence with the Santa Clara River located approximately four miles southwest of the project site. As such, neither on-site nor off-site (downstream) existing drainage patterns will be subject to alteration by the project.

The on-site streambed and floodplain of Bouquet Canyon Creek is infested with invasive giant reed, which has significantly minimized the potential for high quality riparian habitat to occur on-site, while providing a continued source for further infestation downstream. The project will remove approximately 7.08 acres of giant reed stands which comprises over 70% of CDFW jurisdiction on the project site. Removal of giant reed will provide a direct benefit to downstream streambed habitats within Bouquet Canyon Creek and the Santa Clara River by removing the only source of giant reed infestation upstream of the previously channelized portion of Bouquet Canyon Creek. Following construction, the mainstem channel of Bouquet Canyon Creek will be returned to pre-project topographic contours and will be replanted with native species that are appropriate for the Santa Clarita region. A native upland transitional buffer will also be planted adjacent to the habitat. The removal of non-native giant reed stands and revegetation with native species will provide higher quality habitat for wildlife species and eliminate an upstream seed source of giant reed that would otherwise provide a continued source of infestation to downstream habitats.

As described in the project's Urban Stormwater Mitigation Plan (USMP) provided as Appendix G to the DEIR, potential impacts to water quality due to pollutants from residential uses will be addressed through the use of infiltration basins where feasible and biofiltration basins where infiltration is not feasible due to low percolation rates in the underlying soil. The USMP is currently under review by the Los Angeles Regional Water Quality Control Board who have deemed the application complete with no comments regarding the project USMP. Given the removal of giant reed and implementation of the project USMP, no adverse effects to habitat quality or water quality downstream are anticipated from implementation of the project.

The hydrology study prepared by the consulting civil engineer, Sikand, determined that water surface flows within the project reach would only contribute an additional 100 cubic feet per second, which represents approximately 0.5 percent of the overall flow within this reach of Bouquet Canyon Creek. Potential increases to surface flow rates due to project construction of impervious surfaces (e.g., roads, roofs, sidewalks, etc.) would be offset by constructing desilting basins upstream of the realigned Bouquet Canyon Road to help ensure that post-project discharge from site remains consistent with pre-project conditions. As discussed above, giant reed will be removed from the streambed and floodplain through implementation of the project. Following construction, the Bouquet Canyon Creek mainstem will be returned to pre-project topographic contours and replanted with appropriate native species. The revegetated streambed will provide higher quality habitat than the giant reed stands that currently dominate the streambed. Although the mainstem drainage will be returned to existing contours and revegetated with appropriate native species, the loss of biological function and values within the entire extent of the CDFW jurisdictional streambed and relict floodplain on-site will be fully compensated through off-site mitigation consistent with the DEIR and the pending Section 1602 application.

The mainstem channel will maintain its historic alignment and contours. Typical flows will continue through the drainage and only high flow storm events will be rerouted into the flood control channel. The flood control channel will protect the temporarily impacted on-site revegetated mainstem of Bouquet Canyon Creek from erosion and siltation that can occur during large flow events. Additionally, the revegetated streambed will provide higher quality habitat compared to the existing condition, which will protect the stream benches and banks from potential erosion during normal storm events. Per the project engineer, water surface flows within the project reach will only contribute an additional 100 cubic feet per second, which represents approximately 0.5 percent of the overall flow within this reach of Bouquet Canyon Creek. Potential increases to surface flow rates due to project construction of impervious surfaces (e.g., roads, roofs, sidewalks, etc.) would be offset by the construction of desilting basins upstream of the realigned Bouquet Canyon Road to ensure that post-project discharge from site remains consistent with pre-project conditions. Consequently, no adverse effects to the existing stream pattern and/or geomorphologic processes to the mainstream drainage or downstream channelized extent of Bouquet Canyon Creek are anticipated to be adversely affected by the project. Permanent impacts to the on-site Bouquet Canyon Creek floodplain are required to adequately convey the 100-year flood event pursuant to LACFCD and City-required guidelines for the project as determined by the project engineer.

As documented in the BTR, coast live oak woodlands are not present on the project site. Only two coast live oak (*Quercus agrifolia*) trees occur on the project site. These oaks are located in the eastern portion of the project site, adjacent to the Joseph Scott Detention Center. The coast live oak trees are not streambed-associated (see Figure 8 in the BTR).

The project proponent had expected to avoid a majority of the CDFW jurisdictional areas on-site during the early planning process. However, it was determined by the project engineer that the most feasible solution to comply with County and City flood conveyance requirements for the project is to construct a concrete trapezoidal channel through the site to adequately convey high storm flows. The construction of a trapezoidal channel rendered a site plan with significant avoidance of Bouquet Canyon Creek infeasible. In addition, complete avoidance of Bouquet Canyon Creek was determined infeasible since the County Fire Department requires a 200-foot fuel modification zone from structures (Los Angeles County Fire Department 2020). This would require the development to setback a minimum of 200 feet from the outer limit of Bouquet Canyon Creek in order to avoid fuel modification impacts within CDFW jurisdiction, which would not only significantly reduce the developable acreage of the project, but also require that the project provide compensatory mitigation for ongoing fuel modification and maintenance impacts within the CDFW jurisdictional areas. It should be noted that the project is proposing to return the mainstream channel of Bouquet Canyon Creek to pre-project topographic contours and revegetate the reestablished mainstem streambed with appropriate native species to include a native transitional buffer, while fully mitigating off-site for the mainstem drainage as a permanent impact to CDFW jurisdictional waters.

As discussed on page 3.3-8 of the DEIR and pages 18-19 and 28 of the BTR, the project site was not identified as a regional wildlife movement corridor. Bouquet Canyon Creek directly downstream of the project site is a concrete channel and supports little to no vegetation. The lack of downstream habitat limits wildlife movement through this portion of Bouquet Canyon Creek, although local wildlife movement likely occurs. Once grading is complete, the mainstem channel of Bouquet Canyon Creek will be returned to pre-project topographic contours. Invasive giant reed will be removed from the creek and the area will be replanted with native species that are appropriate for the Santa Clarita region. The revegetated channel will provide higher quality habitat for wildlife since invasive and non-native species will be replaced with native species. The project will not remove an ephemeral water source for terrestrial wildlife since the creek will maintain its connection to upstream water sources.

Best Management Practices (BMPs) to minimize and avoid impacts to CDFW jurisdiction during and after construction will be addressed through compliance with a Storm Water Pollution Prevention Plan and the project's USMP. Compliance with the BMPs required as part of the General Construction Stormwater Permit and the project's USMP will help ensure that adequate erosion prevention measures are implemented to avoid the discharge of sediment and pollutants into downstream ephemeral streambeds. Minimization and avoidance measures may include, but are not limited to, the following:

- Construction-related equipment will be stored in developed areas, outside of drainages. No equipment maintenance will be done within or adjacent to the drainage.

- Mud, silt, spoil sites, raw cement, asphalt, or other pollutants from construction activities will not be placed within or adjacent to the drainage.
- Open trenches or other excavated areas will be properly secured at the end of the day to avoid entrapment of animals, or an escape ramp will be provided.
- To avoid attracting predators during construction, the project will be kept clean of debris to the extent possible. All food-related trash items will be enclosed in sealed containers and regularly removed from site.
- Construction personnel will strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.
- Exclusion fencing will be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities.
- To the extent feasible, construction will be conducted outside of the nesting bird season (as required by MM 3.3-5).

**Comment 6: Comment #3: Impacts to Oak Woodland**

***Issue #1****: As stated in the DEIR Impact 3.3e, "The proposed project would remove 26 oak trees, subject 1 oak tree to major encroachment and 2 oak trees to minor encroachment". This removal or encroachment, "would require approximately 91 replacement oak trees," according to the DEIR.*

***Issue #2****: Impact 3.3e of the DEIR also states, "If planting on-site is not possible, the applicant may donate the replacement oak trees to the City or provide the equivalent monetary value of the replacement trees to the City."*

*CDFW does not accept "equivalent monetary value" as a means of mitigation.*

***Specific impacts:*** *CDFW considers oak woodlands distinct biological communities, consisting of layers that include trees, shrubs, vines, and herbaceous understory vegetation. The DEIR only considers the value of the trees and does not appear to characterize the value of these unique individual communities in a biological setting. Removal or thinning of an understory or any one of these layers in oak woodland directly impacts the functions and values of the entire oak woodland. In addition, monetary means do not mitigate for the complete loss of this distinct biological community.*

***Why impacts would occur:*** *Project implementation includes grading, vegetation clearing, building construction, and other activities that may result in direct mortality, population declines, or local extirpation of oak woodlands.*

***Evidence impacts would be significant**: The goal of the mitigation is to recreate functioning oak woodland of similar composition, structure, and function to the selected oak woodland that was impacted. The mitigation site should mimic the function, density, percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the mitigation should be deemed sufficient. Mitigation measures should repair, rehabilitate, or restore the impacted environment. Monetary mitigation does not compensate for the significant impact by replacing or providing substitute resources/environments, for such unique, biologically valuable vegetation communities that, if not mitigated in kind, will be lost forever.*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure #1: If avoidance is not possible, impacts to the oak woodland should be mitigated through habitat restoration or conservation. All revegetation/restoration areas that will serve as mitigation should include preparation of a separate restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).*

*Recommendation #2: Please note, in 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/. To determine the rarity ranking and mitigation ratios of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.*

**Response 6**: Mitigation for project impacts to oak (Quercus spp.) trees is intended to satisfy requirements per the City's Oak Tree Preservation Ordinance, which requires replacement trees to be planted on-site, donation of trees to the City, or an equivalent monetary value to be paid to the City (City 2013).

As stated above, proposed mitigation for impacts to oak trees on the project site is consistent with requirements of the City's Oak Tree Preservation Ordinance. Additionally, no oak woodlands or sensitive oak communities were mapped on the project site. The majority of oaks observed on the project site were shrubs, including scrub oak (*Quercus berberidifolia*) and Tucker oak (*Quercus john-tuckeri*). Areas dominated by these species were mapped as scrub oak chaparral (MCV scrub oak chaparral; CaCode 37.407.02) and southern north slope chaparral (MCV Tucker oak

chaparral; CaCode 37.418.04), respectively (see Figure 5 of the BTR). Neither of these communities are designated by CDFW as sensitive natural communities, and therefore impacts to these communities do not warrant mitigation pursuant to CDFW (CDFW 2019).

MCV alliance/association community names as defined by Sawyer et al. 2009 are provided in Table 2 of the BTR.

**Comment 7: Vegetation Community Classification**

***Issue:*** *Table 3 in the BTR identifies Impacts to Vegetation Communities and the DEIR states, "plant communities were classified in accordance with Holland (1986) and Oberbauer (1996), with additional vegetation community information taken from the Manual of California Vegetation, second edition (MCV; Sawyer, et al. 2008).*

***Specific impact:*** *CDFW considers grading a vegetation community a permanent impact unless mitigation is proposed that includes specific criteria that ensure the exact vegetation community is recreated, with consideration for the temporal loss of the habitat as well as defined success criteria and weed management. Revegetation or acquisition/preservation would be a mitigation measure proposed to offset impacts to a CDFW sensitive vegetation community.*

***Why impact would occur:*** *Project implementation includes grading, vegetation clearing, road construction, utilities construction, road maintenance, fuel modification, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive vegetation communities. If sensitive areas are not correctly identified, CDFW is unable to accurately determine proper mitigation measures for that vegetation community. CDFW considers vegetation communities, alliances, and associations with a statewide ranking of S1, S2, S3 and some S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive vegetation communities.*

*Any revegetation effort should represent the actual vegetation community being impacted. Vegetation communities are named using alliances or associations. An example is California Buckwheat Scrub Alliance. The Manual of California Vegetation (MCV) (Sawyer, et al., 2008) separates the diagnostic species for the California Buckwheat Scrub Alliance into trans and cis montane stands. The species assemblages for this one alliance change over the length of this project. CDFW is concerned spreading a generic seed mix that is not truly representative of the unique plant community alliances present will impact the existing habitat, introduce species that don't occur there, and ultimately change the structure of the vegetation community. Additionally, plants that aren't found in an area may not be suited to survive there, raising the rate of failure.*

***Evidence impact would be significant**: Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect. This, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS). Impacts to all sensitive communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Using non-conforming modifications to MCV alliances may misidentify rare or sensitive vegetation communities, resulting in impacts to the species.*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure #1: Vegetation Communities that do not conform to existing MCV-defined alliances might be considered rare. All data and proposed modification to existing or new alliances should be submitted to CDFW for scientific review. If a project's dominant vegetation does not fit into one of the non-native alliances or provisional alliances, then a description (scientific, including information used to determine membership for this new alliance) should be included to defend this conclusion. This process is imperative to maintain a rigorous scientific vetting process and defensible classification system.*

*Mitigation Measure #2: CDFW recommends that updated botanical surveys utilizing MCV-defined alliances be conducted to inform impact assessments, avoidance, minimization, and mitigation measures in the DEIR. Focused surveys for sensitive/rare plants on-site should be disclosed in the CEQA document. Based on the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW, 2018), a qualified biologist should "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.*

*Recommendation #3: See Recommendation #2 in Comment #2*

**Response 7:** No seed mixes will be spread for mitigation purposes. The project will revegetate the mainstem channel of Bouquet Canyon Creek with appropriate native species as well as a transitional buffer with native upland species. Plant palettes will consist of species native to the Santa Clarita area and will be reviewed and approved by CDFW prior to implementation as part of the pending Section 1602 Lake and Streambed Alteration Agreement process for the project. Only native plants will be used for project landscaping within the reestablished mainstem of Bouquet Canyon Creek on-site. Please note that this revegetation effort is not being implemented as mitigation for streambed impacts. Bouquet Canyon Creek will be returned to pre-

project topographic contours and revegetated to remain under the impact threshold for a U.S. Army Corps of Engineers' Nationwide Permit.

As discussed on pages 3.3-17 and 3.3-20 of the DEIR and page 26 of the BTR, two sensitive communities pursuant to CDFW were identified: elderberry savanna and southern willow scrub/giant reed stand (CDFW 2019). Both communities are extremely disturbed. The sensitive natural community designation is generally reserved for high-quality habitats, such as those that lack invasive species, do not show signs of human-caused disturbance, and show signs of reproduction (i.e., sprouts and seedlings present). No mitigation is proposed for impacts to blue elderberry stands since is the community is small and isolated from other native habitat, with the exception of a small patch of big sagebrush scrub. The understory is dominated by dense non-native short-pod mustard (*Hirschfeldia incana*), which is likely due to historic disturbance from ranching activities, fuel modification over the years, and its proximity to Bouquet Canyon Road. No sprouts or seedlings were noted during field surveys. Impacts to red willow thickets/giant reed breaks would be mitigated through compensatory mitigation for impacts to CDFW jurisdiction. As required by MM 3.3-3, permanent impacts to CDFW jurisdiction for southern willow scrub/giant reed stand will be mitigated through on-site or off-site enhancement, restoration, and/or creation of CDFW jurisdictional streambed at ratio of no less than 1:1. A mitigation ratio of no less than 1:1 would adequately mitigate for impacts to this community since the mitigation would provide a higher quality resource than the community proposed for impacts. Additionally, the project would remove an upstream seed source of giant reed that would otherwise provide a continued source of infestation to downstream habitats.

Plant communities were defined using existing MCV-defined alliances (see Table 2 in the BTR). MCV-defined alliances were used during vegetation mapping and are provided in Table 2 of the BTR. Therefore, updated botanical surveys are not necessary. Rare plant survey methods are discussed in detail on page 3 of the BTR and results are provided on pages 3.3-6 and 3.3-7 of the DEIR and pages 13-14 of the BTR.

A thorough discussion on presence/absence of sensitive plants on-site is provided on pages 3.3-6 and 3.3-7 of the DEIR, pages 13-14 of the BTR, and Appendix I to the BTR. As discussed above and on page 26 of the BTR, two sensitive communities pursuant to CDFW were identified: elderberry savanna and southern willow scrub/giant reed stand (CDFW 2019). Both communities are extremely disturbed. No mitigation is proposed for impacts to blue elderberry stands due the low quality of the habitat. Impacts to red willow thickets/giant reed breaks would be mitigated through compensatory mitigation for impacts to CDFW jurisdiction.

**Comment 8: Mitigation for slender mariposa lily (Calochortus clavatus var. gracilis)**

***Issue #1:*** *MM 3.3-1 of the DEIR states, "Prior to construction, a mitigation plan shall be developed that describes methods to mitigate for impacts to slender mariposa lily". Providing a mitigation plan with methods of maintenance, monitoring, performance*

*standards, and success criteria in the future is considered deferred mitigation under CEQA.*

***Issue #2:*** *MM 3.3-1 of the DEIR describes the mitigation ratio as 1:1. It is unclear if the ratio is designated for individual plants or whether that includes the acreage on which they are located. In addition, 1:1 is insufficient replacement for this rare plant species.*

***Issue #3****: MM 3.3-1 of the DEIR states, "The mitigation plan shall include a description of the mitigation site…". CDFW does not support transplantation of rare plants, into areas they currently do not occur, as a mitigation strategy.*

***Issue #4****: MM 3.3-1 of the DEIR states, "seeds shall be obtained from a native plant nursery if available." CDFW is not aware of any nursery that has slender mariposa lily bulbs.*

***Issue #5****: CDFW does not accept payment into an in-lieu fee program as a viable mitigation option.*

***Specific impacts:*** *Project grading and fuel modification associated with the residential development would impact approximately 142 slender mariposa lilies. Construction of the new alignment of Bouquet Canyon Road would impact approximately 320 slender mariposa lilies. CDFW, in general, does not recommend transplantation of rare plants, in particular bulbiferous species like the slender mariposa lily, as a mitigation/minimization measure to reduce adverse effects from the project because successful implementation of translocation is rare with minimal documented success. CDFW defines success as long-term, self-sustaining population with a positive overall population trend, demonstrated fertile seed set, and demonstrated recruitment. Even if transplantation is initially successful, they typically fail to persist over time. To ensure the conservation of sensitive plant species, transplantation should be undertaken as a last resort. Why impacts would occur: CEQA Guidelines §15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on future surveys, the preparation of future management plans, or mitigating by obtaining permits from CDFW are considered deferred mitigation under CEQA. In order to analyze if a project may have a significant effect on the environment, the Project related impacts, including survey results for species that occur in the Project footprint need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).*

*These impacts would continue to be significant because MM 3.3-1 will not result in adequate avoidance or successful mitigation for the unavoidable direct, indirect and temporal losses including the uncertainties and often failures of creation or restoration practices for special status plants using transplanting of species.*

***Evidence impacts would be significant:*** *Creation or restoration using the transplanting of plant species should be considered experimental in nature and not be viewed as a mitigation measure to mitigate for slender mariposa lily and other CNPS special status plants below a significant level under CEQA. In addition, because transplantation projects have a poor success rate, and demonstrate a downward trend of survival over time (GodeFroid, S., et al., 2010). Studies show success of transplantation projects within the 10 to 15 percent range, with an optimistic outcome of 50 percent survival maintained over 5 years (or thereafter, 50% survival maintained for 1 year).*

*In addition, the DEIR does not address the cumulative loss of slender mariposa lily in Los Angeles County adequately. A description of the remaining acreage compared to historical range, connectivity of remaining slender mariposa lily and how the loss of 320 individuals of slender mariposa lily in this location will affect the local region should be discussed in more detail and figures. Based upon MM 3.3-1, the Project would continue to result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Absent adequate mitigation, the ecosystem function and contribution to genetic biological diversity of slender mariposa lily and other CNPS special status plants in conjunction with their contribution to breeding, feeding and cover habitat for wildlife will be compromised.*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure #1: CDFW recommends as a better mitigation strategy. The preservation of areas where slender mariposa lily is located on site or an existing, similarly sized, population of slender mariposa lily in perpetuity at another location. This would be at an acreage of no less than 3 acres preservation of occupied habitat for every 1 acre of impact to occupied habitat.*

*Mitigation Measure #2: CDFW recommends the DEIR include defined mitigation measures for adverse project-related impacts to sensitive plants. Mitigation measures should emphasize avoidance and reduction of project impacts. For any impacts that have been adequately demonstrated to be unavoidable, CDFW recommends that the City should require a scientifically rigorous monitoring and management program as part of the Project's CEQA mitigation, monitoring, and reporting program (MMRP) that would include adaptive management strategies (Public Resources Code 21081.6 and CEQA Guidelines Section 15097). If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through occupied habitat acquisition and preservation in perpetuity may be appropriate.*

*Mitigation Measure #3: CDFW recommends that all open space preservation/mitigation land be protected in perpetuity with minimal human intrusion by recording and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. CDFW recommends all open space or habitat lands considered for mitigation of environmental impact under CEQA be*

*owned and managed by an entity with experience in managing habitat and be placed under a conservation easement. CDFW has encountered problems with using portions of privately owned lots as open space habitat mitigation under CEQA. Homeowners may grade and remove vegetation on their land and there is little legal recourse to remedy this loss under CEQA. The better option is to place ownership of any open space or habitat land considered as avoidance under CEQA with a conservancy or other land management company to allow for legal remedies should trespass and clearing/damage occur. A management and monitoring plan, including a funding commitment, should be developed for any conserved land, and implemented in perpetuity to protect existing biological functions and values. Permeable wildlife fencing should be erected around any conserved land to restrict incompatible land uses and signage posted and maintained at conspicuous locations communicating these restrictions to the public.*

*Mitigation Measure #4: For any land that is proposed for preservation and/or restoration, the CEQA document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, invasive plant removal, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of open space preservation/mitigation lands.*

**Response 8:** Mitigation was not deferred as MM 3.3-1 in the DEIR outlines how the project will mitigate for impacts to slender mariposa lily (*Calochortus clavatus* var. *gracilis*) at a 1:1 ratio. The ratio is intended to provide flexibility depending on which proposed mitigation strategy is determined the most feasible. The ratio may be at a 1:1 replacement ratio for impacted individuals, 1:1 acreage ratio for preserving occupied habitat, or a combination.

As noted below, the project proponent is currently evaluating opportunities to implement mitigation for slender mariposa lily to comply with MM 3.3-1. Preservation of existing occupied habitat is the preferred mitigation option, which would not require a mitigation plan. If enhancement and/or bulb transplantation is determined to be the most feasible mitigation option, CDFW will have the opportunity to review, comment, and approve the mitigation plan prior to implementation.

It is acknowledged that there could be some temporal loss due to a lag time between when impacts occur and mitigation is implemented. Therefore, the following opportunities are being evaluated by the project proponent in compliance with the DEIR measure in light of CDFW's comments:

1. Preservation of existing on-site or off-site habitat occupied by slender mariposa lily at an acreage ratio of 2:1.

2. Enhancement of existing on-site or off-site habitat occupied by slender mariposa lily at an acreage ratio of 1:5:1.
3. Transplantation of slender mariposa lily bulbs at a 1:1 ratio in addition to either (a) preservation of on-site or off-site habitat occupied by slender mariposa lily at an acreage ratio of 0.5:1 or (b) enhancement of on-site or off-site habitat occupied by slender mariposa lily at an acreage ratio of 0.25:1.
4. Transplantation of slender mariposa lily bulbs at a 1.5:1 ratio.

Preservation of habitat currently occupied by slender mariposa lily is the preferred mitigation option. The project proponent is actively assessing off-site properties that may be suitable for preservation and/or transplantation. The mitigation proposed above will be dependent on suitable land that is available. The mitigation outlined above remains consistent with MM 3.3-1 as provided in the project's DEIR but has been expanded to provide additional details based on ongoing analysis by the project proponent of on-site and off-site mitigation opportunities.

It is noted that CDFW does not support transplantation of rare plants into areas they currently do not occur in, as a mitigation strategy. As noted above by CDFW, preservation of habitat currently occupied by slender mariposa lily is the preferred mitigation option. The project proponent is actively looking for off-site properties that may be suitable for preservation and/or transplantation.

It is noted that CDFW is not aware of any nursery that has slender mariposa lily bulbs. This option was included in MM 3.3-1 to provide flexibility in the event a nursery that carries bulbs was identified.

There are currently no known in-lieu fee programs for slender mariposa lilies and no such program appears to be in planning stages. Given these circumstances and CDFW's indication that they will not accept in-lieu fee mitigation, no in-lieu fee credits will be acquired as mitigation for slender mariposa lily. The language of MM 3.3-1 has been revised to remove the reference to in-lieu fee mitigation.

Mitigation has not been deferred. MM 3.3-1 outlines what steps will be taken to mitigate impacts to slender mariposa lily to less than significant. As stated in MM 3.3-1, impacts to slender mariposa lily will be offset by mitigation at a ratio of 1:1. The mitigation will include either transplantation of lilies to an appropriate on-site or off-site mitigation area and/or preservation of existing occupied land. A mitigation plan would be provided to CDFW for review, comment, and approval. The mitigation plan would require maintenance and monitoring of the receptor site for a minimum of five years and specific success criteria would need to be met before the mitigation is considered successful. See discussion above regarding additional mitigation details currently being analyzed by the project proponent.

The project would not contribute to a significant cumulative impact involving loss of this species since the proposed mitigation would ensure that a viable population of a

comparable number of individuals would be preserved/enhanced/established, thus fully offsetting the potential loss of plants within the project site.

The project does not propose or anticipate a requirement to preserve open space or to mitigate for any biological resources on-site, with the exception of slender mariposa lily. On-site and/or off-site mitigation for impacts to slender mariposa lily would be preserved in perpetuity via a legal preservation mechanism such as a deed restriction or conservation easement, to be identified in the mitigation plan to be provided to CDFW for review, comment and approval. Streambed impacts are anticipated to be mitigated through purchase of off-site streambed mitigation credits.

**Comment 9: Impacts to nesting birds**

***Issue**: The BTR indicates that coastal California gnatcatcher (Polioptila californica californica), a California Species of Special Concern and an Endangered Species Act (ESA) listed species, has the possibility of occurring on site. In addition, the BTR and a review of the California Natural Diversity Database (CNDDB) indicates an occurrence of loggerhead shrike (Lanius ludovicianus), a California Species of Special Concern, within a mile and a quarter of the Project site. The occurrence of oak woodland and other vegetation communities indicate the potential for nesting within and around the Project vicinity.*

***Specific impacts**: Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.*

***Why impact would occur:** Impacts to nesting birds could result from ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.*

***Evidence impact would be significant:** The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under state laws and regulations, including Fish and Game Code sections 3503 and 3503.5.*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure #1: To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction should occur from February 15 (January 1 for raptors) through August 31.*

*Mitigation Measure #2: If avoidance is not feasible, a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of the construction*

*site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers should be increased if needed to protect the nesting birds.*

**Response 9:** Based on biological surveys conducted at the project site, Coastal California gnatcatcher *(Polioptila californica californica; CAGN)* is presumed absent based on negative survey findings (see CAGN survey report included as Appendix E to the BTR). Please note that oak woodlands were not mapped on the project site (see Response 6 for further explanation). MM 3.3-5 was included in the DEIR to avoid impacts to nesting birds, which requires similar measures to be implemented as those proposed by CDFW in this comment.

**Comment 10: Impacts to Bat Species, including California Species of Special Concern**

***Issue:*** *The Project includes activities that will result in the removal of trees and vegetation that may provide habitat for bats. In addition, Appendix J (Sensitive Animal Species Potential to Occur) in the BTR, identifies Townsend's big-eared bat (Corynorhinus townsendii), a California Species of Special Concern, as possible likelihood to occur on site.*

***Specific impacts:*** *Project activities include the removal of trees, vegetation, and/or structures that may provide foraging habitat and therefore has the potential for the direct loss of bats. Why impacts would occur: The removal of vegetation and trees will potentially result in the loss of foraging habitat for bats.*

***Evidence impacts would be significant:*** *Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Although the Townsend's big-eared bat is the species in question, it is important to remember that there are many bat species, for example the western yellow bat, that can be found year-round in urban areas throughout the south coast region (Miner & Stokes, 2005). Several bat species are considered California Species of Special Concern and meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).*

*In addition, "Encroachment of urban development and agriculture into areas of native vegetation likely alters the composition and abundance of insect prey in an area and may affect the ability of Townsend's big-eared bat to find adequate prey. Encroachment may also disturb roosts by increasing the rate of human visitation and increasing predation pressure from cats and other generalist predators associated with human settlement" (Gruver, J.C., 2006).*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure: CDFW recommends bat surveys be conducted by a qualified bat specialist to determine baseline conditions within the Project and within a 500-foot buffer. In addition, an analysis of the potential significant effects of the proposed Project on the species (CEQA Guidelines §15125). CDFW recommends the DEIR include the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. The DEIR should document the presence of any bats and include species specific mitigation measures to reduce impacts to below a level of significance.*

**Response 10:** Townsend's big-eared bat (*Corynorhinus townsendii*) was the only sensitive bat species recorded on CNDDB within the UGSGS Mint Canyon quadrangle search (CDFW 2018). The status of this species was recently changed from a State Candidate Threatened species to a Species of Special Concern. As discussed on page 3.3-16 of the DEIR and page 24 of the BTR, the project site does not support preferred roosting habitat (i.e., caves, cliffs, rock ledges) and this species is extremely sensitive to human disturbance (Western Working Bat Group 2005). Townsend's big-eared bat species preferred foraging habitat is along the edges of streams and wooded habitat. The project site supports limited wooded habitat and is primarily vegetated with non-native grass and forb species as well as chaparral and coastal sage scrub shrubs. Open space with potential suitable habitat is located to the north and east of the project site, and loss of foraging habitat on the project site would not substantially reduce the foraging habitat of this species or cause this species to drop below self-sustaining levels. Additionally, the habitat on the project site will be enhanced by removing dense, invasive giant reed stands and the mainstream channel will be revegetated with appropriate native species. The revegetation within and adjacent to Bouquet Canyon Creek would provide higher quality foraging habitat for this species. Bat surveys are not warranted since the project will not significantly impact roosting or potentially suitable foraging habitat for Townsend's big-eared bat.

**Comment 11: Impacts to California Species of Special Concern**

***Issue**: One mammal species, San Diego black-tailed jackrabbit (Lepus californicus bennettii) is identified in Appendix J of the BTR (Sensitive Animal Species Potential to Occur) as having high possibility to occur onsite. In addition, four reptile species with a possible to likely potential to occur on site from Appendix J of the BTR include the California legless lizard (Anniella pulchra), California glossy snake (Arizona elegans*

*occidentalis), coastal whiptail (Aspidoscelis tigris stejnegeri), and coast horned lizard (Phrynosoma blainvillii).*

***Specific impact:*** *Project ground disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. In addition, the Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.*

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

***Evidence impact would be significant****: CEQA provides protection not only for state and federally listed species, but for any species including but not limited to California Species of Special Concern which can be shown to meet the criteria for State listing. These Species of Special Concern meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of Species of Special Concern could require a mandatory finding of significance by the Lead Agency, (CEQA Guidelines, § 15065).*

***Recommended Potentially Feasible Mitigation Measure(s):***

*Mitigation Measure #1: Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with the reptile and mammal species behavior and life history should conduct specialized surveys to determine the presence/absence of Species of Special Concern. Surveys should be conducted during active season when the reptiles are most likely to be detected. California legless lizard are active yearround in the mornings and evenings; California glossy snake are nocturnal and active February to November (peaking in May); coastal whiptail are diurnal (activity peaking in late morning) and active from March to October; coast horned lizard are active February to November and are diurnal in the spring and crepuscular in summer and fall (Thomson, R.C. et al., 2016). Jackrabbits have yearlong diurnal and crepuscular activity (Zeiner, D.C. et al., 1988-1990). Survey results, including negative findings, should be submitted to CDFW for review 2 weeks prior to initiation of Project activities.*

*Mitigation Measure #2: To further avoid direct mortality, CDFW recommends that a qualified biological monitor approved by CDFW be on-site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the Project clearly identify that the designated entity should obtain all appropriate state and federal permits.*

**Response 11:** CEQA Guidelines § 15065 states that a significant effect is when the project has the potential to "substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory."

The project site supports suitable habitat for Species of Special Concern, including California glossy snake (*Arizona elegans occidentalis*), California legless lizard (*Anniella* sp.), coast horned lizard (*Phrynosoma blainvillii*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), loggerhead shrike (*Lanius ludovicianus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), southern grasshopper mouse (*Onychomys torridus ramona*), and Townsend's big-eared bat (see discussion above regarding this species). Please see detailed discussion of potential for these species to occur on the project site on pages 3.3-15 and 3.3-16 of the DEIR, pages 14-16 of the BTR, and Appendix J to the BTR.

Numerous field surveys have been conducted over the last three years on the project site at different times of the year (June 17, 2017; July 6, 2017; March 24, 2018; March 27, 2018; April 7, 2018; April 13, 2018; April 4, 2018; April 21, 2018; May 5, 2018; May 12, 2018; May 15, 2018; June 8, 2018; June 26, 2018; December 19, 2018; December 20, 2018; May 9, 2019; October 9, 2019). Animals species observed during each site visit were recorded and are listed as Attachment B to the BTR. None of these species have been observed during any of the field surveys conducted on the project site. Based on observations made during site visits, these species are either absent or scarce throughout the project site. Open space with potentially suitable habitat for these species occurs to the north and east of the project site. If present at the time of construction, nesting loggerhead shrike would be protected through implementation of MM 3.3-5. Therefore, the project would not significantly impact these species since the project would not substantially reduce the habitat for these species, cause populations of these species to drop below self-sustaining levels, threaten to eliminate a community, or substantially reduce the number or restrict the range of these species.

Since Species of Special Concern have not been documented on the project site over last three years, the project would not result in significant impacts to those species and no further surveys or mitigation is warranted. Implementation of MM 3.3-5 would protect nesting migratory birds during project construction.

**Comment 12:** *The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project*

*approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).*

**Response 12:** Comment noted. Payment of CDFW fees will be made upon filing of the Notice of Determination.

**Comment 13:** *CDFW recommends the following language to be incorporated into a future environmental document for the Project.*

| ***Biological Resources*** | | | |
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| | ***Mitigation Measure*** | ***Timing*** | ***Responsible Party*** |
| ***MM-BIO-1-Impacts to unarmored threespine stickleback*** | *CDFW recommends the City fully avoid all impacts to Bouquet Creek and unarmored threespine stickleback.* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-2-Impacts to Bouquet Creek*** | *The Project will be designed to avoid impacts to the existing, natural extent of Bouquet Creek and its floodplain. This is important, especially given that this segment of drainage facilitates regional wildlife movement and provides an ephemeral source of water to terrestrial wildlife.* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-3-Impacts to Bouquet Creek*** | *Project proponent shall actively implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into ephemeral stream beds during Project activities. BMPs shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other projects without welded weaves. Nonwelded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.* | | |
| ***MM-BIO-4-Oak woodland*** | *If avoidance is not possible, impacts to the oak woodland shall be mitigated through habitat restoration or conservation. All revegetation/restoration areas that will serve as mitigation shall include preparation of a separate restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan shall include restoration and monitoring methods; annual success criteria; contingency actions shall success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation shall have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-5-Vegetation Communities*** | *Vegetation Communities that do not conform to existing MCV-defined alliances might be considered rare. All data and proposed modification to existing or new alliances shall be submitted to CDFW for scientific review. If a project's dominant vegetation does not fit into one of the non-native alliances or provisional alliances, then a description (scientific, including information used to determine membership* | *Prior to construction* | *City of Santa Clarita Project Proponent* |

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| | *for this new alliance) shall be included to defend this conclusion. This process is imperative to maintain a rigorous scientific vetting process and defensible classification system.* | | |
| ***MM-BIO-6-Vegetation Communities*** | *Botanical surveys utilizing MCV-defined alliances shall be conducted to inform impact assessments, avoidance, minimization, and mitigation measures in the DEIR. Focused surveys for sensitive/rare plants on-site shall be disclosed in the CEQA document. Based on the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW, 2018), a qualified biologist shall "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." CEQA documentation shall provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.* | *During Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-7-slender mariposa lily*** | *Areas where slender mariposa lily is located on site shall be preserved or an existing, similarly sized population of slender mariposa lily shall be preserved in perpetuity at another location, at an acreage of no less than 3 acres preservation of occupied habitat for every 1 acre of impact to occupied habitat.* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-8-slender mariposa lily*** | *The DEIR shall include defined mitigation measures for adverse Project-related impacts to sensitive plants. Mitigation measures shall emphasize* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *avoidance and reduction of Project impacts. For any impacts that have been adequately demonstrated to be unavoidable, The City shall require a scientifically rigorous monitoring and management program as part of the Project's CEQA mitigation, monitoring, and reporting program (MMRP) that would include adaptive management strategies (Public Resources Code 21081.6 and CEQA Guidelines Section 15097). If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through occupied habitat acquisition and preservation in perpetuity may be appropriate.* | | |
| ***MM-BIO-9-Slender mariposa lily*** | *All open space preservation/mitigation land be protected in perpetuity with minimal human intrusion by recording and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. All open space or habitat lands considered for mitigation of environmental impact under CEQA be owned and managed by an entity with experience in managing habitat and be placed under a conservation easement. CDFW has encountered problems with using portions of privately owned lots as open space habitat mitigation under CEQA. Homeowners may grade and remove vegetation on their land and there is little legal recourse to remedy this loss under CEQA. The better option is to place ownership of any open space or habitat land* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *considered as avoidance under CEQA with a conservancy or other land management company to allow for legal remedies shall trespass and clearing/damage occur. A management and monitoring plan, including a funding commitment, shall be developed for any conserved land, and implemented in perpetuity to protect existing biological functions and values. Permeable wildlife fencing shall be erected around any conserved land to restrict incompatible land uses and signage posted and maintained at conspicuous locations communicating these restrictions to the public.* | | |
| ***MM-BIO-10-slender mariposa lily*** | *For any land that is proposed for preservation and/or restoration, the CEQA document shall include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective shall be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that shall be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, invasive plant removal, and increased human intrusion. An appropriate non-wasting* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-11-Nesting Birds*** | *To protect nesting birds that may occur on site or adjacent to the project boundary, no construction shall occur from February 15 (January 1 for raptors) through August 31.* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-12-Nesting Birds*** | *If avoidance is not feasible, a qualified biologist shall complete a survey for nesting* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *bird activity within a 500- foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests.*<br>*These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds.* | | |
| ***MM-BIO-13 Bat Species*** | *Bat surveys shall be conducted by a qualified bat specialist to determine baseline conditions within the Project and within a 500-foot buffer and analyze the potential significant effects of the proposed Project on the species (CEQA Guidelines §15125). The DEIR will include the use of acoustic recognition technology to maximize detection of bat species to* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *minimize impacts to sensitive bat species. The DEIR shall document the presence of any bats and include species specific mitigation measures to reduce impacts to below a level of significance.* | | |
| ***MM-BIO-14- Species of Special Concern*** | *Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with the reptile and mammal species behavior and life history shall conduct specialized surveys to determine the presence/absence of Species of Special Concern. Surveys shall be conducted during active season when the reptiles are most likely to be detected. California legless lizard are active year-round in the mornings and evenings; California glossy snake are nocturnal and active February to November (peaking in May); coastal whiptail are diurnal (activity peaking in late morning) and active from March to October; coast horned lizard are active February to November and are diurnal in the spring and crepuscular in summer and fall (Thomson, R.C. et al., 2016). Jackrabbits have yearlong diurnal and crepuscular activity. Survey results, including negative findings, shall be submitted to CDFW for review 2 weeks prior to initiation of Project activities.* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |
| ***MM-BIO-15 Out of Harm's Way*** | *To further avoid direct mortality, a qualified biological monitor approved by CDFW be on-site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It shall* | *Prior to Construction* | *City of Santa Clarita Project Proponent* |

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| | *be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the Project clearly identify that the designated entity shall obtain all appropriate state and federal permits.* | | |

**Response 13:** The comment and the suggestions for language to be included in the Project's Mitigation monitoring and Reporting Program are noted and will be provided to the City Planning Commission and City Council for consideration. The City will adopt a Mitigation Monitoring and Reporting Program to identify mitigation actions/timing, mitigation timing, and responsible entities for the mitigation and monitoring actions. This will be based on the mitigation measures presented in the Draft EIR and any revisions or additions thereto that may occur prior to City Council action to certify the Final EIR.

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# Comment Letter Number 12

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

*GAVIN NEWSOM, Governor*
*CHARLTON H. BONHAM, Director*

June 10, 2020

Hai Nguyen
City of Santa Clarita
Community Development Department
23920 Valencia Blvd, Suite 302
Santa Clarita, CA 91355
HNGUYEN@santa-clarita.com

**Subject: Bouquet Canyon Project, Draft Environmental Impact Report (DEIR), SCH #2018121009, Los Angeles County**

Dear Mr. Nguyen:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Bouquet Canyon Project (Project). The DEIR's supporting documentation includes a *Biological Technical Report* (BTR). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

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

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

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**Project Description and Summary**

**Objective:** The proposed Project will include the development of 375 homes in five distinct neighborhoods. The development of the site will include extensive alterations to the existing landscape and topography, with substantial site improvements to support a residential community. A major element is the reconfiguration of Bouquet Creek and its adjacent floodplain. Other improvements include internal streets, storm drainage, water, sewer, electrical and natural gas infrastructure. This includes off-site connections to existing distribution mains for water, sewer, energy and telecommunications services, private recreation areas, and public parkland and trails. An additional facet of the Project is the realignment of a segment of Bouquet Canyon Road. It would involve abandoning a portion of the existing Bouquet Canyon Road between Hob Avenue and Pam Court and constructing a new segment starting 1,500 feet north of Plum Canyon Road and extending to 700 feet south of Shadow Valley Lane. The new portion of Bouquet Canyon Road would be a four-lane roadway with bicycle lanes and parkways on both sides.

**Location:** The Project site is approximately 67.6 acres of undeveloped land located in the Saugus area of the City of Santa Clarita, approximately 0.2 miles to the north of the junction of Bouquet Canyon Road and Plum Canyon Road. The site is currently undeveloped and is covered by a mixture of natural and altered landscapes, prominent hills on the west, and Bouquet Creek, which flows along the northern portion of the site from east to west.

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**Comments and Recommendations**

CDFW offers the comments and recommendations below to assist the City of Santa Clarita (City) in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

3

**Comment #1: Impacts to Unarmored Threespine Stickleback (*Gasterosteus aculeatus williamsoni)***

**Issue:** CDFW is concerned that the Project is impacting Bouquet Creek, which is occupied by unarmored threespine stickleback. According to CNDDB, there are numerous historical records of unarmored threespine stickleback, a state fully protected species, in Bouquet Creek. Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any fully protected species is prohibited and cannot be authorized by CDFW (Fish and Game Code § 5515 and § 3511). "Take" is defined in Section 86 of Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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CDFW cannot authorize the take of any fully protected species as defined by State law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully

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protected species are documented to occur on, or in, the vicinity of the project area, or that such species have some potential to occur on, or in, the vicinity of the project area, due to the presence of suitable habitat.

**Specific impacts:** The Project may result in the loss of streams, associated watershed function, and biological diversity that could directly or indirectly impact the local population of unarmored threespine stickleback.

**Why impacts would occur:** Unarmored threespine stickleback is a small, freshwater fish inhabiting slow-moving reaches or quiet-water microhabitats of streams and rivers. Unarmored threespine stickleback feed primarily on benthic insects, small crustaceans, and snails, and to a lesser degree on flatworms, nematodes, and terrestrial insects. Unarmored threespine stickleback typically prefer a lower stream gradient, slower water velocity, broader channel, and lack of native or invasive aquatic predators. Juveniles and sub-adults also tend to be found in the protection of vegetation, in slow moving or standing water. Adults are found in all areas of the stream. They tend to gather in areas of slower moving or standing water. In places where water is moving rapidly, they tend to be found behind obstructions or at the edge of the stream, especially under the edge of algal mats (Sasaki, 1977). Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream and upstream areas and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Water diversions can cause changes in flow regimes of streams. Thus, diversions can impact unarmored threespine stickleback by:

- Reducing the transport of fine sediment downstream causing streams to become graded or buried (Poff et al., 1997, Bauer et al., 2015);
- Disconnecting channels from still or slow-moving backwaters that are used by UTS, leading to reductions in reproduction and recruitment (Junk et al., 1989, Sparks, 1995, Poff et al., 1997);
- Wash-out and stranding of fish (Cushman, 1985);
- Changing benthic food sources;
- Altering habitat cover and algae;
- Dewatering small streams used by unarmored threespine stickleback; and
- Increasing water temperatures of streams that can slow growth, increase predation risk, and increase susceptibility to disease (Moore and Townsend, 1998, Marine and Cech, Jr., 2004).

**Evidence impacts would be significant**: Unarmored threespine stickleback is an endangered species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 *et seq.*) and CESA (Fish & G. Code, § 2050 *et seq.*) and a Fully Protected species (Fish & G. Code § 5515). Therefore, this species qualifies as an endangered, rare, or threatened species under CEQA consistent with CEQA Guidelines, Section 15380.

Unarmored threespine stickleback, once widespread in streams in southern California, are now only found in the upper Santa Clara River and its tributaries. The species is threatened by loss

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and alteration of their habitat through water diversions, development, dams, and pollution as well as introduction of invasive species that predate or compete with unarmored threespine stickleback (USFWS, 2009).

Based on the foregoing, Project impacts resulting from channelizing a portion of Bouquet Creek would potentially reduce the range of unarmored threespine stickleback.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure:** CDFW recommends the City fully avoid all impacts to Bouquet Creek and unarmored threespine stickleback.

**Comment #2: Impacts to Bouquet Creek**

**Issue #1:** Section 3.9.4 of the DEIR states "a new engineered channel would be constructed parallel to and on the southern side of the Bouquet Creek alignment within the project site".

**Issue #2**: The Project also proposes enhance "flood control protection along Bouquet Creek, which would eliminate much of the existing floodplain conditions…Bouquet Creek would be channelized and designed to contain 100-year and other higher intensity storm flows."

CDFW is concerned that this new landscape feature and creek channelization will permanently alter the existing drainage pattern of Bouquet Creek and its surrounding riparian area.

**Specific impacts:** Direct loss of stream and riparian habitat directly affect water and habitat quality downstream. Additionally, piping and undergrounding streams cause changes in the hydrograph of the stream, altering geomorphic processes within the site and the potential listed species that depend on them.

**Why impact would occur:** Project implementation includes grading, vegetation clearing, building construction, paved surfaces, and extensive landscaping. All these activities have potential to impact the hydrograph and geomorphic processes on site as well as the wildlife that depend on these processes.

**Evidence impact would be significant:** The Project may substantially adversely affect the existing stream pattern and geomorphologic processes of the Project site through the alteration or diversion of a stream. Absent specific mitigation, the Project could result in substantial erosion or siltation on-site or off-site of the Project.

In addition, a review of The Nature Conservancy's Groundwater Dependent Ecosystem (GDE) Pulse Map and California Department of Water Resources' Natural Communities Commonly Associated with Groundwater (NCCAG) dataset, indicates the presence of coast live oak, a groundwater dependent ecosystem, on the Project site. Channelization of Bouquet Creek will have impacts on fish and wildlife beneficial uses and users of groundwater, including GDEs and interconnected surface water habitats, that are impacted disproportionately by shallow groundwater trends. Therefore, channelization of Bouquet Creek may result in the removal of sensitive vegetation communities and listed species associated with them.



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**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends redesigning the Project to avoid impacts to the existing, natural extent of Bouquet Creek and its floodplain. This is important, especially given that this segment of drainage facilitates regional wildlife movement and provides an ephemeral source of water to terrestrial wildlife.

**Mitigation Measure #2**: CDFW recommends the Project proponent actively implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into ephemeral stream beds during Project activities. BMPs should be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent should prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site should be free of nonnative plant materials. Fiber rolls or erosion control mesh should be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other projects without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.

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**Comment #3: Impacts to Oak Woodland**

**Issue #1:** As stated in the DEIR Impact 3.3e, “The proposed project would remove 26 oak trees, subject 1 oak tree to major encroachment and 2 oak trees to minor encroachment”. This removal or encroachment, “would require approximately 91 replacement oak trees,” according to the DEIR.

**Issue #2:** Impact 3.3e of the DEIR also states, “If planting on-site is not possible, the applicant may donate the replacement oak trees to the City or provide the equivalent monetary value of the replacement trees to the City.”

CDFW does not accept “equivalent monetary value” as a means of mitigation.

**Specific impacts:** CDFW considers oak woodlands distinct biological communities, consisting of layers that include trees, shrubs, vines, and herbaceous understory vegetation. The DEIR only considers the value of the trees and does not appear to characterize the value of these unique individual communities in a biological setting. Removal or thinning of an understory or any one of these layers in oak woodland directly impacts the functions and values of the entire oak woodland. In addition, monetary means do not mitigate for the complete loss of this distinct biological community.

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**Why impacts would occur:** Project implementation includes grading, vegetation clearing, building construction, and other activities that may result in direct mortality, population declines, or local extirpation of oak woodlands.

**Evidence impacts would be significant**: The goal of the mitigation is to recreate functioning oak woodland of similar composition, structure, and function to the selected oak woodland that was impacted. The mitigation site should mimic the function, density, percent basal, canopy, and vegetation cover, as well as other measurable success criteria before the mitigation should be deemed sufficient. Mitigation measures should repair, rehabilitate, or restore the impacted

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environment. Monetary mitigation does not compensate for the significant impact by replacing or providing substitute resources/environments, for such unique, biologically valuable vegetation communities that, if not mitigated in kind, will be lost forever.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** If avoidance is not possible, impacts to the oak woodland should be mitigated through habitat restoration or conservation. All revegetation/restoration areas that will serve as mitigation should include preparation of a separate restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

**Recommendation #2:** Please note, in 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance- and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/. To determine the rarity ranking and mitigation ratios of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

**Comment #4: Vegetation Community Classification**

**Issue:** Table 3 in the BTR identifies Impacts to Vegetation Communities and the DEIR states, “plant communities were classified in accordance with Holland (1986) and Oberbauer (1996), with additional vegetation community information taken from the *Manual of California Vegetation*, second edition (MCV; Sawyer, et al. 2008).

**Specific impact:** CDFW considers grading a vegetation community a permanent impact unless mitigation is proposed that includes specific criteria that ensure the exact vegetation community is recreated, with consideration for the temporal loss of the habitat as well as defined success criteria and weed management. Revegetation or acquisition/preservation would be a mitigation measure proposed to offset impacts to a CDFW sensitive vegetation community.

**Why impact would occur:** Project implementation includes grading, vegetation clearing, road construction, utilities construction, road maintenance, fuel modification, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive vegetation communities. If sensitive areas are not correctly identified, CDFW is unable to accurately determine proper mitigation measures for that vegetation community. CDFW considers vegetation communities, alliances, and associations with a statewide ranking of S1, S2, S3 and some S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California, S2 has 6 to 20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive vegetation communities.

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Any revegetation effort should represent the actual vegetation community being impacted. Vegetation communities are named using alliances or associations. An example is California Buckwheat Scrub Alliance. The Manual of California Vegetation (MCV) (Sawyer, et al., 2008) separates the diagnostic species for the California Buckwheat Scrub Alliance into trans and cis montane stands. The species assemblages for this one alliance change over the length of this project. CDFW is concerned spreading a generic seed mix that is not truly representative of the unique plant community alliances present will impact the existing habitat, introduce species that don't occur there, and ultimately change the structure of the vegetation community. Additionally, plants that aren't found in an area may not be suited to survive there, raising the rate of failure.

**Evidence impact would be significant:** Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect. This, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS). Impacts to all sensitive communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Using non-conforming modifications to MCV alliances may misidentify rare or sensitive vegetation communities, resulting in impacts to the species.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1**: Vegetation Communities that do not conform to existing MCV-defined alliances might be considered rare. All data and proposed modification to existing or new alliances should be submitted to CDFW for scientific review. If a project's dominant vegetation does not fit into one of the non-native alliances or provisional alliances, then a description (scientific, including information used to determine membership for this new alliance) should be included to defend this conclusion. This process is imperative to maintain a rigorous scientific vetting process and defensible classification system.

**Mitigation Measure #2:** CDFW recommends that updated botanical surveys utilizing MCV-defined alliances be conducted to inform impact assessments, avoidance, minimization, and mitigation measures in the DEIR. Focused surveys for sensitive/rare plants on-site should be disclosed in the CEQA document. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), a qualified biologist should "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.

**Recommendation #3:** See Recommendation #2 in Comment #2

**Comment #5: Mitigation for slender mariposa lily (*Calochortus clavatus var. gracilis*)**

**Issue #1:** MM 3.3-1 of the DEIR states, "Prior to construction, a mitigation plan shall be developed that describes methods to mitigate for impacts to slender mariposa lily". Providing a mitigation plan with methods of maintenance, monitoring, performance standards, and success criteria in the future is considered deferred mitigation under CEQA.

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**Issue #2**: MM 3.3-1 of the DEIR describes the mitigation ratio as 1:1. It is unclear if the ratio is designated for individual plants or whether that includes the acreage on which they are located. In addition, 1:1 is insufficient replacement for this rare plant species.

**Issue #3**: MM 3.3-1 of the DEIR states, "The mitigation plan shall include a description of the mitigation site...". CDFW does not support transplantation of rare plants, into areas they currently do not occur, as a mitigation strategy.

**Issue #4**: MM 3.3-1 of the DEIR states, "seeds shall be obtained from a native plant nursery if available." CDFW is not aware of any nursery that has slender mariposa lily bulbs.

**Issue #5**: CDFW does not accept payment into an in-lieu fee program as a viable mitigation option.

**Specific impacts:** Project grading and fuel modification associated with the residential development would impact approximately 142 slender mariposa lilies. Construction of the new alignment of Bouquet Canyon Road would impact approximately 320 slender mariposa lilies**.** CDFW, in general, does not recommend transplantation of rare plants, in particular bulbiferous species like the slender mariposa lily, as a mitigation/minimization measure to reduce adverse effects from the project because successful implementation of translocation is rare with minimal documented success. CDFW defines success as long-term, self-sustaining population with a positive overall population trend, demonstrated fertile seed set, and demonstrated recruitment. Even if transplantation is initially successful, they typically fail to persist over time. To ensure the conservation of sensitive plant species, transplantation should be undertaken as a last resort.

**Why impacts would occur:** CEQA Guidelines §15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on future surveys, the preparation of future management plans, or mitigating by obtaining permits from CDFW are considered deferred mitigation under CEQA. In order to analyze if a project may have a significant effect on the environment, the Project related impacts, including survey results for species that occur in the Project footprint need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

These impacts would continue to be significant because MM 3.3-1 will not result in adequate avoidance or successful mitigation for the unavoidable direct, indirect and temporal losses including the uncertainties and often failures of creation or restoration practices for special status plants using transplanting of species.

**Evidence impacts would be significant**: Creation or restoration using the transplanting of plant species should be considered experimental in nature and not be viewed as a mitigation measure to mitigate for slender mariposa lily and other CNPS special status plants below a significant level under CEQA. In addition, because transplantation projects have a poor success rate, and demonstrate a downward trend of survival over time (GodeFroid, S., et al., 2010). Studies show success of transplantation projects within the 10 to 15 percent range, with an



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optimistic outcome of 50 percent survival maintained over 5 years (or thereafter, 50% survival maintained for 1 year).

In addition, the DEIR does not address the cumulative loss of slender mariposa lily in Los Angeles County adequately. A description of the remaining acreage compared to historical range, connectivity of remaining slender mariposa lily and how the loss of 320 individuals of slender mariposa lily in this location will affect the local region should be discussed in more detail and figures. Based upon MM 3.3-1, the Project would continue to result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Absent adequate mitigation, the ecosystem function and contribution to genetic biological diversity of slender mariposa lily and other CNPS special status plants in conjunction with their contribution to breeding, feeding and cover habitat for wildlife will be compromised.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends as a better mitigation strategy. The preservation of areas where slender mariposa lily is located on site or an existing, similarly sized, population of slender mariposa lily in perpetuity at another location. This would be at an acreage of no less than 3 acres preservation of occupied habitat for every 1 acre of impact to occupied habitat.

**Mitigation Measure #2**: CDFW recommends the DEIR include defined mitigation measures for adverse project-related impacts to sensitive plants. Mitigation measures should emphasize avoidance and reduction of project impacts. For any impacts that have been adequately demonstrated to be unavoidable, CDFW recommends that the City should require a scientifically rigorous monitoring and management program as part of the Project's CEQA mitigation, monitoring, and reporting program (MMRP) that would include adaptive management strategies (Public Resources Code 21081.6 and CEQA Guidelines Section 15097). If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through occupied habitat acquisition and preservation in perpetuity may be appropriate.

**Mitigation Measure #3**: CDFW recommends that all open space preservation/mitigation land be protected in perpetuity with minimal human intrusion by recording and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. CDFW recommends all open space or habitat lands considered for mitigation of environmental impact under CEQA be owned and managed by an entity with experience in managing habitat and be placed under a conservation easement. CDFW has encountered problems with using portions of privately owned lots as open space habitat mitigation under CEQA. Homeowners may grade and remove vegetation on their land and there is little legal recourse to remedy this loss under CEQA. The better option is to place ownership of any open space or habitat land considered as avoidance under CEQA with a conservancy or other land management company to allow for legal remedies should trespass and clearing/damage occur. A management and monitoring plan, including a funding commitment, should be developed for any conserved land, and implemented in perpetuity to protect existing biological functions and values. Permeable wildlife fencing should be erected around any conserved land to restrict incompatible land uses and signage posted and maintained at conspicuous locations communicating these restrictions to the public.

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**Mitigation Measure #4**: For any land that is proposed for preservation and/or restoration, the CEQA document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, invasive plant removal, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of open space preservation/mitigation lands.

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**Comment #6: Impacts to nesting birds**

**Issue:** The BTR indicates that coastal California gnatcatcher (*Polioptila californica californica)*, a California Species of Special Concern and an Endangered Species Act (ESA) listed species, has the possibility of occurring on site. In addition, the BTR and a review of the California Natural Diversity Database (CNDDB) indicates an occurrence of loggerhead shrike (*Lanius ludovicianus*), a California Species of Special Concern, within a mile and a quarter of the Project site. The occurrence of oak woodland and other vegetation communities indicate the potential for nesting within and around the Project vicinity.

**Specific impacts:** Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.

**Why impact would occur**: Impacts to nesting birds could result from ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable foraging habitats. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

**Evidence impact would be significant:** The loss of occupied habitat or reductions in the number of rare bird species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under state laws and regulations, including Fish and Game Code sections 3503 and 3503.5.

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**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction should occur from February 15 (January 1 for raptors) through August 31.

**Mitigation Measure #2: If avoidance is not feasible,** a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the

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surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. 9

These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers should be increased if needed to protect the nesting birds.

**Comment #7: Impacts to Bat Species, including California Species of Special Concern**

**Issue:** The Project includes activities that will result in the removal of trees and vegetation that may provide habitat for bats. In addition, Appendix J (Sensitive Animal Species Potential to Occur) in the BTR, identifies Townsend's big-eared bat *(Corynorhinus townsendii*), a California Species of Special Concern, as possible likelihood to occur on site.

**Specific impacts:** Project activities include the removal of trees, vegetation, and/or structures that may provide foraging habitat and therefore has the potential for the direct loss of bats.

**Why impacts would occur:** The removal of vegetation and trees will potentially result in the loss of foraging habitat for bats.

**Evidence impacts would be significant**: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Although the Townsend's big-eared bat is the species in question, it is important to remember that there are many bat species, for example the western yellow bat, that can be found year-round in urban areas throughout the south coast region (Miner & Stokes, 2005). Several bat species are considered California Species of Special Concern and meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of California Species of Special Concern could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065). 10

In addition, "Encroachment of urban development and agriculture into areas of native vegetation likely alters the composition and abundance of insect prey in an area and may affect the ability of Townsend's big-eared bat to find adequate prey. Encroachment may also disturb roosts by increasing the rate of human visitation and increasing predation pressure from cats and other generalist predators associated with human settlement" (Gruver, J.C., 2006).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure:** CDFW recommends bat surveys be conducted by a qualified bat specialist to determine baseline conditions within the Project and within a 500-foot buffer. In addition, an analysis of the potential significant effects of the proposed Project on the species (CEQA Guidelines §15125). CDFW recommends the DEIR include the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. The DEIR should document the presence of any bats and include species specific mitigation measures to reduce impacts to below a level of significance.

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**Comment #8: Impacts to California Species of Special Concern**

**Issue:** One mammal species, San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) is identified in Appendix J of the BTR (Sensitive Animal Species Potential to Occur) as having high possibility to occur onsite. In addition, four reptile species with a possible to likely potential to occur on site from Appendix J of the BTR include the California legless lizard (*Anniella pulchra*), California glossy snake (*Arizona elegans occidentalis*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), and coast horned lizard (*Phrynosoma blainvillii*).

**Specific impact:** Project ground disturbing activities such as grading and grubbing may result in habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. In addition, the Project may remove habitat by eliminating native vegetation that may support essential foraging and breeding habitat.

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

**Evidence impact would be significant:** CEQA provides protection not only for state and federally listed species, but for any species including but not limited to California Species of Special Concern which can be shown to meet the criteria for State listing. These Species of Special Concern meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines, § 15065). Take of Species of Special Concern could require a mandatory finding of significance by the Lead Agency, (CEQA Guidelines, § 15065).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with the reptile and mammal species behavior and life history should conduct specialized surveys to determine the presence/absence of Species of Special Concern. Surveys should be conducted during active season when the reptiles are most likely to be detected. California legless lizard are active year-round in the mornings and evenings; California glossy snake are nocturnal and active February to November (peaking in May); coastal whiptail are diurnal (activity peaking in late morning) and active from March to October; coast horned lizard are active February to November and are diurnal in the spring and crepuscular in summer and fall (Thomson, R.C. et al., 2016). Jackrabbits have yearlong diurnal and crepuscular activity (Zeiner, D.C. et al., 1988-1990). Survey results, including negative findings, should be submitted to CDFW for review 2 weeks prior to initiation of Project activities.

**Mitigation Measure #2:** To further avoid direct mortality, CDFW recommends that a qualified biological monitor approved by CDFW be on-site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the Project clearly identify that the designated entity should obtain all appropriate state and federal permits.

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**Filing Fees**

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The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). 12

**Conclusion**

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 430-0098.

Sincerely,

DocuSigned by:
Erinn Wilson
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Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Felicia Silva – Los Alamitos
Andrew Valand – Los Alamitos
Frederic Reiman – Los Alamitos
Malinda Santonil – Los Alamitos
Susan Howell – San Diego
CEQA Program Coordinator - Sacramento

State Clearinghouse

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

*GAVIN NEWSOM, Governor*
*CHARLTON H. BONHAM, Director*

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

| **Biological Resources** | | | |
|---|---|---|---|
| | **Mitigation Measure** | **Timing** | **Responsible Party** |
| **MM-BIO-1-Impacts to unarmored threespine stickleback** | CDFW recommends the City fully avoid all impacts to Bouquet Creek and unarmored threespine stickleback. | Prior to Construction | City of Santa Clarita Project Proponent |
| **MM-BIO-2-Impacts to Bouquet Creek** | The Project will be designed to avoid impacts to the existing, natural extent of Bouquet Creek and its floodplain. This is important, especially given that this segment of drainage facilitates regional wildlife movement and provides an ephemeral source of water to terrestrial wildlife. | Prior to Construction | City of Santa Clarita Project Proponent |
| **MM-BIO-3-Impacts to Bouquet Creek** | Project proponent shall actively implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into ephemeral stream beds during Project activities. BMPs shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other projects without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by | Prior to Construction | City of Santa Clarita<br><br>Project Proponent |

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| | allowing animals to push through the weave, which expands when spread. | | |
| **MM-BIO-4-Oak woodland** | If avoidance is not possible, impacts to the oak woodland shall be mitigated through habitat restoration or conservation. All revegetation/restoration areas that will serve as mitigation shall include preparation of a separate restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan shall include restoration and monitoring methods; annual success criteria; contingency actions shall success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation shall have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968). | Prior to Construction | City of Santa Clarita<br>Project Proponent |
| **MM-BIO-5-Vegetation Communities** | Vegetation Communities that do not conform to existing MCV-defined alliances might be considered rare. All data and proposed modification to existing or new alliances shall be submitted to CDFW for scientific review. If a project's dominant vegetation does not fit into one of the non-native alliances or provisional alliances, then a description (scientific, including information used to determine membership for this new alliance) shall be included to defend this conclusion. This process is imperative to maintain a rigorous scientific vetting process and defensible classification system. | Prior to Construction | City of Santa Clarita<br>Project Proponent |
| **MM-BIO-6-Vegetation Communities** | Botanical surveys utilizing MCV-defined alliances shall be conducted to inform impact assessments, avoidance, minimization, and mitigation measures in the DEIR. Focused surveys for sensitive/rare plants on-site shall be disclosed in the CEQA document. Based on the | During Construction | City of Santa Clarita<br><br>Project Proponent |

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| | *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), a qualified biologist shall "conduct botanical surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting." CEQA documentation shall provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts. | | |
| **MM-BIO-7-slender mariposa lily** | Areas where slender mariposa lily is located on site shall be preserved or an existing, similarly sized population of slender mariposa lily shall be preserved in perpetuity at another location, at an acreage of no less than 3 acres preservation of occupied habitat for every 1 acre of impact to occupied habitat. | Prior to Construction | City of Santa Clarita<br><br>Project Proponent |
| **MM-BIO-8-slender mariposa lily** | The DEIR shall include defined mitigation measures for adverse Project-related impacts to sensitive plants. Mitigation measures shall emphasize avoidance and reduction of Project impacts. For any impacts that have been adequately demonstrated to be unavoidable, The City shall require a scientifically rigorous monitoring and management program as part of the Project's CEQA mitigation, monitoring, and reporting program (MMRP) that would include adaptive management strategies (Public Resources Code 21081.6 and CEQA Guidelines Section 15097). If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through occupied habitat acquisition and preservation in perpetuity may be appropriate. | Prior to Construction | City of Santa Clarita<br><br>Project Proponent |
| **MM-BIO-9-slender mariposa lily** | All open space preservation/mitigation land be protected in perpetuity with minimal human intrusion by recording | Prior to Construction | City of Santa Clarita |

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| | and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. All open space or habitat lands considered for mitigation of environmental impact under CEQA be owned and managed by an entity with experience in managing habitat and be placed under a conservation easement. CDFW has encountered problems with using portions of privately owned lots as open space habitat mitigation under CEQA. Homeowners may grade and remove vegetation on their land and there is little legal recourse to remedy this loss under CEQA. The better option is to place ownership of any open space or habitat land considered as avoidance under CEQA with a conservancy or other land management company to allow for legal remedies shall trespass and clearing/damage occur. A management and monitoring plan, including a funding commitment, shall be developed for any conserved land, and implemented in perpetuity to protect existing biological functions and values. Permeable wildlife fencing shall be erected around any conserved land to restrict incompatible land uses and signage posted and maintained at conspicuous locations communicating these restrictions to the public. | | Project Proponent |
| **MM-BIO-10-slender mariposa lily** | For any land that is proposed for preservation and/or restoration, the CEQA document shall include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective shall be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that shall be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, invasive plant removal, and increased human intrusion. An appropriate non-wasting | Prior to Construction | City of Santa Clarita<br>Project Proponent |

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| | endowment shall be set aside to provide for long-term management of open space preservation/mitigation lands. | | |
| **MM-BIO-11-Nesting Birds** | To protect nesting birds that may occur on site or adjacent to the Project boundary, no construction shall occur from February 15 (January 1 for raptors) through August 31. | Prior to Construction | City of Santa Clarita<br><br>Project Proponent |
| **MM-BIO-12-Nesting Birds** | If avoidance is not feasible, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the Lead Agency require surveys be conducted by a qualified biologist no more than 14 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests.<br>These buffers shall be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds. | Prior to Construction | City of Santa Clarita<br><br>Project Proponent |
| **MM-BIO-13-Bat Species** | Bat surveys shall be conducted by a qualified bat specialist to determine baseline conditions within the Project and within a 500-foot buffer and analyze the potential significant effects of the proposed Project on | Prior to Construction | City of Santa Clarita<br>Project Proponent |

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| | the species (CEQA Guidelines §15125). The DEIR will include the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. The DEIR shall document the presence of any bats and include species specific mitigation measures to reduce impacts to below a level of significance. | | |
| **MM-BIO-14-Species of Special Concern** | Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with the reptile and mammal species behavior and life history shall conduct specialized surveys to determine the presence/absence of Species of Special Concern. Surveys shall be conducted during active season when the reptiles are most likely to be detected. California legless lizard are active year-round in the mornings and evenings; California glossy snake are nocturnal and active February to November (peaking in May); coastal whiptail are diurnal (activity peaking in late morning) and active from March to October; coast horned lizard are active February to November and are diurnal in the spring and crepuscular in summer and fall (Thomson, R.C. et al., 2016). Jackrabbits have yearlong diurnal and crepuscular activity. Survey results, including negative findings, shall be submitted to CDFW for review 2 weeks prior to initiation of Project activities. | Prior to Construction | City of Santa Clarita Project Proponent |
| **MM-BIO-15-Out of Harm's Way** | To further avoid direct mortality, a qualified biological monitor approved by CDFW be on-site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It shall be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, | Prior to Construction | City of Santa Clarita Project Proponent |

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| | or otherwise handled, we recommend that the Project clearly identify that the designated entity shall obtain all appropriate state and federal permits. | | |

# Roy Cole

SECTION 2

## Response to Comments by Roy Cole, E-Mail dated May 21, 2020

**Comment 1:** *I am strongly opposed to this project.*

**Response 1:** This opinion is noted.

**Comment 2:** *There seem to several inconsistencies as to what is significant or not significant in separate parts of the document. One example is the ridge line to be flattened is significant, but not the most the most significant so it ends up being not significant in the mitigation.*

**Response 2:** The first sentence refers to "several inconsistencies…" in the EIR, but only identifies one example in the second sentence. Accordingly, only the second sentence will be responded to. As discussed on pages 3.1-11 thru 3.1-13 of the Draft EIR, the proposed grading of the southern portion of the on-site significant ridgeline is acknowledged as extensive; however, since it is 200 feet or more lower than other significant ridgelines in this part of Santa Clarita, it is not considered to be a character-defining features of the Saugus community. Further, it is visible primarily from a mobile viewing audience traveling by automobile along the adjacent segment of Bouquet Canyon Road, where the viewing experience is momentary and changes constantly with as the motorist travels along the road. It is not considered to be as important as a stationary public vantage point along a recognized scenic corridor, where people can enjoy the view of a scenic resource or a scenic vista for an extended period of time. Based on these considerations, the aesthetic impact of the proposed ridgeline grading was determined to be less than significant.

**Comment 3**: *I believe this number of homes would have a larger effect on traffic than stated. For miles around turn lanes as well as thru lanes will be even more congested despite the mitigations.*

**Response 3***:* The traffic impact analysis prepared for the EIR is consistent with the City's standards and with current industry standards for analysis of level of service impacts due to a new development project. The proposed mitigation measures would reduce potential level of service impacts sufficiently to achieve the City's performance standards for those affected intersections, and this was determined through commonly applied methodologies to analyze the intersection performance in terms of the volume of vehicles moving through that intersection during peak periods.

**Comment 4:** *Also debris on roadways, sand, gravel, etc. seems inevitable during construction.*

**Response 4:** The proposed grading plan is to balance all earthwork within the project site. As such, there would not be dump truck traffic carrying soil materials on or off-site

as part of the grading program. Routine and mandatory construction control measures will be implemented throughout the construction phases to prevent deposition of sand, gravel and other construction debris on streets surrounding the project site. For example, as stated on page 3.2-16 of the Draft EIR, the project would implement all required SCAQMD dust control techniques (e.g., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM10 and PM2.5 concentrations. These dust control measures would also prevent tracking out of sand, gravel and debris by construction vehicles.

**Comment 5:** *I am also concerned for the wildlife in the area. Even the ones that are not protected.*

**Response 5:** Potential impacts to wildlife are discussed in Section 3.3 of the Draft EIR. Potentially significant impacts to migratory birds such as burrowing owl or other species that might be nesting during construction would be avoided through Mitigation Measure 3.3-2 and 3.3-5. No other significant impacts to wildlife were identified on the basis of the biological surveys conducted at the project site and examination of documented occurrences of sensitive wildlife found in the Santa Clarita Valley area.

**Comment 6:** *Noise during and after construction would seem to lessen the quality of life in the area.*

**Response 6:** Noise impacts during construction and over the long-term operating life of the project area addressed in Section 3.10 of the Draft EIR. This comment does not address the adequacy of that analysis; therefore, no further response can be provided.

**Comment 7**: *Property values near the project would probably fall*.

**Response 7**: This comment speculates about the project's potential impacts to local property values. This issue is outside of the scope of concern under CEQA.

**Comment 8**: *Air quality for 5 years of construction will almost certainly suffer.*

**Response 8**: This statement appears to be in recognition of the estimated 5-year construction time frame identified on page 2.0-17 of the Draft EIR. The commenter's concern with regard to the time period of construction impacts is noted.

**Comment 9:** *I am in the flag lot on Nickie Ln., so I am very close to the proposed action. Presently I enjoy neighbors only in the front of my property and a quiet isolated area.*

*This is why I chose this house and feel it's why my property tax is so high. I would very much like to preserve my quality of life here in Santa Clarita.*

**Response 9:** This comment notes the commenter's place of residence in proximity to the proposed project site, the quiet, isolated character of this area, and the desire to preserve his quality of life. It does not address any aspect of the Draft EIR. This comment is noted.

## Hai Nguyen

**From:** a a <royzmail64@gmail.com>
**Sent:** Thursday, May 21, 2020 11:53 AM
**To:** Hai Nguyen
**Subject:** Bouquet Canyon Project

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Salutations,
I would like to express some of my concerns after reading DEIR of Master Case 18-0089.
I am strongly opposed to this project.

There seem to several inconsistencies as to what is significant or not significant in separate parts of the document. One example is the ridge line to be flattened is significant, but not the most the most significant so it ends up being not significant in the mitigation.

I believe this number of homes would have a larger effect on traffic than stated. For miles around turn lanes as well as thru lanes will be even more congested despite the mitigations.

Also debris on roadways, sand, gravel, etc. seems inevitable during construction.

I am also concerned for the wildlife in the area. Even the ones that are not protected.

Noise during and after construction would seem to lessen the quality of life in the area.

Property values near the project would probably fall.

Air quality for 5 years of construction will almost certainly suffer.

I am in the flag lot on Nickie Ln., so I am very close to the proposed action. Presently I enjoy neighbors only in the front of my property and a quiet isolated area. This is why I chose this house and feel it's why my property tax is so high. I would very much like to preserve my quality of life here in Santa Clarita.

Thank you in advance for your attention.

Roy Cole
20525 Nickie Ln
Saugus, 91350

661.263.3171
royzmail64@gmail.com

# Susan Maness

SECTION 2

## Response to Comments by Susan Maness, E-Mail dated June 3, 2020

**Comment 1:** *It is impossible to fully understand the scope of this project and its environmental impact since there are no elevation viewpoints shown to address the extent of grading and soil removal of the City designated "significant ridgeline" in order to mine soil for the realignment of the New Bouquet Canyon Road.*

**Response 1**: Section 3.1 of the Draft EIR includes figures 3.1-6 thru and 3.1-11, which illustrate existing and developed conditions along existing Bouquet Canyon Road on the western side of the project site, where portions of the significant ridgeline are visible in the foreground, and would be graded for construction of the new Bouquet Canyon Road and development of clusters of new homes. Figures 3.12 to 3.1-14 illustrate existing and post development views from the existing intersection of David Way and Bouquet Canyon Road, with the significant ridgeline visible in the background.

**Comment 2:** *It is stated in the EIR that proposed housing is consistent with surrounding single family homes. How can you say row Townhomes qualify for that classification since none exist in the area?*

Response 2: This comment does not refer to a specific place in the EIR where this statement is made. It appears that this comment is referring to a sentence that appears at the bottom of page 3.1-13, where it stated "No new homes or other structures would exceed two stories/35 feet in height and the built environment character of all proposed planning areas would be consistent in scale and massing with surrounding residential neighborhoods" and a similar statement at the top of page 3.1-31 of the Draft EIR, where it is stated "*No new homes or other structures would exceed two stories in height and the built environment character of all proposed planning areas would be consistent in scale and massing with surrounding residential neighborhoods*." These two statements focus on the scale and massing of the proposed two story homes, which would be consistent with scale and massing of existing single family homes near the project site. This statement does not refer to the type of homes to be built, only the physical form, which is pertinent to the assessment of aesthetic impacts relative to changes in the visual character and quality of the site and surroundings. The statements in the EIR are also followed by additional explanation to support this determination, i.e.:

> "Further, the project provides visual buffers to soften the extent of building massing and maintains views of the site's prominent ridgeline for travelers along Bouquet Canyon Road" (bottom, page 3.1-13)
>
> "Further, the project provides visual buffers to soften the extent of building massing through site design and site landscaping and maintains views of the site's prominent ridgeline for travelers along Bouquet Canyon Road. Therefore, the project would result in a new community image of high visual character and quality and would not

substantially degrade the existing visual character or quality of public views of the site and its surroundings." (top of page 3.1-31).

**Comment 3**: *The intent of the plan is to maintain views for "travelers". Where do you state the intent for current tax paying homeowners to maintain their existing natural views?*

**Response 3**: This comment expresses an opinion that existing homeowners' views should be part of the project's intent. This opinion is noted. The Draft EIR did not assess impacts on existing homeowners' views, since the CEQA thresholds for aesthetics impacts are concerned with views from public viewing locations, where there is a substantial and regular viewing audience.

**Comment 4**: *It is stated that the current habitat supports 4 wildlife species, none of which were seen in your observation of the site. You DID NOT LIST the species. From my yard, I observe red tail hawks circling and hunting in that area as well as coyotes seeking food sources along with rabbits and other birds.*

**Response 4:** This comment does not identify the specific statement in the Draft EIR that is being questioned. There is no such statement in the Draft EIR that is noted in the first sentence of this comment. Appendix B of the Biological Technical Report (this full report is provided as Appendix C of the Draft EIR) provides a comprehensive list of wildlife species observed or detected within the project site. This list includes both red-tailed hawks and Cooper's hawk.

As discussed in Section 3.3.1.1 Investigative Methods, on pages 3.3-1 thru 3.3-3 of the Draft EIR, extensive literature research was conducted to determine the range of wildlife species known to occur in the project area, and several field investigations were conducted by professional wildlife biologist to identify suitable habitat for sensitive wildlife species and signs of wildlife actually occurring on site. On page 3.3-7 of the Draft EIR, it is noted that a total of 45 animal species were identified on site, including 1 reptile species, 40 bird species, and 4 mammal species. On page 3.3-16 of the Draft EIR, it is noted that there is highly suitable habitat on site to support four sensitive wildlife species that have been observed in the area of the project site: coastal whiptail, coast horned lizard, loggerhead shrike, and San Diego black-tailed jackrabbit. None of these species were identified during the on-site biological surveys. No Species of Special Concern were identified during three consecutive years of on-site biological surveys.

**Comment 5:** *It is stated that the project will pay in-lieu fees to the City because it lacks sufficient land per unit use for a proper size park. How will occupants of said project get to surrounding city parks in order to enjoy their benefit? I suggest this is just one element that will increase traffic flow/pollution.*

**Response 5:** The assessment of the project's traffic impacts is based on total trip generation for all trip purposes commonly associated with a residential community, developed through empirical studies conducted by the Institute of Transportation Engineers. As such, the traffic analysis provided in the Draft EIR accounts for trips generated for recreational purposes.

**Comment 6**: *The report appears to imply every point of egress/ingress to the project and surrounding areas is subject to a "D" level at certain times. Traffic impact will be notable for all areas surrounding the project at peak traffic hours (D, E, F) with a statement that any mitigation you implement will have a "less than significant impact". The EIR seems to repeatedly imply there is no significant impact that can't be mitigated yet you fail to prove that as true. Moving traffic from one area simply redirects it to another; there is no benefit for everyone.*

**Response 6:** The traffic impact analysis prepared for the EIR is consistent with the City's standards and with current industry standards for analysis of level of service impacts due to a new development project. The proposed mitigation measures would reduce potential level of service impacts sufficiently to achieve the City's performance standards for those affected intersections, and this was determined through commonly applied methodologies to analyze the intersection performance in terms of the volume of vehicles moving through that intersection during peak periods.

**Comment 7:** *NOISE will increase as the traffic flow increases from the new residents, as you subtlety stated.*

**Response 7:** A quantitative analysis of roadway noise impacts due to the traffic generated by the proposed project is discussed on page 3.10-16 of the Draft EIR, and summarized in Table 3.10-6, on the following page. As discussed therein, the amount of new traffic generated by this project would not significantly increase roadway noise levels, because in all locations analyzed, the project's traffic would result in an increase of less than 1 dBA, which is below the 3 dBA threshold that indicates a potentially significant impact.

**Comment 8:** *All students will have to be transported to education facilities, increasing the daily traffic flow.*

**Response 8**: Children who live in the proposed residential community would attend the same public schools as children who live in the surrounding area and would travel to those school campuses in the same manner, i.e. by private automobile or school bus. The specific numbers who would travel by automobile versus bus cannot be predicted at this time. Trip generation estimates for this project are based on empirical studies conducted by the Institute of Transportation Engineers, which account for all types of

trip purposes in a typical 24-hour period for new homes of this type. As such, the traffic associated with transporting school-age children to local public schools has been properly accounted for in the traffic impact analysis prepared for the EIR.

**Comment 9:** *The surrounding communities will be impacted for 5 years as this project, as it stands, is built out.*

**Response 9**: This statement appears to be in recognition of the estimated 5-year construction time frame identified on page 2.0-17 of the Draft EIR. The commenter's concern with regard to the time period of construction impacts is noted.

**Comment 10:** *Why is the #2 Alternate wedged between 1 and 3? Is it because it is a fully viable alternative that will lessen the impact of ridgeline loss, earth movement, air quality, noise, pollution, and quality of life for those subject to enduring construction for builder benefit? The only way to make this project better for the existing community is to default to the plan that truly mitigates the enormous impact for current homeowners. #2 Alternate is the only possible potential option.*

**Response 10:** This comment expresses a preference for Alternative 2 "Reduced Grading", as it is described in Section 5.4.2 of the Draft EIR. This opinion is noted.

## Hai Nguyen

**From:** Susan Maness <susan.maness@me.com>
**Sent:** Wednesday, June 3, 2020 5:10 PM
**To:** Hai Nguyen
**Subject:** EIR Bouquet Canyon Project

CITY WARNING: This email was sent from an external server. Use caution clicking links or opening attachments.

Dear Mr. Hnguyen,

After reading this report, I must express my **OPPOSITION** to the Bouquet Canyon Project **as you propose** for the following reasons:

1. **It is impossible to fully understand the scope of this project and its environmental impact since there are no elevation viewpoints shown to address the extent of grading and soil removal of the City designated "significant ridgeline" in order to mine soil for the realignnment of the New Bouquet Canyon road.**

2. **It is stated in the EIR that proposed housing is consistent with surrounding single family homes. How can you say row Townhomes qualify for that classification since none exist in the area?**

3. The intent of the plan is to maintain views for "travelers". **Where do you state the intent for current tax paying homeowners to maintain their existing natural views?**

4. It is stated that the current habitat supports 4 wildlife species, none of which were seen in your observation of the site. **You DID NOT LIST the species**. **From my yard, I observe red tail hawks circling and hunting in that area as well as coyotes seeking food sources along with rabbits and other birds.**

5. **It is stated that the project will pay in-lieu fees to the City because it lacks sufficient land per unit use for a proper size park**. How will occupants of said project get to surrounding city parks in order to enjoy their benefit? **I suggest this is just one element that will increase traffic flow/pollution**.

6. **The report appears to imply every point of egress/ingress to the project and surrounding areas is subject to a "D" level at certain times. Traffic impact will be notable for all areas surrounding the project at peak traffic hours (D, E, F) with a statement that any mitigation you implement will have a "less than significant impact". The EIR seems to repeatedly imply there is no significant impact that can't be mitigated yet you fail to prove that as true. Moving traffic from one area simply redirects it to another; there is no benefit for everyone.**

7. **NOISE will increase as the traffic flow increases** from the new residents, as you subtlety stated.

8. **All students will have to be transported to education facilities, increasing the daily traffic flow.**

9. **The surrounding communities will be impacted for 5 years as this project, as it stands, is built out.**

***10. Why is the #2 Alternate wedged between 1 and 3? Is it because it is a fully viable alternative that will lessen the impact of ridgeline loss, earth movement, air quality, noise, pollution, and quality of life for***

***those subject to enduring construction for builder benefit? The only way to make this project better for the existing community is to default to the plan that truly mitigates the enormous impact for current homeowners. #2 Alternate is the only possible potential option.***

# SECTION 3:

## Errata and Revisions to Draft EIR

# Draft EIR Revisions

SECTION 3

CITY OF SANTA CLARITA

# BOUQUET CANYON PROJECT

## DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2018121009

*Prepared for:*

City of SANTA CLARITA


HAI NGUYEN
ASSOCIATE PLANNER
CITY OF SANTA CLARITA
COMMUNITY DEVELOPMENT DEPARTMENT
23920 VALENCIA BOULEVARD, SUITE 302
SANTA CLARITA, CA 91355

EMAIL: HNGUYEN@SANTA-CLARITA.COM
PHONE: (~~616~~661) 255-4365


*Prepared by:*

Michael Baker INTERNATIONAL


3760 KILROY AIRPORT WAY, SUITE 270
LONG BEACH, CA 90806


**APRIL 2020**

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## EXECUTIVE SUMMARY

### PROPOSED PROJECT

This EIR evaluates the proposed Bouquet Canyon Project. The project site is approximately ~~67.6~~74.66 acres of undeveloped land located in the Saugus area of the City of Santa Clarita, approximately 0.2 miles to the north of the junction of Bouquet Canyon Road and Plum Canyon Road. The site is currently undeveloped and is covered by a mixture of natural and altered landscapes, prominent hills on the west, and Bouquet Creek, which flows along the northern portion of the site from east to west. The proposed project would develop this site with a total of 375 for-sale dwelling units divided into groups of five distinct neighborhoods:

**Planning Areas 1 and 1a** – These two planning areas will comprise of a total of 64 single family detached homes with driveways. They are located in the western and southwestern portion of the project site.

**Planning Area 2** – This area will consist of 136 single family detached homes in 8-pack clusters. This area is located in the central portion of the project site and would be accessed by a street passing next to Planning Area 3.

**Planning Area 3** – This area will consist of 90 single-family attached, attached backyard town style homes. This area is located on the southeastern portion of the project site.

**Planning Area 4** – This area will consist of 85 two-story, attached rowtown homes with carriage units. This area is located in the northern portion of the project site.

The development of the site will include extensive alterations to the existing landscape and topography, with substantial site improvements to support a residential community. A major element is the reconfiguration of Bouquet Creek and its adjacent floodplain. Other improvements include internal streets, storm drainage, water, sewer, electrical and natural gas infrastructure, including off-site connections to existing distribution mains for water, sewer, energy and telecommunications services, private recreation areas, and public parkland and trails. An additional facet of the project is the realignment of a segment of Bouquet Canyon Road. This realignment is a planned objective in the Santa Clarita General Plan Circulation Element. It would involve abandoning a portion of the existing Bouquet Canyon Road between Hob Avenue and Pam Court and constructing a new segment starting 1,500 feet north of Plum Canyon Road and extending to 700 feet south of Shadow Valley Lane. The new portion of Bouquet Canyon Road would be a four-lane roadway with bicycle lanes and parkways on both sides.

The proposed project would be constructed over an estimated time-frame of 60 months, in four distinct phases: site clearing/mass grading of the entire site, site improvements, off-site improvements, and home construction and landscaping. The grading plan would involve an estimated excavation of 2,069,664 cubic yards and an embankment (fill) of 2,052,237 cubic yards. All earthwork would be balanced on site. All planning areas are anticipated to be developed simultaneously, with full occupancy occurring by 2024-25.

For more detailed descriptions and exhibits, see Section 2 of this Draft EIR.

**Required Approvals**

***City of Santa Clarita***

- Tentative Tract Map 82126—to subdivide the subject property into 19 lots for residential land uses, streets, private drives, drainage infrastructure, slopes, and various open space lots.
- Conditional Use Permit 18-004—for private gating of multi-family units, any building heights greater than 35 feet, and cluster development.
- Architectural Design Review 18-010—for the proposed building design, styles, and forms.
- Development Review 18-009—for the proposed physical design and layout of the project.
- Hillside Development Review (Class ~~IV~~4) 18-001—to develop land with average cross slopes of 10 percent or more.
- Ridgeline Alteration Permit 18-001—for development near a designated significant ridgeline in the ridgeline preservation overlay zone.
- Oak Tree Permit (Class 4) 19-003 —required for any encroachments or removals of protected oak trees.
- Landscape Plan Review 19-017 – for proposed landscape plan.

***Los Angeles Regional Water Quality Control Board***

- Construction General Permit, under the National Pollutant Discharge Elimination System.
- Water Quality Certification, pursuant to Section 401 of the federal Clean Water Act.

***United States Army Corps of Engineers***

- Nationwide Permit, pursuant to Section 404 of the federal Clean Water Act, for alterations to Bouquet Creek.

***Federal Emergency Management Agency***

- Letter of Map Revision, pursuant to Title 44 of the Code of Federal Regulations, Part 65, to modify floodplain limits along Bouquet Creek and amend the City's Flood Insurance Rate Map, under the National Flood Insurance Program.

| Topic/Impacts | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|
| | **MM 3.2-2**:<br>The contractor shall utilize hauling trucks no larger than Medium Heavy Duty Trucks (MHDT) (i.e., gross vehicle weight rating [GVWR] 14,001 – 33,000 pounds) during the site preparation and grading phases of construction. | |
| *Impact 3.2c*: The project would not expose sensitive receptors to substantial pollutant concentrations with implementation of mitigation measures MM 3.2-1 and MM 3.2-2. | **MM 3.2-1:** Refer to language for MM 3.2-1, above.<br>**MM 3.2-2**: Refer to language for MM 3.2-2, above. | Less than Significant |
| *Impact 3.2d*: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and a less than significant impact would occur. | None Required | Not Applicable |
| **BIOLOGICAL RESOURCES** | | |
| *Impact 3.3a*: The project would remove habitat that supports a rare plant species (slender mariposa lilies) and a sensitive animal species (burrowing owl). However, with implementation of mitigation measures MM 3.3-1 and MM 3.3-2, the proposed project would have a less than significant adverse effect, either directly or indirectly, on candidate, sensitive, or special-status species identified locally or regionally, or by the CDFW or USFWS. | **MM 3.3-1: Preserve or Replace Slender Mariposa Lilies**<br>Mitigation for project impacts to the slender mariposa-lily (Calochortus clavatus var. gracilis) shall include one or more of the following, implemented in consultation with the City and CDFW prior to construction:<br>• Prior to construction, a mitigation plan shall be developed that describes methods to mitigate for impacts to slender mariposa lily at a 1:1 ratio. The mitigation plan shall include a description of the mitigation site, seed/bulb collection and planting methods, maintenance and monitoring requirements, and performance standards to measure the success of the mitigation. Slender mariposa lily bulbs shall be collected at the end of the growing season and prior to ground disturbance, or seeds shall be obtained from a native plant nursery if available. The seeds/bulbs shall be planted within an appropriate on-site or off-site mitigation area, which will be conserved as open space in perpetuity.<br>• Payment into a mitigation bank ~~and/or in-lieu fee program~~ that ~~has mitigation available for the~~supports this rare plant species.<br>• Preservation of land that contains the rare plant species. | Less than Significant |

| Topic/Impacts | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|
| *Impact 3.6a.i*: No State-mapped earthquake faults occur within the project site. An indication of a fault rupture was identified during site geotechnical investigations. Based on observations of trenching through this area, it was determined that this is not an active fault trace. The project would not induce any movement or further rupture of this feature. Impacts would be less than significant.~~; however, further analysis is required to determine if it is active and warrants development restrictions. With mitigation, potential impacts to habitable structures would be avoided.~~ | ~~**MM 3.6-1: Further Testing and Evaluation of the Fault Feature**~~ ~~Prior to the approval of a precise development plan, additional materials testing, and evaluation of the fault feature discovered in Boring FA-10 shall be conducted. If this is determined to be inactive, no further measures would be required. If it is determined to be active, an appropriate Restricted Use Area shall be defined, and restrictions on construction in that area shall also be defined, which shall be noted on the tentative and final subdivision maps.~~None Required | ~~Less than Significant~~Not Applicable |
| *Impact 3.6a.ii*: The project would not cause potential substantial adverse effects involving strong seismic ground shaking. Compliance with the seismic design criteria required by the Santa Clarita Municipal Code would reduce potential seismically induced ground shaking impacts to less than significant. | None Required | Not Applicable |
| *Impact 3.6a.iii*: The project would remove and replace unstable materials that could result in substantial adverse effects involving seismic-related ground failure, including liquefaction. Compliance with the provisions of the Santa Clarita Municipal Code and the recommendations in the project geotechnical report would sufficiently mitigate on-site liquefaction hazards. | None Required | Not Applicable |
| *Impact 3.6a.iv*: The project's grading plan would remediate existing landslide conditions, and compliance with the provisions of the Santa Clarita Building Code would ensure that the earthwork and slope stability measures are sufficient to reduce potential landslide hazards to less than significant. | None Required | Not Applicable |
| *Impact 3.6b*: Site clearance and grading activities would expose soils to potential erosion due to rainstorms or winds. Compliance with existing regulatory standards would provide sufficient measures to prevent significant erosion impacts. The developed site would reduce erosion potential and provide effective erosion controls over the long term, such that there would not be significant erosion impacts. | None Required | Not Applicable |

| Topic/Impacts | Mitigation Measures | Level of Significance After Mitigation |
|---|---|---|
| *Impact 3.6c*: The project is located on land with a geologic unit or soil that is unstable and could potentially result in on-site landslide, subsidence, or liquefaction. Compliance with the provisions of the Santa Clarita Building Code and the mitigation measures identified in the project geotechnical report would sufficiently alleviate the unstable soil conditions. Impacts would be less than significant. | None Required | Not Applicable |
| *Impact 3.6d*: The project would be located on expansive soil, which could create structural damage to proposed structures located in those areas. Compliance with the provisions of the Santa Clarita Building Code and the recommendations in the project geotechnical report would mitigate potential impacts to a level of less than significant. | None Required | Not Applicable |
| *Impact 3.6e*: The project would not involve the use of septic tanks or alternative waste water disposal systems as all wastewater would be discharged to a sanitary sewer system. There would be no impact. | None Required | Not Applicable |
| *Impact 3.6f*: Excavation would disturb two geologic formations where important fossil resources have been discovered in the Santa Clarita Valley. Field monitoring by a qualified paleontologist would ensure that significant paleontological resources are not destroyed by excavation work. The project would partially alter a City-designated Significant Ridgeline in the western part of the site; however, this would be a less than significant impact. | **MM 3.6-~~12~~13:**<br>The developer shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology Standards to develop a monitoring program for the project site in areas where Castaic and Saugus Formation sedimentary layers are exposed or are likely to be exposed during project construction. The qualified paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources and shall be authorized to stop work where potential paleontological resources are discovered to provide an opportunity to examine, recover, and characterize such materials. Additionally, the qualified paleontologist shall conduct construction worker paleontological resources sensitivity training at the project kickoff meeting, prior to ground-disturbing activities. Any significant paleontological resources collected during project-related excavations shall be curated into an accredited repository. The qualified paleontologist shall prepare a final monitoring and mitigation report | Less Than Significant |

# 1.0 INTRODUCTION

## 1.1. PURPOSE AND LEGAL AUTHORITY

This Environmental Impact Report (EIR) evaluates the environmental consequences that could result from implementation of the Bouquet Canyon Project (project). The project consists of a new residential community of 375 for-sale housing units with related infrastructure, dedicated open space areas, public trails, public parks, private recreation, and landscape elements on approximately ~~73.7~~74.66 acres of undeveloped land.

A major project component includes the closure of a portion of Bouquet Canyon Road, between Pam Court and Hob Avenue, and the construction of a new alignment of Bouquet Canyon Road that would provide a more direct alignment to existing segments north and south of the project site, consistent with the Santa Clarita General Plan Circulation Element. In addition, the project includes the channelization of a portion of the flood zone in the northeastern portion of the site while retaining the natural stream course for low flows. A complete project description is contained within Section 2.0, Project Description, of this EIR.

This EIR has been prepared to meet all the substantive and procedural requirements of the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) as amended; the CEQA Guidelines (California Code of Regulations Title 14, Section 15000 et seq.); and the City of Santa Clarita's rules, regulations, and procedures for the implementation of CEQA. The City of Santa Clarita is the lead agency for this project, with primary responsibility for conducting the environmental review process and approving or denying the project.

In enacting CEQA, the California State legislature declared its intent regarding the purposes of an EIR in Section 21002.1 of the CEQA Statute, as follows:

1) Serve as an informational document that will inform the City's decision-makers and the public generally of the significant environmental impacts of the project.

2) Identify possible ways to minimize the significant effects and consider reasonable alternatives that could avoid or reduce one or more of the significant environmental effects that may be identified with respect to the project.

3) Obligate the City to impose measures identified in the EIR to avoid or mitigate potentially significant effects, whenever it is feasible to do so.

4) Grant the City the right to approve a project, despite identification of potential significant effects on the environment that cannot be mitigated due to economic, social, or other conditions.

5) Provide meaningful public disclosure, in a timely and cost-effective manner, of the potential environmental effects that the City considers to be significant.

CEQA Guidelines Section 15382 defines a significant effect to the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the

## 2.0 PROJECT DESCRIPTION

This section describes the project's environmental setting, identifies various community-based and private real estate-based objectives the proposed plan aims to achieve, describes the land use, design, and infrastructure elements of the development plan, outlines the proposed construction program and time frames, and lists the various discretionary land use approvals required to permit the project to proceed.

### 2.1 PROJECT TITLE AND SUMMARY

The proposed project is the "Bouquet Canyon Project." Throughout this EIR, it will be simply referred to as the "project."

Located in the Saugus area, along the northern edge of the City of Santa Clarita, the project site consists of undeveloped land, covered by a mixture of natural and altered landscapes, prominent hills in the western side, and a stream course known as Bouquet Creek flowing from east to west in the northern part of the site. Development of 375 for-sale homes is proposed in five distinct neighborhoods, along with extensive site improvements including internal streets and driveways, storm drainage, water, and sewer facilities, electrical and natural gas facilities, private recreation areas, public parkland and trails, and a reconfiguration of Bouquet Creek and its adjacent floodplain to provide flood control within the project and maintain regular stream flows already occurring. This project also includes construction of a new segment of Bouquet Canyon Road, to follow the general alignment identified in the Santa Clarita General Plan Circulation Element. This is intended to facilitate local and regional travel through a more direct route, compared to the existing long curve that forms the northern and western borders of the site. The total development footprint would cover approximately ~~67.57~~74.66 acres. **Figure 2-1** illustrates the proposed development plan.

Land clearance, grading, and the construction of all site improvements and homes is tentatively estimated to occur over a period of five years, with homes to be sold in phases in response to market demand. For purposes of the analyses conducted for this EIR, it is presumed that all homes will be sold and occupied, and all elements of the project completed and functional by approximately 2025.

### 2.2 ENVIRONMENTAL SETTING

The project site is located along the northern city limits, between the San Gabriel Mountains to the southeast and the Angeles National Forest to the north. The Topatopa Mountains are west of the western city limits and the Santa Susana Mountains are southwest of the city limits. Castaic Lake is 7.5 miles to the northwest, and Lake Piru is 14.6 miles to the west. The Santa Clara River is 1.9 miles to the south. Interstate 5 is approximately 5.6 miles to the west and State Highway 14 is 4.5 miles to the southeast. **Figure 2-2** illustrates the project's location in a regional setting. The project site is just south of the junction of Copper Hill Drive and Bouquet Canyon Road and north of the intersection of Bouquet Canyon Road and Plum Canyon Road. **Figure 2-3** illustrates the project location within the Saugus area. Bouquet Canyon Road forms the northern and western site boundaries. Bouquet Canyon Road, Plum Canyon Road, and Copper Hill Drive provide the main travel routes to and from the rest of the city and the outlying freeway network.

*Planning Area 4: Rowtowns with Carriage Units.* The homes would be designed as two-story structures, with 4–7 attached homes in each "row." Each home would have its own attached garage. Four plans are proposed, with 1–3 bedrooms and 2.5 baths and approximately 721–1,521 square feet of total building area.

**Table 2.0-1**
**SUMMARY OF PROPOSED HOUSING UNITS BY PLANNING AREA**

| Planning Area and Proposed Housing Type | Square Footage Range | # of Housing Units |
|---|---|---|
| 1 and 1A: Single-Family Detached with Driveways | 2,307-2,543 | 64 |
| 2: Single-Family Detached – 8 Pack Cluster | 1,498–1,801 | 136 |
| 3: Attached Backyard Towns | 1,606–1,679 | 90 |
| 4: Rowtowns with Carriage Units | 721-1,521 | 85 |
| | **Total:** | **375** |

*Source: Integral Communities, October 2019*

### Infrastructure

*Streets.* This project proposes off-site and on-site street improvements, as follows. ~~A portion of existing Bouquet Canyon Road would be abandoned, between Hob Court and Pam Court, and a A~~new alignment of Bouquet Canyon Road would be constructed from approximately 1,500 feet north of Plum Canyon Road to approximately 700 feet south of Shadow Valley Lane, in accordance with the City of Santa Clarita General Plan Circulation Element objectives for this major travel route. The Circulation Element classifies Bouquet Canyon Road as a Secondary Highway, ultimately with four travel lanes between Plum Canyon Road and Vasquez Canyon Road. The new segment of Bouquet Canyon Road included in this project would be constructed as a four-lane roadway, with bicycle lanes and parkways on both sides. A portion of existing Bouquet Canyon Road would be abandoned, from just east of Pam Court to just east of David Way, and the existing intersection of David Way and Bouquet Canyon Road would be eliminated and replaced by an extension of Copper Hill Road, from David Way southeasterly to join Bouquet Canyon Road.

A private, on-site vehicle circulation network is proposed to provide access to homes within each planning area and access to/from Bouquet Canyon Road. Access from existing and proposed Bouquet Canyon Road would be provided to the various planning areas, as follows:

- A cul-de-sac is proposed directly opposite Pam Court, to provide access to nine homes in the northern part of Planning Area 1.
- A cul-de-sac is proposed immediately north of the northern end of the Canyon Center commercial site, to provide access to 12 homes in Planning Area 1A.
- A two-lane, gated entry street would be located between Planning Areas 1, 2, and 3, along the new segment of Bouquet Canyon Road. This entry street would link to the internal street network serving Planning Areas 1, 2, and 3 and a total of 269 homes.
- A driveway would be located a few hundred feet east of David Way, to provide access to the 85 homes in Planning Area 4.

*Drainage.* An engineered storm drainage system is proposed to collect and treat runoff from the developed site and provide enhanced flood control protection along Bouquet Creek, which would eliminate much of the existing floodplain conditions in that area. For further details, please refer to Section 3.9 in this EIR. Main elements of the proposed drainage system include:

- A new drainage channel to run parallel to Bouquet Creek, designed to contain 100-year and other higher intensity storm flows. This channel would be constructed ~~with concrete embankments, with a soft bottom~~as a trapezoidal-shaped, reinforced concrete structure. Access roads would be built along both sides to facilitate regular and emergency maintenance operations.
- Infiltration basins, biofiltration basins, debris/desilting basins, a continuous deflective separation unit, and storage pipes to collect and treat site runoff. Infiltration basins would be located at the western end of Planning Area 4 and along the east side of the northern terminus of the new Bouquet Canyon Road, between the new road and the athletic field in the adjacent Los Angeles County Probation Camp Joseph Scott. Biofiltration basins would be located in the northern piece of Planning Area 1, where the proposed cul-de-sac enters from old Bouquet Canyon Road, immediately north of the new "Y" intersection of old and new Bouquet Canyon Roads, and in the southern portion of the project site in Planning Area 1a to the south of the new "Y" intersection of old and new Bouquet Canyon Roads.
- In-street, underground drainage lines to collect runoff from the developed areas for conveyance into the proposed concrete-sided drainage channel north of Planning Area 2.

*Water and Sewer.* The project would connect to existing water mains maintained by the Santa Clarita Valley Water agency, Santa Clarita Water Division, located in Bouquet Canyon Road to the north and south of the proposed new segment of Bouquet Canyon Road. This connection would provide potable water service to an on-site, underground water distribution system to serve all of the homes' interior plumbing fixtures and for all outdoor irrigation applications. The project would need to annex into LACSD, to authorize discharge of wastewater from throughout the project site to LACSD's trunk sewer, referred to as the 24-inch Bouquet Canyon Relief Sewer, located in Bouquet Canyon Road, south of Seco Canyon Road. The project would be required to construct a new sewer main, located in Bouquet Canyon Road, to convey the project's wastewater flows to LACSD's trunk sewer. A private system of underground sewers would collect wastewater generated at the homes and recreation centers for conveyance into the new sewer main.

*Energy and Communications.* Electrical energy would be provided throughout the residential planning areas via a connection to Southern California Edison's facilities, located in Copper Hill Drive and Bouquet Canyon Road. A portion of each home's electrical demand would be met with on-site solar photovoltaic panels, pursuant to California's 2019 Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Code of Regulations), which take effect on January 1, 2020. Natural gas service would be provided to all homes and the two recreation centers via a connection to Southern California Gas Company's transmission main lines, located in Bouquet Canyon Road and Copper Hill Drive. The project would also install underground cables to enable connections within each planning area to telecommunications services from a local provider of such services.

### Open Spaces, Landscaping and Amenities

A variety of private and public amenities are included in the proposed project. This includes two private recreation centers (one in Planning Area 1 and another in Planning Area 2), with in-ground swimming pools and hot tubs, outdoor decks, barbeques, building spaces for social gatherings, and restrooms/changing areas. Two private, open turf/play areas are proposed as outdoor amenities within Planning Area 4. Common landscape areas would be planted within the perimeters of each planning area, and between rows of homes in Planning Areas 3 and 4. An extensive landscaping program is proposed, including community open spaces, street trees and parkways along streets, recreational turf areas, native and manufactured slopes, fuel modification areas, creek riparian enhancements, stormwater management and private yards. **Figure 2-10** illustrates the proposed landscape plan.

An interconnected public walking trail network is proposed around the site perimeter, behind (south edge of) Planning Area 4, through Planning Area 1, and around and up to the top of the hill formation in the western part of the site, as depicted on **Figure 2-1, Proposed Development Plan**. A linear public park, with turf areas, ornamental landscape elements, a tot lot, and seating areas, is proposed within the segment of Bouquet Canyon Road that is to be abandoned, ~~between Hob Court and~~ from just east of Pam Court to where the proposed extension of Copper Hill Drive would join Bouquet Canyon Road. A public parking lot, with adjacent open turf areas, is proposed along the new segment of Bouquet Canyon Road, between the east edge of Planning Area 3 and the eastern end of the new drainage channel, near the northeast corner of the site. This would grant public access to the on-site public trail network.

The northernmost knoll feature in the western part of the site is to be preserved in its natural landform condition, and this feature and adjacent lowland along Bouquet Canyon Road would be the most prominent open space element within the project site. A low-flow "restored to natural" drainage channel, parallel to the proposed main flood control channel, is proposed as a 30-foot wide, landscaped open space corridor to be constructed in the primary drainage zone between Planning Areas 2 and 4. The public trail network described above would provide visual access to the open space along the drainage zone, and walking access along and to the knolltop.

### Construction Program

Construction of the project would entail several main phases and durations, over an estimated 60-month time frame, as summarized in **Table 2.0-2**, below. Construction would occur in the indicated sequence; however, there could be some overlap between phases, where feasible, to shorten the overall construction process. The grading plan would entail approximately 2,070,000 cubic yards of earth work, to be balanced across the site.

**Table 2.0-2**
**CONSTRUCTION PROGRAM**

| Construction Phase | Duration (Months) |
|---|---|
| Site Clearing/Mass Grading of Entire Site | 12 |
| Site Improvements (streets, underground utilities) | 6 |
| Off-Site Improvements (new Bouquet Canyon Road, drainage basins, slopes, new flood channel) | 6 |
| Home Construction and Landscaping | 36 |

gabled rooflines, variations in roof levels, articulation on the front façade with through window molding, covered entries, and variation in building materials. The homes would be constructed as two-story rowhomes in three-plex, four-plex, five-plex, six-plex, and seven-plex clusters. The homes would be constructed in a traditional style, with stucco and wood siding exteriors, asphalt tile roofs with Craftsman design elements along the roofline, and natural material (stone and wood) accents (see **Project Description, Figure 2-9** for architectural renderings of the two-story rowhomes). The rooflines of the homes would reach a maximum of 35 feet high. Such designs are consistent with the Community Character and Design Guidelines for residential development in the Saugus Community (Santa Clarita 2009). The homes in this visualization are located in what would be become Planning Area 4, which includes attached, single-family homes located north of Bouquet Creek and south of Bouquet Canyon Road. One cluster of six attached homes, visible in this view simulation, would be oriented to face Bouquet Canyon Road, with attached garages behind the homes. Ten additional clusters of between three and seven attached homes would be oriented perpendicular to Bouquet Canyon Road. The new homes would rest a minimum of 26 feet from the future southern edge (curb) of the new Copper Hill Road connector and a minimum of 60 feet from the existing northern edge of Bouquet Canyon Road. The typical PA-4 structural setback would range between 30 and 40 feet from the new Copper Hill Road connector southern curb and 70+ feet from the existing northern edge of Bouquet Canyon Road. A Development Review application would be required for each Planning Area with approval by the Community Development Director.~~The homes in Planning Area 4 would be set back approximately 25 to 40 feet from Bouquet Canyon Road.~~ A short span of the ridgeline on the west side of the project site would remain visible to motorists at the intersection of Bouquet Canyon Road and David Way, above the roofline of the two-level homes.

Viewing location D is located at the northeast corner of the project site, along Bouquet Canyon Road, looking southwest onto the project site. This view is characterized by tree clusters, overhead power lines, and the street surface in the foreground, with a mosaic of vegetation forms in the middle ground, and the slopes and ridgeline of the site's most prominent landform in the background. With implementation of the proposed project, the new segment of Bouquet Canyon Road would become a dominant visual feature in the fore- and middle grounds, with landscape and building elements of the developed site prominent to the right of the roadway surface and portions of the on-site hillsides and ridgeline remaining highly visible in the background. The limited views of the creek area would be replaced by the roadway surface, which would bridge across the creek, and the buildings and new landscape elements within future Planning Areas 2 and 3.

Homes within the eastern edge of Planning Areas 2 and 3 would be distantly visible from this location, partially obstructed from view by new landscaping elements to be planted as part of the project. These homes would also be visually buffered for westbound travelers by the reconstructed and revegetated creek corridor that would extend between Planning Areas 3 and 4, through the entire width of the project site. The homes in Planning Area 2 would be single-family detached constructed in a Mediterranean style, with light-colored, stucco exteriors, tile roofs, and stone and wood accents (see **Project Description, Figure 2-7** for architectural renderings of the proposed homes). Homes in Planning Area 3 would be multi-family, backyard towns constructed in California ranch and Craftsman styles, with light-colored, stucco exteriors, asphalt shingle roofs, and stone and wood accents (see **Project Description, Figure 2-8** for architectural renderings of the proposed homes). Homes in both planning areas would be two stories, with a maximum height of 35 feet and would be consistent with the Community Character and Design

## 3.2 AIR QUALITY

This section addresses the air emissions generated by the construction and operation of the project and the potential impacts to air quality. The analysis also addresses the consistency of the project with the air pollution reduction strategies set forth within the South Coast Air Quality Management District's (SCAQMD) *2016 Air Quality Management Plan* (2016 AQMP). The analysis of project-generated air emissions focuses on whether the project would cause an exceedance of an ambient air quality standard or SCAQMD significance thresholds.

For the purposes of air emissions associated with mobile sources, traffic information contained in the *Bouquet Canyon Residential EIR Traffic Impact Analysis* (Traffic Impact Analysis), prepared by Stantec and dated March 2020 was used in this analysis (see **Appendix JL**). Emissions modeling worksheets are provided in **Appendix B** of this EIR.

### 3.2.1 EXISTING CONDITIONS

#### 3.2.1.1 SOUTH COAST AIR BASIN

***Geography***

The City of Santa Clarita (City) is located in the South Coast Air Basin (Basin), a 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area of Riverside County.

The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of air pollutants throughout the Basin.

***Climate***

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The climate consists of a semiarid environment with mild winters, warm summers, moderate temperatures, and comfortable humidity. Precipitation is limited to a few winter storms. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The average annual temperature varies little throughout the Basin, averaging 75 degrees Fahrenheit (°F). However, with a less-pronounced oceanic influence, the eastern inland portions of the Basin show greater variability in annual minimum and maximum temperatures. All portions of the Basin have had recorded temperatures over 100°F in recent years.

Although the Basin has a semi-arid climate, the air near the surface is moist due to the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the Basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70 percent at the coast and 57 percent in the eastern part of the Basin. Precipitation in the

would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site.

**Energy Source Emissions**

Energy source emissions (i.e. generated at the site of the power generation source) would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. It should be noted that the project would comply with the 2019 Title 24 standards which requires more efficient lighting and rooftop solar panels for new residential projects.

**Mobile Source Emissions**

Project related operational air quality impacts are derived predominantly from mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the site vicinity. The operational air quality impacts are derived primarily from vehicle trips generated by the project. According to the Traffic Impact Analysis (refer to Appendix ~~I~~J) the project would generate approximately 3,~~941~~092 daily vehicle trips.

Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, $NO_X$, $SO_X$, $PM_{10}$, and $PM_{2.5}$ are all pollutants of regional concern ($NO_X$ and ROG react with sunlight to form $O_3$ [photochemical smog], and wind currents readily transport $SO_X$, $PM_{10}$, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

**Operational Emissions Summary**

The project's long-term operational emissions estimates were calculated using the CalEEMod model; refer to Appendix B. This model predicts ROG, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$ emissions from area, energy, and mobile traffic sources associated with the proposed land uses. **Table 3.2-5 Long-Term Operational Air Emissions,** presents the anticipated operational source emissions for the project. As indicated, the operational emissions from the project would not exceed regional thresholds of significance established by the SCAQMD for criteria air emissions. Therefore, a less than significant impact would occur in this regard.

**Table 3.2-5**
**LONG-TERM OPERATIONAL AIR EMISSIONS**

| Scenario | Emissions (pounds per day)[1,3] | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_x$ | CO | $SO_x$ | $PM_{10}$ | $PM_{2.5}$ |
| **Project Summer Emissions[2]** | | | | | | |
| Area Source | 10.72 | 5.81 | 32.50 | 0.04 | 0.61 | 0.61 |
| Energy Source | 0.12 | 1.03 | 0.45 | 0.01 | 0.08 | 0.08 |
| Mobile | 5.86 | 25.39 | 79.24 | 0.32 | 28.87 | 7.88 |
| **Total Maximum Daily Emissions** | **16.70** | **32.22** | **112.19** | **0.37** | **29.57** | **8.57** |
| *SCAQMD Regional Threshold* | *55* | *55* | *550* | *150* | *150* | *55* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Project Winter Emissions[2]** | | | | | | |

include a description of the mitigation site, seed/bulb collection and planting methods, maintenance and monitoring requirements, and performance standards to measure the success of the mitigation. Slender mariposa lily bulbs shall be collected at the end of the growing season and prior to ground disturbance, or seeds shall be obtained from a native plant nursery if available. The seeds/bulbs shall be planted within an appropriate on-site or off-site mitigation area, which will be conserved as open space in perpetuity.

Payment into a mitigation bank ~~and/or in lieu fee program~~ that ~~has mitigation available for the~~supports this rare plant species.

Preservation of land that contains the rare plant species.

*Timing/Implementation:* *Plan check and prior to grading*

*Enforcement/Monitoring:* *City of Santa Clarita, Planning Division*

**MM 3.3-2** **Burrowing Owl Avoidance**

In compliance with the CDFW Staff Report on Burrowing Owl Mitigation (2012), a take avoidance survey shall be conducted on the study area within 14 days prior to ground disturbance to determine presence of burrowing owl. If the take avoidance survey is negative and burrowing owl is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If burrowing owl is observed during the take avoidance survey, active burrows shall be avoided by the project in accordance with the CDFW's Staff Report. The CDFW shall be immediately informed of any burrowing owl observations. A Burrowing Owl Protection and Relocation Plan shall be prepared by a qualified biologist, which must be sent for approval by CDFW prior to initiating ground disturbance. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur September 1 through January 31, outside of the nesting season.

*Timing/Implementation:* *Prior to ground disturbance*

*Enforcement/Monitoring:* *City of Santa Clarita, Building and Planning Divisions*

**Impact 3.3-b** The proposed project would result in permanent impacts to 28.68 acres of native plant-dominated habitat and 55.55 acres of habitat dominated by non-native species and previously disturbed areas. The elderberry savanna and southern willow scrub/giant reed stand habitats on the project site are considered sensitive natural communities by CDFW (totaling 1.26 acres) and would be permanently impacted by the proposed project. However, both habitats are considered low quality due to their size and the presence of invasive species. Although southern willow scrub/giant reed stand is considered low-quality habitat, the project would offset permanent impacts to 0.70 acres through compensatory mitigation for jurisdictional streambed impacts as outlined in mitigation measure **MM 3.3-3**. Therefore, with implementation of appropriate mitigation measures, the proposed project would have a less than

| Date | Location | Magnitude |
|---|---|---|
| 1952 | l4km NNW of Tehachapi | 5.6 |
| 1952 | 19km N of Tehachapi | 5.6 |
| 1952 | 22km N of Tehachapi | 5.6 |
| 1952 | 6km SSE of Arvin | 5.5 |
| 1952 | 13km ENE of Grapevine | 5.6 |
| 1952 | 13km WNW of Grapevine | 5.8 |
| 1952 | 6km WNW of Grapevine | 7.5 |
| 1926 | Southern California | 5.5 |
| 1916 | Southern California | 5.5 |
| 1916 | Central California | 6.0 |
| 1899 | Southern California | 6.4 |
| 1894 | Southern California | 5.9 |
| 1893 | Santa Barbara Channel | 5.5 |
| 1855 | Greater Los Angeles area | 6.0 |

*Source: Petra Geosciences, Inc., 2019 (Appendix E of this Draft EIR)*

*Notes:*

*1) Maximum free-field site accelerations based on published accelerogram data for USGS CSMIP Station No. 707, located approximately 2.8 kilometers southwest of the subject site.*

*2) Maximum site acceleration based on the published accelerogram data for CGS CSMIP Station No. 13079, located approximately 5.6 kilometers north of the subject site.*

*3) Maximum site acceleration based on the published accelerogram data for CGS CSMIP Station No. 13326, located approximately 2 kilometers southwest of the subject site.*

*4) Site acceleration was estimated based on the results of a computerized database search using a software application developed by T.F. Blake (Eqsearch V3.0, 2000). For purposes of the computerized site acceleration estimates, the attenuation relationship developed by Bozorgnia, Campbell, and Niazi (1999) for hard rock sites was considered appropriate.*

*5) Based on Wald et al, 1999.*

#### 3.6.1.6 SURFACE FAULT RUPTURE

Indications of a fault rupture were found in Petra's Boring FA-10, located along the north edge of the proposed new segment of Bouquet Canyon Road, in the eastern part of proposed Planning Area 3. Subsequent trenching and evaluation of the materials determined that this is not an active fault ~~The activity level was not readily determinable and will require further investigation.~~

#### 3.6.1.7 SEISMICALLY INDUCED GROUND FAILURE

Strong ground motion can cause different types of ground failure. Liquefaction and lateral spreading, settlement, differential materials response, slope failures, sympathetic movement on weak bedding planes or non-causative faults, shattered ridge effects, and ground lurching are some of the many types of ground failure that can result from seismically induced strong ground motion. Petra's investigations determined that liquefaction, lateral spreading, and landslides are of primary concern within the project site. Liquefaction and lateral spreading are caused in ground that is usually water-saturated and made of loose to moderately dense, fine to medium sands. During strong ground motion, the sands temporarily lose strength and behave like a viscous fluid. As the sand settles, the fluid-like substance can flow down gradients, causing lateral spreading, and push water toward the surface in the form of sand boils and sand

iii. Seismic-related ground failure, including liquefaction.

iv. Landslides.

b) Result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 3.6.4 METHODOLOGY

The analysis of impacts related to geology and soils is based, in part, on the *Updated Geotechnical EIR-Level Assessment, Bouquet Canyon Project, Tentative Tract Map No. 82126, Southerly Adjacent to Bouquet Canyon Road and Copper Hill Drive, Santa Clarita, California*, prepared by Petra Geosciences, Inc., which is available in Appendix E of this Draft EIR. Information, conclusions, and recommendations included in this assessment are based on site-specific data, which includes information obtained from the drilling of borings at the project site followed by laboratory testing of the material obtained therein. The Petra report used resources and followed guidance available from the US Geological Survey, the 2016 CBC, the Earthquake Hazards Zone Maps and the Alquist-Priolo Special Studies Zones Map produced by CGS, the California Division of Mines and Geology's Guidelines for Geologic/Seismic Considerations in EIRs, the City of Santa Clarita's Local Hazard Mitigation Plan (Santa Clarita 2015), and other available resources. The Petra report also used and includes a list of 23 other literature references. R.T. Frankian and Associates performed a professional peer review of the Petra report on behalf of the City of Santa Clarita.

The analysis of paleontological resources is based on a Vertebrate Paleontology Records Check conducted by Dr. Samuel A. McLeod of the Natural History Museum of Los Angeles County. That research is also provided in Appendix E of this Draft EIR.

### 3.6.5 ANALYSIS

**Impact 3.6-a.i:** No State-mapped earthquake faults occur within the project site. An indication of a fault rupture was identified during initial site geotechnical investigations. After subsequent trenching and analysis of this feature, it was determined it is not an active fault trace; therefore, the project would not result in a significant impact involving construction on or near an active fault. ~~The project would not induce any movement or further rupture of this feature; however, further analysis is required to determine if it is active and warrants development restrictions. With mitigation, potential impacts to habitable structures would be avoided.~~

**Discussion**

As mentioned previously, the project site does not intersect any known active earthquake faults. According to mapping from the CGS, no such fault exists in close proximity to the site; the nearest is the San Gabriel fault, which is 3.5 miles to the southwest of the proposed site.

A fault feature was found along the north edge of the proposed new segment of Bouquet Canyon Road, in the eastern part of proposed Planning Area 3, during Petra's investigation. A subsequent investigation found that the project site is not transected by any active fault traces. Therefore, structure setbacks or restrictions related to fault activity will not be required, and there would not be a significant impact involving construction within or along an active fault. ~~With the present information, the activity level of this feature cannot be determined and will require further investigation prior to approval of a precise development plan. If this fault is potentially active, there could be some damage to nearby structures if there were a seismically triggered fault rupture during the life of the completed project. For interim planning purposes, the general locale surrounding this boring has been designated as a Restricted Use Area that prohibits construction of any habitable structures. The City's Building Code regulations (Section 18.02.040) prohibit construction of any building or structure over or upon or within 50 feet of a trace of a known active earthquake fault~~

~~While the proposed grading plan would disturb the area containing the fault feature, that activity would not trigger a fault rupture because the changes in effective stress from grading would be minor in comparison with forces on a fault rupture surface that are generally generated at great depths within the earth. Nonetheless, to ensure that the activity nature of this fault feature and whether some use restrictions are warranted are both properly determined prior to approval of a precise development plan, mitigation measure **MM 3.6-1** will require additional testing of those materials to determine whether some development restrictions would be required~~.

**Mitigation Measures**

Mitigation measures would not be required.

~~**MM 3.6-1 Further Testing and Evaluation of the Fault Feature**~~

~~Prior to the approval of a precise development plan, additional materials testing, and evaluation of the fault feature discovered in Boring FA-10 shall be conducted. If this is determined to be inactive, no further measures would be required. If it is determined to be active, an appropriate Restricted Use Area shall be defined, and restrictions on construction in that area shall also be defined, which shall be noted on the tentative and final subdivision maps.~~

~~*Timing/Implementation: Prior to approval of a Development Review and Tentative Tract Map*~~

~~*Enforcement/Monitoring: City of Santa Clarita, Planning Division*~~

~~**Level of Impact Significance Following Mitigation:**~~

~~Potential impacts related to a fault rupture would be avoided.~~

**Impact 3.6-a.ii:** The project would not cause potential substantial adverse effects involving strong seismic ground shaking. Compliance with the seismic design criteria required by the

unfound paleontological resources, mitigation measure 3.6-12 will be implemented to require targeted monitoring of excavation work by a qualified paleontologist who can identify fossil materials and provide instructions to avoid and recover those materials. With this measure, significant impacts to paleontological resources would be avoided.

Unique Geologic Feature

The Santa Clarita Valley contains diverse topography and prominent ridgelines. The ridgeline on the western side of the project site is a General Plan-designated significant ridgeline (Santa Clarita 2011, p. CO-7). This ridgeline is approximately 100 to 180 feet above the flat central portion of the project site. As described in **Section 2.0 Project Description** of this Draft EIR, a portion of this ridgeline would be graded to allow the new segment of Bouquet Canyon Road to be built. There are no other unique geologic features found on-site.

Although the ridgeline is classified as significant in the Santa Clarita General Plan, there are other, more substantial ridgelines surrounding the project site, as discussed in **Section 3.1 Aesthetics**. Because the project would alter a portion but retain a majority of the ridgeline, and because there are other larger and more distinct ridgelines adjacent to the project site, the project would not have a significant impact on a unique geologic feature.

**Mitigation Measures**

**MM 3.6-12** The developer shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology Standards to develop a monitoring program for the project site in areas where Castaic and Saugus Formation sedimentary layers are exposed or are likely to be exposed during project construction. The qualified paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources and shall be authorized to stop work where potential paleontological resources are discovered to provide an opportunity to examine, recover, and characterize such materials. Additionally, the qualified paleontologist shall conduct construction worker paleontological resources sensitivity training at the project kickoff meeting, prior to ground-disturbing activities. Any significant paleontological resources collected during project-related excavations shall be curated into an accredited repository. The qualified paleontologist shall prepare a final monitoring and mitigation report for submittal to the City that documents the results of the monitoring effort and any discoveries.

*Timing/Implementation:* *Develop monitoring program prior to grading. Monitor during grading.*

*Enforcement/Monitoring:* *City of Santa Clarita, Planning Division*

**Level of Impact Significance Following Mitigation:**

Potential impacts to paleontological resources would be avoided.

## 3.7 GREENHOUSE GAS EMISSIONS

This section identifies and quantifies the greenhouse gas (GHG) emissions directly or indirectly associated with the project and analyzes project compliance with applicable plans, policies and regulations aimed at reducing greenhouse gas emissions. Emissions calculations worksheets are provided in **Appendix B**.

For the purposes of GHG emissions associated with mobile sources, traffic information contained in the *Bouquet Canyon Residential EIR Traffic Impact Analysis* (Traffic Impact Analysis), prepared by Stantec and dated March 2020 was used; refer to **Appendix ~~L~~J, *Traffic Impact Analysis***.

### 3.7.1 EXISTING CONDITIONS

California is a substantial contributor of GHGs, emitting over 420 million metric tons of carbon dioxide equivalent ($CO_2$eq) per year (CEC 2019).[1] Methane ($CH_4$) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of $CO_2$, $CH_4$, and nitrous oxide ($N_2O$) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that $CO_2$ concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global $CO_2$ concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of April 2018, the highest monthly average concentration of $CO_2$ in the atmosphere was recorded at 410 ppm (SCRIPPS 2019).

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of $CO_2$eq concentrations of about 450 ppm or lower are likely to maintain warming below 2 degrees Celsius (°C), which in turn is assumed to be necessary to avoid dangerous climate change (IPCC 2015). While a localized temperature change of 2°C may not seem serious, it has grave consequences on a global scale because this temperature increase directly impacts the sustainability of water, food supplies, ecosystems, coastal stability, and public health (e.g., heatstroke and lung damage due to increased smog) (IPCC 2015; CDOJ 2019).

#### 3.7.1.1 SCOPE OF ANALYSIS FOR CLIMATE CHANGE

The study area for climate change and the analysis of GHG emissions is broad as climate change is influenced by world-wide emissions and their global effects. However, the study area is also limited by

[1] Carbon Dioxide Equivalent (CO2eq) - A metric measure used to compare the emissions from various greenhouse gases based upon their Global Warming Potential.

regional, and local plans for GHG reduction. A consistency analysis is provided below and describes the project's compliance with performance-based standards included in the regulations outlined in the applicable portions of the 2016-2040 RTP/SCS and 2017 Scoping Plan.

**Quantification of Emissions**

In view of the above considerations, this EIR quantifies the project's total annual GHG emissions for informational purposes, taking into account the GHG emission reduction features that would be incorporated into the project's design. The California Emissions Estimator Model version 2016.3.2 (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

### 3.7.5 ANALYSIS

**Impact 3.7-a** The project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment and impacts would be less than significant.

**Impact 3.7-b** The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.

The proposed project involves constructing 375 for-sale homes, comprising different types of housing units, along with supporting utility and street infrastructure, recreational amenities and landscaping. Project-related GHG emissions would include emissions from direct and indirect sources. The project would result in direct and indirect emissions of $CO_2$, $N_2O$, and $CH_4$, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct Project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions (passenger cars and trucks). CalEEMod relies upon trip data within the project's Traffic Impact Analysis (refer to Appendix ~~L~~J) and project-specific land use data to calculate emissions. **Table 3.7-1, Projected Annual Greenhouse Gas Emissions**, presents the estimated $CO_2$, $N_2O$, and $CH_4$ emissions of the project. CalEEMod outputs are contained within **Appendix B**.

**Direct Project-Related Sources of Greenhouse Gases**

Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of a project (assumed to be 30 years), then added to the operational emissions. As shown in **Table 3.7-1**, the project would result in 129.58 metric tons carbon dioxide equivalent per year ($MTCO_2eq$/year) (amortized over 30 years), which represents a total of 3,887.44 $MTCO_2eq$ from

construction activities (129.58 $MTCO_2eq$/year multiplied by 30 years). Please note that these emission levels account for the emission reduction benefits of air quality mitigation measures **MM 3.2-1** and **MM 3.2-2**.

Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. As noted in **Table 3.7-1**, the project would result in 85.89 $MTCO_2eq$/year of area source GHG emissions.

Mobile Source. The CalEEMod model relies upon trip data within the Traffic Impact Analysis and project-specific land use data to calculate mobile source emissions. The project-related operational emissions are derived predominantly from mobile sources, i.e. vehicular exhaust. ~~According to the Traffic Impact Analysis, the project would generate approximately 3,941 daily vehicle trips; refer to Appendix L.~~ Based on the project-generated daily vehicle trips, the project would result in approximately 5,248.77 $MTCO_2eq$/year of mobile source-generated GHG emissions; refer to **Table 3.7-1**.

**Table 3.7-1**
**PROJECTED ANNUAL GREENHOUSE GAS EMISSIONS**

| Source | $CO_2$ | $CH_4$ | | $N_2O$ | | Total Metric Tons of $CO_2eq$[2,3] |
|---|---|---|---|---|---|---|
| | Metric Tons/yr[1] | Metric Tons/yr[1] | Metric Tons of $CO_2eq$[1] | Metric Tons/yr[1] | Metric Tons of $CO_2eq$[1] | |
| **Direct Emissions** | | | | | | |
| Construction (amortized over 30 years) | 129.10 | 0.02 | 0.48 | 0.00 | 0.00 | 129.58 |
| Area Source[4] | 85.27 | 0.01 | 0.19 | 0.00 | 0.43 | 85.89 |
| Mobile Source | 5,242.69 | 0.24 | 6.08 | 0.00 | 0.00 | 5,248.77 |
| *Total Direct Emissions*[2] | 5,457.06 | 0.27 | 6.75 | 0.00 | 0.43 | 5,464.24 |
| **Indirect Emissions** | | | | | | |
| Energy[4] | 647.15 | 0.03 | 0.71 | 0.01 | 2.68 | 650.54 |
| Water Demand | 132.80 | 0.82 | 20.59 | 0.02 | 6.17 | 159.57 |
| Solid Waste Disposal[4] | 33.32 | 1.97 | 49.23 | 0.00 | 0.00 | 82.56 |
| *Total Indirect Emissions*[2] | 813.28 | 2.82 | 70.53 | 0.03 | 8.85 | 892.67 |
| ***Total Project-Related Emissions***[2] | ***6,356.91 $MTCO_2eq$/yr*** | | | | | |

*Notes:*
*1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.*
*2. Totals may be slightly off due to rounding.*
*3. Carbon dioxide equivalent values calculated using the United States Environmental Protection Agency Website, Greenhouse Gas Equivalencies Calculator, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed April 8, 2019.*
*4. The reduction/credits for operational emissions are based on 2019 Title 24 standards which include rooftop solar panel installation.*
*Refer to Appendix B, Air Quality, Energy and Greenhouse Gas Modeling Worksheets, for detailed model input/output data.*
*Source: Michael Baker International, 2019*

### Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using the CalEEMod model and project-specific land use data. Electricity would be provided to the site via Southern California Edison (SCE). The primary use of electricity and natural gas by the project would be for space heating and cooling,

would enter the Filterra system through a curb-inlet opening or pipe and flow through a specially-designed filter media mixture in a landscaped concrete container. The filter media would capture and mobilize pollutants, which would then be decomposed, volatilized, and incorporated into the biomass of the system's micro/macro fauna and flora. Stormwater runoff would then flow through the media and into an underdrain system at the bottom of the container, where the treated water would be discharged.

The combination of the treatment control BMPs identified above would have a high removal effectiveness on the pollutants of concern.

Other project features identified in the USMP include the following:

- Channelization of Bouquet Creek to allow off-site upstream flows to go through the project site for treatment prior to being discharged to Bouquet Creek;
- Storm drain system stenciling and signage; and
- On-going inspection and maintenance of the proposed infiltration and biofiltration basins and CDS and Filterra units.

Therefore, in compliance with the City's Stormwater and Urban Runoff Pollution Control requirements, including implementation of treatment control BMPs, project operation would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, the project would result in a less-than-significant impact related to surface or groundwater quality.

**Mitigation Measures**

No mitigation measures are required.

**Impact 3.9-b** The project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

**Discussion**

There is no groundwater production occurring at the project site; therefore, there would be no disruption to any existing groundwater production from the project site. Although the proposed project would require extensive grading due to the steep slopes and the ridgeline that define the topography of the western side of the project site, the proposed project would not include any subterranean levels that would require deep excavation that would potentially encounter groundwater. As described above, when measured by soil borings in October and November 2018, the groundwater table was encountered at a depth of 45 and 50 feet bgs. The structural footings and other underground elements to be constructed for the proposed residential community would not extend to this level. The developed project would receive all of its water from a piped water system, connected to a Santa Clarita Valley Water Agency water transmission main. As such, the project would not require groundwater withdrawal. In addition, the City's Stormwater Mitigation Plan (SCMC Chapter 17.95) requires that each project develop and implement a mitigation plan to lessen the water quality impacts of the project by using smart growth practices and BMPs and integrate LID design principles to mimic pre-development hydrology conditions through infiltration, evapotranspiration, rainfall harvest, and use.

The project would create new impervious surfaces throughout the site, where none exist today, in the form of streets, buildings, patios and parking areas and a concrete-lined high-flow flood control channel. But, a majority of the site's drainage area (approximately 72%) would consist of pervious surfaces, comprised of vegetated slopes, landscaped community open space areas, private yards, parkways, recreation turf areas, etc., where infiltration would occur during rainstorms. Bouquet Creek, within the project site, would be maintained as a natural (unpaved and vegetated) drainage course and would continue to provide groundwater recharge by carrying low-intensity storm flows as it does today.

An analysis of the project's effects on groundwater recharge within the project site was conducted, to help determine whether the proposed concrete-lined high flow channel would have a significant adverse impact on the volume of annual groundwater recharge, compared to existing conditions. This analysis was prepared by Thomas Harder & Co., a hydrogeological firm that specializes in groundwater consulting, with extensive experience evaluating projects in the Santa Clarita Valley, and is included in the ERRATA and DRAFT EIR REVISIONS section of the Final EIR.

***Approach to Analysis***

The methodology used to quantify pre- and post-Project recharge involves quantifying recharge in Bouquet Creek and recharge in the retention basins. The former relies on the streamflow data whereas the latter relies on the precipitation data (to quantify runoff into the retention basins) along with an estimate of infiltration rate at the two subarea basins most likely to influence the calculations (i.e. 100A and 300A as noted on the "LID Exhibit" within the Urban Stormwater Mitigation Plan, which is provided as Appendix G of the Draft EIR). Recharge associated with high intensity rainfall events that could result in flow from the retention basins into Bouquet Creek are not accounted for in our methodology, primarily due to the uncertainty associated with precisely where such an exchange would occur and expected low frequency of such events.

***Methodology to Estimate Bouquet Creek Recharge***

Infiltration within Bouquet Creek was estimated based on historical streamflow records, estimated stream width, stream length, and infiltration rate. Daily infiltration is the product of stream width, stream length, and infiltration rate. The stream width was based on the stream profile from SIKAND at three stages, 0, 100, and 200 cfs (see Figure 4 in Harder & Co. report). The flows between each stage were assumed to be proportional to the area. Using these proportions, the daily stream profile (including width) was calculated based the daily streamflow data. The width of the stream when flows were greater than 200 cfs were assumed to be equal to the maximum width of the stream profile.

The length of the Bouquet Creek within the Project area is approximately 2,000 ft. The infiltration rate was based on three infiltration tests conducted near Bouquet Creek as reported in the Urban Stormwater Mitigation Plan. As shown in Figure 2 of the Harder & Co. report, two of the tests were conducted at drainage subarea basin100A whereas the third was conducted at drainage subarea basin 300A. The average of the adjusted infiltration rates (as presented in the original report) was 8.0 ft/day.

Recharge for flows less than 200 cfs were assumed to be the same for pre-Project and Project conditions. Infiltration for flows greater than 200 cfs was limited to that which is calculated for the primary, low flow channel. As noted above, based on the available data daily streamflow exceeded 200 cfs 11 times.

***Methodology to Estimate Captured Runoff***

Captured runoff was estimated based on historical precipitation data, runoff volumes from SIKAND, the size of the stormwater retention basin, and the estimated infiltration rate within subareas 100A 300A, and 400A retention basins. Precipitation runoff was calculated by SIKAND for Subareas 100A, 300A, and 400A as presented in the Urban Stormwater Mitigation Plan. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

The basins will be unlined and located on the canyon floor alluvium. Based on the available infiltration data noted above, the basins are assumed to have an infiltration rate of 8.0 ft/day, which translates to a combined recharge capacity for both basins of 5.0 acre-ft/day when full.

Based on a peak flow hydrologic analysis by SIKAND, a 0.85-inch precipitation event within Subareas 100A, 300A, and 300A would generate 0.86, 0.38, and 0.07 acre-ft of water under Project conditions, respectively. Estimated runoff was based on the proportion of measured daily rainfall to the 0.85-inch baseline. Due to the high recharge rates of the basins, the total capture volume was limited to the total recharge capacity.

***Results of Pre-Project and Project Recharge Conditions Analysis***

Based on the analyses described above, the estimated annual recharge within the project area from Bouquet Creek and captured runoff is summarized in the following table:

**Table 3.9-1**
**RESULTS OF PRE-PROJECT AND PROJECT RECHARGE CONDITIONS ANALYSIS**

| Recharge within the Project Area | Pre-Project | Project |
|---|---|---|
| Bouquet Creek Recharge | 114 acre-ft/yr | 109 acre-ft/yr |
| Subareas 100A and 300A Captured Runoff | 0 acre-ft/yr | 14 acre-ft/yr |
| Total | 114 acre-ft/yr | 123 acre-ft/yr |

Based on the results of this analysis, the project would result in an increase in annual groundwater recharge within the project site; therefore, the project would have a less than significant impact to groundwater recharge associated with proposed site improvements, including the proposed concrete channel to carry high storm flows.

~~the project would not contribute to depletion of groundwater or interfere with recharge of a managed groundwater supply source. Impacts would be less than significant.~~

**Mitigation Measures**

No mitigation measures are required.

**Impact 3.9-c.i** The project would not substantially alter the existing drainage pattern of the project site or the project vicinity, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result

### Long-Term Operational Noise Impacts

#### *Mobile Noise*

Operation of the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. ~~Based on the Traffic Impact Analysis, the proposed project is projected to generate~~As a conservative approach, the analysis of project-related changes to roadway noise levels was based on a total of approximately 3,941 daily vehicle trips, which includes approximately 271 a.m. peak hour trips and approximately 366 p.m. peak hour trips. (This number was calculated in the traffic analysis for an earlier version of the project, rather than the current version which would generate approximately 3,092 daily trips). The "Existing Without Project" and "Existing With Project" scenarios are compared in **Table 3.10-6, Modeled Existing and Existing plus Project Traffic Noise Levels**. As shown under the "Existing Without Project" scenario, noise levels would range from approximately 51.9 dBA to 70.0 dBA, with the highest noise levels occurring along Newhall Ranch Road. The "Existing With Project" scenario noise levels would range from approximately 52.4 dBA to 70.0 dBA, with the highest noise levels also occurring along Newhall Ranch Road.

**Table 3.10-6** also shows the differences between the "Existing Without Project" scenario and the "Existing With Project" scenario. The noise levels would result in a maximum increase of 0.7 dBA, as a result of the proposed project, along Bouquet Canyon Road (Plum Canyon to David Way). Therefore, the proposed project would not significantly increase noise levels along the roadway segments analyzed (i.e., noise increase would be less than 3.0 dBA). Furthermore, the increase of traffic due to the project would not cause the existing noise levels under 65 dBA CNEL to exceed the land use compatibility "normally acceptable" community noise exposure level of 65 dBA CNEL; refer to **Table 3.10-4**. Therefore, the impact would be less than significant.

### Stationary Noise

#### *On-site Recreation Center Outdoor Activity Noise*

Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. According to "Prediction of Crowd" *Noise* (Hayne, Rumble, and Mee 2006), crowd noise would be approximately 62 dBA at 1 meter from the source.[1]

Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source (Harris 1994). Based on Figure 2.1 in the Project Description, the nearest sensitive receptor is an existing residence located approximately 500 feet[2] from the proposed private recreation center located in Planning Area 1. As a result, crowd noise at this distance would be 18 dBA, which would not exceed the City's noise standards and would be lower than existing ambient noise levels near the site. As such, project operational noise associated with outdoor activities would not introduce an intrusive noise source. Thus, a less than significant impact would occur in this regard.

[1] Crowd noise is estimated at 60 dBA at 1 meter (3.28 feet) away for raised normal speaking. This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members. Therefore, crowd noise would be approximately 62 dBA at 1 meter from the source.

2 The main surface parking area represents the closest outdoor space area to nearby sensitive receptors (i.e. residential uses).

## 3.11 PUBLIC SERVICES

Pursuant to the environmental scoping process conducted in the first phase of this Draft EIR (see **Appendix A**), this section evaluates potential impacts related to the provision of public services for fire protection and emergency medical response, public safety and law enforcement, public schools, and parks. As indicated in the Initial Study prepared during the scoping process, the project's impact on other public services was determined to be less than significant and, therefore, is not further evaluated herein.

### 3.11.1 FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

#### 3.11.1.1 EXISTING CONDITIONS

Fire suppression and emergency medical response services for the project site and the surrounding area are provided by the Los Angeles County Fire Department (LACoFD). Specifically, ~~16~~ 15 fire stations with ~~15~~ 14 engine companies, 5 paramedic squads, 1 hazardous materials squad, and 2 ladder trucks serve the Santa Clarita Valley. LACoFD Station 108 is located at 28799 Rock Canyon Drive, approximately 2 miles northwest of the project site, and is the jurisdictional station serving the site. Station 108 is staffed with a four-person engine company that includes one captain, one firefighter specialist, and two firefighters. The next nearest fire station is LACoFD Station 128, at 28450 Whites Canyon Road, approximately 3.5 miles southeast of the project site. During 2017, Station 108 had an average emergency response time of 6 minutes and ~~14~~ 37 seconds.

#### 3.11.1.2 REGULATORY AND PLANNING FRAMEWORK

**FEDERAL**

**National Fire Protection Association Standard 1720 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations**

This standard, which is used by the LACoFD, contains minimum requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public and addresses functions and outcomes of fire department emergency service delivery, response capabilities, and resources. In accordance with this standard, the LACoFD applies the 5-minute response time for the first arriving fire department and emergency medical services (EMS) personnel and 8-minute response time for advanced life support personnel in urban areas, and an 8-minute response time for first arriving fire department and EMS personnel and 12-minute response time for advance life support personnel in suburban areas. Santa Clarita is a mixture of urban and suburban areas.

**STATE**

**California Code of Regulations, Title 24, Part 9: Fire Code**

The California Fire Code (CFC) contains regulations consistent with nationally recognized accepted practices for safeguarding, to a reasonable degree, life and property from the hazards of fire and explosion; hazardous conditions in the use or occupancy of buildings or premises; and dangerous conditions arising from the storage, handling, and use of hazardous materials and devices.

The CFC also contains provisions to assist emergency response personnel. These fire safety-related building standards are referenced in other parts of Title 24 and this code is compatible with the International Fire Code with necessary California amendments.

As noted above in the Methodology section, the primary metric utilized by the City of Santa Clarita to evaluate performance of the circulation system is LOS. The subsections below consider the following two scenarios to evaluate the project's effect on LOS: the Existing Plus Project scenario and the Interim Year Cumulative (2028) Conditions With Project scenario. The subsections below also provide a qualitative analysis of the project's consistency with plans addressing the transit, bicycle, and pedestrian systems.

***Vehicular Circulation System Analysis***

The proposed project is a residential development consisting of five planning areas with different types of residential products. The project consists of a total of 375 dwelling units, ~~64~~ 200 of which are detached ~~single~~ single-family units and ~~311~~ 175 are multi-family for-sale units. ~~The Project site is presently vacant with one single-family unit that would be removed.~~ Based on trip generation factors from the Institute of Transportation Engineers (ITE) Trip Generation Manual and the County of Los Angeles Department of Public Works Traffic Impact Analysis Guidelines, the project is estimated to generate 3,092 daily trips, including 215 during the AM peak hour and 290 during the PM peak hour (see Table 1 in the Supplemental Traffic Analysis memo in **Appendix J** for trip generation calculations).[1]

The project's trips were distributed onto the roadway network using the SCVCTM. The SCVCTM is a computerized travel demand model that utilizes a sophisticated trip distribution function to derive the distribution of vehicle trips, and which has previously been calibrated to the existing conditions of the Santa Clarita Valley. Based on the model, approximately 16 percent of Project trips are distributed to Copper Hill Drive west of the Project site, 55 percent to Bouquet Canyon Road south of the Project site, 26 percent to Plum Canyon Road east of the Project site, and 3 percent to Bouquet Canyon Road north of the Project site.

Site Access

The project's trip distribution is also based on the proposed site access controls, illustrated in Figure 3.12-3, and described below.

The Project includes a gated entry along the newly relocated Bouquet Canyon Drive that provides access to Planning Areas 1 through 3 in the western and central portions of the Project. This intersection will serve as the main access point into/out of the Project site and was evaluated for satisfaction of a traffic signal warrant. A traffic signal at this intersection is warranted based on the estimated peak hour volumes.

The Project also includes a private street approximately a quarter mile north of the main Planning Area 1-3 access intersection described above. This driveway is primarily for trailhead parking but will also provide a connection into Planning Areas 1-3. The driveway will be under stop control and limited to right-turns in/out only.

[1] The iteration of the project evaluated in the project's Traffic Study consisted of total of 366 dwelling units, 197 of single-family units and 169 multi-family for-sale units, which was estimated to generate 3,941 daily trips, with 271 trips during the AM peak hour, and 366 trips during the PM peak hour. The currently proposed project results in a lower trip generation, with 22 less AM peak hour trips, 28 less PM peak hour trips, and 120 less daily trips as a result of the change in project mix (i.e., fewer single-family detached units and more multi-family units). Therefore, the LOS analysis presented in the project's Traffic Study and in this EIR is a conservative worst-case analysis. See the Supplemental Traffic Analysis memo in Appendix J for additional details.

## 3.14 UTILITIES AND SERVICES SYSTEMS

Pursuant to the preliminary analysis in the Initial Study prepared for the proposed project (see **Appendix A**), this section of the Draft EIR evaluates the potential impacts related to the connection and/or extension of water, wastewater conveyance and treatment, storm drain, and dry utilities (electric, gas, and telecommunications) infrastructure to the project site. This section also evaluates the proposed project's potential impacts to wastewater treatment capacity and water supply resources.

As discussed in the Initial Study, potential impacts related to solid waste collection and disposal were determined to be less than significant; therefore, that topic will not be addressed in this section.

### 3.14.1 WATER SUPPLY AND INFRASTRUCTURE

#### 3.14.1.1 EXISTING CONDITIONS

Water service to the project site is provided by the Santa Clarita Valley Water Agency (SCV Water). SCV Water was created January 1, 2018, through the merger of the Castaic Lake Water Agency (CLWA) and its Santa Clarita Water Division (SCWD), Newhall County Water District (NCWD), and the Valencia Water Company (VWC). The CLWA was formed as a wholesale water agency to acquire, treat, and deliver State Water Project water supply throughout the Santa Clarita Valley, and SCWD, NCWD and VWC were the retail water purveyors (SCV Water 2010). SCV Water also provides wholesale water to Los Angeles County Waterworks District (LACWWD) #36, Val Verde, which is located northwest of Santa Clarita, west of I-5 and north of State Route 126. In total, the SCV Water service area has a population of 273,000 and covers approximately 195 square miles (124,800 acres) (SCV Water 2019). The project site is located within the service area of the SCWD, which covers 34,700 acres and has approximately 31,350 service connections (L&S 2018).

SCV Water's sources of water consist of local groundwater, imported water primarily from the State Water Project, and recycled water. The sole source of local groundwater in the Santa Clarita Valley is the Santa Clara River Valley Groundwater Basin, East Subbasin, which is composed of two aquifer systems, the Alluvium and the Saugus Formation. The Alluvium generally underlies the Santa Clara River and its several tributaries, and the Saugus Formation underlies most of the Upper Santa Clara River area (KJC 2016). SCV Water obtains imported water from the State Water Project from Castaic Lake and delivers it through an extensive transmission pipeline system to its retail purveyors (KJC 2016). Recycled water has been available in Santa Clarita Valley since 2003 and is used for irrigation purpose. **Table 3.14-1**~~Error! Reference source not found.~~ below summarizes SCV Water's projected existing and planned water supply sources for the period 2020 to 2050.

**Table 3.14-1**
**SUMMARY OF EXISTING AND PLANNED WATER SUPPLIES (ACRE-FEET)[A]**

| | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|---|---|---|---|---|---|---|---|
| **Existing Supplies** | | | | | | | |
| Groundwater[b] | 31,545 | 31,545 | 31,545 | 31,545 | 31,545 | 31,545 | 31,545 |
| Imported Water | 78,467 | 78,167 | 75,587 | 75,387 | 75,387 | 75,387 | 75,387 |
| Recycled Water | 450 | 450 | 450 | 450 | 450 | 450 | 450 |

| | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|---|---|---|---|---|---|---|---|
| Banking/Exchange Programs | 22,950 | 12,950 | 12,950 | 12,950 | 12,950 | 12,950 | 7.950 |
| ***Total Existing*** | 133,412 | 123,112 | 120,532 | 120,332 | 120,332 | 120,332 | 115,332 |
| **Planned New Supplies** | | | | | | | |
| Groundwater | 5,230 | 7,230 | 8,230 | 10,230 | 10,230 | 10,230 | 10,230 |
| Recycled | 565 | 5,156 | 7,627 | 9,604 | 9,604 | 9,604 | 9,604 |
| Banking/Exchange Programs | 7,000 | 7,000 | 17,000 | 17,000 | 17,000 | 17,000 | 22,000 |
| ***Total Planned*** | 12,795 | 19,386 | 32,857 | 36,834 | 36,834 | 36,834 | 41,834 |

Source: KJC 2016, pg. 3-2.

[a] The values shown under "Existing Supplies" and "Planned Supplies" are projected to be available in average/normal years. The values shown under "Existing Banking and Exchange Programs" and "Planned Banking Programs" are the maximum capacity of program withdrawals, and would typically be used only during dry years.

[b] *Existing groundwater supplies represent the quantity of groundwater anticipated to be pumped with existing wells.*

In 2017, the total water demand for the SCV Water service area was approximately 77,000 acre-feet (AF), consisting of approximately 63,600 AF for municipal use and 13,400 AF for agricultural and other (miscellaneous) uses (L&S 2018). The total water demand in 2017 was met by a combination of approximately 29,900 AF from local groundwater, approximately 46,600 AF of imported water, and approximately 500 AF of recycled water.

~~Error! Reference source not found.~~ **Table 3.14-2** below summarizes the projected water demand for the SCV Water service area for five-year increments beginning 2020 through 2050.

**Table 3.14-2**

**SUMMARY OF PROJECTED WATER DEMAND FOR ENTIRE SCV WATER SERVICE AREA (ACRE-FEET)[a]**

| | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|---|---|---|---|---|---|---|---|
| NCWD | 10,100 | 10,700 | 11,200 | 11,800 | 12,600 | 13,400 | 14,200 |
| SCWD | 28,400 | 29,100 | 29,900 | 30,800 | 32,400 | 33,900 | 36,000 |
| VWC | 28,100 | 32,100 | 36,600 | 40,000 | 39,600 | 39,300 | 39,000 |
| LACWWD #36[b] | 2,300 | 2,700 | 3,100 | 3,500 | 3,900 | 4,300 | 4,700 |
| ***Total Demand*** | 68,900 | 74,600 | 80,800 | 86,100 | 88,500 | 90,900 | 93,900 |

Source: KJC 2016, pg. 2-6.

[a] Values rounded to the nearest hundred. Demands include savings from plumbing code and standards and active conservation as assumed in the 2015 Santa Clarita Valley Water Use Efficiency Strategic Plan.

[b] *LACWWD 36 future demand was based on a growth projection factor and not on land use. LACWWD #36 is included for purposes of providing regional completeness.*

The project site is currently undeveloped with no existing improvements on the site. Therefore, there is no water infrastructure on the project site (e.g., groundwater wells or distribution lines) and the project site does not generate water demand under current conditions.

includes identifying existing off-site water infrastructure in the vicinity of the project site and determining whether connections to such existing water infrastructure would result in project impacts.

#### 3.14.1.5 ANALYSIS

**Impact 3.14.1a** The proposed project would require water service provided by SCV Water's Santa Clarita Water Division (SCWD). The development of 375 new residential units and private and common landscape areas on the project site would generate a water demand of approximately 338.85 acre-feet per year. This would require construction of new on- and off-site water infrastructure to connect to the existing local water distribution lines maintained and operated by SCWD. Impacts would be less than significant.

**Discussion**

SCV Water's SCWD would provide water service to the project site for the proposed 375 new residential units. Points of connection to the SCWD existing water distribution lines are located along the south side of Bouquet Canyon Road in the two areas where the new layout of Bouquet Canyon Road would tie into the existing roadway. Construction impacts associated with the installation of these connections to the existing water distribution lines would primarily involve trenching to place the connections below the ground surface. The design and installation of these new service connections would require coordination with SCWD to ensure compliance with applicable construction standards and avoid disruption of water service to existing customers, and to maintain safe traffic flow over affected street segments. In addition, during construction of the proposed project, water would be required primarily for dust control, cleaning of equipment, and other related construction activities; however, the water demand would be temporary and intermittent. Water for construction-related purposes could be provided by water trucks and/or through connections to nearby water distribution lines. The amount of water required during this construction phase would be well below the total water demand of the fully developed project and would not require expansions of existing or construction of new water transmission infrastructure. Therefore, construction impacts to water supplies and facilities would be less than significant.

~~Error! Reference source not found.~~ Table 3.14-3 below summarizes the proposed project's estimated water demand by housing unit type and total irrigation demand. The proposed project would generate an estimated total water demand of 338.85 AF per year during an average rainfall year; in single drought years, the water demand is estimated to be 10 percent higher, or 372.7 AF per year (Marks 2019). According to SCV Water, the proposed project's water demand would not require additional water transmission infrastructure; therefore, project impacts would be less than significant.

**Table 3.14-3**
**ESTIMATED PROJECT WATER DEMAND (ACRE-FEET PER YEAR) IN AVERAGE RAINFALL YEAR**

| | No. of Units | Demand Factor | Demand |
|---|---|---|---|
| Planning Area 1 - Single-Family Lots with Driveways | 52 | 0.7936 | 41.3 |
| Planning Area 1A - Single-Family Lots with Driveways | 12 | 0.7936 | 9.5 |
| Planning Area 2 - Single-Family Detached/8-Pack Cluster | 136 | 0.7936 | 107.9 |
| Planning Area 3 - Backyard Towns | 90 | 0.3436 | 30.9 |

| | No. of Units | Demand Factor | Demand |
|---|---|---|---|
| Planning Area 4 - Rowtown with Carriage Units | 85 | 0.3436 | 29.2 |
| Landscape Irrigation | - | - | 120.0 |
| **Total Demand** | **375** | **-** | **338.85** |

*Source: Marks 2019*

**Mitigation Measures**

The project would have a less than significant impact and would not require mitigation.

**Impact 3.14.1b** SCV Water would have sufficient water supplies to meet the project's water demand of 338.85 acre-feet per year to supply water service to the 375 new homes and the irrigated landscape areas proposed by the project, during normal, dry, and multiple dry years. Impacts would be less than significant.

**Discussion**

As discussed above, the proposed project would generate an estimated total water demand of 338.85 AF per year during an average rainfall year or 372.7 AF per year in single dry years. The proposed project is consistent with the "Urban Residential 2 (UR2)", "Urban Residential 5 (UR5)", and "Neighborhood Commercial (CN)" General Plan land use designations for the project site, which allows for single-family homes, medium- to high-density apartment, and condominium complexes. SCV Water has stated that the proposed project's water demand is included in the water demand projections contained in the 2015 UWMP (see Table 3.14-2~~Error! Reference source not found.~~), since the proposed project is consistent with the City's General Plan land use designations (Marks 2019). Therefore, SCV Water's existing and planned water supplies (see Table 3.14-1 ~~Error! Reference source not found.~~) would be sufficient to serve the project site and impacts would be less than significant.

**Mitigation Measures**

The project would have a less than significant impact and would not require mitigation.

### 3.14.2 WASTEWATER TREATMENT AND INFRASTRUCTURE

#### 3.14.2.1 EXISTING CONDITIONS

The project site has no wastewater infrastructure and does not currently generate any wastewater. It is not within the jurisdictional boundaries of the Sanitation Districts of Los Angeles County (SDLAC), which provides wastewater collection and treatment services throughout the Santa Clarita Valley and a larger total service area of approximately 824 square miles, consisting of 24 independent sanitation districts serving approximately 5.5 million people within 78 cities and unincorporated territory in Los Angeles County (SDLAC 2019a). The Santa Clarita Valley Sanitation District owns, operates, and maintains the wastewater conveyance system for the Santa Clarita Valley, which consists of a 34-mile long, interconnected network of trunk sewers and two pumping plants (SDLAC 2019b). The system conveys wastewater and wastewater solids from the local sewer lines, which are either owned by the City of Santa Clarita or Los Angeles County, to the Saugus and Valencia Water Reclamation Plants (WRPs) (SDLAC 2019b). The Saugus WRP is located at 26200 Springbrook Avenue in the City of Santa Clarita and provides

### 3.14.2.5 ANALYSIS

**Impact 3.14.2a** Wastewater flows from the project site would be discharged to the Los Angeles County Sanitation District's Bouquet Canyon Relief Trunk Sewer, then conveyed to the Saugus and Valencia WRPs for treatment. The trunk sewer and the Saugus and Valencia WRPs would have sufficient capacity to convey and treat the flows generated by the fully developed project. Therefore, the project would not require the construction of new or expanded wastewater collection or treatment facilities and impacts would be less than significant.

**Discussion**

~~Error! Reference source not found.~~ Table 3.14-4 provides the estimated wastewater flows that would be generated by the proposed project at buildout. As shown, based on the loading factors provided by SDLAC, the 375 new homes and the recreation center on the project site would generate a total of 74,490 gallons per day (gpd) of wastewater. The wastewater flow from the project site would be discharged to a new sewer main to be constructed by the project within the proposed new segment of Bouquet Canyon Road, then conveyed to the 24-inch Bouquet Canyon Relief Trunk Sewer, located in Bouquet Canyon Road at Festividad Drive, south of Seco Canyon Road, approximately two miles southwest of the project site. Construction of the sewer main within the new segment of Bouquet Canyon Road would not result in additional or stand-alone impacts that have not been accounted for in the project's various construction impacts associated with the new segment of Bouquet Canyon Road. A private system of underground sewers would collect wastewater generated at the homes and recreation centers for conveyance into the new sewer main.

The project site is not within the jurisdictional boundaries of the SDLAC and will require annexation before sewer service can be provided. The proposed project would also be required to pay a capital facilities fee to connect to the SDLAC sewer system. Upon annexation and connection, the Bouquet Canyon relief trunk sewer, which has a capacity of 12.3 mgd and peak flow of 3.5 mgd, would have sufficient capacity to accept the estimated 74,490 gpd (0.074 mgd) of wastewater from the project site. This would represent a minor increment of the available capacity in that sewer. The project's estimated 0.074 mgd of wastewater would represent a negligible share of the total capacity of the SCVJSS and would thus result in a minor impact on system capacity. The proposed project would not require the construction of new or expanded wastewater collection or treatment facilities. Impacts would be less than significant.

**Table 3.14-4**
**ESTIMATED PROJECT WASTEWATER GENERATION (GALLONS PER DAY)**

| | No. of Units | Factor[a] | Demand |
|---|---|---|---|
| Single-Family Detached | 64 | 260 | 16,640 |
| Single-Family Detached/8 Pack Cluster | 136 | 195 | 26,520 |
| Attached Backyard Towns | 90 | 195 | 17,550 |
| Attached Rowtowns | 85 | 156 | 13,260 |
| Recreation Centers | 2[b] | 260 | 520 |
| **Total Wastewater Flow** | | | **74,490** |

Source: Michael Baker International 2019

[a] Based on the factors provided by SDLAC in *Table 1, Loadings for Each Class of Land Use.* Website: https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531, accessed May 31, 2019.

on the extent of other evacuation efforts in other parts of the community that may generate traffic on the same routes.

Estimates of project-related evacuation trips as a percentage of normal weekday peak hour traffic on affected roadways are presented in, below, as a way of examining the relative magnitude of the project's impact during such normally congested time periods, when the impact would likely be highest. During non-peak hours, especially late-night and early morning periods when there is much less traffic, the impact of project residents leaving during an emergency evacuation would likely be less than during peak hour conditions. Conditions during such lower traffic periods could be exacerbated if several neighboring communities were also threatened by the same wildfire conditions and forced to evacuate along the same escape routes as project residents.

**Table 3.15-2**
**PROJECT EMERGENCY EVACUATION TRAFFIC AS A PERCENTAGE OF TYPICAL PEAK HOUR TRAFFIC**

| Roadway Segment/Number of Lanes | Highest Two-Way Peak Hour Volume – Current Conditions[1] | Existing Volume-to-Capacity Ratio[2] | Project-Added Vehicles with Full Evacuation[3] | Project Increase in V/C Ratio (One Direction)[4] |
|---|---|---|---|---|
| Copper Hill Road, between Old Bouquet Canyon Rd and Benz Road/2 lanes | 883 (PM) | V/C = 0.44 | 85 from PA 4 (or could also split ½ in this direction, ½ to east) | V/C = up to 0.53 (+.09) |
| Copper Hill Road, west of Benz/4 lanes | 1,198 (AM) | V/C = 0.30 | Up to 97 from PA 1A and PA 4 | V/C = 0.35 (+.05) |
| Bouquet Canyon Road, north of new segment of Bouquet Canyon Road/2 lanes | 1,387 (PM) | V/C = 0.69 | Up to 85 from PA 4, possibly up to 281 more from PAs 1, 1A, 2 and 3 | V/C could increase to 1.~~06~~ 07 (+.38) with ~~366~~ 375 homes taking this route |
| Bouquet Canyon Road, south of new Bouquet Canyon Road/~~2~~ 4 lanes | 1,~~277~~ 414 (PM) | V/C = 0.~~64~~35 | Up to 281 from PAs 1, 1A, 2 and 3 | V/C = 0.~~92~~ 49 (+.~~28~~14) |
| Benz Road, between old Bouquet Canyon Road and Copper Hill/2 lanes | 304 (PM) | V/C = 0.~~15~~30 | 9 from PA 1 | V/C = 0.16 (+.01) |
| Plum Canyon Road, east of old Bouquet Canyon Road/4 lanes | 1,680 (PM) | V/C = 0.42 (PM) | Up to 281 from PAs 1, 1A, 2, and 3, but many would likely continue on old Bouquet Canyon Road rather than turning onto Plum Canyon Road. | V/C could increase to 0.56 (+.14) |

*[1] AM = morning peak hour and PM = afternoon peak hour*
*[2] Assumes 1,000 vehicles per lane capacity and volume of lanes in both directions*
*[3] "PA" refers to proposed project Planning Areas and number of homes from specific areas that might evacuate in one vehicle*

*[4] Project trips added to ½ peak hour two-way volumes, then V/C calculated based on that total divided by total lane capacity in that direction*
*Sources: Stantec, October 2019; Michael Baker International, December 2019*

As shown in **Table 3.15-2**, the project would add a range of vehicles to local roadways during an evacuation event, with corresponding increases in peak hour V/C ranging from ~~5~~ 1 – ~~37~~ 38 percent. With the project's emergency evacuation traffic, the affected roadways would operate at well below saturation levels, at less than 60 percent of volume-capacity, except in two locations. If the hypothetical "worst-case" condition involving 375 homes evacuating and all drivers electing to escape to the north, via existing two-lane Bouquet Canyon Road to the north of the project, the peak hour V/C would increase to 1.~~06~~07, indicating more than the capacity of the northbound lane. This represents severely congested conditions with difficult and highly constrained traffic flow and would represent a serious constraint to evacuating motorists. If the hypothetical worst-case condition involving evacuation of 281 homes and all escaping motorists elect to escape to the south, via the existing ~~2~~4-lane Bouquet Canyon Road, the peak hour V/C would increase to 0.~~92~~49, representing ~~92~~ 49 percent of the southbound lane capacity, which indicates a substantial remaining roadway capacity.~~and a highly congested condition that would represent a serious constraint to evacuating motorists~~.

As noted earlier, the City's HMP provides a framework for communications, decisions, and actions by emergency response personnel for wildfire emergencies. The command structure would assess local conditions in a dynamic, i.e., ongoing manner, to identify locations and severity of threats to homes and businesses and any other land uses that put people in the path of a wildfire. Based on those assessments, decisions would be made on where to focus fire response efforts, initiate calls for back-up assistance and assignment of additional resources, and when/where to implement emergency evacuations if no other options are deemed viable. This could include partial or total evacuation of the project site, sheltering in place for some parts of the community, possibly moving people to the internal recreation centers, or combinations of all of these approaches. The two hypothetical worst-case conditions noted above where project residents evacuating the site could encounter and complicate congested peak hour roadway conditions are unlikely to occur, since it is unlikely that all of the escaping motorists would select the same routes after exiting the project site. It is more likely that motorists would select the route and direction that they believe would take them most quickly away from whatever direction a wildfire might be approaching. Actions by emergency responders to direct evacuation efforts would also be based, in part, on indications of where congestion is occurring so that project evacuees could be directed in a different direction. The City's existing emergency response system, including the manner in which emergency evacuations are initiated and managed, would be sufficient to address emergency evacuation scenarios in the event of future wildfires in the project area that result in a need to evacuate some or all of the proposed 375 home residential community. Development of the proposed project would not adversely affect the emergency response protocols established by the City's HMP or current best practices. Project impacts would be less than significant.

**Mitigation Measures**

Mitigation measures would not be required.

**Impact 3.15-b** The project would not exacerbate wildfire risks, and therefore would not create conditions that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The overall level of wildland fire hazard would be reduced to a similar level, compared to existing conditions, for the project or Alternative 3.

***Cumulative Impacts***

Alternative 1 would result in no contribution to any cumulative impacts. As discussed in Chapter 4, no significant cumulative impacts are anticipated during project construction, as there are no nearby projects that could be under construction at the same time that could add to the localized impacts generated by the project's construction activities. These circumstances would apply to Alternatives 2 and 3, as well; therefore, each of the three development alternatives would result in the same, less than significant cumulative impact during construction. As discussed in Chapter 4, the project would not add to cumulative impacts involving aesthetics, cultural resources, geology and soils, hydrology and water quality, or tribal cultural resources, since these types of impacts are site-specific. With the same number of new homes and a comparable mixture of housing types for the proposed project and Alternatives 2 and 3, and assuming site development in the same time frame, all long-term impacts resulting from the number and types of homes and the corresponding levels of impact for air pollution, greenhouse gas emissions, utilities, energy sources, public services, and traffic would be similar and the scope and intensity of cumulative impacts would be the same for all three development scenarios. The interactions or absence thereof between the proposed project, Alternatives 2 and 3, and other pending projects considered in the analysis of cumulative impacts would be the same. The level of cumulative impact, therefore, would be the same for any of the development alternatives assessed in this chapter.

**Table 5.0-1,** below, summarizes the determinations concerning the comparison of impacts between the proposed project and the three alternatives.

**Table 5.0-1**
**SUMMARY COMPARISON OF THE IMPACTS OF ALTERNATIVES**

| Impact Topics | Proposed Project | Alternative 1-No Project/No-Development | Alternative 2-Reduced Grading | Alternative 3-Reduced Alteration of Creek, Oak Trees, Sensitive Habitat |
|---|---|---|---|---|
| Aesthetics | LS | Ø | < | < |
| Air Quality | LSM | Ø | < | = |
| Biological Resources | LSM | Ø | = | < |
| Cultural Resources | LSM | Ø | = | < |
| Energy Consumption | LS | Ø | = | = |
| Geology/Soils | LSM | Ø | < | < |
| Greenhouse Gas Emissions | LS | Ø | = | = |
| Hazards and Hazardous Materials | LSM | Ø | = | = |
| Hydrology/Water Quality | LS~~M~~ | Ø | = | < |
| Noise | LSM | Ø | = | = |

| Impact Topics | Proposed Project | Alternative 1-No Project/No-Development | Alternative 2-Reduced Grading | Alternative 3-Reduced Alteration of Creek, Oak Trees, Sensitive Habitat |
|---|---|---|---|---|
| Population and Housing | LS | Ø | = | = |
| Public Services | LS | Ø | = | = |
| Transportation/Traffic | LSM | Ø | = | = |
| Tribal Cultural Resources | LSM | Ø | = | =< |
| Utilities | LS | Ø | = | = |
| Wildfire | LSM | Ø | = | = |
| Cumulative Impacts | LSM | Ø | = | = |

*Acronyms: LS = Less Than Significant. LSM = Less Than Significant With Mitigation.*
*Symbols: = is similar to project impact, > is greater than project impact, < is less than project impact, Ø is no impact*
*Environmentally Superior Alternative*

Based on the preceding analysis, the No Project/No Development Alternative would have the least impact, as it would not alter the existing conditions and would not result in any of the short-term or long-term impacts that would occur as a result of the proposed project or the other development alternatives. Section 15126.6(e)(2) of the State CEQA Guidelines requires that in those instances in which the No Project Alternative would be environmentally superior, the EIR must also identify which of the other alternatives would have the least environmental impact. Among the development alternatives, Alternative 3 would be considered environmentally superior, as it would have a lesser level of impact than the project for five types of impacts, whereas Alternative 2 would have a lesser level of impact for three types of impacts. Both Alternatives 2 and 3 would have reduced impacts compared to the proposed project with respect to aesthetics and geology/soils. Alternative 2 would have the least impact involving grading-related air pollutant emissions. Alternative 3 would have the least impact involving removal of biological and cultural resources and alteration of the existing floodplain along Bouquet Creek.

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# Supplemental Analysis: Groundwater Recharge

SECTION 3

July 28, 2020

City of Santa Clarita
Planning Department
23920 W. Valencia Blvd.
Valencia, CA 91355

**Re: Hydrogeologic Investigation of Groundwater Recharge for Multifamily Residential Development Project (Tentative Track 82126), Bouquet Canyon, Santa Clarita, California**

To Whom It May Concern,

This letter presents the results of a hydrogeological investigation of groundwater recharge in Bouquet Canyon in Santa Clarita, California. Thomas Harder & Company (TH&Co) has been retained by SIKAND to conduct this analysis. SIKAND is providing engineering services to Integral Communities for the multifamily residential development project known as Tentative Track 82126 (the Project; see Figure 1). Bouquet Creek currently flows through the Project area via an undeveloped (i.e. native) channel and the Project includes construction of two parallel channels to convey Bouquet Creek flows through the Project area. The Project also includes the construction of six stormwater retention basins.

The purpose of this work is to conduct an analysis that addresses the following comments from the Satna Clarita Valley Water Agency:

> *Please provide further evaluation of the project's overall effect on groundwater recharge at the project site. Would the project result in a reduction, an increase or maintain approximately the same levels of recharge compared to existing conditions? A comparison of the length of Bouquet Creek on site with the total length from the upstream reservoir to the channelized Bouquet Creek on the north side of Bouquet Canyon Road is not sufficient. That does not determine whether groundwater recharge within the project site would increase or decrease or not be materially affected.*

The latter portion of this comment, which references the comparison of lengths, is directed at an analysis conducted by SIKAND. To be responsive, the analysis presented herein quantitatively evaluates pre-project and post-project recharge conditions within the Project area (i.e. Bouquet Creek and the six planned retention basins) using publicly-available precipitation and streamflow data.

## Data Sources

The following sources of data and documents reviewed for this work included:

- Tentative Track Map No 82126 and site layout information provided by SIKAND
- Bouquet Creek profile and stages provided by SIKAND
- Urban Stormwater Mitigation Plan, January 2020, prepared by SIKAND
- Daily precipitation data from Los Angeles County Department of Public Works
- Daily streamflow data from Los Angeles County Department of Public Works

## Planned Project Construction

The Project includes the construction of two parallel channels to convey Bouquet Creek flows through the Project area (see Figure 2). The primary channel is the current native channel but would be modified such that it would transmit flows only up to 200 cubic feet per second (cfs; i.e. "low flows"). Flows greater than 200 cfs (i.e. "high flows") would be diverted into a second, concrete-lined channel running parallel to the primary channel. Therefore, recharge associated with low flows would not change due to the project but recharge associated with high flows would be decreased to that associated with 200 cfs within the primary channel. For example, if 350 cfs flows into the Project area, the decrease in recharge in the Project area would be that associated with 350 cfs in the primary channel minus the recharge associated with 200 cfs in the primary channel.

The Project also includes the construction of six stormwater retention basins related to six subareas (100A, 200A, 300A, 400A, 500A, and 600A; see Figure 2). The feature for 600A is herein counted as a basin even though the design is outside the scope of the analysis.

Three of these basins, for subareas 100A, 300A, and 400A, are located on comparatively permeable canyon floor alluvium and are expected to capture the majority of runoff that will become recharge. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

## Data

The analysis relies on both streamflow data and precipitation data. The streamflow data is used to quantify recharge through the streambed sediments of Bouquet Creek whereas the precipitation data are used to estimate runoff to, and subsequent recharge in, the retention basins.

### Bouquet Creek Streamflow Data

Bouquet Creek average daily streamflow data is available from October 1969 to September 2001 at station F377 (Bouquet Creek Near Saugus) and from October 2001 to May 2020 at station F377B (Bouquet Creek Above Bouquet Canyon Road). The locations of these gages are shown on Figure 1 whereas the streamflow data is shown on Figure 3. Gaps in the data of more than two days are noted on this figure. Daily streamflow ranged from zero to 1,050 cfs with an average of 1.3 cfs (933 acre-ft/yr). Based on the available data daily streamflow exceeded 200 cfs 11 times.

It is noted that streamflows may be influenced by releases from Bouquet Reservoir[1] approximately 11 miles upstream of the Project and 1 to 3 miles upstream of the gages though the scale of the potential influence at the project site is unknown. It is also noted that the gages are downstream of Haskell Canyon and Plum Canyon which are tributaries to Bouquet Canyon downstream of the Project. Therefore, the streamflows measured at the gages more closely reflect streamflow through the Project area only during those times when there is no streamflow in these tributaries and then only after accounting for streamflow losses between the Project area and the gages.

### Precipitation Data

Mint Canyon (station AL402) daily precipitation data was available from March 1998 to August 2019. Gaps in the data of more than two days include from July 31, 2000 to February 25, 2001, August 4, 2003 to August 26, 2003, October 6, 2009 to November 3, 2009, and March 4, 2010, to March 22, 2010. Average annual precipitation based on the available data was 9.2 inches per year. It is noted that the average annual precipitation for the Project area is 14 inches per year based on a long-term, regional, state-wide map[2]. The difference may be due to the relatively short period of available data (22 years) and gaps in data.

[1] Santa Clarita Valley Water Agency, 2017. 2017 Santa Clarita Valley Water Report. Prepared by Luhdorff & Scalmanini, September 2018.
[2] California Department of Forestry and Fire Protection, 1998. California Mean Annual Precipitation Zones, 1900-1960

## Methodology

The methodology used to quantify pre- and post-Project recharge involves quantifying recharge in Bouquet Creek and recharge in the retention basins. The former relies on the streamflow data whereas the latter relies on the precipitation data (to quantify runoff into the retention basins) along with an estimate of infiltration rate at the two subarea basins most likely to influence the calculations (i.e. 100A and 300A as noted earlier). Recharge associated with high intensity rainfall events that could result in flow from the retention basins into Bouquet Creek are not accounted for in our methodology, primarily due to the uncertainty associated with precisely where such an exchange would occur and expected low frequency of such events.

### Methodology to Estimate Bouquet Creek Recharge

Infiltration within Bouquet Creek was estimated based on historical streamflow records, estimated stream width, stream length, and infiltration rate. Daily infiltration is the product of stream width, stream length, and infiltration rate.

The stream width was based on the stream profile from SIKAND at three stages, 0, 100, and 200 cfs (see Figure 4). The flows between each stage were assumed to be proportional to the area. Using these proportions, the daily stream profile (including width) was calculated based the daily streamflow data. The width of the stream when flows were greater than 200 cfs were assumed to be equal to the maximum width of the stream profile.

The length of the Bouquet Creek within the Project area is approximately 2,000 ft. The infiltration rate was based on three infiltration tests conducted near Bouquet Creek as reported in the Urban Stormwater Mitigation Plan. As shown in Figure 2, two of the tests were conducted at 100A whereas the third was conducted at 300A. The average of the adjusted infiltration rates (as presented in the original report) was 8.0 ft/day.

Recharge for flows less than 200 cfs were assumed to be the same for pre-Project and Project conditions. Infiltration for flows greater than 200 cfs was limited to that which is calculated for the primary, low flow channel. As noted above, based on the available data daily streamflow exceeded 200 cfs 11 times.

### Methodology to Estimate Captured Runoff

Captured runoff was estimated based on historical precipitation data, runoff volumes from SIKAND, the size of the stormwater retention basin, and the estimated infiltration rate within subareas 100A 300A, and 400A retention basins.

Precipitation runoff was calculated by SIKAND for Subareas 100A, 300A, and 400A as presented in the Urban Stormwater Mitigation Plan. Runoff within Subarea 100A will be captured in a 0.5-acre basin with a maximum capacity of 1.75 acre-ft. Runoff within Subarea 300A will be captured in a 0.09-acre basin with a maximum capacity of 0.38 acre-ft. Runoff within Subarea 400A will be captured in a 0.03-acre basin with a maximum capacity of 0.07 acre-ft.

The basins will be unlined and located on the canyon floor alluvium. Based on the available infiltration data noted above, the basins are assumed to have an infiltration rate of 8.0 ft/day, which translates to a combined recharge capacity for both basins of 5.0 acre-ft/day when full.

Based on a peak flow hydrologic analysis by SIKAND, a 0.85-inch precipitation event within Subbareas 100A, 300A, and 300A would generate 0.86, 0.38, and 0.07 acre-ft of water under Project conditions, respectively. Estimated runoff was based on the proportion of measured daily rainfall to the 0.85-inch baseline. Due to the high recharge rates of the basins, the total capture volume was limited to the total recharge capacity.

## Results of Pre-Project and Project Recharge Conditions Analysis

Based on the analyses described above, the estimated annual recharge within the project area from Bouquet Creek and captured runoff is summarized in the following table:

| Recharge within the Project Area | Pre-Project | Project |
|---|---|---|
| Bouquet Creek Recharge | 114 acre-ft/yr | 109 acre-ft/yr |
| Subbareas 100A and 300A Captured Runoff | 0 acre-ft/yr | 14 acre-ft/yr |
| Total | 114 acre-ft/yr | 123 acre-ft/yr |

I appreciate the opportunity to provide hydrogeological consulting services for this project. If you have any questions, please do not hesitate to contact me at (714) 930-6436.

Sincerely,

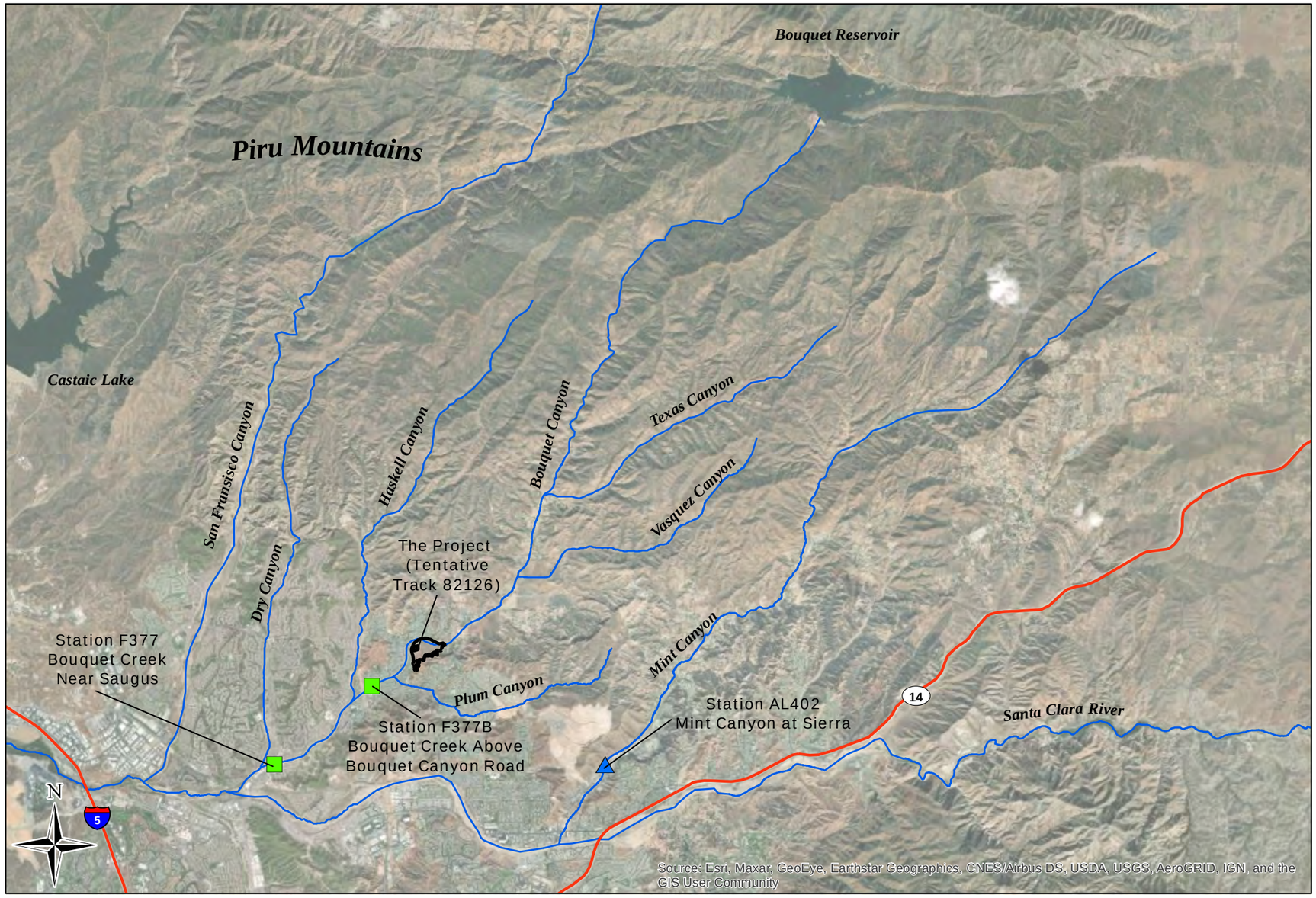


Benjamin Lewis, P.G., C.HG.
Senior Hydrogeologist

**SIKAND**

28-Jul-20

# *Hydrogeologic Investigation of Groundwater Recharge in Bouquet Canyon (Tentative Track 82126)*




0 1 2 4 Miles

NAD 83 State Plane Zone 5

**Map Features**

- Precipitation Station
- Streamflow Gage Station
- Project Area
- Freeway
- Stream/River Channel

Note: Precipitation and streamflow data from Los Angeles County Department of Public Works

Thomas Harder & Co.
Groundwater Consulting

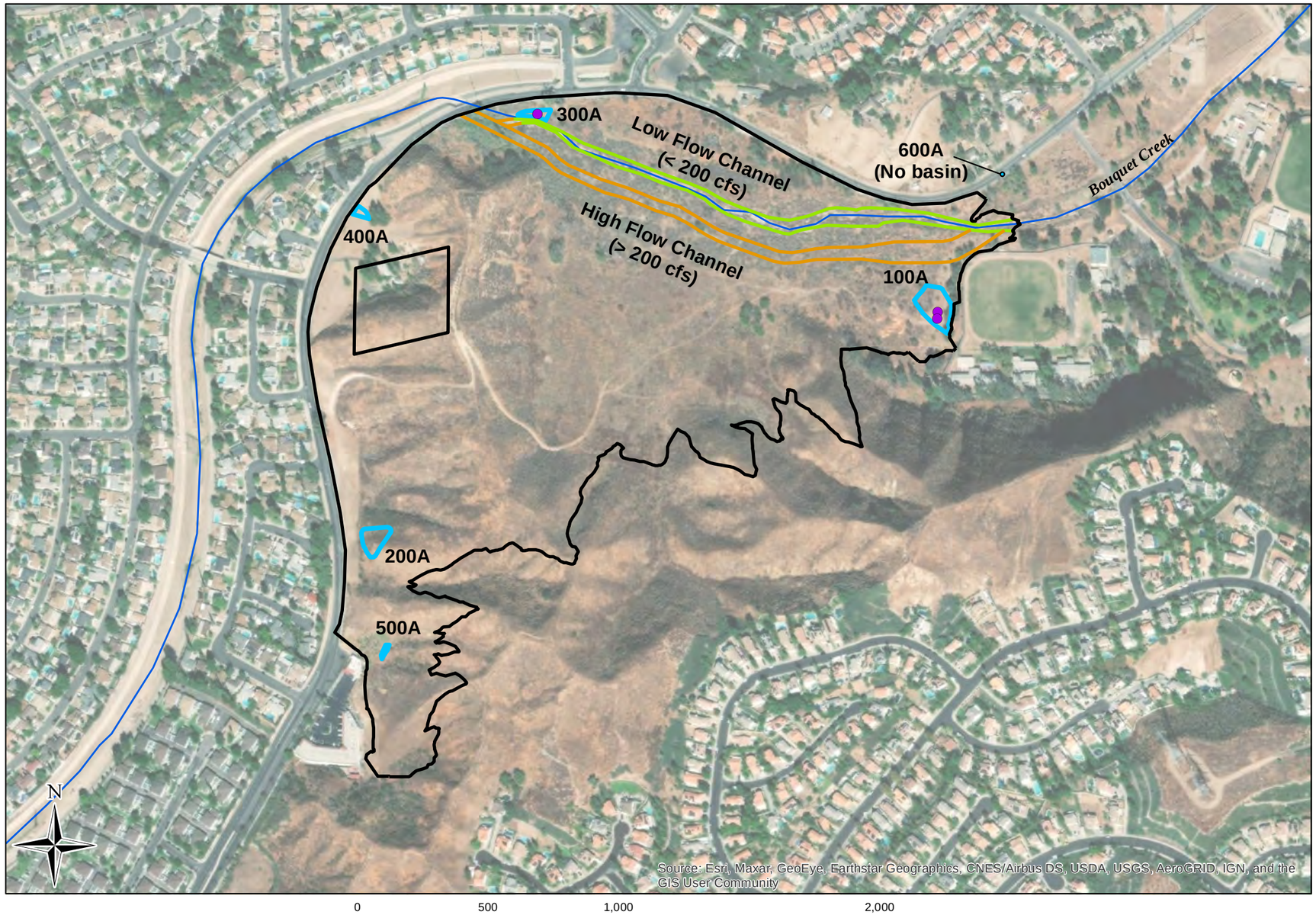
## *Regional Map*

**Figure 1**

# *Hydrogeologic Investigation of Groundwater Recharge in Bouquet Canyon (Tentative Track 82126)*

***SIKAND***

28-Jul-20




0 500 1,000 2,000 Feet

NAD 83 State Plane Zone 5

***Map Features***

- Project Area
- Low Flow Channel
- High Flow Channel
- Stormwater Capture Basin
- Infiltration Test
- Bouquet Creek

Note: Channel Areas Approximate

Thomas Harder & Co.
Groundwater Consulting

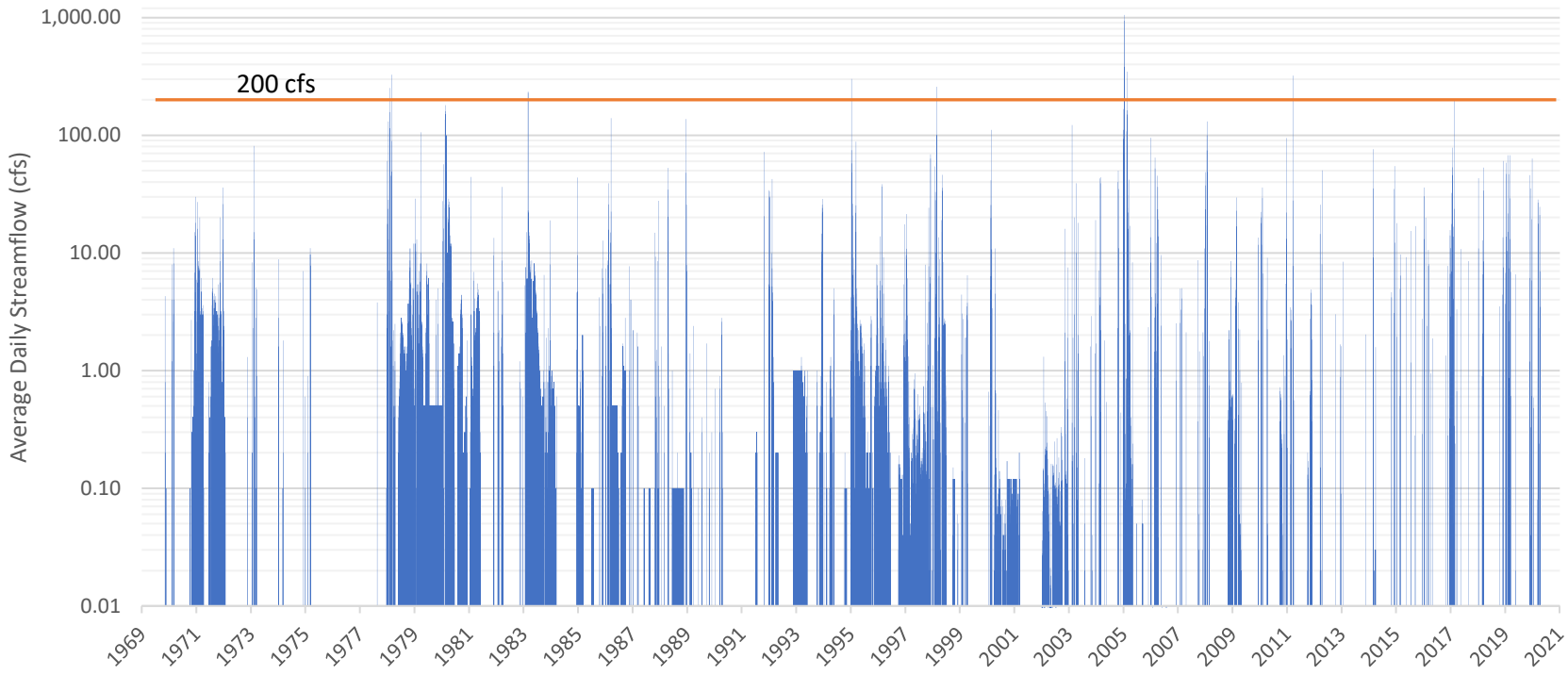
***Project Area***

**Figure 2**

**SIKAND**
**Hydrogeologic Investigation of Groundwater Recharge in Bouquet Canyon (Tentative Track 82126)**

**Figure 3**

## Bouquet Creek Average Daily Streamflow

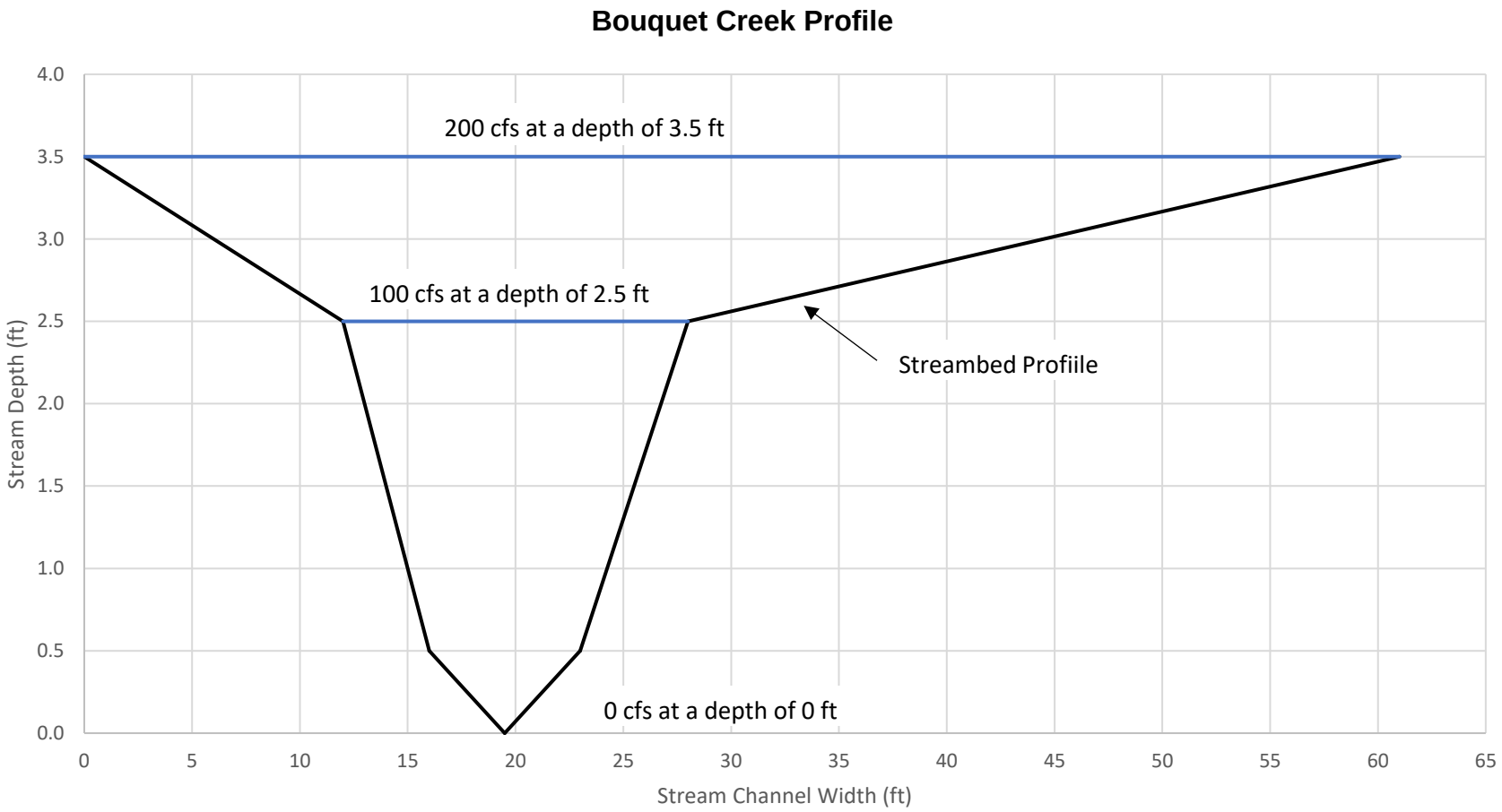



***Notes:***

Data from Los Angeles County Department of Public Works
October 1969 to September 2001 from station F377 and October 2001 to May 2020 from station F377B
Gaps in the data of more than two days include October 1, 1975 to July 21, 1977, May 1, 1982 to October 1, 1982, May 1, 1993 to October 1, 1993, July 1, 1994 to November 11, 1995, August 1, 1998 to September 30, 1998, and September 30 2005 to November 10, 2005

**SIKAND**
**Hydrogeologic Investigation of Groundwater Recharge in Bouquet Canyon (Tentative Track 82126)**

**Figure 4**




***Note:***

Data from SIKAND
cfs = cubic feet per second

Thomas Harder & Co.
Groundwater Consulting

**28-Jul-20**

# Updated Project Plans

SECTION 3




# SITE DATA

**PA 1**
45x60 Lot w/ Drivewavs

| | | | Plan | Mix | Percent | Sq. Ft. | Total Sq. Ft. |
|---|---|---|---|---|---|---|---|
| Total Lots | 48 | | Plan 1 | 16 | 33.33% | 2,302 | 36,832 |
| Average Sq. Ft. | 2,409 | | Plan 2 | 16 | 33.33% | 2,402 | 38,432 |
| Density | 7.62 | | Plan 3 | 16 | 33.33% | 2,522 | 40,352 |
| Acres | 6.3 | | | | | Total | 115,616 |

**PA 1A**
45x60 Lot w/ Drivewavs

| | | | Plan | Mix | Percent | Sq. Ft. | Total Sq. Ft. |
|---|---|---|---|---|---|---|---|
| Total Lots | 11 | | Plan 1 | 3 | 27.27% | 2,302 | 6,906 |
| Average Sq. Ft. | 2,409 | | Plan 2 | 4 | 36.36% | 2,402 | 9,608 |
| Density | 7.33 | | Plan 3 | 4 | 36.36% | 2,522 | 10,088 |
| Acres | 1.5 | | | | | Total | 26,602 |

**PA 2**
8-Pack

| | | | Plan | Mix | Percent | Sq. Ft. | Total Sq. Ft. |
|---|---|---|---|---|---|---|---|
| Total Units | 136 | | Plan 1 | 38 | 27.94% | 1,498 | 56,924 |
| Average Sq. Ft. | 1,637 | | Plan 2 | 34 | 25% | 1,549 | 52,666 |
| Density | 12.48 | | Plan 3 | 30 | 22% | 1,700 | 51,000 |
| Acres | 10.9 | | Plan 4 | 34 | 25.00% | 1,800 | 61,200 |
| | | | | | | Total | 221,790 |

**PA 3**
Backyard Towns

| | | | Plan | Mix | Percent | Sq. Ft. | Total Sq. Ft. |
|---|---|---|---|---|---|---|---|
| Total Units | 90 | | Plan 1 | 30 | 33.33% | 1,602 | 48,060 |
| Average Sq. Ft. | 1,646 | | Plan 2 | 30 | 33.33% | 1,658 | 49,740 |
| Density | 15.79 | | Plan 3 | 30 | 33.33% | 1,679 | 50,370 |
| Acres | 5.7 | | | | | Total | 148,170 |

**PA 4**
Rowtowns w/ Carriage Units

| | | | Plan | Mix | Percent | Sq. Ft. | Total Sq. Ft. |
|---|---|---|---|---|---|---|---|
| Total Units | 85 | | Plan 1 | 19 | 22.35% | 1,464 | 27,816 |
| Average Sq. Ft. | 1,381 | | Plan 2 | 26 | 30.59% | 1,538 | 39,988 |
| Density | 16.35 | | Plan 3 | 24 | 28.24% | 1,800 | 43,200 |
| Acres | 5.2 | | Carriage | 16 | 18.82% | 721 | 11,536 |
| | | | | | | Total | 122,540 |

Rowtowns Carriage

**SUMMARY**

| Planning Area | Total Sq. Ft. | Units |
|---|---|---|
| PA 1 | 115,616 | 48 |
| PA 1A | 26,602 | 11 |
| PA 2 | 221,790 | 136 |
| PA 3 | 148,170 | 90 |
| PA 4 | 122,540 | 85 |
| Total | 634,718 | 370 |

1"=100'- 0" SCALE
0 100 200

08.26.2020

# CONCEPT SITE STUDY

## BOUQUET CANYON| INTEGRAL COMMUNITIES

SANTA CLARITA, CALIFORNIA

INTEGRAL Communities
A DIVERSIFIED REAL ESTATE COMPANY

woodley architectural group,inc
**colorado //** 731 southpark dr. suite B
littleton, co 80120 / 303 683.7231
**california //** 2943 pullman st. suite A
santa ana, ca 92705 / 949 553.8919

NOTE: SQUARE FOOTAGE MAY VARY BASED ON CALCULATION METHODS

THESE DRAWINGS ARE INTENDED FOR DESIGN DEVELOPMENT AND PRELIMINARY STUDIES ONLY AND ARE NOT TO BE USED FOR ANY OTHER PURPOSE, SUCH AS FINAL PLOTTING OR FINAL ENGINEERING. COPYRIGHT WOODLEY ARCHITECTURAL GROUP, INC. THESE DRAWINGS MAY NOT BE USED OR DUPLICATED WITHOUT THE EXPRESS WRITTEN PERMISSION OF WOODLEY ARCHITECTURAL GROUP, INC.

## PARK DATA

| PARK DESCRIPTION | QUANTITY | AREA (SF) |
|---|---|---|
| PARK 1 - PUBLIC | | 51145 |
| BENCHES | 6 | |
| TRASH RECEPTACLES | 4 | |
| PET WASTE STATIONS | 1 | |
| TABLES | 2 | |
| BBQ GRILLS | 2 | |
| PARK 2 - PUBLIC | | 9868 |
| BENCHES | 4 | |
| TRASH RECEPTACLE | 1 | |
| SHADE STRUCTURE | 1 | |
| PARK 3 - PUBLIC | | 16812 |
| BENCHES | 4 | |
| TRASH RECEPTACLES | 3 | |
| PET WASTE STATIONS | 1 | |
| PARK 4 - PUBLIC | | 3033 |
| TRASH RECEPTACLES | 1 | |
| PET WASTE STATIONS | 1 | |
| BENCHES | 2 | |
| PARK 5 - PUBLIC | | 4548 |
| TRASH RECEPTACLES | 1 | |
| PET WASTE STATIONS | 1 | |
| BENCHES | 4 | |
| PARK 6 - PRIVATE | | 12134 |
| SHADE STRUCTURE | 1 | |
| TABLES | 2 | |
| BBQ GRILLS | 2 | |
| TRASH RECEPTACLES | 1 | |
| PET WASTE STATIONS | 1 | |
| SPLASH PAD | 1 | |
| PARK 7 - PRIVATE | | 2307 |
| BENCHES | 1 | |
| TRAILHEAD PARK - PUBLIC | | 25617 |
| SHADE STRUCTURE | 1 | |
| TABLES | 2 | |
| BBQ GRILLS | 2 | |
| BENCHES | 1 | |
| TRASH RECEPTACLES | 1 | |
| PET WASTE STATION | 1 | |
| REC CENTER - PRIVATE | | 6755 |
| TRASH RECEPTACLES | 4 | |
| BBQ GRILLS | 2 | |
| SHADE STRUCTURE | 6 | |
| LOUNGE CHAIRS | 18 | |
| POOL | 1 | |
| SPA | 1 | |
| BATHROOMS | 2 | |

| | |
|---|---|
| TRAILS | 8,068 LF |
| BICYCLE RACK | 14 |
| TRASH RECEPTACLES (HOA MAINTENANCE TO EMPTY) | 16 |
| BICYCLE PARKING SPACES PER LOCATION | 4 OR 8 (AS NOTED) |
| BICYCLE PARKING SPACES | 68 |




# BOUQUET CANYON

## SANTA CLARITA | CA

INTEGRAL COMMUNITIES | 18-049

DATE 9 | 4 | 20

1"=100'-0" SCALE

0 100 200

NORTH

PRELIMINARY PARK EXHIBIT | L3

URBAN ARENA

# CONCEPT PLANT SCHEDULE

STREET TREES
AGONIS FLEXUOSA / PEPPERMINT TREE
CASSIA LEPTOPHYLLA / GOLD MEDALLION TREE
CINNAMOMUM CAMPHORA / CAMPHOR TREE
GEIJERA PARVIFLORA / AUSTRALIAN WILLOW
JACARANDA MIMOSIFOLIA / JACARANDA
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE
PODOCARPUS GRACILIOR / FERN PINE
QUERCUS AGRIFOLIA / COAST LIVE OAK
TABEBUIA IMPETIGINOSA / PINK TRUMPET TREE
ULMUS PARVIFOLIA / CHINESE ELM

NATIVE SLOPE TREES
QUERCUS AGRIFOLIA / COAST LIVE OAK
SAMBUCUS NIGRA / COMMON ELDERBERRY

COMMUNITY TREES
AGONIS FLEXUOSA / PEPPERMINT TREE
CASSIA LEPTOPHYLLA / GOLD MEDALLION TREE
CHILOPSIS LINEARIS / DESERT WILLOW
CINNAMOMUM CAMPHORA / CAMPHOR TREE
GEIJERA PARVIFLORA / AUSTRALIAN WILLOW
JACARANDA MIMOSIFOLIA / JACARANDA
KOELREUTERIA BIPINNATA / CHINESE FLAME TREE
PLATANUS RACEMOSA / CALIFORNIA SYCAMORE
PODOCARPUS GRACILIOR / FERN PINE
QUERCUS AGRIFOLIA / COAST LIVE OAK
TABEBUIA IMPETIGINOSA / PINK TRUMPET TREE
ULMUS PARVIFOLIA / CHINESE ELM

MOISTURE-ADJACENT TREES
ACER MACROPHYLLUM / BIG LEAF MAPLE
ALNUS RHOMBIFOLIA / WHITE ALDER
JUGLANS HINDSII / CALIFORNIA BLACK WALNUT
PLATANUS RACEMOSA / CALIFORNIA SYCAMORE
POPULUS FREMONTII / FREMONT COTTONWOOD
QUERCUS AGRIFOLIA / COAST LIVE OAK
SALIX GOODINGII / WILLOW
SALIX LAEVIGATA / RED WILLOW
SALIX LASIOLEPIS / ARROYO WILLOW
SALIX LUCIDA / PACIFIC WILLOW
SAMBUCUS NIGRA / COMMON ELDERBERRY
UMBELLULARIA CALIFORNICA / CALIFORNIA LAUREL

FUEL MOD NATIVE SLOPES
BACCHARIS PILULARIS / COYOTE BRUSH
CLEOME ISOMERIS / BLADDERPOD SPIDERFLOWER
DIPLACUS AURANTIACUS / STICKY MONKEYFLOWER
ENCELIA CALIFORNICA / CALIFORNIA ENCELIA
ENCELIA FARINOSA / BRITTLE BUSH
EPHEDRA CALIFORNICA / CALIFORNIA JOINT FIR
ERICAMERIA LINEARIFOLIA / TURPENTINE BUSH
HESPEROYUCCA WHIPPLEI / CHAPARRAL YUCCA
ISOCOMA MENZIESII / GOLDENBUSH
KECKIELLA CORDIFOLIA / CLIMBING PENSTEMON
LOTUS SCOPARIUS / CALIFORNIA DEER WEED
MALOSMA LAURINA / LAUREL SUMAC
OPUNTIA LITTORALIS / SHORE CACTUS
RHUS INTEGRIFOLIA / LEMONADE BERRY
RHUS OVATA / SUGAR BUSH
SALVIA MELLIFERA / BLACK SAGE

NATIVE SLOPES
ADENOSTOMA FASCICULATUM / CHAMISE
ARTEMISIA CALIFORNICA / CALIFORNIA SAGEBRUSH
BACCHARIS PILULARIS / COYOTE BRUSH
CLEOME ISOMERIS / BLADDERPOD SPIDERFLOWER
DIPLACUS AURANTIACUS / STICKY MONKEYFLOWER
ENCELIA CALIFORNICA / CALIFORNIA ENCELIA
ENCELIA FARINOSA / BRITTLE BUSH
EPHEDRA CALIFORNICA / CALIFORNIA JOINT FIR
ERICAMERIA LINEARIFOLIA / TURPENTINE BUSH
ERIOGONUM FASCICULATUM / COMMON BUCKWHEAT
HESPEROYUCCA WHIPPLEI / CHAPARRAL YUCCA
ISOCOMA MENZIESII / GOLDENBUSH
KECKIELLA CORDIFOLIA / CLIMBING PENSTEMON
LOTUS SCOPARIUS / CALIFORNIA DEER WEED
MALOSMA LAURINA / LAUREL SUMAC
OPUNTIA LITTORALIS / SHORE CACTUS
RHUS INTEGRIFOLIA / LEMONADE BERRY
RHUS OVATA / SUGAR BUSH
SALVIA MELLIFERA / BLACK SAGE

STORMWATER MANAGEMENT
ACHILLEA MILLEFOLIUM / COMMON YARROW
BACCHARIS PILULARIS / COYOTE BRUSH
BACCHARIS SALICIFOLIA / MULE FAT
BIDENS SPP.
CAREX SPP. / SEDGE
CORNUS SERICEA / RED TWIG DOGWOOD
ELEOCHARIS SPP.
JUNCUS ACUMINATUS / TAPERED RUSH
MIMULUS SPP. / MONKEYFLOWER
NASTURTIUM SPP. / WATERCRESS
POLYGONUM SPP.
RUMEX SPP.
SCHOENOPLECTUS ACUTUS / HARDSTEM BULRUSH
SCHOENOPLECTUS AMERICANUS / THREE-SQUARE BULRUSH
SCHOENOPLECTUS CALIFORNICUS / CALIFORNIA BULRUSH
SISYRINCHIUM BELLUM / BLUE EYED GRASS

TURFGRASS
WARM SEASON TURFGRASS

PARKWAYS & MEDIANS
ACHILLEA MILLEFOLIUM / COMMON YARROW
ARISTIDA PURPUREA / PURPLE THREEAWN
BACCHARIS PILULARIS 'PIGEON POINT' / COYOTE BRUSH
CAREX PRAEGRACILIS / SLENDER SEDGE
DUDLEYA SPP. / DUDLEYA
ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE
ERIGERON GLAUCUS / BEACH DAISY
ERIOGONUM FASCICULATUM 'WARRINER LYTLE' / WARRINER LYTLE BUCKWHEAT
ERIOPHYLLUM CONFERTIFLORUM / GOLDEN YARROW
HESPEROYUCCA WHIPPLEI / CHAPARRAL YUCCA
IRIS DOUGLASIANA 'PACIFIC COAST HYBRIDS' / PCH IRIS
JUNCUS SPP. / RUSH
MIMULUS SPP. / MONKEYFLOWER
MONARDELLA VILLOSA / COYOTE MINT
MUHLENBERGIA RIGENS / DEER GRASS
NASSELLA PULCHRA / PURPLE NEEDLE GRASS
SALVIA SPATHACEA / HUMMINGBIRD SAGE
SALVIA X 'BEE'S BLISS' / SAGE
SISYRINCHIUM BELLUM / BLUE EYED GRASS
ZAUSCHNERIA CALIFORNICA / CALIFORNIA FUCHSIA

PRIVATE YARD
-

COMMUNITY ORNAMENTAL LANDSCAPE
ACHILLEA MILLEFOLIUM / COMMON YARROW
ARISTIDA PURPUREA / PURPLE THREEAWN
ARTEMISIA CALIFORNICA 'CANYON GREY' / PROSTRATE CALIFORNIA SAGEBRUSH
BACCHARIS PILULARIS / COYOTE BRUSH
BACCHARIS PILULARIS 'PIGEON POINT' / COYOTE BRUSH
CAREX PRAEGRACILIS / SLENDER SEDGE
CORETHROGYNE FILAGINIFOLIA 'SILVER CARPET' / CALIFONIA ASTER
DIPLACUS AURANTIACUS / STICKY MONKEYFLOWER
DUDLEYA SPP. / DUDLEYA
ELYMUS CONDENSATUS 'CANYON PRINCE' / CANYON PRINCE WILD RYE
ENCELIA CALIFORNICA / CALIFORNIA ENCELIA
ENCELIA FARINOSA / BRITTLE BUSH
ERIGERON GLAUCUS / BEACH DAISY
ERIOGONUM FASCICULATUM 'WARRINER LYTLE' / WARRINER LYTLE BUCKWHEAT
ERIOPHYLLUM CONFERTIFLORUM / GOLDEN YARROW
HESPEROYUCCA WHIPPLEI / CHAPARRAL YUCCA
IRIS DOUGLASIANA 'PACIFIC COAST HYBRIDS' / PCH IRIS
JUNCUS PATENS / CALIFORNIA GRAY RUSH
MIMULUS SPP. / MONKEYFLOWER
MONARDELLA VILLOSA / COYOTE MINT
MUHLENBERGIA RIGENS / DEER GRASS
NASSELLA PULCHRA / PURPLE NEEDLE GRASS
RHAMNUS CALIFORNICA 'MOUND SAN BRUNO' / CALIFORNIA COFFEEBERRY
RHUS INTEGRIFOLIA / LEMONADE BERRY
ROSA CALIFORNICA / CALIFORNIA WILD ROSE
SALVIA LEUCANTHA / MEXICAN BUSH SAGE
SALVIA MELLIFERA / BLACK SAGE
SALVIA SPATHACEA / HUMMINGBIRD SAGE
SALVIA X 'BEE'S BLISS' / SAGE
SISYRINCHIUM BELLUM / BLUE EYED GRASS
TRICHOSTEMA LANATUM / WOOLLY BLUE CURLS
ZAUSCHNERIA CALIFORNICA / CALIFORNIA FUCHSIA

UNDISTURBED NATIVE LANDSCAPE
UNDISTURBED NATURAL VEGETATION

RIPARIAN
AMBROSIA PSILOSTACHYA / WESTERN RAGWEED
ANEMOPSIS CALIFORNICA / YERBA MANSA
BACCHARIS PILULARIS / COYOTE BRUSH
BACCHARIS SALICIFOLIA / MULE FAT
CORNUS SERICEA / RED TWIG DOGWOOD
JUNCUS SPP. / RUSH
SCHOENOPLECTUS ACUTUS / HARDSTEM BULRUSH
SCHOENOPLECTUS AMERICANUS / THREE-SQUARE BULRUSH
SCHOENOPLECTUS CALIFORNICUS / CALIFORNIA BULRUSH
TYPHA SPP. / CATTAIL
VITIS GIRDIANA / DESERT WILD GRAPE




# BOUQUET CANYON

SANTA CLARITA | CA

INTEGRAL COMMUNITIES | 18-049

DATE 9 | 4 | 20

1"=100'-0" SCALE
0 100 200

NORTH

PRELIMINARY LANDSCAPE PLAN | L1

URBAN ARENA

# SECTION 4:

## Mitigation Monitoring and Reporting Program

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
|---|---|---|---|---|---|---|
| 3.2-1 | Air Quality | All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the EPA-certified Tier 4 emission standards. In addition, all construction equipment shall be outfitted with best available control technologies (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.<br>A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment. | Provide these specifications in grading plan and construction permit and implement during construction. | During grading plan check and during grading and construction. | Project Developer | City of Santa Clarita, Department of Public Works, Building and Safety Division during grading plan review and to conduct field inspections during grading |
| 3.2-2 | Air Quality | The contractor shall utilize hauling trucks no larger than Medium Heavy Duty Trucks (MHDT) (i.e., gross vehicle weight rating [GVWR] 14,001 – 33,000 pounds) during the site preparation and grading phases of construction. | Provide these specifications in grading plan and construction permit, and implement during construction. | During grading plan check and during site preparation and grading phases of construction. | Project developer | City of Santa Clarita, Department of Public Works, Building and Safety Division during grading plan review and to conduct field inspections during grading |
| 3.3-1 | Biological Resources | Mitigation for project impacts to the slender mariposa-lily (Calochortus clavatus var. gracilis) shall include one or more of the following, implemented in consultation with the City and CDFW prior to construction: | Provide mitigation plan or evidence of compliance prior to grading. | Review/approve plan or confirm payment of fee or land preservation, prior to issuance of | Project developer | City of Santa Clarita, Community Development Department, |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | • Prior to construction, a mitigation plan shall be developed that describes methods to mitigate for impacts to slender mariposa lily at a 1:1 ratio. The mitigation plan shall include a description of the mitigation site, seed/bulb collection and planting methods, maintenance and monitoring requirements, and performance standards to measure the success of the mitigation. Slender mariposa lily bulbs shall be collected at the end of the growing season and prior to ground disturbance, or seeds shall be obtained from a native plant nursery if available. The seeds/bulbs shall be planted within an appropriate on-site or off-site mitigation area, which will be conserved as open space in perpetuity.<br>• Payment into a mitigation bank that supports this rare plant species.<br>• Preservation of land that contains the rare plant species. | | grading permit. Verify completion of on-site seed/bulb collection and planting, if that's the approved action, prior to issuance of first building permit. | | Planning Division and California Department of Fish and Wildlife |
| 3.3-2 | Biological Resources | In compliance with the CDFW Staff Report on Burrowing Owl Mitigation (2012), a take avoidance survey shall be conducted on the study area within 14 days prior to ground disturbance to determine presence of burrowing owl. If the take avoidance survey is negative and burrowing owl is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If burrowing owl is observed during the take avoidance survey, active burrows shall be | Conduct owl survey and, if warranted, prepare a Burrowing Owl Protection and Relocation Plan prior to issuance of a grading permit. Implement avoidance measures, if | Review results of owl survey and approve protection plan, prior to ground-disturbing activities. | Project developer | City of Santa Clarita, Community Development Department, Planning Division and California Department of Fish and Wildlife |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
|---|---|---|---|---|---|---|
| | | avoided by the project in accordance with the CDFW's Staff Report. The CDFW shall be immediately informed of any burrowing owl observations. A Burrowing Owl Protection and Relocation Plan shall be prepared by a qualified biologist, which must be sent for approval by CDFW prior to initiating ground disturbance. The plan shall detail avoidance measures that shall be implemented during construction and passive or active relocation methodology. Relocation shall only occur September 1 through January 31, outside of the nesting season. | needed, during grading. | | | |
| 3.3-3 | Biological Resources | Prior to the City's issuance of a grading permit, the applicant shall demonstrate that a Streambed Alteration Agreement has been issued by the CDFW. Temporary impact areas under CDFW jurisdiction shall be returned to pre-project topographic contours once the project has been completed. Permanent impacts to areas under CDFW jurisdiction for southern willow scrub/giant reed stand (0.70 acres) shall be mitigated through on-site or off-site enhancement, restoration, and/or creation of CDFW jurisdictional streambed at ratio of no less than 1:1. Given that the remaining portion of Bouquet Canyon Creek is dominated by invasive giant reed stands, which is of extremely low biological function and value and contributes to downstream infestation of giant reed, the remaining permanent impacts to CDFW jurisdiction (8.63 acres) shall be mitigated through on-site or off-site enhancement, restoration, and/or creation of CDFW | Obtain Streambed Alteration Agreement from CDFW.<br><br>Implement mitigation identified in agreement, throughout construction in area governed by agreement. | Review agreement prior to issuance of grading permit. Observe implementation actions during construction in area governed by agreement. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | jurisdictional streambed at a ratio of no less than 0.5:1. Best management practices (BMPs) to minimize and avoid impacts to CDFW jurisdiction during and after construction will be addressed as part in the Streambed Alteration Agreement.<br>Minimization and avoidance measures may include, but are not limited to, the following:<br>• Construction-related equipment will be stored in developed areas, outside of drainages. No equipment maintenance will be done within or adjacent to the drainage.<br>• Mud, silt, spoil sites, raw cement, asphalt, or other pollutants from construction activities will not be placed within or adjacent to the drainage.<br>• Open trenches or other excavated areas will be properly secured at the end of the day to avoid entrapment of animals, or an escape ramp will be provided.<br>• To avoid attracting predators during construction, the project shall be kept clean of debris to the extent possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from site.<br>• Construction personnel shall strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.<br>• Exclusion fencing shall be installed to demarcate the limits of disturbance and shall be maintained until the completion of construction activities. | | | | |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | • To the extent feasible, construction will be conducted outside of the bird nesting season (see mitigation measure 3.3-5, later herein). | | | | |
| 3.3-4 | Biological Resources | Prior to the City's issuance of a grading permit, the applicant shall demonstrate that the appropriate regulatory permits have been issued by the USACE and RWQCB. Temporarily impacted WUS shall be returned to pre-project topographic contours once the project has been completed. Compensatory mitigation for permanent impacts to WUS shall be required as part of subsequent permitting requirements. Permanent impacts to WUS shall be mitigated through on-site or off-site enhancement, restoration, and/or creation of jurisdictional streambed at a ratio of no less than 1:1. BMPs to minimize and avoid impacts to WUS during and after construction will be addressed as part of the USACE and RWQCB permitting process. Minimization and avoidance measures may include, but are not limited to, the following:<br>• Construction-related equipment will be stored in developed areas, outside of the drainage. No equipment maintenance will be done within or adjacent to the drainage.<br>• Source control and treatment control BMPs will be implemented to minimize the potential contaminants that are generated during and after construction. Water quality BMPs will be implemented throughout the project to capture and treat potential contaminants. | Obtain required permits from the USACE and RWQCB.<br><br>Implement mitigation identified in permits, throughout construction, in area governed by permits. | Review permits, prior to issuance of grading permit.<br><br>Observe implementation actions during construction in area governed by permits. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | • Substances harmful to aquatic life will not be discharged into the drainage. All hazardous substances will be properly handled and stored.<br>• A Storm Water Pollution Prevention Plan will be prepared to prevent sediment from entering the drainage during construction.<br>• To avoid attracting predators during construction, the project will be kept clean of debris to the extent possible. All food-related trash items will be enclosed in sealed containers and regularly removed from site.<br>• Construction personnel will strictly limit their activities, vehicles, equipment and construction material to the proposed project footprint, staging areas, and designated routes of travel.<br>• Exclusion fencing will be installed to demarcate the limits of disturbance. The exclusion fencing should be maintained until the completion of construction activities. | | | | |
| 3.3-5 | Biological Resources | Schedule construction activities (i.e., earthwork, clearing, and grubbing) outside of the general bird nesting season for migratory birds, if feasible. This season is February 15 through August 31 for songbirds and January 15 through August 31 for raptors. If construction activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird nesting season for migratory birds and raptors, a qualified biologist shall perform a preconstruction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and | Schedule construction outside of nesting season or conduct preconstruction survey, or additional surveys if construction ceases for 7+ days, by a qualified biologist. | Review grading plan to confirm schedule specification or that pre-construction survey will be conducted. Review results of bird surveys prior to commencement of grading in | Project developer | City of Santa Clarita, Community Development Department, Planning Division, based on reports from monitoring biologist. |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | raptors afforded protection under the Migratory Bird Treaty Act and California Fish and Game Code. The preconstruction survey shall be performed no more than seven days prior to the commencement of construction activities. The results of the preconstruction survey shall be documented by the qualified biologist. If construction is inactive for more than seven days, an additional survey shall be conducted. If the qualified biologist determines that no active migratory bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no construction within 300 feet (500 feet for raptors) of the active nest shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The biological monitor may modify the buffer or propose other recommendations in order to minimize disturbance to nesting birds. | | potential nesting habitat.<br><br>Direct contractor to cease work in any area where active nests are found. | | |
| 3.4-1 | Cultural Resources | The applicant shall retain a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist to develop a monitoring program for the project site in areas of young alluvium and colluvium (see Appendix D: Figure 10, Areas of Young Alluvium or Colluvium Deposits). This program shall also address potential discovery of the Ruiz cemetery on the main ridgeline. The monitoring | Provide these specifications in the grading plan. Conduct monitoring during grading. File post monitoring report. | During grading plan check, during grading, and file report after field monitoring is completed. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | program shall include the archaeological context, rationale for monitoring, Native American participation, monitoring procedures, and what to do with resource/remains discoveries. The monitoring program shall require an archaeologist and Native American monitor from the Fernandeño Tataviam Band of Mission Indians to hold a preconstruction meeting with the grading contractor and both are to be present during initial ground-disturbing activities within the areas of young alluvium and colluvium. Both archaeological and Native American monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activities in the event cultural resources are encountered. If potentially significant cultural material is encountered, the monitors shall make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits should be evaluated for eligibility to the California Register of Historical Resources (CRHR). If the deposit is not CRHR-eligible, no further protection of the find is necessary. If the deposits are CRHR-eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of but is not necessarily limited to systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and | | | | |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | accessioning recovered archaeological materials at an appropriate curation facility. | | | | |
| 3.4-2 | Cultural Resources | Prior to the issuance of a grading permit associated with Planning Area 1, the project developer shall provide the City with evidence of the exact location of the early twentieth century-period Chari/Suraco cemetery, using noninvasive techniques, and shall delineate those areas in the field to provide visual markers to ensure that grading crews avoid that burial site. The Chari/Suraco cemetery shall be included in the permanent open space area to be preserved in the land immediately east of Planning Area 1. | Provide these specifications in the grading plan. Include cemetery in permanent open space area. Delineate cemetery avoidance limits prior to grading for Planning Area 1. | Review specifications prior to issuance of grading permit. Observe cemetery delineation in the field, prior to commencement of grading for Planning Area 1. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |
| 3.6-1 | Geology and Soils | The developer shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology Standards to develop a monitoring program for the project site in areas where Castaic and Saugus Formation sedimentary layers are exposed or are likely to be exposed during project construction. The qualified paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources and shall be authorized to stop work where potential paleontological resources are discovered to provide an opportunity to examine, recover, and characterize such materials. Additionally, the qualified paleontologist shall conduct construction worker paleontological resources sensitivity training at the project kickoff meeting, prior to ground-disturbing activities. Any significant paleontological resources collected during | Provide these specifications in the grading plan. Conduct monitoring during grading. File post monitoring report. | Review monitoring and construction crew training specifications during grading plan check. Review paleontological monitor field reports during grading, and review report filed after field monitoring is completed. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | project-related excavations shall be curated into an accredited repository. The qualified paleontologist shall prepare a final monitoring and mitigation report for submittal to the City that documents the results of the monitoring effort and any discoveries. | | | | |
| 3.8-1 | Hazards / Hazardous Materials | Prior to the issuance of a grading permit, the project applicant shall test the oil/gas well located on APN 2812-008-022 for leakage. The soils around the oil/gas well shall also be tested for significant amounts of hydrocarbons. The results of the soils testing shall be submitted to the City of Santa Clarita Planning Division for review. Any soils containing significant amounts of hydrocarbons shall be disposed of in accordance with local, state, and federal laws. | Conduct testing for leakage and submit results to the City of Santa Clarita, Community Development Department, Planning Division. Remove and dispose of contaminants, prior to any home construction, if needed. | Review test results prior to issuance of a grading permit.<br><br>Confirm proper disposition of any contaminants requiring removal, prior to commencement of any home construction. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |
| 3.10-1 | Noise | To reduce noise impacts due to construction, the project applicant shall demonstrate, to the satisfaction of the City of Santa Clarita Community Development Director, that the project complies with the following:<br>• Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating project construction activities, including haul truck deliveries, shall only occur between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturdays, and with no | Provide these specifications in grading and construction plans and implement throughout construction. | Prior to issuance of grading plan and/or building permits and during construction. | Project developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
|---|---|---|---|---|---|---|
| | | activity allowed on Sundays or federal holidays. The project construction supervisor shall ensure compliance with the note and the City of Santa Clarita shall conduct periodic inspections at its discretion.<br>• During all project construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the nearest noise-sensitive receptors.<br>• The construction contractor shall locate equipment staging in areas that would create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the site during all project construction. | | | | |
| 3.12-1 | Transportation | <u>David Way and Old Bouquet Canyon East</u>: Remove existing traffic signal. Close David Way between Old Bouquet Canyon Road and Copper Hill Drive (eliminates south leg of the David Way and Copper Hill Drive intersection). Construct new east leg at David Way at Copper Hill Drive intersection and connect to Old Bouquet Canyon Road. At the David Way and Copper Hill Drive intersection, construct median island to restrict the left-turn movement (southbound left) from | Provide these specifications in grading and construction plans and implement throughout construction. | Prior to issuance of a certificate of occupancy for any of the proposed buildings. | Project developer | City of Santa Clarita, Community Development Department, Planning Division and Department of Public Works |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
|---|---|---|---|---|---|---|
| | | David Way to Copper Hill Drive and install stop sign at David Way. | | | | |
| 3.12-2 | Transportation | Benz Road and Copper Hill Drive: Construct median island to restrict left-turn movement (northbound left) from Benz Road to Copper Hill Drive. | Payment of project's fair share fee. | Confirm receipt of fee, prior to occupancy of first home. | Project developer | City of Santa Clarita, Department of Public Works |
| 3.12-3 | Transportation | New Bouquet Canyon Road and Old Bouquet Canyon East: Installation of a traffic signal. | Provide these specifications in grading and construction plans and complete prior to occupancy of first home. | Review/approve signal plans, prior to construction of this new intersection. Confirm full functionality of completed signal improvements, prior to occupancy of first home. | Project developer | City of Santa Clarita, Department of Public Works |
| 3.12-4 | Transportation | The project proponent shall pay the project's fair share contribution to a collective set of improvements around the Project site would alter and improve traffic flow on Benz Road, Copper Hill Drive, Kathleen Avenue, David Way, and Bouquet Canyon Road. | Payment of project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-5 | Transportation | Bouquet Canyon Road and Vasquez Canyon Road: The project proponent shall pay the project's fair share (2%) of the cost of these improvements: Add a northbound right-turn de-facto lane and add a dedicated westbound left-turn lane. Installation of traffic signal with northbound and southbound split-phasing. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| 3.12-6 | Transportation | New Bouquet Canyon Road and Old Bouquet Canyon Road West: The project proponent shall pay the project's fair share (25%) of the cost of these improvements: Construct median island to restrict left-turn movement (southbound left) from Old Bouquet Canyon Road to eastbound New Bouquet Canyon Road. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-7 | Transportation | Kathleen Avenue and Copper Hill Drive: The project proponent shall pay the project's fair share (2%) of the cost of these improvements: Installation of a traffic signal and widen Copper Hill Drive from 2 lanes to 4 lanes from Benz to Kathleen. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-8 | Transportation | Golden Valley Road and Plum Canyon Road: The project proponent shall pay the project's fair share (8%) of the cost of these improvements: Update corridor signal timing coordination, as needed, due to future cumulative traffic volumes. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-9 | Transportation | Seco Canyon Road and Bouquet Canyon Road: The project proponent shall pay the project's fair share (42%) of the cost of these improvements: Add second southbound left-turn lane, add one eastbound right-turn lane, add third northbound through lane. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-10 | Transportation | Bouquet Canyon Road and Newhall Ranch Road: The project proponent shall pay the project's fair share (8%) of the cost of these improvements: Add third westbound left-turn lane. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-11 | Transportation | Golden Valley Road and Newhall Ranch Road: The project proponent shall pay the project's fair share (0.5%) of the cost of these improvements: | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | Extend median pocket from 300 feet to 500 feet plus taper. Update corridor signal timing coordination, as needed, due to future cumulative traffic volumes. | | | | Department of Public Works |
| 3.12-12 | Transportation | New Bouquet Canyon Road and Old Bouquet Canyon Road East (Copper Hill): The project proponent shall pay the project's fair share (5%) of the cost of these improvements: Add second northbound through lane, add second southbound through lane. | Payment of the project's fair share fee. | Prior to occupancy of first home. | Project Developer | City of Santa Clarita, Department of Public Works |
| 3.12-13 | Transportation | A secondary access to the proposed segment of Bouquet Canyon Road shall be provided for the homes in Planning Areas 1, 2 and 3 that are accessible only to that new roadway segment. This secondary access shall be identified on the project plans and approved by the County Fire Department and City of Santa Clarita, prior to approval of a Final Tract Map. | Provide these specifications on approved Tentative Tract Map and Final Tract Map. Construct approved access, prior to occupancy of first home in Planning Areas 1, 2, or 3. | Review/approve specifications shown on approved Tentative Tract Map and Final Tract Map. | Project developer | City of Santa Clarita, Community Development Department, Planning Division and Department of Public Works and the Los Angeles County Fire Department |
| 3.13-1 | Tribal Cultural Resources | The applicant shall retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all clearing, grubbing, and grading operations within areas designated sensitive for tribal cultural resources, including areas with young alluvium and colluvium soil conditions. Monitoring activities. If cultural resources are encountered, the Native American monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery to | Provide these specifications in the grading plan. Conduct monitoring during grading. File post-monitoring report with City Planning Division. | Review monitoring plan during grading plan check and review monitor reports during grading. Review post-monitoring report when grading/monitoring is completed. | Project Developer | City of Santa Clarita, Community Development Department, Planning Division |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | assess and document potential finds in real time. One monitor will be required on-site for all ground-disturbing activities in areas designated through additional consultation. However, if ground-disturbing activities occur in more than one of the designated monitoring areas at the same time, then the parties can mutually agree to an additional monitor, to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.<br>If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted pursuant to California Health and Safety Code Section 7050.5 and that code shall be enforced for the duration of the project. Inadvertent discoveries of human remains and/or funerary objects and the subsequent disposition of those discoveries shall be decided by the most likely descendant as determined by the Native American Heritage Commission, should those findings be determined as Native American in origin. | | | | |
| 3.15-1 | Wildfire | The Project Applicant shall develop a Construction Fire Prevention Plan that addresses training of construction personnel and provides details of fire-suppression procedures and equipment to be used during construction. Information contained in the plan shall be included as part of project- | Submit Construction Fire Prevention Plan for City/County Fire Department approval, prior to issuance of grading | During grading plan check and during grading and construction. | Project Developer | City of Santa Clarita, Department of Public Works and the Los |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | related environmental awareness training. At minimum, the plan shall include the following:<br>• Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions;<br>• Work restrictions during periods of high winds, Red Flag Warnings and High to Extreme Fire Danger days;<br>• Fire coordinator role and responsibility;<br>• Worker training for fire prevention, initial attack firefighting, and fire reporting;<br>• Emergency communication, response, and reporting procedures;<br>• Coordination with local fire agencies to facilitate agency access through the project site;<br>• Emergency contact information | permit. in the grading plan and implement during grading and construction. | | | Angeles County Fire Department |
| 3.15-2 | Wildfire | The Construction Contractor shall ensure the implementation of all construction-phase flammable vegetation removal, fuel modification landscape materials, and irrigation systems required by the Los Angeles County Fire Department, prior to combustible building materials being delivered to the site. | Provide these specifications in the construction plans and implement during site preparation preceding building construction. | Review specifications as part of construction plan checks, approve prior to issuance of building permits, and conduct field inspections to verify full compliance, prior | Project Developer | City of Santa Clarita, Department of Public Works - Building and Safety Division, and the Los Angeles County Fire Department |

| # | Environmental Factor | Mitigation Measure | Actions Required | When Monitoring Occurs | Responsible Agency or Party | Monitoring Agency or Party |
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| | | | | to delivery of combustible building materials to the site. | | |
| 3.15-3 | Wildfire | To avoid impeding emergency vehicle and evacuation traffic around construction vehicles and equipment, the Project Applicant, in consultation with the City, shall develop an Emergency Vehicle Access Plan that includes the following:<br>• Evidence of advanced coordination with emergency service providers, including but not necessarily limited to police departments, fire departments, ambulance services, and paramedic services;<br>• Emergency service providers will be notified of the proposed project locations, nature, timing, and duration of any construction activities, and will be asked for advice about any road access restrictions that could impact their response effectiveness; and<br>Project construction schedules and routes designed to avoid restricting movement of emergency vehicles to the best extent possible. Provisions to be ready at all times to accommodate emergency vehicles. Provisions could include the use of platings over excavations, short detours, and/or alternate routes. | Provide the Emergency Vehicle Access Plan in the grading and construction plans and implement during grading and construction. | Review/approve specifications for Emergency Vehicle Access Plan during grading and construction plan check and verify compliance during grading and construction. | Project Developer | City of Santa Clarita, Department of Public Works, Engineering Services and Building and Safety Divisions |

**Mitigation Compliance**

As a means of ensuring compliance of above mitigation measures, the project proponent and subsequent owner(s) are responsible for funding of all mitigation measures and monitoring efforts, for submitting regular compliance reports to the Director of Community Development for review, and for replenishing the mitigation monitoring account if necessary, until such time as all mitigation measures have been implemented and completed.