
Appendix A-2

Notice of Preparation Comment Letters

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STATE OF CALIFORNIA

Gavin Newsom, Governor



NATIVE AMERICAN HERITAGE COMMISSION

June 16, 2022

Erica Gutierrez
County of Los Angeles
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

CHAIRPERSON
Laura Miranda
Luiseño

Re: 2022060346, Trails at Canyon Project, Los Angeles County

VICE CHAIRPERSON
Reginald Pagaling
Chumash

Dear Ms. Gutierrez:

PARLIAMENTARIAN
Russell Attebery
Karuk

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

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Paiute/White Mountain
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CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

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The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

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AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



Making Conservation
a California Way of Life.

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July 1, 2022

Erica Gutierrez, AICP
County of Los Angeles, Department of Regional Planning
Principal Planner, Subdivisions Section
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Trails at Lyons Canyon Project – Notice of
Preparation (NOP)
SCH# 2022060346
GTS# 07-LA-2022-03985
Vic. LA-5 PM 49.71

Dear Erica Gutierrez,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project includes the development of 504 residential units in a mix of attached and detached dwelling units, and affordable senior housing, subdivided into 23 lots within 233.18 acres, associated infrastructure, a designated lot for a future fire station, three Los Angeles County Flood Control District lots, and approximately 164 acres of natural and improved open space. The portions of the project site developed with residential uses would be situated in the northerly portion of the project site on approximately 40.33 acres, adjacent to The Old Road, and the natural and improved open space would predominantly be located within the westerly and southerly portions of the project site. The proposed dwelling units would be located within up to six planning areas, proximate to each other and connected by internal driveways and sidewalks. These internal driveways would connect to proposed "A" and "B" Streets. Proposed "A" and "B" Streets would provide public access throughout the developed portions of the project site (i.e., the northeasterly portion of the site) from two access points on The Old Road. Project infrastructure would also incorporate, trails, a new water tank, and debris basins.

The nearest State facility to the proposed project is Interstate 5. After reviewing the NOP, Caltrans has the following comments:

Currently the project is designed in a way that induces a high number of vehicle trips per household due to being an exclusively residential, car-oriented development. The proposed project extends the exurban area and sprawls into the Wildland Urban Interface (WUI) as designated by the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP), increasing wildfire risks in addition to potentially significant Vehicle Miles Travelled (VMT) impacts. The Lead Agency is encouraged to integrate

“Provide a safe and reliable transportation network that serves all people and respects the environment”

transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Caltrans recommends the following to more effectively address the significant VMT that this project may create as currently proposed:

- 1) Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse. This can allow goods, services, and jobs to be created closer to where the project's residents live.
- 2) Reduce the amount of parking whenever possible, as abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building too much parking.
- 3) Improve connections to existing active transportation and transit infrastructure. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities. Additionally, the most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.

Please be aware that any work on or adjacent to Caltrans Right-of-Way will require an Encroachment Permit and that 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.

Caltrans looks forward to the forthcoming Draft Environmental Impact Report to confirm that the Project will result in a net reduction in Vehicle Miles Traveled.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2022-03985.

Sincerely,

Miya Edmonson
Miya Edmonson

LDR Branch Chief

cc: State Clearinghouse



State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
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Via Electronic Mail Only

July 12, 2022

Erica Gutierrez
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
EGutierrez@planning.lacounty.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Trails at Lyons Canyon Project, SCH #2022060346, Los Angeles County Department of Regional Planning, Los Angeles County

Dear Ms. Gutierrez:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of Draft Environmental Impact Report (DEIR) from the Los Angeles County Department of Regional Planning (DRP) for the Trails at Lyons Canyon Project (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's 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; Pub. 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 (Pub. 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 CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

Erica Gutierrez
Los Angeles County Department of Regional Planning
July 12, 2022
Page 2 of 19

Project Description and Summary

Objective: The Project proposes to develop 504 residential units subdivided into 23 lots within 233 acres. One lot would be designated for a fire station. Three lots would be designated to the Los Angeles County Flood Control District. Approximately 164 acres of natural and improved open space is proposed. The portion of the Project site that would be developed with residential uses would be located in the northerly portion of the Project site on approximately 40.33 acres. The natural and improved open space would predominantly be located within the westerly and southerly portions of the Project site. The Project would include internal driveways, sidewalks, and streets. Streets would provide public access throughout the developed portions of the Project site. The Project would include trails, a new water tank, and debris basins. The Project would require up to 1,460,000 cubic yards of cut and 1,260,000 cubic yards of fill for a total of 2,720,000 cubic yards of grading with 1,345,000 cubic yards of over excavation.

Location: The 233-acre Project site is located in the northern foothills of the Santa Susana Mountains in unincorporated Los Angeles County. The Project site is contiguous to The Old Road on the east, west of Interstate 5, south of Sagecrest Circle, and north of Calgrove Boulevard. The Project site is associated with Assessor's Parcel Number 2826-022-026, 2826-022-027, 2826-022-035, 2826-023-014, and 2826-041-039. The Project site is located within the Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA). The Project site is relatively undisturbed for much of the property.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist DRP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the DEIR when it is available.

Specific Comments

- 1) Impacts on Mountain Lion (*Puma concolor*). Mountain lions collared and tracked by the National Park Service have been documented in the proposed Project site. On August 9, 2021, a male mountain lion was captured on a wildlife camera less than one mile from the Project site (CDFW 2021). P32's dispersal path crossed through the Santa Susana Mountains close to the Project site before P32 was struck and killed by a vehicle in 2015. Multiple collared mountain lions have been tracked in the Santa Susana Mountains, including P16, P35, P38, and P39. Finally, the Project site is located near multiple predation sites in the Santa Susana Mountains (Benson et al. 2016). The Project could impact mountain lion due habitat loss, habitat fragmentation, introducing new barriers to movement, increasing vehicle strikes, and increasing fire risk. The Project could therefore exacerbate the challenges faced by mountain lion in the Santa Susana Mountains and southern California.
 - a) Protection Status: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list the Southern California/Central Coast

Erica Gutierrez
Los Angeles County Department of Regional Planning
July 12, 2022
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Evolutionary Significant Unit of mountain lion as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

b) Analysis and Disclosure. The DEIR should analyze the Project's potential impact and cumulative impact on mountain lion during both Project construction and for the Project's lifetime. The DEIR should analyze impact on mountain lion from the standpoint of the following:

- Introducing new/additional barriers to movement;
- Constraining/eliminating essential corridors and pinch points leading to severed migration;
- Habitat loss, fragmentation, and encroachment;
 - i. Discuss the number or acreage of landscape linkages/landscape blocks within the Project area and adjacent areas. CDFW recommends referencing CDFW's Natural Landscape Blocks dataset (DS 621) in the [Biogeographic Information and Observation System \(BIOS\)](#) (CDFW 2022a).
 - ii. Discuss the acreage of mountain lion habitat suitability (a proxy for mountain lion permeability and use) within the Project area and adjacent areas. CDFW recommends referencing CDFW's Mountain Lion Habitat Suitability dataset (DS 2916) and Mountain Lion Predicted Habitat CWHW dataset (DS 2616).
 - iii. Provide an analysis of current landscape intactness (current level of development) around the Project site, and how the Project may impact habitat connectivity or impede mountain lion movement across the landscape to adjacent habitats.
- Increased human presence, traffic, noise, and lighting, as well as introduction of any livestock or animal keeping;
- Increased fire risk; and
- Use of herbicides, pesticides, and rodenticides.

CDFW recommends discussing Project's impact in relation to the South Coast Missing Linkages (DS 419), specifically the Santa Monica-Sierra Madre Connection. The undeveloped natural areas on both sides of the I-5 Freeway are important areas for maintaining and improving regional and State-wide connectivity. In addition, CDFW recommends such analysis include a wildlife camera study to aid in identification of areas that may be important to wildlife movement between the Project site and adjacent habitat. CDFW recommends DRP retain a qualified biologist to establish a robust wildlife camera study. Wildlife cameras should be deployed for a duration sufficient to capture any mountain lion potentially moving through the Project site. Wildlife camera study protocols and guidelines can be found on CDFW's [Survey and Monitoring Protocols and Guidelines](#) webpage (CDFW 2022b). DRP is welcome to consult with CDFW to develop a robust study design.

CDFW also recommends the DEIR evaluate the Project's cumulative impacts on both the Central Coast South (CC-S) mountain lion population and the Southern California/Central Coast Evolutionarily Significant Unit of mountain lion. Impacts should those listed above.

Erica Gutierrez
Los Angeles County Department of Regional Planning
July 12, 2022
Page 4 of 19

- c) Avoidance. CDFW recommends DRP require the Project applicant to design the Project to fully avoid impacts on mountain lion. The DEIR should discuss how the Project has been designed to avoid impacts on mountain lion. CDFW recommends the DEIR provide maps of the Project design overlaid on important areas for wildlife movement so that CDFW may evaluate whether the Project has been designed to avoid impacts on mountain lion or whether the Project's impact would be less than significant impact on mountain lion.
- d) Minimizing Impacts and Compensatory Mitigation. If the Project would have a significant impact on mountain lion, CDFW recommends DRP require the Project applicant to minimize the Project's impact through retaining and/or creating habitat and wildlife crossings that would facilitate mountain lion movement and dispersal. If avoiding and minimizing impacts is not feasible, CDFW recommends the DEIR include measures to fully compensate for loss of mountain lion habitat, corridors, and linkages. Appropriate mitigation may include obtaining appropriate take authorization under CESA (pursuant to Fish & Game Code, § 2080 et seq.).
- e) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from a project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project and any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.
- 2) Cumulative Impact. CDFW is aware of the Canyon View Estates project located adjacent to the proposed Project in the northern foothills of the Santa Susana Mountains¹. Cumulative impacts on biological resources can result from collectively significant projects. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have a potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but is not limited to, the biological resources described in this letter.

¹ Canyon View Estates Project/Project No. 2016-002179; Tract Map No. 74650; Conditional Use Permit No. 2016004409; Oak Tree Permit No. RPPL2017009209; and Environmental Assessment No. 20160044100. CEQA documents, including CDFW's comments on the Canyon View Estates Project available at: <https://ceganet.opr.ca.gov/2019089066/2>

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Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects [Pub. Resources Code, § 21083(b)]. DRP's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if DRP concludes that the Project would not result in cumulative impacts on biological resources, DRP "shall identify facts and analysis supporting DRP's conclusion that the cumulative impact is less than significant" [CEQA Guidelines section § 15130(a)(2)]. When using a threshold of significance, the DEIR should briefly explain how compliance with the threshold means that the Project's impacts are less than significant. A threshold of significance is an identifiable quantitative, qualitative, or performance level of a particular environmental effect [CEQA Guidelines, § 15064.7]. Compliance with the threshold does not relieve DRP's obligation to consider substantial evidence indicating that the Project's environmental effects may still be significant [CEQA Guidelines, § 15064(b)(2)]. Alternatively, if DRP concludes that the Project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through implementation of mitigation measures, the DEIR should briefly explain how the contribution has been rendered by DRP to be less than cumulatively considerable. DRP "shall identify facts and analysis supporting DRP's conclusion that the contribution will be rendered less than cumulatively considerable" [CEQA Guidelines section, § 15130(a)(3)].

- 3) 164 Acres of Open Space. According to the NOP, the Project would include approximately 164 acres of natural and improved open space. The DEIR should discuss whether these 164 acres are being proposed as compensatory mitigation for potentially significant impacts on biological resources [CEQA Guidelines, § 15370(e)]. The DEIR should discuss why these 164 acres would be adequate to compensate for each biological resource impacted. There should be a nexus between the impacted biological resource and the compensatory mitigation provided (e.g., like-for-like, in-kind). In addition, if DRP determines that providing 164 acres of open space would avoid significant effects or mitigate effects to below a level of significance, the DEIR should explain the reasons for determining why effects would not be significant [CEQA Guidelines, §§ 15063(c)(3)(C); 15063(c)(5); 15064(f)(2)].
- 4) Fire. The Project proposes a new residential development in a 'Very High' Fire Severity Zone (VHFSZ) (County of Los Angeles 2022). Development in a VHFSZ and wildland urban interface could increase fire risk, frequency, and intensity. The DEIR should discuss how the Project may impact biological resources, open space, natural areas, and adjacent conserved land as a result of introducing and intensifying land use in a VHFSZ. In addition, the DEIR should discuss if the Project would require fuel modification (e.g., thinning, trimming, and removal of understory or mulch layer), provide maps showing potential fuel modification zones, and discuss how fuel modification may impact biological resources. Fuel modification may result in additional habitat loss and have perpetual impacts on biological resources. If the Project may require fuel modification, CDFW recommends DRP require the Project applicant to design the Project with features such as block walls or other alternatives. Block walls, for example, may reduce the extent and amount of vegetation and habitat that may need to be removed. Also, if the Project may require irrigation in fuel modification zones, CDFW recommends DRP require the Project applicant to provide an

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irrigation plan such that water drains back into the development and not onto any adjacent open space, natural areas, and conserved lands. The DEIR should discuss how the Project has been designed to avoid or minimize impacts on biological resources resulting from potential fuel modification requirements.

- 5) Open Space and Natural Areas. According to the California Protected Areas Database Holdings dataset available in BIOS, the following protected areas are located adjacent to the Project site: Santa Clarita Woodlands Park, Ed Davis Park in Towsley Canyon, and Rivendale Ranch Open Space (CDFW 2022a). These and other unnamed open space and natural areas are managed by the Mountains Recreation and Conservation Authority, City of Santa Clarita, and Santa Monica Mountains Conservancy. The Project may encroach onto these lands and/or may impact these lands by increasing fire risk within the proposed development that can spread onto adjacent open space. Project-related fuel modification could also impact adjacent open space and natural areas.
 - a) Analysis and Disclosure. CDFW recommends the DEIR discuss the Project's potential impact on open space and natural areas resulting from Project-related construction and activities, ground-disturbance activities (e.g., mobilization, parking, staging, and access), vegetation removal, fuel modification, spread of invasive species, altered hydrology, and altered habitat conditions (e.g., microclimate, soils, and slope). The DEIR should disclose the amount of open space and natural areas impacted as a result of the proposed Project.
 - b) Avoidance and Setback. CDFW recommends the Project fully avoid encroaching onto open space/natural areas. Encroachment onto open space/natural areas creates an abrupt transition between two different land uses. Encroachment onto open space/natural areas could affect environmental and biological conditions and increase the magnitude of edge effects such as spread of non-native plants and pests (e.g., Argentine ants), fuel modification, and nighttime lighting. Edge effects can result in habitat type conversion (e.g., native to more non-native species) and reduce plant and wildlife species richness (Mitrovich et al. 2009). CDFW recommends DRP require the Project applicant to modify the Project so that impacts on open space/natural areas are completely avoided. The Project should be designed with effective setbacks adjoining open space/natural areas. The DEIR should include a discussion of how the chosen setback distance fully avoids encroachment onto open space/natural areas.
- 6) Streams and Associated Natural Communities. According to the U.S. Fish and Wildlife Service's (USFWS) [National Wetlands Mapper](#), multiple streams are located within the Project site (USFWS 2022). Buildout of the Project may impact streams and associated natural communities as a result of grading and development. Streams could be channelized or diverted underground. Streams could become impaired because of streambank erosion resulting from Project construction and Project buildout. Natural communities adjacent to streams could be removed or degraded through habitat modification (e.g., loss of water source, encroachment by the Project, edge effects leading to introduction of non-native plants).
 - a) Stream Delineation and Impact Assessment. The DEIR should provide a stream delineation, which should also identify culverts, ditches, and storm channels that may

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transport water, sediment, pollutants, and discharge into any rivers, streams, and lakes². The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification. In addition, the DEIR should disclose the total impacts (linear feet and/or acreage) including impacts resulting from fuel modification on any river, stream, or lake and associated natural communities.

- b) Avoidance and Setbacks. CDFW recommends the Project avoid impacts on streams and associated natural communities by avoiding or minimizing Project-related development adjacent to streams. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. CDFW recommends DRP require the Project applicant to modify the Project so that impacts on streams are avoided and/or minimized. The Project should be designed with effective setbacks adjoining streams and associated natural communities. The chosen setback distance should be disclosed in the DEIR so CDFW may assess potential impacts on biological resources.
- c) Mitigation. If avoidance is not feasible, the DEIR should include measures to fully compensate for impacts on streams and loss of associated natural communities. Higher mitigation should be provided to compensate for impacts on streams supporting rare, sensitive, or special status fish, wildlife, and natural communities. In addition, the DEIR should be conditioned to require the Project/Project applicant to submit a Lake and Streambed Alteration (LSA) Notification to CDFW pursuant to Fish and Game Code Section 1600 et seq. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW³. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2022c).
- 7) Coastal California Gnatcatcher (*Poliophtila californica californica*). The Project site may be within the coastal California gnatcatcher (gnatcatcher) range (Cooper et al. 2017; USFWS 2010). In addition, the Project site is adjacent to critical habitat for the gnatcatcher. Furthermore, based on review of aerial imagery, there appears to be vegetation consistent with coastal scrub within and around the Project site. Gnatcatchers are closely tied to coastal scrub vegetation for reproduction (USFWS 2010). During the non-breeding season, gnatcatchers may also occur in other nearby plant communities (USFWS 2010).

² "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

³ CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

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- a) Protection Status: Gnatcatcher is a California Species of Special Concern (SSC) and a species listed as threatened under the Endangered Species Act (ESA). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). As an ESA-listed species, gnatcatcher is considered an endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). Take under the ESA is more broadly defined than CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.
- b) Surveys. In preparation of the DEIR, CDFW recommends DRP require that a qualified biologist perform protocol-level surveys for gnatcatcher in order to determine if gnatcatcher is present. The qualified biologist should conduct surveys according to the [Coastal California Gnatcatcher \(*Polioptila californica californica*\) Presence/Absence Survey Guidelines](#) (USFWS 1997). The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997).
- c) Disclosure and Mitigation. The DEIR should discuss the Project's potential impacts on gnatcatcher and habitat. The DEIR should provide measures to avoid those impacts or measures to mitigate for impacts if avoidance is not feasible. If the Project would result in habitat loss, CDFW recommends the Project Applicant provide replacement habitat to ensure no net loss.
- 8) Crotch's bumble bee (*Bombus crotchii*). Based on a search of the California Natural Diversity Database (CNDDDB) in BIOS, there is a recent occurrence of Crotch's bumble bee within one mile of the Project site (CDFW 2022d)⁴. The Project site may support habitat for Crotch's bumble bee, which includes grasslands and scrub. The Project as proposed could grade and/or develop habitat that could support Crotch's bumble bee. The Project may result in temporal or permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee. In addition, Project ground-disturbing activities and vegetation removal may cause death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success.
- a) Protection Status. Crotch's bumble bee is listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted range and steep population declines make the species vulnerable to extirpation from the State (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, impacts to Crotch's bumble bee could require a mandatory finding

⁴ A lack of current occurrences for Crotch's bumble bee within and/or adjacent to the Project site is likely due to an absence of focused surveys and not necessarily that Crotch's bumble bee is not present. Until recently, focused surveys for Crotch's bumble bee were not required for projects.

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of significance by DRP [CEQA Guidelines, § 15065(a)(1)].

- b) Surveys and Disclosure. CDFW recommends DRP retain a qualified biologist familiar with the species to survey the Project site for Crotch's bumble bee and habitat. Surveys for Crotch's bumble bee should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). The DEIR should assess the Project's potential impact on Crotch's bumble bee, including impacts resulting from habitat loss.
 - c) Mitigation. The DEIR should include measures to first avoid impacts on Crotch's bumble bee. If the Project would impact Crotch's bumble bee and result in loss of habitat, CDFW recommends the DEIR provide measures to minimize direct impacts on Crotch's bumble bee and provide compensatory mitigation for loss of habitat.
- 9) Rare Plants. A qualified biologist should survey the entire Project site for rare plants in accordance with established protocol (see General Comment #3b). The qualified biologist should survey for species including, but not limited, to the following: San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*), a CESA-listed species; slender mariposa lily (*Calochortus clavatus* var. *gracilis*), a California Rare Plant Rank (CRPR) 1B.2 species; Plummer's mariposa lily (*Calochortus plummerae*), a CRPR 4.2 species; and Peirson's morning glory (*Calystegia piersonii*), a CRPR 4.2 species.

CDFW recommends DRP require the Project applicant to design the Project to fully avoid impacts on rare plants and habitat, especially those that are CESA and/or ESA-listed. The DEIR should discuss and show how the Project has been designed to fully avoid impacts. If impacts cannot be avoided, the DEIR should fully disclose where impacts would occur and how many plants and acres of habitat would be impacted. The DEIR should be conditioned to provide compensatory mitigation for loss of individual rare plants as well as acres of habitat.

- 10) Sensitive Natural Communities. A qualified biologist should map all natural communities within the Project site as well as areas subject to off-site impacts such as edge effects in accordance with established protocol (see General Comment #3b and 3c). The qualified biologist should identify and map natural communities including, but not limited, to the following: California walnut groves (*Juglans californica* Alliance); California sycamore woodlands (*Platanus racemosa* Alliance); Fremont cottonwood forest and woodland (*Populus fremontii* Alliance); oak forest and woodland (*Quercus* genus Alliance); and willow riparian woodland and forest (*Salix* genus Alliance).

The DEIR should fully disclose where impacts would occur and how many acres of natural communities would be impacted. The DEIR should be conditioned to provide compensatory mitigation for impacts on Sensitive Natural Communities (see General Comment #3a). Due to the local/regional rarity and significance, compensatory mitigation should be higher for impacts on Sensitive Natural Communities with a State Rarity Ranking of S1 or S2 and/or a Sensitive Natural Community with an additional ranking of 0.1 or 0.2.

- 11) Nesting Birds. The Project proposes to develop within or adjacent to open space and natural areas that likely supports nesting birds and raptors. Accordingly, the Project may impact nesting birds and raptors. Project activities occurring during the bird and raptor nesting

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season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.

- a) Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) Avoidance. CDFW recommends that measures be taken to avoid impacts on nesting birds and raptors. CDFW recommends the DEIR include a measure whereby the Project avoids ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
 - c) Minimizing Potential Impacts. If impacts on nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, CDFW recommends a qualified biologist conduct breeding bird and raptor surveys to identify nests occurring in the disturbance area and 100 feet from the disturbance area to the extent allowable and accessible. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no-disturbance buffer around active bird nests. For raptors, the no-disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on nesting birds, sensitivity of the area, and adherence to the no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.
- 12) Loss of Bird and Raptor Nesting Habitat. The Project proposes to develop within or adjacent to open space and natural areas that likely supports nesting birds and raptors.
- a) Analysis and Disclosure. CDFW recommends the DEIR discuss the Project's impact on nesting habitat. Edge effects and impacts due to fuel modification should also be discussed. The DEIR should disclose the acreage of nesting habitat that could be impacted and lost as a result of the proposed Project.
 - b) Minimizing Potential Impacts and Compensatory Mitigation. CDFW recommends the Project avoid and minimize development and encroachment onto nesting habitat. If avoidance is not feasible, CDFW recommends the DEIR provide compensatory mitigation for the loss of nesting habitat.
- 13) Bats. Bats may forage and roost in open space and natural areas in the vicinity of the Project area. Ground-disturbing activities and vegetation removal could impact bats and roosts. Extra noise, human activity, dust, ground vibrations, or the reconfiguration of large objects can disturb roosting bats which may have a negative impact on the animals.

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- a) Protection Status: 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). In addition, some bats are considered SSC.
 - b) Analysis and Disclosure: In preparation of the DEIR, CDFW recommends DRP require that a qualified bat specialist identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats.
 - c) Avoidance and Minimization. If the Project would impact bats, CDFW recommends the DEIR provide measures to avoid/minimize impacts on bats, roosts, and maternity roosts. The DEIR should incorporate mitigation measures in accordance with [California Bat Mitigation Measures](#) (Johnston et al. 2004).
- 14) Los Angeles County Significant Ecological Areas (SEAs). The Project site is located within the Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA). [Los Angeles County Significant Ecological Areas](#) are officially designated areas within Los Angeles County identified as having irreplaceable biological resources (LACDRP 2019). These areas represent the wide-ranging biodiversity of Los Angeles County and contain some of Los Angeles County's most important biological resources. The DEIR should discuss the Project's impact on the Santa Susana Mountains/Simi Hills SEA.

General Comments

- 1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency "shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures" (Pub. Resources Code, § 21081.6). CDFW recommends DRP provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

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- b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2022e);
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Botanical field surveys should be comprehensive over the entire Project area, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the project area. This usually involves multiple visits to the Project area (e.g., in early, mid, and late-season) to capture the floristic diversity at a level necessary to determine if special status plants are present;
- c) Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project area and within adjacent areas. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off site;

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- d) A complete and recent assessment of the biological resources associated with each habitat type in the Project area and within adjacent areas. CDFW's [California Natural Diversity Database](#) should be accessed to obtain current information on any previously reported sensitive species and habitat (CDFW 2022f). An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project area. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources. Please see [CNDDDB Data Use Guidelines – Why do I need to do this?](#) for additional information (CDFW 2011);
 - e) A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
 - f) A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project area and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol (CDFW 2022g). Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS; and,
 - g) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
- 4) Direct and Indirect Impacts on Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to adversely affect biological resources with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR;
 - b) A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem

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supporting those species impacted [CEQA Guidelines, § 15126.2(a)];

- c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat (if any) supported by the groundwater. Measures to mitigate such impacts should be included; and
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
- 5) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of the proposed Project;
 - b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document “shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project.” CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion; and,
 - c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends DRP select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends DRP consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR “shall” include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

Erica Gutierrez
Los Angeles County Department of Regional Planning
July 12, 2022
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- d) Where the Project may impact aquatic and riparian resources, CDFW recommends DRP select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the watercourse to alter its course of flow.
- 6) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and sensitive natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2022h). To submit information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022i). DRP should ensure data collected for the preparation of the DEIR be properly submitted, with all data fields applicable filled out.
- 7) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 8) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset 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, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.
- 9) Wildlife Friendly Fencing. Fencing could obstruct wildlife movement and result in wildlife injury or mortality due to impalement and entanglement (e.g., chain link fencing). If the Project would include temporary and/or permanent fencing, prior to preparation of the DEIR, CDFW recommends DRP require the Project applicant to provide wildlife friendly fencing designs. Fencing designs should be disclosed and evaluated in the DEIR for potential impacts on biological resources and wildlife movement. The DEIR should discuss how

Erica Gutierrez
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fencing proposed for the Project would minimize impacts on biological resources, specifically wildlife movement. CDFW supports the use of wildlife-friendly fencing. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value in order to protect biological resources, habitat, and wildlife movement. CDFW recommends [A Landowner's Guide to Wildlife Friendly Fences](#) for information wildlife-friendly fences (MFWP 2012).

- 10) Use of Native Plants and Trees. If the Project would include landscaping, CDFW recommends DRP require the Project applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2022). CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.
- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 12) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
 - a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of

Erica Gutierrez
Los Angeles County Department of Regional Planning
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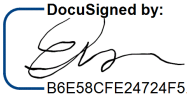
wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a “no net loss” of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.

- b) The Fish and Game Commission’s Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

Conclusion

We appreciate the opportunity to comment on the NOP for the Trails at Lyons Canyon Project to assist the Los Angeles County Department of Regional Planning in preparing the Project’s environmental document and identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov or (562) 619-2230.

Sincerely,

DocuSigned by:

B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Julisa Portugal, Los Alamitos – Julisa.Portugal@wildlife.ca.gov
Frederic (Fritz) Rieman, Los Alamitos – Frederic.Rieman@wildlife.ca.gov
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov

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CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
Office of Planning and Research
State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

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State Water Resources Control Board

Division of Drinking Water

July 6, 2022

Erica Gutierrez, AICP
Principal Planner, Subdivisions Section
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
egutierrez@planning.lacounty.gov

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TRAILS AT LYONS CANYON PROJECT IN THE CITY OF SANTA CLARITA, CALIFORNIA

Dear Ms. Gutierrez,

Thank you for including the State Water Resources Control Board (State Board), Division of Drinking Water (Division) in the environmental review process for the Trails at Lyons Canyon Project (Project). The project site is located west of the Old Road and south of Sagecrest Circle in the City of Santa Clarita, California. The project includes the development of 504 residential units in a mix of attached and detached dwelling units, affordable senior housing, associated infrastructure, a designated lot for a future fire station, three Los Angeles County Flood Control District lots, and approximately 164 acres of natural and improved open space. The project infrastructure also incorporates trails, a new water tank, and debris basins. The Division has reviewed the Notice of Preparation of a Draft Environmental Impact Report for this Project and has the following comments:

1. The proposed project includes the development of 504 residential units and a new water tank. Pursuant to Section 64556, Title 22 of the California Code of Regulations, an application for an amended domestic water supply permit shall be submitted to the State Board for the following:
 - a. Addition of a new distribution reservoir with a capacity of 100,000 gallons or greater.
 - b. Expansion of the existing service area by 20% or more of the number of service connections specified in the most recent permit or permit amendment.
2. The layouts of the new water pipelines must comply with the Water Main Separation requirements of Chapter 16, California Waterworks Standards of Title 22, California Code of Regulations.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

If you have any questions regarding this letter, please feel free to contact Mr. Bill Liang, P.E. at (818) 551-2024 or myself at (818) 551-2068.

Sincerely,

Jeff O'Keefe, P.E.
Southern California Section Chief
Division of Drinking Water
State Water Resources Control Board

CC: Los Angeles County
Department of Regional Planning
info@planning.lacounty.gov

Governor's Office of Planning and Research
State Clearing House
state.clearinghouse@opr.ca.gov

Daria Sarraf

From: Erica Gutierrez <EGutierrez@planning.lacounty.gov>
Sent: Wednesday, July 20, 2022 5:00 PM
To: Daria Sarraf; Kristin Starbird
Cc: Joshua Huntington; Alisha Winterswyk; Hannah Park; Aaron Clark; Jonathan Frankel; 'Ryan.Leaderman@hklaw.com'
Subject: FW: Notice of Preparation of EIR for The Trails at Lyons Canyon Project (Project No. 2021-001195-(5))

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Daria, for your records.

ERICA G. AGUIRRE, AICP (she/her/hers)

PRINCIPAL PLANNER, Subdivisions

From: Erica Gutierrez
Sent: Wednesday, July 20, 2022 4:58 PM
To: 'Ryan Nordness' <Ryan.Nordness@sanmanuel-nsn.gov>
Subject: RE: Notice of Preparation of EIR for The Trails at Lyons Canyon Project (Project No. 2021-001195-(5))

Thank you for letting us know, Mr. Ryan Nordness. With this email we would like to confirm this AB52 consultation outreach process is now closed.

Thank you again,

ERICA G. AGUIRRE, AICP (she/her/hers)

PRINCIPAL PLANNER, Subdivisions

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>
Sent: Wednesday, July 20, 2022 1:46 PM
To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>
Subject: Notice of Preparation of EIR for The Trails at Lyons Canyon Project (Project No. 2021-001195-(5))

CAUTION: External Email. Proceed Responsibly.

Dear Erica,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on June 22nd 2022. The proposed project is located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.

Kind regards,

Ryan Nordness
Cultural Resource Analyst
Yuhaaviatam of San Manuel Nation

Ryan Nordness

Cultural Resource Analyst

Ryan.Nordness@sanmanuel-nsn.gov

O:(909) 864-8933 Ext 50-2022

M:(909) 838-4053

26569 Community Center Dr Highland, California 92346



Daria Sarraf

From: Sarajian, Kylee@DOC <Kylee.Sarajian@conservation.ca.gov>
Sent: Wednesday, July 27, 2022 9:52 AM
To: OPR State Clearinghouse; OLRA@DOC; Perez, Jan@DOC; Erica G. Aguirre
Cc: Foreshee, Blake@DOC
Subject: CalGEM Letter to Los Angeles County Department of Regional Planning SCH 2022060346
Attachments: SCH 2022060346 Trails at Lyons Canyon Project.pdf

CAUTION: External Email. Proceed Responsibly.

Hello,

Please see attached CSWR Report and contact Mr. Blake Foreshee Blake.Foreshee@conservation.ca.gov should you have any questions.

Thank you,



Kylee Sarajian

Office Technician | California Geologic
Energy Management Division

California Department of Conservation

195 S Broadway, Suite 101, Orcutt, CA 93455

P: (805) 937-7246

E: kylee.sarajian@conservation.ca.gov



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July 15, 2022

VIA EMAIL

Ms. Erica Gutierrez
 Los Angeles County Department of Regional Planning
 320 W Temple St # 13th Floor
 Los Angeles, CA 90012
egutierrez@planning.lacounty.gov

Dear Ms. Gutierrez:

TRAILS AT LYONS CANYON PROJECT, NOP - Notice of Preparation of a Draft EIR, STATE CLEARINGHOUSE NO. 2022060346.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project received June 16, 2022. CalGEM provides the following comments regarding the Trails at Lyons Canyon Project.

1. With the mission of safeguarding public health and protecting the environment, CalGEM administers regulations and procedures pertaining to all oil and gas wells on California public and private land and offshore. Operators must obtain CalGEM approval and permits for a variety of activities, including drilling, reworking, and plugging and abandoning oil wells. Wells must be constructed and maintained in accordance with CalGEM regulations. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. This includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any re-abandonment work.

2. The project boundary encompasses one known plugged and abandoned oil well within the Lyon Canyon (abandoned) Oil Field:

API	0403706017
Lease	Ayers
Well Number	1
Type	Dry Hole
Status	Plugged & Abandoned

State of California Natural Resources Agency | Department of Conservation

Northern District

Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673
 Sacramento Office and Mail: 715 P Street, MS 1804, Sacramento, CA 95814 | T: (916) 322-1110 | F: (916) 445-3319
 Ventura Office: 1000 S. Hill Road, Suite 116, Ventura, CA 93003 | T: (805) 937-7246 | F: (805) 654-4765
 Ventura Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455
conservation.ca.gov

Ms. Erica Gutierrez

July 15, 2022

Several wildcat wells exist in the surrounding area and may not be accurately mapped. CalGEM's district office shall be notified of any oil well found during development activities. Please visit CalGEM's website to view oil and gas well locations at <https://maps.conservation.ca.gov/doggr/wellfinder>

3. Prior to development activities near oil and gas wells, please contact CalGEM for a review and recommendations. Public Resources Code (PRC) section 3208.1 establishes well re-abandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

CalGEM categorically advises against building over, or in any way impeding access to oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

There are no guarantees a well abandoned in compliance with current CalGEM requirements as prescribed by law will not start leaking in the future. Any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges that wells plugged and abandoned to the most current CalGEM requirements, as prescribed by law, have a lower probability of leaking in the future. However, there is no guarantee that such abandonments will not leak.

PRC section 3208.1 gives CalGEM the authority to order and/or permit the re-abandonment of any well where there is reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

- a) **The property owner** - If the well was plugged and abandoned in conformance with CalGEM requirements at the time of plugging and abandonment, and its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the

Ms. Erica Gutierrez

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well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

- b) **The person or entity causing construction over or near the well** - If the well was plugged and abandoned in conformance with CalGEM requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
- c) **The party or parties responsible for disturbing the integrity of the abandonment** - If the well was plugged and abandoned in conformance with CalGEM requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. California Code of Regulations (CCR) section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e., casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start. CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

- a) To ensure that present and future property owners are aware of 3(a) the existence of all wells located on the property, and 3(b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

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July 15, 2022

- b) CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

Thank you for considering CalGEM's comments. If you have any questions, please contact the Northern District office at (805) 937-7246 or via email at CalGEMNorthern@conservation.ca.gov

Sincerely,

Miguel Cabrera

Miguel Cabrera
Northern District Deputy

BF:bw:ks

cc: Chrono
CEQA
CEQA HQ
Jan Perez
STATE CLEARINGHOUSE
OLRA



July 7, 2022

Erica Gutierrez, AICP, Principal Planner
County of Los Angeles, Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012
Phone (213) 974-6411
E-mail: egutierrez@planning.lacounty.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Trails at Lyons Canyon [SCAG NO. IGR10653]

Dear Erica Gutierrez,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Trails at Lyons Canyon (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Trails at Lyons Canyon in Los Angeles County. The proposed project includes the development of a mix of attached and detached 504 residential units and affordable senior housing, associated infrastructure, a fire station, three LA County Flood Control District lots, and 164 acres of open space on a 233.18-acre site.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Annaleigh Ekman, Assistant Regional Planner, at (213) 630-1427 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

SOUTHERN CALIFORNIA
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**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
TRAILS AT LYONS CANYON [SCAG NO. IGR10653]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted County of Los Angeles Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	10,407,326	10,899,849	11,173,987	11,673,937
Households	6,333,458	6,902,821	7,170,110	7,633,451	3,471,759	3,749,346	3,884,871	4,119,336
Employment	8,695,427	9,303,627	9,566,384	10,048,822	4,838,458	5,059,615	5,171,618	5,382,235

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



July 12, 2022

Ms. Erica Gutierrez, Principal Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Dear Ms. Gutierrez:

**THE TRAILS AT LYONS CANYON PROJECT
NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
PROJECT NO. 2021-001195-(5)
REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the June 2022 Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) for the Trails at Lyons Canyon Project (Project). The proposed Project is located in an undeveloped area west of The Old Road and south of Sagecrest Circle in an unincorporated Los Angeles County area community of Stevenson Ranch. The proposed Project is a new residential development consisting of approximately 504 residential units in a mix of attached and detached dwelling units, affordable senior housing with associated infrastructure, a future fire station lot, three Los Angeles County Flood Control District lots, and approximately 164 acres of natural and improved open space.

The proposed Project is located within the service area of the Department's Santa Clarita Valley Sheriff's Station (Station). The proposed Project may impact the Station's law enforcement services. Due to the cumulative impacts of recently approved projects within the Santa Clarita Valley, the proposed Project's building programs including the residential and commercial use components, and the anticipated growth in residents, employees, visitors, daytime, and evening population will add to the increase in the level of service required by the Station. The Draft EIR should clearly identify the anticipated population increases so that the Station can properly assess the impacts to their services. To date, the Station is currently understaffed. However, assigning additional law enforcement

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personnel to the Station to meet an acceptable service ratio will require modification of the law enforcement service contract, additional support personnel and equipment assets. These requirements for additional law enforcement personnel and/or support staff will need to be evaluated and addressed to resolve the cumulative impacts. The Project Applicant will be required to pay all applicable development and law enforcement mitigation fees associated with the Project.

The Department recommends that the principles of Crime Prevention through Environmental Design (CPTED) are incorporated in the design plans. The goal of CPTED is to reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior, while encouraging the legitimate use of the site. The overall tenets of CPTED include defensible space, territoriality, surveillance, lighting, landscaping, and physical security. The Station recommends installation of security cameras to reduce opportunities for criminal activities. With advanced notice, Station personnel can be available to discuss CPTED with the Project developer.

A Construction Traffic Management Plan should also be established as part of the proposed Project to address construction-related traffic congestion and emergency access issues. If temporary lane closures are necessary for the installation of utilities, emergency access should be maintained at all times. Flag persons and/or detours should be provided as needed to ensure safe traffic operations, and construction signs should be posted to advise motorists of reduced construction zone speed limits.

The Station remains concerned that the continued growth and intensification of multi-use land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. It is reasonable to expect that continued development will lead to a significant increase in the demand for law enforcement services. Meeting such demand will require additional resources, including law enforcement service personnel, support personnel, and attendant assets, such as patrol vehicles, support vehicles, communications equipment, weaponry, office furnishings/equipment, etc.

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Ms. Gutierrez

- 3 -

July 12, 2022

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
County Health Officer

MEGAN McCLAIRE, M.S.P.H.
Chief Deputy Director

LIZA FRIAS, REHS
Director of Environmental Health

BRENDA LOPEZ, REHS
Assistant Director of Environmental Health

5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5374 • FAX (626) 813-3000

www.publichealth.lacounty.gov/eh/

July 12, 2022

TO: Joshua Huntington
Supervising Regional Planner
Department of Regional Planning

Attention: Erica Gutierrez

FROM: Charlene Contreras 
Director, Toxicology & Environmental Assessment Branch
Department of Public Health

**SUBJECT: ENVIRONMENTAL PLAN – NOTICE OF PREPARATION
CASE: RPPL2021003071
PROJECT: TR 83301**

Thank you for the opportunity to review the Notice of Preparation for the above referenced project Vesting Tentative Map 083301, also known as “The Trails at Lyon Canyon,” which proposes a 15 lot Subdivision for condo purposes, including affordable senior housing permit. In addition, there will be the following requests: Zone Change, Development Program with Zone Change, Density Controlled Development CUP, Residential Uses in a C3 Zone, Oak Tree Permit, Onsite Grading exceeding 100,000 cy CUP, HMA Development, and SEA CUP. The project is proposing to connect to a public water system and to connect to the existing public sewer system.

Public Health agrees with the determination of the Lead Agency and does not foresee any significant impacts given the proposed plans. The applicant shall abide by the requirements contained in Title 12, Section 12.08. Noise Control Ordinance for the County



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July 12, 2022

Page 2 of 2

of Los Angeles (reference available at municode.com). The sections in Title 12 that apply to this project include but are not limited to: 12.08.390 Exterior Noise Standards, 12.08.440 Construction Noise and 12.08.530 Residential Air-Conditioning.

If you have any other questions or require additional information, please contact Makkaphoeum Em of Public Health, Environmental Hygiene Program at (626) 430-5201 or mem@ph.lacounty.gov.

CC:me

DPH_NOP COMMENTS_RPPL2021003071_07.12.2022

SKYE PATRICK
Library Director



July 14, 2022

Erica Gutierrez, AICP, Principal Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

**COMMENTS FOR THE TRAILS AT LYONS CANYON PROJECT
PROJECT NO. 2021-001195-(5)**

Dear Erica Gutierrez:

This is to provide comments regarding the Trails at Lyons Canyon Project which proposes the development of 504 residential units and approximately 164 acres of natural and improved open space, located West of The Old Road and South of Sagecrest Circle, Santa Clarita. Attached is a report of LA County Library's analysis of the development and the projected impact to services.

If you have any questions or need additional information, please contact Elsa Muñoz at (562) 940-8450 or EMunoz@library.lacounty.gov.

Very best,

A handwritten signature in black ink that reads 'Patrick'.

Skye Patrick
County Librarian

SP:YDR:GR:EM

c: Grace Reyes, Administrative Deputy, LA County Library
Jesse Walker-Lanz, Assistant Director, Public Services, LA County Library
Ting Fanti, Departmental Finance Manager, Budget and Fiscal Services, LA County Library

[https://lacounty.sharepoint.com/sites/publiclibrary/docs/staffservices/Documents/EIR/Lyons Canyon Project/DRP/Lyons Canyon Project response.doc](https://lacounty.sharepoint.com/sites/publiclibrary/docs/staffservices/Documents/EIR/Lyons_Canyon_Project/DRP/Lyons_Canyon_Project_response.doc)

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**LA COUNTY LIBRARY
COMMENTS FOR THE TRAILS AT LYONS CANYON PROJECT**

LA County Library evaluated the Lyons Canyon project located west of The Old Road and south of Sagecrest Circle, Santa Clarita, CA.

The project area is being serviced by the Stevenson Ranch Library, located at 25950 The Old Road, Stevenson Ranch, CA 91381, a facility with 11,551 sq. ft. of space, a collection of 52,662 books, magazines, and media, and 21 computers. LA County Library service level guidelines require a minimum of 0.50 gross square foot of library facility space per capita, 2.75 items (books and other library materials) per capita, and 1.0 public access computer per 1,000 people served.

Stevenson Ranch Library is a community library and based on these guidelines does not currently meet the minimum requirements for the population of the service area. The current deficiency is 5,275 collection items.

The proposed project involves the construction of a total of 504 residential units, with an estimated population increase of 1,578. This project will have a significant impact on library services since it will create a demand for additional materials and public access computers and will affect the library's capacity to serve the residents of the area.

We estimate the total increased service cost related to the proposed project to be approximately \$125K which is illustrated by the following chart:

Trails at Lyons Canyon Project Environmental Impact Report	Impact Per Capita (population of 1,578)	Cost	Total Cost
a. Building	0	\$1,000 sq. ft	0
b. Land (4:1 land to building ratio)	0	\$23 (Library Planning Area 1)	0
c. Collections	4,340	\$28	\$ 121,520
d. Computer	2	\$1,800	\$ 3,600
Total			\$125,120

In efforts to minimize the impact of residential projects on library services LA County Library collects a one-time Library Facilities Mitigation Fee (Developer Fee) at the time building permits are requested for all new residential dwellings located within the unincorporated areas of the County served by the LA County Library. The current Developer Fees are as follows, by Library Planning Area, these fees are subject to a CPI increase effective July 1:

FY 2022-23 Library Facilities Mitigation Fee Schedule

Planning Area	Fee per Dwelling Unit
Area 1 - Santa Clarita Valley	\$1,096
Area 2 - Antelope Valley	\$1,061
Area 3 - West San Gabriel Valley	\$1,108
Area 4 - East San Gabriel Valley	\$1,094
Area 5 – Southeast	\$1,097
Area 6 – Southwest	\$1,105
Area 7 - Santa Monica Mountains	\$1,099

The proposed project is in the Library's Planning Area 1 (Santa Clarita Valley), and the mitigation fee for this area is \$1,096 per residential unit for FY 2022-2023. The total mitigation fee for this project is \$552,384 ($\$1,096 \times 504$ units).

LA County Library also collects an annual special tax which is levied on parcels within 10 cities (Cudahy, Culver City, Duarte, El Monte, La Cañada Flintridge, Lakewood, Lomita, Lynwood, Maywood, and West Hollywood) and unincorporated areas serviced by LA County Library. The Special Tax Rate for FY 2022-23 is \$33.20 per parcel.



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION


"Parks Make Life Better!"

Norma E. Garcia, Director

Alina Bokde, Chief Deputy Director

July 14, 2022

TO: Erica Gutierrez
Department of Regional Planning

FROM: Loretta Quach 
Planning and CEQA Section

SUBJECT: **RPPL2021003071**
TR 83301
Notice of Preparation of a Draft Environmental Impact Report

The Notice of Preparation (NOP) of a Draft Environmental Impact Report for the proposed project has been reviewed for potential impacts on the facilities of the Department of Parks and Recreation (DPR). Please update the following to include Los Angeles County multi-use trails:

(Page 4, Checklist Issue – Recreation)

The project site shares a property boundary with the City of Santa Clarita's Riverdale Park and Open Space facility. A bikeway described in the County Master Plan of Bikeways is designated along The Old Road and Regional multi-use trails described in the County Masterplan of Trails are designated within the development with connectivity to existing City and Mountains Recreation and Conservation Authority trails. Evaluation of recreation impacts will be conducted.

The Department of Parks and Recreation is requesting twenty-foot wide multi-use (equestrian, hiking, and mountain biking) trail easements be dedicated to the County over existing regional trails within the proposed open space lot no. 22, open space lot no. 23, and lot no. 20 for continued public trail connectivity to both City and Mountains Recreation and Conservation Authority trails.

Thank you for including this Department in the review of this document. If you have any questions, please contact me at lquach@parks.lacounty.gov or (626) 588-5305 or Robert Ettleman at rettleman@parks.lacounty.gov or (626) 588-5323



COUNTY OF LOS ANGELES FIRE DEPARTMENT

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July 15, 2022

Erica Gutierrez, Planner
Department of Regional Planning
Planning Department
320 W. Temple Street
Los Angeles, CA 90012

Dear Ms. Gutierrez:

The County of Los Angeles Fire Department's Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division have reviewed the following case **RPPL2021003071**.

Vesting Tentative Map 083301 - The Trails at Lyons Canyon - 15 lot Subdivision for condo purposes, including affordable senior housing permit. In addition, there will be the following requests: Zone Change, Development Program w/Zone Change, Density Controlled Development CUP, Residential Uses in a C3 Zone, Oak Tree Permit, Onsite Grading exceeding 100,000 cy CUP, HMA Development, and SEA CUP, RPPL2021003071

The following are their comments:

PLANNING DIVISION:

We will reserve our comments for the Draft EIR.

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

LAND DEVELOPMENT UNIT:

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

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

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VERNON
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

Erica Gutierrez, Planner
July 15, 2022
Page 2

When involved with subdivision in unincorporated areas within the County of Los Angeles, Fire Department requirements for access, fire flows and hydrants are being addressed during the subdivision tentative map stage with ongoing review of the plans.

Specific fire and life safety requirements for the construction phase will be addressed at the Fire Department building plan check review. There may be additional fire and life safety requirements during this time.

The Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

This property is located in an area described by the Forester and Fire Warden as being in a Fire Hazard Severity Zone. The development of this project must comply with all Fire Hazard severity Zone code and ordinance requirements for fuel modification. Specific questions regarding fuel modification requirements should be directed to the Fuel Modification Office at (626) 969-2375.

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

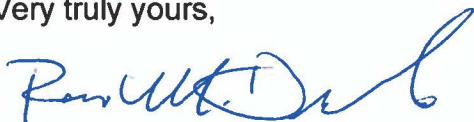
For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comments or requirements for the project at this time. [Note: HHMD will clear the project after "Active Holds" are removed from this project record]

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or Jennifer.Levenson@fire.lacounty.gov if you have any questions.

Very truly yours,



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

RMD:pg

From: Jose Cruz <JoCruz@dpw.lacounty.gov>
Sent: Tuesday, July 19, 2022 11:26 AM
To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>
Cc: Toan Duong <TDUONG@dpw.lacounty.gov>
Subject: FW: Trails at Lyons Canyon Project NOP TR83301

Hello Erica,

FYI-Please see the email below and the attached file for your reference.

Thank You,

Jose D. Cruz
Senior Civil Engineering Assistant
Los Angeles County Public Works
Office#: (626) 458-4921

*Public Works reopened its offices to the public. Our HQ office hours are Monday through Thursday, 7 a.m. to 5 p.m. **Masks and distancing will be required** of all visitors and staff. You can avoid waiting in line by scheduling a virtual appointment now. Click [here](#) to schedule yours!*

From: Jennifer Rodriguez <JeRodriguez@dpw.lacounty.gov>
Sent: Tuesday, July 19, 2022 10:36 AM
To: Toan Duong <TDUONG@dpw.lacounty.gov>
Cc: Nilda Gemeniano <NGEMENIA@dpw.lacounty.gov>
Subject: Trails at Lyons Canyon Project NOP

Hi Toan,

EPD has reviewed the NOP of the subject project and provides the following comments. This project is located in the Stevenson Ranch area.

Building and Safety

- The Los Angeles County Building Code, Section 110.4 requires that buildings or structures adjacent to or within 300 feet (60.96 m) of active, abandoned or idle oil or gas well(s) be provided with methane gas protection systems. If the project site contains or lies within 300 feet of active, abandoned or idle oil or gas wells, this issue should be addressed and mitigation measure provided. Contact Environmental Programs Division at (626) 458-2193 for issuance of necessary permits.

Underground Storage Tanks / Industrial Waste / Stormwater

- Should any operation within the subject project include the construction, installation, modification or removal of underground storage tanks (Los Angeles County Code [LACC] Title 11, Division 4)], industrial waste treatment or disposal facilities, and/or storm water treatment facilities, Environmental Programs Division

must be contacted for required approvals and operating permits. Specific industry types will also be subject to registration and inspections related to implementation of best management practices to prevent stormwater related pollution (LACC Title 12, Chapter 12.80). Visit pw.lacounty.gov/epd/Stormwater/inspection.cfm online or contact Environmental Program Division at (626) 458-3517 for more permit information.

If you have any questions, please contact Nilda Gemeniano at (626) 418-1550.

Best,

Jennifer Rodriguez

Senior Civil Engineering Assistant

Los Angeles County Public Works

(626) 300-2624

**NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
AND PUBLIC SCOPING MEETING**

DATE: Thursday, June 16, 2022

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report in Compliance with Title 14, Section 15082(a) of the California Code of Regulations.

The County of Los Angeles (“County”) is the lead agency pursuant to the California Environmental Quality Act (“CEQA”) and intends to prepare an Environmental Impact Report (“EIR”) for the proposed Trails at Lyons Canyon Project identified below. The County has prepared this Notice of Preparation (“NOP”) to provide Responsible and Trustee Agencies and other interested parties with information describing the Project and to identify its potential environmental effects pursuant to State requirements.

AGENCIES: The County requests your agency’s views on the scope and content of the environmental information relevant to your agency’s statutory responsibilities in connection with the proposed project, in accordance with Title 14, Section 15082(b) of the California Code of Regulations. Your agency may need to use the EIR prepared by the County when considering any permits that your agency must issue, or other approvals that your agency must give for the project to proceed.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the project.

PROJECT & PERMIT(S): The Trails at Lyons Canyon Project, Project No. 2021-001195-(5), Case No(s). Vesting Tentative Tract Map No. 83301 (RPPL 2021003061), Conditional Use Permit No. RPPL 2021003113, Housing No. RPPL 2021003105, Zone Change No. RPPL2021003163, Oak Tree Permit No. RPPL2021003070, and Environmental Assessment No. 2021003071.

PROJECT APPLICANT: Adam Browning, President/C.E.O., NUWI Lyons Canyon, LLC, 2001 Wilshire Boulevard, Suite 401, Santa Monica, CA 90403.

NOTICE OF PREPARATION AND SCOPING MEETING

June 16, 2022

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PROJECT LOCATION: West of The Old Road and South of Sagecrest Circle, Santa Clarita APNs: 2826-022-026, -027, -035; 2826-023-014; 2826-041-039

The approximately 233-acre project site is located in the northern foothills of the Santa Susana Mountains in unincorporated Los Angeles County; refer to **Figure 1, Regional Location and Vicinity Map**. The project site is contiguous to The Old Road on the east; west of Interstate 5 (I-5); just south of Sagecrest Circle; and north of Calgrove Boulevard near Ed Davis Park in Towsley Canyon.

PROJECT DESCRIPTION: The project includes the development of 504 residential units in a mix of attached and detached dwelling units, and affordable senior housing, subdivided into 23 lots within 233.18 acres, associated infrastructure, a designated lot for a future fire station, three Los Angeles County Flood Control District lots, and approximately 164 acres of natural and improved open space. The portions of the project site developed with residential uses would be situated in the northerly portion of the project site on approximately 40.33 acres, adjacent to The Old Road, and the natural and improved open space would predominantly be located within the westerly and southerly portions of the project site. The proposed dwelling units would be located within up to six planning areas, proximate to each other and connected by internal driveways and sidewalks. These internal driveways would connect to proposed "A" and "B" Streets. Proposed "A" and "B" Streets would provide public access throughout the developed portions of the project site (i.e., the northeasterly portion of the site) from two access points on The Old Road. Project infrastructure would also incorporate, trails, a new water tank, and debris basins. The project would require up to 1,460,000 cubic yards of cut and 1,260,000 cubic yards of fill for a total of 2,720,000 cubic yards of grading with 1,345,000 cubic yards of over excavation. There is expected to be 15 percent shrinkage on the over excavation for a total of 200,000 cubic yards. The total earth movement will be 2,805,000 cubic yards. The grading will balance onsite.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT

Based on a preliminary review of the proposed project consistent with Section 15060 of the State CEQA Guidelines, the County has determined that an EIR should be prepared for this project. In addition, consistent with Section 15082 of the State CEQA Guidelines, the County has identified the following probable environmental effects of the project listed in **Table 1**, which will be addressed in the EIR for this project:

Table 1
Environmental Analysis Overview

Checklist Issue	Topics for Analysis
Aesthetics	A significant ridgeline is designated in the southern portion of the project site, and not proposed to be disturbed. In addition, existing regional public trails for walking, hiking, and mountain biking are located to the south and northwest of the Project Site. These trails are part of the Ed Davis Park and Towsley Canyon and the City of Santa Clarita’s Riverdale Park and Open Space. Evaluation of the project’s impact on visual quality; scenic vistas; scenic resources; visual character from public viewpoints; and light and glare would be conducted.
Agriculture and Forestry Resources	No impacts are anticipated as the project site and most surrounding areas do not contain agricultural uses or related operations and no forest land or forestry uses. Evaluation of agriculture and forestry resources will be included within the EIR.
Air Quality	Evaluation of air pollutant emissions generated by project construction and operation would be conducted. A qualitative analysis of odor impacts based on the project land uses and site compatibility will be conducted. A refined construction health risk assessment (HRA) to quantitatively evaluate construction-period toxic air contaminant impacts to air quality sensitive receptors in the vicinity of the project would be conducted. A qualitative analysis of operational toxic air contaminant impacts would be conducted. Further, an operational HRA to evaluate the mobile source air toxic emissions from vehicles on I-5 impacting the project’s proposed residential uses will be conducted.
Biological Resources	The project site is located within the Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA). The project site is relatively undisturbed for much of the property, with species that may qualify as protected trees under the Los Angeles County SEA Ordinance Implementation Guide and the Los Angeles County Oak Tree ordinance. Evaluation of potentially sensitive natural communities, special-status species, federally or state protected wetlands, wildlife movement corridors, oak woodlands, and conflict with local policies, including, but not limited to, Wildflower Reserve Areas, Los Angeles County Oak Tree ordinance, and SEA ordinance would be conducted. Compliance with the SEA compatibility criteria and the Los Angeles County Oak Tree ordinance and applicable requirements for tree protection and removal would be analyzed.
Cultural Resources	Evaluation of historical resources, archaeological resources, and the potential discovery of human remains would be conducted.
Energy	Evaluation of the project’s anticipated construction and operation energy needs would be conducted.

NOTICE OF PREPARATION AND SCOPING MEETING

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Geology and Soils	Evaluation of strong seismic ground shaking, ground failure including liquefaction and lateral spreading, landslides, soil erosion and loss of topsoil, subsidence or collapse, expansive soil, and paleontological resources would be conducted.
Greenhouse Gas Emissions	Evaluation of project greenhouse gas emissions created by project construction and operation would be conducted.
Hazards and Hazardous Materials	Evaluation would include analysis of significant hazardous materials or waste, adopted emergency response plan or emergency evacuation plan, and the Very High Fire Hazard Severity Zone within which the project site is located.
Hydrology and Water Quality	Evaluation of water quality standards or waste discharge requirements, groundwater supplies or recharge, drainage, project water features, and runoff would be conducted.
Land Use and Planning	Consistency with General Plan and area land use plan and zoning code, including SEA, hillside management, inclusionary housing ordinance, and oak tree ordinance, would be conducted.
Mineral Resources	No impacts are anticipated as the project site is not located within a known mineral resources area and no mineral resources are known to occur on the project site. Evaluation of mineral resources will be included in the EIR.
Noise	Evaluation of project generated noise and vibration impacts, including changes in ambient noise levels, generated by project construction and operation would be conducted. In addition, an assessment of whether the project would exceed General Plan and noise ordinance standards will be included in the EIR.
Population and Housing	The project would result in the development of 504 dwelling units consisting of a mix of single-family dwelling units and affordable senior dwelling units on a site that currently does not include any occupied dwelling units. Evaluation of population, housing, and employment impacts would be conducted.
Public Services	The project will be evaluated for fire and police impacts. The project would generate a number of new students. Evaluation of school impacts would be conducted. In addition, evaluation of parks and library service will be conducted.
Recreation	The project site shares a property boundary with the City of Santa Clarita's Riverdale Park and Open Space facility. A bikeway described in the County Master Plan of Bikeways is designated along The Old Road. Evaluation of recreation impacts will be conducted.
Transportation	Evaluation of transportation impacts based on vehicle miles traveled, site access, circulation, and emergency access would be conducted.
Tribal Cultural Resources	Records searches of the South Central Coastal Information Center (SCCIC) and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) will be conducted, and the County will consult with local tribes for Assembly Bill (AB) 52 compliance obligations. Evaluation of

NOTICE OF PREPARATION AND SCOPING MEETING

June 16, 2022

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Utilities and Service Systems	tribal cultural resources would be included in the EIR. Evaluation of construction and operation impacts to water supply, sewer and wastewater treatment capacity, storm water drainage, and solid waste would be conducted. A water supply assessment is required.
Wildfire	The project site is located within a Very High Fire Hazard Severity Zone and evaluation of wildfire emergency response and risk would be conducted. In addition, a discussion of exposure of people to significant risk of loss or injury resulting from wildland fires will be provided.
Mandatory Findings of Significance	The EIR will analyze whether the project would substantially reduce the quality of fish and wildlife habitat or cause fish or wildlife populations to be threatened or eliminated. An assessment of impacts to rare or endangered plant or animal species will occur in the EIR. Paleontological resources will be evaluated within the EIR, including the potential that history or prehistory would be eliminated. The EIR will analyze whether the project will or will not have environmental effects that cause substantial adverse effects on human beings. The project does not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. The project’s cumulative environmental impacts will be analyzed.

NOTICE OF SCOPING MEETING: The County will conduct a virtual (online) public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the EIR.

All interested parties are invited to attend the virtual scoping meeting to assist in identifying issues to be addressed in the EIR. The scoping meeting will include a brief presentation of the proposed project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR. The Scoping Meeting will be held virtually on **Wednesday, June 29, 2022, at 6 p.m.** (Pacific Time). See details below:

VIRTUAL SCOPING MEETING:	<p>Wednesday, June 29, 2022</p> <p>6:00 p.m. (Pacific Time) - Via Zoom Meeting</p> <p>Please click the link below to join the webinar:</p> <p>https://us06web.zoom.us/j/86390472095</p>
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Translation in other languages can be made available at the meeting upon request. Please submit translation requests at least seven business days in advance of the scheduled meeting to info@planning.lacounty.gov.

NOTICE OF PREPARATION AND SCOPING MEETING

June 16, 2022

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PUBLIC REVIEW PERIOD: The County has determined to make this NOP available for public review and comment pursuant to Title 14, section 15082(b) of the California Code of Regulations. The comment period for the NOP begins on Thursday, June 16, 2022 and ends on Friday, July, 15, 2022.

Written comments must be received or postmarked by Friday, July 15, 2022.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the EIR.

Please direct all written comments to the following address:

Erica Gutierrez, AICP
County of Los Angeles
Department of Regional Planning
Principal Planner, Subdivisions Section
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: (213) 974-6411
Fax: (213) 626-0434
egutierrez@planning.lacounty.gov

Comments submitted on the NOP will be addressed in the Draft EIR.

DOCUMENT AVAILABILITY: The NOP is available for public review at the Los Angeles County Department of Regional Planning's ("Regional Planning's) website at:

<https://planning.lacounty.gov/ceqa/notices>

The public is also encouraged to visit the Regional Planning's website to review the project information at <https://planning.lacounty.gov/case/view/2021-001195>.

Thank you for your participation in the environmental review of this project.

NOTICE OF PREPARATION AND SCOPING MEETING

June 16, 2022

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Si necesita más información por favor llame al (213) 974-6411.

If oral language interpretation for non-English speaking persons is desired or if a special accommodation is desired pursuant to the Americans with Disabilities Act, please make your request by phone or email to the Secretary of the Regional Planning Commission at 213-974-6409 or info@planning.lacounty.gov 72 business hours prior to the meeting. Thank you.

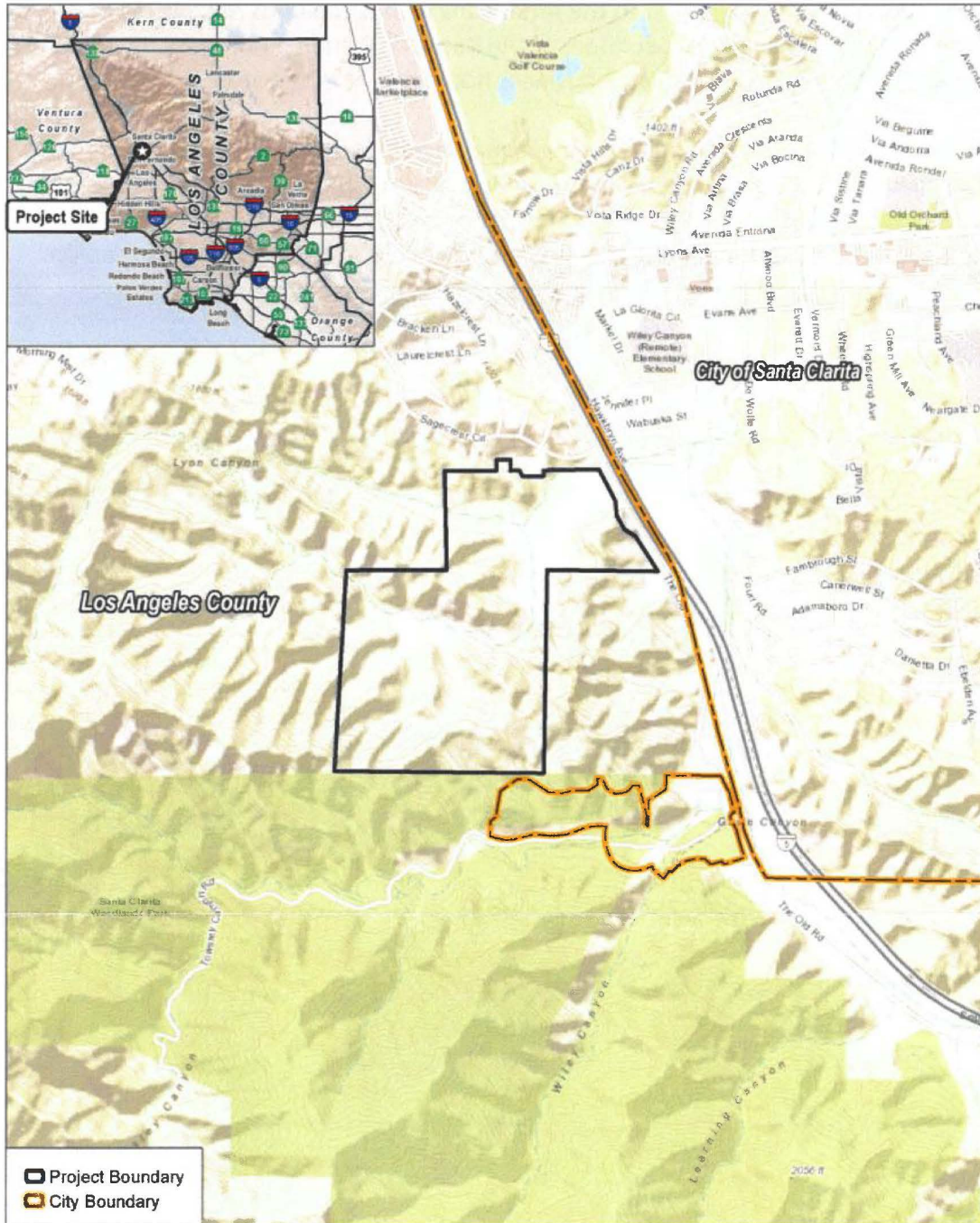
Si desea una interpretación oral para personas que no hablan inglés o una adaptación especial conforme a la Ley Americanos con Discapacidades, por favor haga su solicitud por teléfono o correo electrónico a la Secretaría de la Comisión de Planificación Regional llamando al 213-974-6409 o dirigiéndose a info@planning.lacounty.gov 72 horas hábiles antes de la reunión. Gracias.

비영어권 사람들을 위한 구두 통역을 원하거나 미국 장애인법에 따라 특별한 숙소를 원하는 경우 회의 시작 72시간 전에 지역 계획 위원회 장관에게 213-974-6409 또는 info@planning.lacounty.gov 로 전화 또는 이메일을 통해 요청하십시오. 감사합니다.

如果需要為非英語人士提供口語翻譯或根據美國殘疾人法案需要提供特殊便利，請在會議前 72

個工作小時內通過電話或電子郵件向區域規劃委員會秘書提出請求，電話號碼為 213-974-6409，電郵地址為 info@planning.lacounty.gov。謝謝。

Figure 1 Regional Location and Vicinity Map



SOURCE: ESRI World Topographic Map



FIGURE 1
Regional Location and Vicinity Map
Trails of Lyons Canyon Project

From: Albert Lew <albert.lew@lacity.org>
Sent: Monday, July 25, 2022 12:15 PM
To: Erica Gutierrez
Subject: CEQA letter completed: The Trails at Lyons Canyon Project - NOP of dEIR & Public Scoping Meeting
Attachments: 07182022_The Trails at Lyons Canyon Project - NOP of dEIR & Public Scoping Meeting.pdf

CAUTION: External Email. Proceed Responsibly.

Please find attached the official response. A hard copy will be sent to your office when normal operations resume.

Regards,

Albert C. Lew, P.E.

Wastewater Engineering Services Division (WESD)

Bureau of Sanitation

Department of Public Works

City of Los Angeles

Phone: 323.342.6207

Fax: 323.342.6210



-----Confidentiality Notice-----

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CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

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ALEXANDER E. HELOU
ASSISTANT DIRECTORS

TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

—
**WASTEWATER ENGINEERING
SERVICES DIVISION**
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

July 18, 2022

Ms. Erica Gutierrez, AIC
County of Los Angeles, Department of Regional Planning
Principal Planner, Subdivisions Section
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Dear Ms. Gutierrez,

THE TRAILS AT LYONS CANYON PROJECT - NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT & PUBLIC SCOPING MEETING

This is in response to your June 16, 2022 Notice of Preparation of Draft Environmental Impact Report and Public Scoping Meeting for the proposed Trails at Lyons Canyon project. The project site is contiguous to The Old Road on the east; west of Interstate 5 (I - 5); just south of Sagecrest Circle; and north of Calgrove Boulevard, Santa Clarita, CA 91321. LA Sanitation, Wastewater Engineering Services Division (WESD) has received and logged the notification.

Based on the project location, we have determined the sewer infrastructure does not fall in the jurisdiction of the City of Los Angeles and therefore do not have sufficient details to offer an analysis.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,

Rowena Lau, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

RL/CD: sa

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Christine Sotelo, LASAN
Christopher DeMonbrun, LASAN

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File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\The Trails at Lyons Canyon Project - NOP of dEIR & Public Scoping Meeting.docx

From: Dan Silver <dsilverla@me.com>
Sent: Friday, July 1, 2022 9:54 AM
To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>
Subject: The Trails at Lyons Canyon Project, Project No. 2021-001195- (5)

CAUTION: External Email. Proceed Responsibly.

June 30, 2022

Erica Gutierrez, AICP
County of Los Angeles
Department of Regional Planning Principal Planner, Subdivisions Section 320 West Temple Street, 13th
Floor
Los Angeles, CA 90012

RE: NOP for The Trails at Lyons Canyon Project, Project No. 2021-001195-(5)

Dear Ms. Gutierrez:

Endangered Habitats League (EHL) appreciates the opportunity to review the NOP for this project. For your reference, EHL is a Southern California conservation group dedicated to ecosystem protection and sustainable land use. The proposed project is automobile-dependent sprawl, situated on a “greenfield” of intact natural open space. We are concerned over biological resources, fire hazard, greenhouse gas emissions, vehicle miles traveled, and housing affordable to low and moderate income households. We urge rigorous application of the Significant Ecological Area ordinance and the updated Housing, Safety, and Land Use Elements.

Please retain EHL on all mailing distribution lists for the project, including CEQA documents and public hearings.

Regards,

Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA [90069-4267](tel:90069-4267)

[213-804-2750](tel:213-804-2750)
dsilverla@me.com
<https://ehleague.org>

3250 Wilshire Blvd Suite 1106
Los Angeles, CA 90010

(213) 387-4287 phone
www.sierraclub.org



July 15, 2022

Erica Gutierrez, AICP
County of Los Angeles
Department of Regional Planning Principal Planner, Subdivisions Section 320 West Temple Street,
13th Floor
Los Angeles, CA 90012

Project: Proposed Trails at Lyons Canyon; Project #2021-001195

Requested Entitlements:

Vesting Tentative Tract Map No. 83301 (RPPL2021003061)

Zone Change No. RPPL2021003163

Administrative Housing Permit No. RPPL2021003105

SEA Conditional Use Permit No. RPPL2021003113 SEA Tree Permit No. RPPL2021003070

Environmental Assessment No. RPPL2021003071

Dear Ms. Gutierrez:

Though this proposal has been somewhat reduced in scale from the original that was approved by the County several years ago, there remain a number of important reasons to reject this application. Following the topics including in the NOP, we offer the following comments:

Aesthetics: We are very concerned about the aesthetic impacts of the development on those who are residing north of the project and those who enjoy recreational activities at Ed Davis Park, Towsley Canyon, Riverdale Park & Open Space, and Santa Clarita Woodlands Park to the south. The effects of light and glare must be carefully analyzed in relation to the wildlife in those areas, in addition to those living in and adjacent to this proposed development.

Air Quality: The Santa Clarita Valley already has some of the worst air quality in the nation, including non-attainment for Ozone, PM_{2.5} and PM₁₀. The proposed project will contribute to our worsening air quality overall and, due to its canyon setting and immediate proximity to the I-5 Freeway, result in a high concentration of pollutants for those living in the area. Efforts to reduce particulates during construction would have to include measures that do not require the use of potable water.

Biological Resources: We appreciate your listing in the NOP of the many biological resources in the SEA in which this project is located. The Sierra Club continues to oppose projects in SEAs and we believe that the proposed project will substantially degrade the quality of the environment in the Santa Clarita Valley in contravention to the County's Area Plan and the City of Santa Clarita's OVOV General Plan. The development area is part of a major wildlife linkage corridor and the proposed project will drastically interfere with the abundance of wildlife species' movement and foraging within the Santa Susana watershed. It will reduce the habitat of numerous plant species



which may very well result in elimination of species. The damage to the oak woodlands through the removal and/or encroachment of 454 Protected Trees, including 316 oak trees (of which 30 are Heritage), as well as the loss of 138 non-oak SEA protected trees would be a devastating loss for which there is no acceptable mitigation.

This project is in a Significant Ecological Area (63) and we do not believe that this impact can be mitigated. We are opposed to building in SEAs! We request that the County include an alternative that does not fill the majority of the canyon with development farthest from the Old Road access point.

Paleontological Resources: Impacts to potential paleontological resources as a result of the proposed project must be addressed. The proposed development lies in the upper Pico and lower Saugus formations. There are marine fossils in this area that are rare and should be protected. If development of any kind is allowed a paleontologist should be at the scene in order to preserve specimens. Specimens should then be donated to Los Angeles County Natural History Museum.

Geology and Soils: The proposed project is on a very unstable and geologically active area subject to landslides and liquefaction. It is also prone to tectonic uplift and includes a well-researched and well-known over-turned fault complex. These facts were not included in the NOP for the project nor did the NOP contain detailed information about the anticlines/synclines in the area. Also missing in the NOP is the mention of the active tectonic shifting nearby. To the southwest the mountains are rising on a level similar with that of the tectonic force required to create the Himalaya Mountains. Rock beds are upside down due to the force and faulting associated with the San Gabriel fault. We expect to see these problems addressed in a credible DEIR prepared by qualified geotechnical experts who are not beholden to the developer. The proposed movement of 2.8 million cubic yards of earth in such an area would be irresponsible.

Greenhouse Gas Emissions: A complete analysis of Greenhouse Gas Emissions should also be coupled with requirements including, but not limited to, rooftop solar, electric-only appliances, LED lighting, energy and electric vehicle charging stations. The Sierra Club requests that green building standards be included as conditions of any approval that might be considered.

Hazards and Hazardous Materials: The potential for loss of life and property with a project of this size in this location is very high. The freeway has been clogged with traffic and shut down due to accidents on a fairly regular basis. One of our more recent fires made it impossible for people to rapidly exit the valley using the freeway and the surface streets, including The Old Road. Traffic was brought to a crawl for hours. This project has two means of ingress/egress, both of which connect directly to The Old Road. Residents of this project may have no means of escape when a very high fire occurs in the area, which experience tells us it will. The presence of a fire station on the site will have little impact when another fire roars through this area.

Hydrology and Water Quality: California is in a drought crisis and is rapidly transforming to an arid climate. With that in mind, we urge a rigorous study of the hydrology and impact on water quality with this project.



Land Use and Planning: The proposed project as described in the NOP appears to be the antithesis of good planning. The Sierra Club acknowledges the need for housing, including the inclusion of affordable units, and supports infill projects as opposed to sprawl. However, this project will intrude into natural areas near preserved open space in a Very High Fire Hazard Severity Zone. It would supplant true undisturbed natural habitat with “improved open space.” The project will also offer relatively few affordable units which does not even come close to approaching our standards for this time of situation.

Noise: We support a rigorous noise study that considers the noise generated by the I-5 corridor at peak periods.

Population and Housing: Housing costs in the Santa Clarita Valley are exorbitant and seniors, in particular, need dwelling units that will remain truly affordable for many years. Many seniors need subsidized or very low-income housing. That should be considered as this project is reviewed.

Public Services: We have noted that in some of the planning reports the project offers very little in the way of parks and recreational opportunities. We request that the project, if approved, be required to offer more than the standard required to offset the loss of natural resources.

Recreation: Planning reports also indicate that the applicant has not fully identified the trail and bikeway connections and should be required to do so. Nevertheless, amenities offered within this project will come at the cost of loss of natural recreation areas to the south of the property. Evaluation of the bikeway on The Old Road as identified in the County’s Master Plan must consider the impact of this project as stated in the NOP.

Transportation: A thorough transportation study should be conducted and public transportation should be included in the design of the site.

Tribal Cultural Resources: The Santa Clarita Valley was home to the Tatavium peoples and it is very likely that there be tribal artifacts and perhaps remains in the project area. We support the careful study and respect for tribal requirements.

Utilities and Service Systems: Wastewater and storm drainage are a concern in this pristine canyon. We will expect to see those issues and the availability of potable water and a water recycling system addressed in the DEIR.

Wildfire: Again, the potential for loss of life and property with a project of this size in this location is very high. The freeway has been clogged with traffic and shut down due to accidents on a fairly regular basis. One of our more recent fires made it impossible for people to rapidly exit the valley using the freeway and the surface streets, including The Old Road. Traffic was brought to a crawl for hours. This project has two means of ingress/egress, both of which connect directly to The Old Road. Residents of this project may have no means of escape when a very high fire occurs in the area, which experience tells us it will. The presence of a fire station on the site will have little impact when another fire roars through this area.



In conclusion, the Sierra Club is extremely concerned about the lasting damage to this canyon and the surrounding areas. We are strongly opposed to any building in an SEA. We are strongly opposed to building in a Very High Fire Hazard Severity Zone.

Thank you for the opportunity to submit our comments on the proposed Trails of Lyons Canyon project. Please include both of us in notifications if and when the project moves forward.

Sincerely,

Katherine Solomon
Conservation Chair
Sierra Club, Santa Clarita Valley Group
Contact: kpsquires@gmail.com

Sandra Cattell
Chair
Sierra Club, Santa Clarita Valley Group
Contact: sumcatt@yahoo.com

3250 Wilshire Boulevard
Suite 1106
Los Angeles, CA 90010



(213) 387-4297 phone
(213) 387-5383 fax
www.sierraclub.org

WILDLAND URBAN WILDFIRE COMMITTEE

July 15, 2022

Erica Gutierrez, Senior Planner
Los Angeles County Dept of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012
Via email: egutierrez@planning.lacounty.gov

Re: Notice of Preparation of a Draft Environmental Impact Report Lyons Canyon Project, No. 2021-001195-(5), Case No(s). Vesting Tentative Tract Map No. 83301 (RPPL 2021003061), Conditional Use Permit No. RPPL 2021003113, Housing No. RPPL 2021003105, Zone Change No. RPPL2021003163, Oak Tree Permit No. RPPL2021003070, and Environmental Assessment No. 2021003071

Dear Ms. Gutierrez:

The Sierra Club Angeles Chapter Wildland Urban Wildfire Committee (Wildfire Committee) was formed to address land use planning and safety policies related to the increasing intensity and frequency of wildfires in the Wildland-Urban Interface (WUI).¹ Our mission is to assess the risks associated with building in the Very High Fire Hazard Severity Zones (VHFHSZs) in Los Angeles and Orange Counties and influence decision-makers to reduce those dangers while protecting the environment through education, organizing, and policy change. Oftentimes projects are considered and approved in spite of the wildfire risk to current and future residents, wildlife, and habitat and there is a failure to consider the huge cost to the public.

The Lyons Canyon Project (Project) as described in the NOP is located in the northern foothills of the Santa Susana Mountains in unincorporated Los Angeles County, contiguous to The Old Road on the east; west of Interstate 5 (I-5); just south of Sagecrest Circle; and north of Calgrove Boulevard near Ed Davis Park in Towsley Canyon. It proposes the development of 504 residential subdivided into 23 lots within 233.18 acres, associated infrastructure, a designated lot for a future fire station, three Los Angeles County Flood Control District lots, and approximately 164 acres of natural and improved open space. The Project would require up to 1,460,000 cubic yards of cut and 1,260,000 cubic yards of fill for a total of 2,720,000 cubic yards of grading with 1,345,000 cubic yards of over excavation. There is expected to be 15 percent shrinkage on the over excavation for a total of 200,000 cubic yards. The total earth movement will be 2,805,000 cubic yards.

NOP should be re-noticed and re-circulated due to a failure to disclose important information.

The NOP did not disclose that the Project proposes the removal of and/or encroachment onto 454 SEA Protected Trees including 316 oak trees (30 of which are Heritage Trees), and 138 non-oak, non-heritage SEA protected trees. Oak Trees are important for their fire resiliency and because they often function as “fire catchers,” harmlessly trapping wind driven embers before those embers can reach local residences.

¹ WUI is defined as areas adjacent to or of transition between wildlands and human development and its associated infrastructure in which severe wildfire hazards are increasingly likely due to flammable native and non-native wildland vegetation, hazardous weather patterns, and steep topography. These areas have been designated as Very High Fire Hazard Severity Zones by Cal Fire.

It is well-established that oaks can act as “fire-catchers” even in high-wind events, by stopping sparks from reaching homes.² Of course this is an aid to County fire protection and reduces insurance payouts. Removal of this many trees could affect the nearby community, but there was no indication in the NOP of the substantial number of trees to be removed.



“Rancho Culbergo,” the Lobo Canyon home of Leah and Paul Culberg, is an oasis of green after the Woolsey Fire razed surrounding chaparral and 12 neighboring homes on Nov. 9, 2018. (Chris Willig) Courtesy LA Times

This is important information that must be shared with the public through an NOP so the community has the opportunity to give meaningful input into the process. However this information was only made available in an obscure Subdivision Committee Report, not circulated to the public as is required by Title 14, Section 15082(a) of the California Code of Regulations. Since the County was aware of this information prior to the circulation of the NOP, this constitutes non-compliance with the above cited section of the code and a lack of transparency.

Knowledge of the high number of tree removals would not only affect how the public might comment on the NOP, but also how others would comment on biological impacts, GH gases (carbon sequestration), fire hazards and possibly other relevant sections. The public is thus prejudiced by the County’s failure to disclose.

Comments on the NOP

This Project is located in a Very High Fire Hazard Severity Zone in the wildland urban interface area designated as the Lyon Canyon Significant Ecological Area. The approval will require several permits that appear to violate various portions of the Los Angeles County General Plan and Santa Clarita Area Plan known as One Valley One Vision. These include SEA Ordinances, Tree Ordinances and Policy S 4.1 and S 4.20 of the County Safety Plan and Policy LU 1.10: Prohibit plan amendments that increase density of residential land uses within mapped fire and flood hazard areas.

The EIR must describe how this Project would comply with these GP requirements and protect public safety.

Further, this Project does not appear to comply with Los Angeles County fire codes³ in that a large number of housing units empty onto a two lane highway. Subdivisions Code Section 21.24.020(A)(1) allows up to 150

² Los Angeles Times, Nov. 16th 2019, <https://www.latimes.com/lifestyle/story/2019-11-16/woolsey-fire-survivors-one-year-later>
³ 21.24.020 - Restricted residential access.

A. If a street or street system is restricted to a single route of access to a highway shown on the Highway Plan, except for a limited secondary highway, which is maintained and open to public travel, whether at the point of intersection with the highway or at some point distant from the highway, the street or street system shall serve not more than:

1. 150 dwelling units where the restriction is designed to be permanent and the street or street system does not traverse a wildland area which is subject to hazard from brush or forest fire;
2. 75 dwelling units where the restriction is designed to be permanent and the street or street system traverses a wildland area which is subject to hazard from brush or forest fire;
3. 300 dwelling units, where the restriction is subject to removal through future development.

B. If the roadway paving on that portion of the street or street system forming the restriction is less than 36 feet in width and is not to be widened to 36 feet or more as a part of the development of the division of land, the permitted number of dwelling units shall be reduced by 25 percent if the pavement is 28 feet or more in width, and by 50 percent if the pavement is less than 28 feet in width. If the roadway paving on that portion of the street or street system forming the restriction is 64 feet or more in width and the restriction is subject to removal through future development, the permitted number of dwelling units may be increased to 600. In no event shall the pavement width be less than 20 feet. The provisions of this section shall not apply to divisions of land referred to in

units along a single route of access if the street or street system 1) connects to a highway, and 2) does not traverse a wildland. (The Ordinance can be found in an endnote.)

CEQA Requirements

CEQA guidelines have been updated to require an analysis of a project's wildfire impacts⁴ for projects "in or near state responsibility areas or lands classified as very high fire hazard severity zones" to determine whether the project would:

- substantially impair adopted emergency response or evacuation plans,
- exacerbate wildfire risks due to slope, prevailing winds, or other factors and expose project occupants to pollutant concentrations from a wildfire or uncontrollable spread of wildfire,
- require installation/maintenance of wildfire associated infrastructure (roads, fire breaks, water resources, power lines, other utilities) that may exacerbate fire risks or result in environmental impacts, or
- expose people or structures to significant post-fire risks, such as downslope or downstream flooding/landslides, slope instability, drainage changes

Therefore, Fire Hazard must be considered a significant impact under CEQA for this Project.

Conclusion

We request that our above concerns be addressed, including re-issuing and re-circulating the NOP for comment with accurate information about tree removals and encroachments. We urge the Planning Department to read a recently published article regarding planned retreat from VHFHSZs:

We can't design our way out of wildfires. Some communities need to retreat

Please add Sierra Club Wildland Urban Wildfire Committee to the mailing list so that we can receive all future notices for this Project.

Thank you for your attention to this matter.

Sincerely,

Wendy-Sue Rosen

Sierra Club, Angeles Chapter
Wildland Urban Wildfire Committee

Section 21.32.040 to divisions of land approved pursuant to Section 21.32.080, or to minor land divisions. (Ord. 85-0168 § 2, 1985; Ord. 10485 § 4, 1972; Ord. 4478 Art. 4 § 40.2, 1945.)

21.24.030 - Wildland access.

Notwithstanding the provisions of Sections 21.24.020 and 21.24.190, the advisory agency may disapprove a design of a division of land which utilizes a cul-de-sac or branching street system or other single-access street or street system as the sole or principal means of access to lots within the division, where the forester and fire warden advises:

A. That the street or street system will traverse a wildland area which is subject to extreme hazard from brush or forest fires;

B. That the lack of a second route of access would unduly hinder public evacuation and the deployment of firefighting and other emergency equipment in the event of a brush or forest fire. (Ord. 10485 § 3, 1972; Ord. 4478 Art. 4 § 40.1, 1945.)

⁴ See revised Appendix G adding a new section XX on the need to address project wildfire impacts (p. 10 at the following link: http://califaep.org/docs/2019-Appendix_G_Checklist.pdf)

SANTA MONICA MOUNTAINS CONSERVANCY

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July 18, 2022

Erica Gutierrez, AICP
County of Los Angeles
Department of Regional Planning
Principal Planner, Subdivisions Section
320 West Temple Street, 13th Floor
Los Angeles, California 90012

**Notice of Preparation Comments for The Trails at Lyons Canyon Project
SCH No. 2022060346, Project No. 2021-001195- (5),
Case No(s). Vesting Tentative Tract Map No. 83301 (RPPL 2021003061), Conditional
Use Permit No. RPPL 2021003113, Zone Change No. RPPL 2021003163,
Oak Tree Permit No. RPPL 2021003070**

Dear Ms. Gutierrez:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced Notice of Preparation for a 504 dwelling unit mixed-residential project requiring a zone change to grade over 2.7 million cubic yards and eliminate 454 protected trees in the Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA). The subject property abuts parkland owned by both the City of Santa Clarita and the Mountains Recreation and Conservation Authority (MRCA). Why would the County vote to up zone agricultural land with exceptional watershed, biological and visual resources when many iterations of economically viable developments are possible on an existing flat disturbed ten-acre frontage portion of the property? Ten acres of housing can provide many dwelling units and economic return. Open space lands and watershed recharge areas are invaluable in 2022. This letter outlines resource avoidance alternative projects for analysis in the DEIR.

Any project that eliminates or extensively damages the oak studded hill in the southeast corner of the subject property would result in unavoidable significant adverse biological and visual impacts. Any project footprint that requires filling and channelizing any portion of Lyons Creek would result in unavoidable significant adverse biological impacts. The proposed project both eliminates the subject oak studded hill and partially channelizes both Lyons Creek and a substantial tributary and thus would require a statement of overriding considerations for both biological and visual impacts. The same need for a statement of overriding considerations would also be true for any DEIR

alternatives that damage these two described geological and hydrological features. CEQA demands significant impact avoidance if possible.

The Draft Environmental Impact Report (DEIR) must include the full analysis of at least one project alternative that requires neither grading the oak studded hill in the southeast property corner or requires any substantive streambed alteration impact to the main USGS blue line channel of Lyons Creek or the USGS blue line channel tributary that joins it within the northern part of APN 2826-002-026. A project designed with those two parameters would provide for ten-flat-disturbed acres of development area.

Because of that existing disturbance, if the elevations of that flat area need to be raised for flood purposes, such an avoidance alternative could include the import of offsite soils. It could also include harvesting soil from just outside CDFW jurisdictional area to raise pads closest to Lyons Creek. The addition of flood plain area does not constitute a stream bed alteration or water quality impact and could provide an exceptionally cost effective and visually beneficial tree mitigation area.

With all such suggested avoidance alternatives, why would any retention basins be needed other than to temporarily clean and retain runoff from the developed 10-acre area? There would be no other changes to the existing hydrological conditions in Lyons Canyon leading to the existing culvert at the Old Road adjacent to MRCA land. Ten pre-disturbed, highly-compacted, road front acres by existing utilities in Santa Clarita provide a lucrative development asset without the need for a zone change, streambed alteration permit, oak tree mitigation, extensive stormwater infrastructure, and most likely water tank and Fire Station.

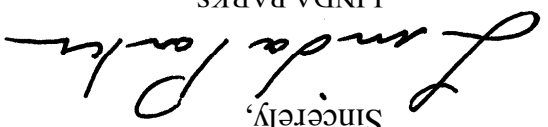
There is no economic hardship need to eliminate a scenic small oak studded mountain next to a public trailhead or to bridge or fill Lyons Creek or any of its USGS blue line tributaries. A ten-acre flat area can accommodate a mix of commercial and residential development. The DEIR should include a maximum ten-acre (no mountain or stream grading) alternative with no zone change and one with a zone change component to provide decisionmakers with the best set of alternatives to consider. The DEIR must make clear if, and why, a dedicated Fire Station lot is required for development of the subject property, particularly in the case of a reduced footprint-resource avoidance projects suggested in this letter.

The Notice of Preparation is deficient for not including the significant loss numbers of both SEA protected trees and all oak trees.

The DEIR must study the ecological value of the MRCA's abutting public open space parcel in the northeast project corner. This parcel connects Lyons Creek to a large culvert under both the Old Road and Interstate 5 that is available for smaller mammal and herpetofauna cross-treeway-movement. How will the project's addition of a new culvert affect the effectiveness of this adjacent culvert for herpetofauna movement via changing flow and soil moisture conditions? How will the introduction of development from the project affect the resources on the MRCA open space via annual fuel modification, irrigation, and lighting?

The project area is in an SEA and a CDFW approved Conceptual Area Protection Plan (CAP). It is integral to the core habitat of the Santa Susana Mountains and habitat for the candidate threatened southern California mountain lion population. Because of this ecological sensitivity. The DEIR mitigation measures must include a minimum 2:1 mitigation ratio for impacts to all Sensitive Natural Communities with mid to high level rankings.

Please contact Paul Edelman of our staff with all questions and correspondence at edelman@smmc.ca.gov or at the above letterhead address.

Sincerely,

LINDA PARKS
Chairperson

From: Erica Gutierrez

Sent: Wednesday, July 6, 2022 5:29 PM

To: Ava M. soccer highlights G07 M <cjg823@gmail.com>

Subject: RE: Notice of scope meeting for title 14 section 15082 project the trails at lyons canyon project no. 2021-001195-(5)

Hi Ava,

Just wanted to let you know the Scoping meeting recording is posted on our website here:

<https://planning.lacounty.gov/case/view/2021-001195>

The direct link is also here:

<https://www.youtube.com/watch?t=36&v=Wbi4AZSWYqo&feature=youtu.be>

ERICA GUTIERREZ, AICP (she/her/hers)

PRINCIPAL PLANNER, Subdivisions

From: Erica Gutierrez

Sent: Thursday, June 30, 2022 3:48 PM

To: Ava M. soccer highlights G07 M <cjg823@gmail.com>

Subject: RE: Notice of scope meeting for title 14 section 15082 project the trails at lyons canyon project no. 2021-001195-(5)

Hi Ava,

I am sorry you couldn't make the meeting last night. We did have a good turnout with about 30 attendees.

We will be posting the meeting video on our website very soon, and I will send you the link to that. Please also check back here: <https://planning.lacounty.gov/case/view/2021-001195>

You are also welcome to send a response in writing to me, as well. Please submit your written comments by July 15, 2022.

Thank you,

ERICA GUTIERREZ, AICP (she/her/hers)

PRINCIPAL PLANNER, Subdivisions

From: Ava M. soccer highlights G07 M <cjg823@gmail.com>

Sent: Wednesday, June 29, 2022 7:05 PM

To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>

Subject: Notice of scope meeting for title 14 section 15082 project the trails at lyons canyon project no. 2021-001195-(5)

CAUTION: External Email. Proceed Responsibly.

Good evening ,

Myself and several other homeowners in my area had trouble logging onto the zoom meeting to listen to the propose building of this project, myself and the other homeowners are requesting another meeting to be able to listen and also to be able to provide input to this project that will destroy all the natural habitat behind our homes. Please gives us this opportunity to give our feedback on why it is so important to preserve the wildlife that we see on a daily basis and what's left of nature still in a city. This was one of our main reasons for moving to this wonderful neighborhood from the overwhelming crowding of the San Fernando valley besides the schools.

Best regards

Christle Gonzalez

Sent from my iPhone

From: Ava M. soccer highlights G07 M <cjg823@gmail.com>

Sent: Thursday, July 14, 2022 10:09 PM

To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>

Subject: Lyons canyon trail

CAUTION: External Email. Proceed Responsibly.

Good Evening,

I am a Resident of Sunset Pointe. I have reviewed the proposed plans for Lyons Canyon Trail and I am opposed to the plans for the reasons being that it will destroy all the beautiful agriculture that we have , as well as it will rid of all of the wildlife that my family and I see on a daily basis which is what we love about living here at sunset pointe. It will congest the old road and will also add to more noise level to area, it will also crowd the existing school system which is already crowded because I had a hard time getting my own child in. This area is also an extreme fire hazard area and because of that a lot of us have lost our fire insurance and have had difficulty getting new fire insurance. I was not able to attend the first meeting but I was able to hear the recording and I felt that some of the people that spoke that were for the project should have no say in it when they do not live in the area and do not experience all the beautiful trees and all the beautiful animals that we see everyday, obviously the people that did oppose the project where the ones that live on the area . I have several pictures that I can provide with all the animals that I see in my backyard that this project will force these animals out of their homes. I think enough is enough with the building we need another hospital in this large valley to provide proper healthcare for all these people not more homes .



Sent from my iPhone





From: Jmagana <jmagana123@yahoo.com>
Sent: Thursday, July 14, 2022 10:24 PM
To: Erica Gutierrez <EGutierrez@planning.lacounty.gov>
Subject: Lyons canyon trails

CAUTION: External Email. Proceed Responsibly.

To whom it may concern

My name is George Magaña resident of Sunset Point and I opposed this project. I like to start by saying every construction project results in these gas emissions of carbon dioxide, methane and other waste products that pollute the air and are believed to contribute to global warming. According to an article published in [Bold Business](#), the construction sector contributes to 25% – 40% of the world's carbon emissions.

1. Pollution – Construction causes both air and water pollution. Harmful chemicals used during construction can be harmful to both workers and the environment.
2. Harming wildlife – During construction, clearing vegetation and excavating can destroy wildlife and habitats.

It is extremely important to protect the environment from harm. Taking steps towards reducing carbon emissions in construction will go a long way in protecting the world we live in.

Thank you

George Magaña

