Appendix B
NOP Comment Letters
DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
VENTURA FIELD OFFICE
2151 ALESSANDRO DRIVE, SUITE 110
VENTURA, CALIFORNIA 93001

October 21, 2015

Samuel Dea
Special Projects Section
County of Los Angeles, Dept. of Regional Planning
320 West Temple Street
Los Angeles, California
90012

DEPARTMENT OF THE ARMY PERMIT APPLICATION REQUEST

Dear Mr. Dea:

It has come to my attention that Centennial Founders, LLC has plans, distributed for public review, regarding the development of a mixed-use community located north of Quail Lake on 12,323 acres of undeveloped land. The proposed project location lies entirely within the privately-owned Tejon Ranch, Los Angeles County, California. The proposed development project would include the phased construction of 19,333 residential units, 600 acres of business uses, 100 acres of commercial/retail uses, 140 acres of institutional uses (such as schools, medical facilities, transportation facilities, civic government, etc.), 80 acres of recreational facilities, and 180 acres of vital infrastructure. Remaining lands (approximately 47 percent of the proposed development project) would be set aside for resource protection as open space, greenways, and parks.

This activity may require a Department of Army (DA) permit from the U.S. Army Corps of Engineers. A DA permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the United States", including wetlands and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to the following activities:
  a. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;
  b. mechanized land clearing and grading which involve filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the U.S.;
  c. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the U.S.; and
  d. placing pilings when such placement has or would have the effect of a discharge of fill material.

An application for a DA permit is available on our website: http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx. If you have any
questions, please contact Ian Bordenave at 805-585-2151 or via e-mail at Ian.T.Bordenave@usace.army.mil. Please refer to this letter and SPL-2015-00751 in your reply. Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,

[Signature]

Aaron O. Allen, Ph.D
Chief, North Coast Branch
Regulatory Division
November 2, 2015

Mr. Samuel Dea  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Re: Centennial Project  
Notice of Preparation of Draft EIR  
SCH#2004031072, IGR No: 151003/EA  
Vic: LA / 138 / 0.415 – 4.106; LA / 005/ 82.625

Dear Mr. Dea

The California Department of Transportation (Caltrans) has received a revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the proposed Centennial project. The Centennial project still involves the development of a master plan community consisting of 19,333 residential units ranging from estates to small lot single-family houses, multi-family townhomes, condominiums, and apartments. The project now includes 19,333 residential units which represents a reduction from the 23,000 units proposed previously. In addition, the project includes approximately 7.371 million square feet of Business Park which includes office, research and development, and warehousing or light manufacturing uses. The project also includes approximately 981,000 square feet of commercial uses, approximately 1.55 million square feet Civic/Institutional uses such as schools, medical facilities, transit centers, and library. Approximately, 117 thousand square feet of Recreation/Entertainment uses such as clubhouse, health club, farmers market and child care facilities are also included.

The project site is located adjacent to State Route 138 (SR-138) approximately four miles east of the I-5 and SR-138 junction. Caltrans has reviewed the revised notice of preparation and has the following comments:

Caltrans submitted comments to the original notice of preparation of a Draft EIR back in 2004 and expressed various concerns regarding potential transportation impacts to State highway facilities. Caltrans still has some of the same concerns, so please refer to our comments dated April 21, 2014. We reiterate some the same concerns in the letter:

Traffic Impact Analysis (TIA) and Mitigation Measures

At this time, Caltrans requests the TIA be updated to reflect current conditions and future traffic forecasts. Please instruct traffic engineers for the project to coordinate with Caltrans again to obtain concurrence as
to the assumptions and methodologies of the TIA. Caltrans participation in the TIA is essential as it will be involved in the approval of the different planned connections to State Route 138 (SR-138) and any improvements to SR-138 mainline. Caltrans will be involved in the widening of SR-138 which is likely between the project site and Interstate 5 (I-5).

Please refer traffic engineers to follow the Caltrans Guide for the Preparation of Traffic Impacts Studies, it is accessible online at: http://www.dot.ca.gov/hq/tpp/offices/oep/igr_ceqa_files/tisguide.pdf

Caltrans will be interested in reaching concurrence as to the study area, methods of analysis, travel forecast modeling, thresholds of significance, vehicle trip generation and internal capture rates, future projection year and cumulative scenarios. The study area should extend into Kern County, and Caltrans District 6. District 6 will also be involved in the development and review of the TIA.

I-5 through the project site is very important for the movement of people and goods across the state and nationally, as such it carries a high volume of heavy duty trucks. The TIA must evaluate potential impacts associated with existing and additional truck traffic from the proposed project and ambient growth. The TIA should pay special attention to the I-5 and SR-138 interchange because of its importance in accommodating future truck through traffic and Centennial truck traffic.

Caltrans over sought the preparation of a Project Study Report (PSR) that identified two alternatives in addition to the no-project alternative for improvements to the segment of SR-138 from I-5 to State Route 138. The TIA should include reference to this document and its findings.

To the extent that vehicle trips are reduced and captured within the project site, less mitigation will be required off-site on State highway facilities. Caltrans recommends a Transportation Management Plan (TMP) to coordinate transit, vanpooling, carpooling, and other transportation options. Employer-sponsored carpools/vanpools or monthly transit passes for employees could be set up. Transportation alternatives for longer-distance travel should be planned for (e.g. express bus to Santa Clarita, Palmdale, and Kern County).

The entire development should be pedestrian and bicycle friendly with bicycle and pedestrian connections to the outside community. Internal circulation of public transit and adequate bike parking should be provided throughout. To provide good connectivity within each community and between communities the grid pattern is preferred over the cul-de-sac design. Park-and-Ride areas should be included and designed to accommodate regional transit. The different communities should be designed to accommodate Neighborhood Electric Vehicles (NEV’s).

**Land-Use and Project Phasing**

It is understood the project will be developed in phases over a twenty-year period. If the residential development occurs prior to the commercial, business, and employment center the typical morning and evening commutes typical of sprawl type development might be established. To avoid this unsustainable scenario, the County as the lead agency should plan the phasing of the development accordingly. Both residential and employment centers should be developed concurrently.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
The NOP states that “The Project Applicant has designed an Affordable Housing Program that provides Very Low-, Low-, and Moderate-Income affordable housing opportunities in several housing categories, including for-sale units and/or rental units. The provision of housing affordable for the various income levels is critical to minimize long-distance peak hour commutes. Please pay special attention to the phasing-in of development and housing affordability.

Caltrans understands that the Centennial Project would be developed over time according to market demands and so would the transportation improvements. Transportation facilities necessary to accommodate build-out of the entire Centennial project should be identified at this stage as well as which parts would be implemented by each phase.

Environmental Concerns

In our previous NOP comments, Caltrans expressed concerns involving potential impacts to the environment associated with necessary highway improvements. Mitigation of environmental impacts should consider not only the direct impacts of the proposed development, but those associated with supporting infrastructure improvements as well. Expanding capacity on State routes will not only involve cultural and air quality issues, but also endangered species habitat and wildlife. Native American burial grounds and ancient cultural sites may be an issue within the project site. Development in this area may affect the wildlife corridor crossing of SR-138 and mitigation measures should be planned for.

Conclusion

Caltrans staff is available to work with the project sponsors and its traffic engineers to identify the parameters of traffic impact analysis such as study area, vehicle trip reduction factors, method of analysis, significant criteria, and possible mitigation measures. Caltrans worked with Traffic engineers for the Centennial Project in the past to identify potential transportation impacts and mitigation measures in the TIA. In the Spirit of Mutual Cooperation, Caltrans request the same coordination opportunity this time around.

If you have any questions regarding these comments and wish to schedule a meeting, please feel free to contact me at (213) 897 – 9140 or project coordinator Elmer Alvarez at (213) 897-6696 or electronically at elmer.alvarez@dot.ca.gov.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans District 7

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
October 30, 2015

Samuel Dea  
Special Projects Section  
Department of Regional Planning  
County of Los Angeles  
320 West Temple Street  
Los Angeles, California 90012

Revised Notice of Preparation, Centennial Project, East of the Community of Gorman, North of Quail Lake, Los Angeles County, Southern Field Division, SCH2004031072

Dear Mr. Dea:

Thank you for the opportunity to review and comment on the Revised Notice of Preparation (NOP) of the Centennial Project (Project) located in an unincorporated area north of Quail Lake and south of Tehachapi Afterbay in Los Angeles County. The Project includes development of 12,323-acre master planned community with residential, business park, commercial, civic and institutional, and recreation and entertainment uses within the privately-owned Tejon Ranch. Community infrastructure facilities that will serve the Project include construction of wastewater reclamation facilities, water treatment facility, water bank, and materials recovery facility. A new bridge crossing over the West Branch of the California Aqueduct (Aqueduct) is also proposed in the Project.

The Notice of Preparation of the Project was originally submitted in 2004 and is revised to include reduction in development area and no development in the northwest area of the Project site.

California Department of Water Resources (DWR) has concerns about the Project at the following areas:

**Biological Resources**

DWR personnel conduct routine maintenance and repairs, and project to increase safety adjacent to the Project. DWR requests impacts to wildlife that cause migration into DWR right-of-way be analyzed as nesting birds and special-status species relocating into DWR right-of-way will impact our ability to maintain and improve State Water Project (SWP) facilities. Nesting birds, including ground nesting raptors, and special status species moving into DWR right-of-way due to loss of habitat would likely require DWR having to consult with wildlife control agencies in order to perform the
routine maintenance and repair. Movement of wildlife into DWR right of way has the potential stop work until take permits are secured whereas prior to development no take permits were required.

Antelope, deer, and badgers are often seen in the area of the Project. Movement of wildlife species into the DWR right-of-way could result in increased accidents with large mammals and road kill. The environmental impact report (EIR) shall address wildlife movement caused by the Project. Page 6 of the NOP states that the Aqueduct is a barrier to wildlife movement; however, many species have been observed finding ways to cross the aqueduct and an increased number of bridges along the Aqueduct could promote crossing used by wildlife.

**Hydrology and Water Quality**

Two golf courses are planned for each side of the Aqueduct. Golf courses traditionally use fertilizers and pesticides for maintenance. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by maintenance of the golf courses and project drainage need to be addressed in the EIR. In addition, the project will increase use of fertilizers and pesticides used by residents. Fertilizers and pesticides could have a major impact on water quality to the California Aqueduct. Impacts to water quality caused by residential use need to be addressed as well.

The Project also has the potential to increase the risk of household chemicals and hydrocarbons entering the Aqueduct. Improper disposal of motor oil and household chemicals is a recognized problem in many California communities and may have a significant impact to the Aqueduct as a result of the Project. Impacts to water quality of the Aqueduct shall be addressed.

New bridge developments, and improvements to existing bridges over the Aqueduct, have the potential to impact water quality during construction. Impacts to water quality due to construction shall be addressed.

Drainages need to be designed to avoid the California Aqueduct, and must be specifically discussed in the EIR.

The Project would be located adjacent to the California Aqueduct and Quail Lake. In addition, the western portion of the Project site is located within the watershed of Gorman Creek, which drains to Pyramid Lake. The EIR should evaluate whether the Project would cause erosion and introduce sediment into the Aqueduct or Quail Lake, and whether the Project would cause other pollutants to flow into these waters or
Gorman Creek. Introduction of sediment into the SWP system could reduce the capacity of the SWP water storage and conveyance facilities, damage SWP mechanisms, and/or require DWR to perform additional, unnecessary, and potentially costly maintenance on the SWP facilities. Also, introduction of sediment and other pollutants into the SWP system could impair the quality of the water transported by the SWP.

Geology and Soils

Ground subsidence due to overdraft of ground water is a problem that impacts canals throughout California. Ground subsidence near the Project could cause impacts to the Aqueduct that may result in the need to increase maintenance or call for major repairs. Groundwater use and overdraft prevention shall be addressed in the EIR document.

Some portions of the Project would be built in close proximity to SWP facilities. The EIR should evaluate whether the Project would affect the geology and/or soils in the vicinity of the SWP facilities in a manner that would impair the geological stability of the SWP or the quality of the water flowing through the SWP.

Hazards

The Project would be located near several SWP facilities, most of which are closed to the public for safety and infrastructure security reasons. The Project would substantially increase the number of people living, working, shopping, recreating, and otherwise visiting the Project area and . The EIR should evaluate whether the Project would substantially increase the potential for public safety hazards (e.g., drowning), vandalism, or infrastructure security concerns attributable to the proposed population increase near the SWP. The Project should be designed to discourage and prevent unauthorized access to SWP facilities.

The EIR should also evaluate the potential for the Project to introduce hazardous materials (e.g., construction fuels and chemicals) onto SWP land and into the water carried by the system.

Land Use

The Project would be located adjacent to the California Aqueduct and Quail Lake. The Project should be designed to avoid unauthorized encroachment onto SWP facilities and to not interfere with DWR's ability to access and maintain the SWP. If the Project encroaches onto land owned or managed by DWR (e.g., the proposed access road, bridges, and water pipeline), the Project sponsor should coordinate with DWR during
the early stages of the planning process about securing authorization for the encroachment(s).

Any construction activity in the vicinity of the California Aqueduct may require an encroachment permit issued by DWR. Information regarding regulations and forms for submitting an application for an encroachment permit to DWR can be found at:

http://www.water.ca.gov/engineering/Services/Real_Estate/Encroach_Rel/

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be sent to:

Leroy Ellinghouse, Chief
SWP Encroachments Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-2
Sacramento, California 95814

If you have any questions, please contact Leroy Ellinghouse, Chief of the SWP Encroachments Section, at (916) 659-7168 or Jonathan Canuela at (916) 653-5095.

Sincerely,

David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

cc: State Clearinghouse
Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, California 95814
November 4, 2015

File: Environmental Doc Review
Los Angeles County

Samuel Dea
County of Los Angeles Planning Department
320 West Temple St.
Los Angeles, CA 90012
Email: specialprojects@planning.lacounty.gov

Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Centennial Development Project, Los Angeles County, State Clearinghouse Number 2004031072

The Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the County of Los Angeles Planning Department (County) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the proposed Project, we recommend that several issues be considered in the preparation of the Notice of Preparation (NOP), particularly: 1) established numerical and narrative water quality objectives and standards should be used when evaluating thresholds of significance for Project impacts; (2) post-construction best management practices (BMPs) for stormwater control are an essential part of project planning and should be discussed in the DEIR; and 3) all potential downstream impacts to hydrology and water quality must be evaluated as a result of Project implementation. Our comments on the Project are outlined below.

Project Overview

The Centennial Project is a large residential-commercial development that will include 19,333 dwelling units on an area of a total of 12,323 acres in western Antelope Valley, 36 miles west of Lancaster. Approximately 6,700 acres of land will be developed into a series of communities over a 20 year period, and approximately 5,600 acres of land will be preserved for open space for drainages and conservation. New infrastructure facilities including shopping centers, water treatment facilities, water banking facilities will be built on approximately 180 acres, while approximately 140 acres will be set aside for K-12 schools. Commercial buildings will occupy approximately 100 acres, hospitals, medical facilities, and higher education buildings will occupy approximately 110 acres, and recreational and entertainment facilities will occupy approximately 80 acres.
Water Board’s Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board’s web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

Specific Issues to be Considered in the NOP

Based on our review of the information provided, we recommend that the following issues be considered in preparation of the DEIR.

1. The DEIR should identify all the applicable water quality standards that pertain to this project and identify which standards could potentially be violated by Project alternatives and use these standards when evaluating thresholds of significance for impacts. Water quality objectives and standards, both numerical and narrative, for all waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water.

2. The Project area is located within the Neenach Hydrologic Area of the Antelope Hydrologic Unit, 626.00. The Project area lies over the Antelope Valley groundwater basin (Department of Water Resources unit 6-44). We note that the NOP in section 3.e. does not include the Basin Plan in its list of relevant plans. The beneficial uses of minor surface waters and wetlands are listed in Chapter 2 of the Basin Plan. The DEIR should identify and list all the beneficial uses of the surface water and groundwater resources within the Project area, and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.

3. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of the Antelope Hydrologic Unit, including groundwater. The DEIR should discuss the project components and their potential impacts to watersheds on the project area.
4. The DEIR should describe a proposed long-term maintenance and monitoring plan that will be implemented to evaluate and maintain the established baseline conditions. Specific routine and non-routine activities should be identified, such as dredging/excavation and re-contouring, and the thresholds that will trigger when maintenance activities are warranted.

5. The DEIR should describe the long-term post-construction best management practices (BMPs) maintenance plan. It is understood that routine sediment removal is necessary to maintain the function of a basin, and the removal of accumulated sediments in the bottom of a basin would completely remove any vegetation that may have been present. However, we also recognize the benefits of vegetation for water quality by filtering sediments and constituents of concerns from water. We strongly recommend that the County proponent include in their long term maintenance plan provisions for mowing rather than eradication, so that vegetation can more easily reestablish itself post-maintenance. Maintaining healthy deep-rooted vegetation is crucial to soil stabilization. Re-contouring and vegetation grubbing should only be done on an as-needed basis.

6. The DEIR should describe the project design standards used for sizing and constructing hydraulic features. Surface waters support a variety of beneficial uses including municipal and agricultural uses, groundwater and fresh water recharge, habitat, flood attenuation, and water quality enhancement. To ensure that no net loss of function and value will occur as a result of Project implementation, we request that culverts be designed to (1) pass storm flows without impoundment upstream, (2) with sufficient energy dissipation provided at the outlet to reduce flow velocities to pre-Project conditions, and (3) sufficiently sized to allow for habitat connectivity across/beneath the roadway.

7. All rock slope protection and energy dissipation rip-rap placed within stream channels should be ungrouted and the minimum amount necessary to provide scour protection and energy dissipation to prevent erosion. The DEIR should describe channel design and energy dissipation to prevent erosion. The DEIR should describe channel design criteria.

8. Construction and post-construction storm water management must be considered a significant Project component, and BMPs that effectively treat storm water runoff should be included as part of the Project. The DEIR should specify those temporary and permanent long-term sediment and erosion control BMPs that will be implemented to mitigate potential water quality impacts related to stormwater. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. We request that vegetation clearing be kept to a minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction. A long-term BMP maintenance plan should be included in the DEIR.

9. The DEIR should identify all impacts to water resources and describe how impacts were avoided, minimized, or proposed to be mitigated. The Water Board requires that impacts to water resources be avoided where feasible and minimized to the extent practical. Compensatory mitigation will be required for all unavoidable permanent impacts to surface water resources. Water Board staff coordinate all mitigation requirements with staff from other federal and state regulatory agencies,
including the USACE and the California Department of Fish and Wildlife. In determining appropriate mitigation ratios for impacts to waters of the State, Water Board staff considers Basin Plan requirements (minimum 1.5:1 mitigation ratio for impacts to wetlands) and utilizes 12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios, published December 2012 by the USACE, South Pacific Division.

10. All temporary impacts to water resource and upland areas should be restored (recontoured and revegetated) to match pre-Project conditions. A Restoration and Revegetation Monitoring Plan should be prepared and described in the DEIR that requires monitoring for some period of time (usually no less than 3 years), outlines a schedule with performance measures to be met in order for the restoration/revegetation to be deemed successful, and contains adaptive management criteria in the event performance measures are not being met.

11. Equipment staging areas, excavated soil stockpiles, and hazardous materials (i.e. oils and fuels) should be sited in upland areas outside surface waters and adjacent flood plain areas. We recommend that a comprehensive Spill Prevention and Response Plan be prepared and described in the DEIR that outlines the site-specific monitoring requirements and lists the BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.

12. Buffer areas should be identified and exclusion fencing used to protect water resources and to prevent unauthorized vehicles or equipment from entering or otherwise disturbing the surface waters. Equipment should use existing roadways to the extent feasible. These features should be described in the DEIR.

13. The project plans to construct and operate a domestic wastewater treatment plant. The plant will produce recycled water for use within the project area. Onsite disposal of treated wastewater must not cause pollution and minimize degradation. Denitrification should be included in the plant design. The DEIR should fully describe the following.

a. Treatment plant and disposal pond locations,
b. Treatment plant design criteria,
c. Storage and disposal pond design criteria,
d. Expected wastewater quality,
e. Receiving groundwater quality,
f. Expected receiving groundwater degradation (nature and extent) resulting from the discharge according to State Board Resolution 68-16,
g. Background receiving groundwater quality and direction of flow established from a statistically significant data set,
h. Location and well construction design of monitoring wells installed to evaluate groundwater quality,
i. Lift station locations and design,
j. Backup power features,
k. Recycled water storage, delivery, and use area design standards, and
l. Entity responsible for owning and operating the treatment plant and recycled water infrastructure.
Permitting Requirements

A number of activities associated with the proposed Project have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

14. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.

15. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board if water of the United States are affected. The DEIR should identify where waters of the United States are present with in the project area. The Water Board may establish individual waste discharge requirements to address stormwater impacts to state only waters.

16. New industrial operations may require coverage under the Industrial General Stormwater Permit (2014-0057-DWQ) if waters of the United States are affected. Information on the Industrial General Stormwater Permit is available on the State Water Board’s web site at http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml. These permits must be obtained from the Lahontan Water Board.

17. Disposal from wastewater treatment facilities will require a waste discharge requirements which must be obtained from the Lahontan Water Board. Information on what information is needed in a report of waste discharge is available on the State Water Board’s web site at http://www.waterboards.ca.gov/water_issues/programs/land_disposal/waste_discharge_requirements.shtml

18. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board. The DEIR should identify any and all proposed diversion or dewatering actions.

19. Recycled water uses are subject to water reclamation and waste discharge requirements issued by the Water Board. An Engineering Report must be submitted to the Water Board and State Division of Drinking Water, which also must approve the Engineering Report.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The specific Project activities that may trigger these permitting actions should be identified in the appropriate sections of the NOP. The Project proponent should consult with Water Board staff early on should Project implementation result in activities that trigger
these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

Thank you for the opportunity to comment on the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7391 thomas.browne@waterboards.ca.gov or Jehiel Cass, Senior Water Resource Control Engineer, at (760) 241-2434 jehiel.cass@waterboards.ca.gov.

Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse Number, when available, and Project name in the subject line.

Jehiel W. Cass, P.E.
Tom Browne, PhD, PE
Water Resource Control Engineer

cc: USEPA Wetlands Regulatory Office, Region 9 (R9-WTR8-Mailbox@epa.gov)
    Daniel Swenson, USACE (Daniel.P.Swenson@usace.army.mil)
    CA Dept. of Fish and Wildlife (askR5@wildlife.ca.gov)
    Shu-Fang Orr, Division of Drinking Water (shu-fang.orr@waterboards.ca.gov)
Dear Mr. Samuel Dea:

We have reviewed the subject NOP and determined that the County of Los Angeles Department of Public Works Consolidated Sewer Maintenance District does not maintain any sewer facilities within the project area. Therefore, we have no comments to offer.

Marissa Morelos  
Sewer Maintenance Division  
Los Angeles County Department of Public Works  
(626) 300-3370 PHONE  
(626) 300-3365 FAX
Dear Mr. Dea,

Thank you for the opportunity to comment on the Revised Notice of Preparation for the proposed Centennial Project. In reviewing the project description and potential traffic/circulation impacts, the City of Santa Clarita requests that the following intersections and roadway links be included as part of the traffic/access section of the EIR.

1) Interstate 5, between State Route 138 and State Route 14
2) Newhall Ranch Road/SR-126 interchange at Interstate 5
3) Magic Mountain Parkway interchange at Interstate 5

Please contact me if you have any questions.

Ian Pari
Senior Traffic Engineer
City of Santa Clarita

Phone: (661) 284-1402
Email: IPARI@santa-clarita.com
Web: http://www.santa-clarita.com
November 4, 2015

Mr. Samuel Dea
County of Los Angeles of Regional Planning, Special Projects Section
320 West Temple Street
Los Angeles, California 90012
Phone: (213) 974-4876
E-mail: specialprojects@planning.lacounty.gov

RE: SCAG Comments on the Revised Notice of Preparation of a Draft Environmental Impact Report for the Centennial Project [SCAG NO. IGR3107]

Dear Mr. Dea,

Thank you for submitting the Revised Notice of Preparation of a Draft Environmental Impact Report for the Centennial Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Revised Notice of Preparation of a Draft Environmental Impact Report for the Centennial Project in the Los Angeles County. The proposed project is a master planned community for 19,333 residential units on approximately 4,950 acres of land designated for residential/mixed use development. The proposed project also includes business park uses, commercial uses, civic/institutional uses, and recreation/entertainment uses.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@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 Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Program Manager II, Land Use and Environmental Planning

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1 SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.
COMMENTS ON THE REVISED NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE CENTENNIAL PROJECT [SCAG NO. IGR3107]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS GOALS

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

<table>
<thead>
<tr>
<th>SCAG 2012 RTP/SCS GOALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness</td>
</tr>
<tr>
<td>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G3: Ensure travel safety and reliability for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G4: Preserve and ensure a sustainable regional transportation system</td>
</tr>
<tr>
<td>RTP/SCS G5: Maximize the productivity of our transportation system</td>
</tr>
<tr>
<td>RTP/SCS G6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</td>
</tr>
<tr>
<td>RTP/SCS G7: Actively encourage and create incentives for energy efficiency, where possible</td>
</tr>
<tr>
<td>RTP/SCS G8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation</td>
</tr>
<tr>
<td>RTP/SCS G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</td>
</tr>
</tbody>
</table>

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 policy and supportive analysis in a table format. Suggested format is as follows:
### SCAG 2012 RTP/SCS GOALS

<table>
<thead>
<tr>
<th>Goal</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness</td>
<td>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</td>
</tr>
<tr>
<td>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region</td>
<td>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</td>
</tr>
</tbody>
</table>

etc.

### RTP/SCS STRATEGIES

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit [http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTSCS.pdf](http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTSCS.pdf) (Tables 4.3 – 4.7, beginning on page 152).

### REGIONAL GROWTH FORECASTS

At the time of this letter, the most recently adopted SCAG forecasts, at the jurisdictional level, consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit [http://scag.ca.gov/Documents/2012/AdoptedGrowthForecastPDF.pdf](http://scag.ca.gov/Documents/2012/AdoptedGrowthForecastPDF.pdf). The forecasts for the region and applicable jurisdictions are below.

<table>
<thead>
<tr>
<th>Adopted SCAG Region Wide Forecasts</th>
<th>Adopted County of Los Angeles Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 2020</td>
<td>Year 2035</td>
</tr>
<tr>
<td>Population</td>
<td>19,663,000</td>
</tr>
<tr>
<td>Households</td>
<td>6,458,000</td>
</tr>
<tr>
<td>Employment</td>
<td>8,414,000</td>
</tr>
</tbody>
</table>

### MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: [http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf](http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf)

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects. Appendix G can be accessed at: [http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/2012PEIR_AppendixG_ExampleMeasures.pdf](http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/2012PEIR_AppendixG_ExampleMeasures.pdf)
November 4, 2015

Samuel Dea  
County of Los Angeles Department of Regional Planning  
Special Projects Section  
320 West Temple Street  
Los Angeles, CA 90012  
specialprojects@planning.lacounty.gov

RE: Centennial Project (NOP)

Dear Mr. Dea:

Southern California Edison (SCE) appreciates the opportunity to review and provide comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the proposed Centennial Project. The Project is a master planned community for 19,333 residential units, business park/office, commercial, schools, parks, natural open space, cultural, and public uses.

SCE provides electric service to the County of Los Angeles and maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances in the County. Attached is a map of the Project area and SCE’s existing 66 kilovolt (kV) subtransmission lines illustrated as bold green lines and 220 kV transmission lines illustrated as bold blue lines.

**Potential Impacts to SCE’s Facilities**

SCE is concerned that the proposed Centennial Project may impact SCE’s existing transmission lines. The developer for the Centennial Project should contact George Perez of SCE’s Transmission Project Delivery Department to discuss the relocation of the existing 66 kV subtransmission lines and identification of necessary on- and off-site electrical facilities required to service the proposed Project. He may be contacted at George.Perez@sce.com or (805) 559-9913.

**Encroachment of SCE’s Right-of-Way and Access Roads**

The proposed project should not impose constraints on SCE’s ability to access, maintain, and operate its current and future facilities. Additionally, if bike lanes and landscaping are planned within SCE’s corridors an agreement between the developer and SCE is required. Any parkways or pathways (either by foot, bicycles, or other means) that invite the public onto SCE’s right-of-way will require the installation of fencing and/or Climbing Discouragers on each transmission line tower at the customer’s expense.

SCE’s rights-of-way and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. SCE will review any proposed use on a case-by-case basis. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. Please forward five (5) sets of plans depicting SCE’s facilities and associated land rights to the following location:

Real Properties Department  
Southern California Edison Company  
2131 Walnut Grove Avenue, G.O.3 – Second Floor  
Rosemead, CA 91770
General Order 131-D
The construction, modification, and relocation of transmission lines, or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to the California Public Utilities Commission’s (CPUC) General Order 131-D. If the construction, modification, or relocation of transmission lines results in significant environmental impacts, they should be identified and discussed in the Draft EIR. If not, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of the SCE transmission line portion of the project for two years or longer.

If you have any questions regarding this letter, please contact me at David.A.Ford@sce.com or (323) 720-5290.

Regards,

David A. Ford
Local Public Affairs, Governmental Affairs Representative
Southern California Edison Company

cc: George Perez, SCE
    Karen Cadavona, SCE

1 http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF
SCE FACILITIES IN PROJECT AREA
Public Comment Letter

From: Lynn S. Stafford

P.O. Box 6160

Stafford@frazmtn.com

Pine Mountain Club, 93222

California

Re: Revised Notice of Preparation

Project Title: Centennial project

County Project Number: Project No.02-232

State Clearinghouse Number: 2004031072

It is important that Los Angeles County (The County) is planning the inclusion of all areas of potential environmental impact for the EIR for this Project. I am commenting on just those areas in which I have specific knowledge and/or concerns. The exclusion of the other areas from my comments does not mean I consider them less important.

I am going to begin my comments by making an overall statement and a request for justification.

Justification of the Centennial City Project

Why is this project being considered at all? Obviously, the property owner and developers want to see a profit. However, this is a huge project with tremendous future effects on, not only the immediate area, but on much of California. Where is the need? Amid growing concern for urban sprawl and its damaging effects, this project plan flies in the face of sensible land use planning. The County needs to show a strong need to create this size of instant planned city in a rural/natural setting well away from any urban center. And this need must justify the extreme negative effects in the many environmental areas, as delineated in the CEQA process. As an example, this project, when built-out in its remote
location, will impact traffic and highway construction needs throughout much of the State. These effects and costs will need to be absorbed by Californian citizens having no relationship to or benefit from the project. It is essential that The County show that this project is absolutely necessary for the future of California. In the light of current conditions, including natural habitat destruction, drought and water woes, traffic congestion, unsold housing in existing cities and many other areas of concern, I do not see a need for this massive example of urban sprawl. As a citizen of this State, I need to be convinced that there is a pressing need beyond the personal desires of the land owner and developers for this project that is going to have far-reaching negative effects on many people and the environment. At this time, I support the no-project alternative.

**Aesthetics:** Much of Southern California has been transformed into a sea of human-made structures, such as roads, buildings and utility poles and lines, bringing with them a cacophony of sound, blotting out the night with artificial light, and polluting the natural areas with various forms of urban-caused blight. Much has been said and written about the human psychological need for the sights and sounds of nature. Just study television commercials. So many of them associate their products or services, whether they are beer, vehicles or insurance, with images of nature. These advertisers are smart: they understand people’s needs. This project proposal destroys 12,000 acres of relatively undisturbed natural area containing the aesthetics values necessary to the emotional well-being of humans, and will have indirect effects on the aesthetics of a much larger area.

The EIR must address these concerns.

**Air Quality:** In analyzing the effects of the project on air quality, the EIR must include vehicle trips to and from the project area. Residents, as well as individuals associated with Centennial City will be driving to Bakersfield, Lancaster/Palmdale and the Greater Los Angeles area as well as beyond. The remote location of this project and the absence of mass transit greatly increase air pollution from travel.

The EIR must discuss the air quality impacts of both the construction and completion/occupation phases.

**Biological Resources:** This is a very crucial category. I am going to focus on four concerns. These are not the only ones, but are especially important.

1) **Tejon Ranch biological resources:** Tejon Ranch, at 277,000 acres, much of it relatively undisturbed until recent and proposed developments, has immensely important biological resource value. These range from Antelope Valley Mojave desert to San Joaquin Valley desert to foothill grasslands and oak savannah, to a variety of higher scrub and forest lands in the Tehachapi Mountains. Little by little, Tejon Ranch has been nibbling away at its vast natural habitat holdings. Large agricultural lands in the San Joaquin Valley were developed early on. More recently the industrial parks around Laval Road have cropped up and are increasing. Besides Centennial City, Tejon Mountain Village is proposed in the heart of the highlands,
including major California Condor country in the Beartrap Canyon area. Another residential community is planned west of Grapevine/Laval Road. This wonderful natural resource is being turned into another Santa Clarita-type sprawl. There are pronghorn, short-eared, burrowing and barn owls, and many other native animals in what is planned to become a suburb unattached to any nearby city. What is the need for this remotely located suburb of no nearby city?

The EIR must address the accumulative effects of Tejon Ranch’s past, present and future development plans on the natural environment and the overall environmental concerns of the CEQA process.

2) **Wildlife/plant corridor:** The Centennial City proposed footprint sits right in the middle of interconnections between five major biomes (large naturally occurring communities of flora and fauna occupying a major habitat). These include the Mojave Desert, the Transverse Mountain Ranges (including the San Gabriel Mountains, Sespe and other Ventura County mountains and Santa Barbara mountains), the southern end of the Coast Mountain Ranges, the Central Valley and the Sierra Nevada. In addition, there are elements close to the project site of the more southern Peninsular Ranges. There is no other location that has the juxtaposition of as many of the ten Landform and Natural Regions of California (from A Natural History of California by Allan A. Schoenherr, University of California Press, 1992). This proposed project directly, and permanently, will disconnect the flow of species of plants, animals and other life forms between these biomes. This is a historic disruption. I do not know that a disruption of genetic flow of this magnitude has ever occurred in the modern history of mankind on this earth. The Notice of Preparation states that north/south movement of many animals in the central and eastern portions of the project area have already been disrupted by the Aqueduct, so movement is no longer an issue. This is false. Aqueducts and highways can and are being bridged by both overhead and underneath animal corridors throughout North America. A 12,000 residential and commercial development will be a much more substantial barrier for wildlife. Once again, I have to ask, “What is the Need?”

The EIR must address the multifaceted disruption of the flow of organisms and genomes between all the biomes represented within and adjacent to the project.

3) The aerial corridor from the bottom of the grapevine along the I-5 corridor past Gorman and on east through Antelope Valley is a major migration bird pathway. It is no widely recognized as such, but I know from personal observations over the past 19 years that it definitely important. Shorebirds, waterfowl, raptors and songbirds
all use this corridor. Many songbirds move in flocks through the brushfields as well as overhead. The project, as planned, is spread across the entire valley at the western terminus of Antelope Valley.

The EIR must address the effects of this project on migratory bird movement in the region, including changes to the natural night sky.

4) **Quail Lake:** Quail Lake was originally a natural ephemeral pond created by cataclysmic action on the San Andreas Fault. It was one of a string of sag ponds along the fault in the region. By 1972, the California Department of Water Resources had constructed and filled a larger reservoir out of the pond. This reservoir has dual functions of conducting the West Branch California Aqueduct over the San Andreas Fault and providing a regulatory storage body for the water system. The inflow from the Tehachapi Afterbay enters the Lake at its eastern end and exits at the western end to pass south to Pyramid Lake. Quail Lake in its present state is approximately 1.2 miles long and 0.6 miles wide with 3 miles of shoreline. It lies at 3330 feet elevation. Since the conversion of the natural pond into Quail Lake by 1972, the Lake has developed several wetland wildlife habitats to compliment the surrounding natural and rural uplands. The lake consists primarily of open water with surrounding shoreline. A few small islands and rocks are present. There are areas of steep, relatively bare banks separated by patches of emergent vegetation, mostly bulrushes. Above the shoreline in several locations are stands of riparian brush and trees. There are a large number of animals that use Quail Lake. There are hundreds of bird species that utilize the Lake and its surrounding upland habitats – in migration, during breeding season, in winter and as permanent residents. Some species have special conservation protection status. An example is the tri-colored blackbird, *Agelaius tricolor*. It has been on and off the protected species status in California for years and is under consideration by the State and federal governments at present. Three of four colonies bred at the Lake’s edge in 2015. The birds were observed to forage by flying well into the Tejon Ranchfields north of the Lake at least one half mile. Tri-colored blackbirds need enormous supplies of food adjacent to their colonies because of their dense colonial nature and synchronous ovulation. The proposed Centennial City development section north of Quail Lake will definitely destroy these colonies. The EIR must address the effects of the proposed development on areas not part of Centennial City, but immediately adjacent to the project. The tri-colored is only one of many species bound to be negatively affected.
5) **Biological resources of Adjacent Areas:** At one place in the Notice of Preparation (NOP), it is stated that the Aqueduct and Quail Lake are outside the project limits. At another location in the NOP, it is stated specifically that the flora and fauna within the project are to be studied. These two statements together mean that the effects of the project on flora and fauna outside the project, but adjacent to the project will not be considered. As I pointed out in the prior, a special-status species that is breeding at the Lake will almost undoubtedly be negatively affected by the project.

The EIR must consider the effects of the project on the biota of adjacent areas.

**Hydrology/Water Quality:** The NOP is very general and non-specific in its listing of sources of water, water needs for and project, and effects of water usage on other users of water. The NOP describes in considerable detail the various aspects of the project. Water experts certainly can estimate the projected uses of these different aspects of the project. Also missing is any quantitative analysis of the sources of water. Also missing is any discussion of the effects of project water usage (including construction) on local water availability, both by humans and regional flora and fauna. Will future ground water extraction alter ground elevation, as is happening in the Central Valley at this time?

The EIR must address in quantitative detail 1) the sources of water for the project – both construction and finished phases, 2) the amounts of water to be used for different sections of the project – both construction and finished phases and 3) the effects of water extraction and usage on both human and natural users of water in areas where the water is extracted.

I will leave other areas such as infrastructure and traffic to other commenters. These are very important areas of concern to many of us. The cost of building and maintaining a suburb without a city in the middle of nowhere is being to have to be borne by all taxpayers in California. Why?
COMMENTS: Lowincome and senior housing
What levels of income from the 34,000 jobs inhabitants
How will you protect Quail Lake and the habitats
that use it for life (animals & birds, fish, etc)

Name: Terry Kelling
Address: 3836 Park Dr. / P.O. Box 811 / Frazier Park, CA 93225
E-Mail: ctkel@hotmail.com
Thanks again!

SZ

On Wed, Oct 28, 2015 at 11:02 AM, DRP Special Projects <dspecialprojects@planning.lacounty.gov> wrote:

I don’t believe that was posted on the county’s web page but I will provide a scan copy to you for reference only.

From: ARTC- AV [mailto:ourartc@gmail.com]
Sent: Wednesday, October 28, 2015 8:27 AM

To: DRP Special Projects
Subject: Re: Centennial 02-0232

Samuel,

Thank you so much! For a long time, the documents were posted on the project page, so they do exist in digital form.

Susan

On Tue, Oct 27, 2015 at 1:36 PM, DRP Special Projects <dspecialprojects@planning.lacounty.gov> wrote:

An Initial study questionnaire form was completed in 2004. All the areas were consider potential significant. I’ll see if I find a copy and provide that for your information.

From: ARTC- AV [mailto:ourartc@gmail.com]
Sent: Tuesday, October 27, 2015 8:22 AM
To: DRP Special Projects
Subject: Re: Centennial 02-0232

I would like to see the study for determination of what is considered significant, less than significant with mitigation, etc. You must have done a document. Or, do you have one from 2004? If so, could you send that?

Thanks,

Susan
On Tue, Oct 27, 2015 at 7:05 AM, DRP Special Projects wrote:

Morning Susan,

We didn’t include an initial study for the project since the County concluded that every areas of impacts identified in a initial study or Appendix G will need to be analyzed in the EIR for the project.

Samuel Dea

From: ARTC- AV [mailto:ourartc@gmail.com]
Sent: Monday, October 26, 2015 3:02 PM
To: DRP Special Projects
Subject: Centennial 02-0232

Hello Samuel,

Could you send me a copy of the initial study for the project? It does not appear on the webpages.

Thanks,

Susan Zahnter

Interim Director
661.724.2043
Samuel Dea,

Patric of Mountain Enterprise recently asked me to clarify my comments about Tejon Centennial. I wanted to reiterate them to make them perfectly clear.

In 2011 I bought a lot on the corner of Avenue B and 255th street west. Purchase price $10K. My neighbors bought their lots in 2008 for $100K. This example in a nutshell is the damage that Tejon creates by announcing that they are going to build a development then not following through. Some stupid investor lost 90% of their investment value on the belief that Centennial was going to be built next door.

Nota bene property taxes on my 1/2 mile stretch of 255th come out ot $15,000/year. The road looks like a beach. To visit this lot I had to park 1/2 mile away and walk because a car could not drive the road. If the county invested our property tax money to pave the roads this land would pay for itself in 3 years. So in effect the county has profited and prospered from the Tejon promise as well. The property taxes generated by the land values that go up due to the Tejon declarations are not being invested back in the community.

Tejon Mountain Village in neighboring Kern county got the green light to build 3 years ago. To date they have not moved one shovel of dirt. They have however made a back-room transaction for $70,000,000 USD to buy back some rights to the project.

My neighbors on 255th St West pay $1000/year in property tax on land that has lost 90% of its value as a result of the Tejon on-again off-again cherade. How much is Tejon paying in property tax to Kern county now that their Tejon mountain village lots are designated building zoning for housing and commercial?

See that's the problem with Kern and Los Angeles County vis-a-vis Tejon. There is no pressure on them whatsoever to build. They use these permits to make huge back office deals and to make money on the New York stock market and other ways. They cause damage to local real estate investors. They bamboozled their way into being the chosen ones and the only ones able to build in the far west Antelope valley when everyone else is vexed with a no-build juggernaut by the new Town and Country plan.

There needs to be a use-it-or-lose-it clause involved with these kinds of plans and permits. A very high property tax which reflects the new designation would do the trick. You need to make it unprofitable and unwise for them to hold onto the land and keep it undeveloped.

Jack Tuszynski