

Agenda Item No. 9
September 16, 2009

ADDITIONAL
CORRESPONDENCE

Skyline Ranch
Project No. 04-075-(5)
TR 060922

Baldwin, Alejandrina C.

From: Bush, Michele
Sent: Monday, September 14, 2009 10:33 AM
To: Margaret Shekell; Baldwin, Alejandrina C.
Cc: Jay Ziff
Subject: FW: Notice of Completion and Availability of the DEIR, Skyline Ranch Project, County Permit No. 04-075, Santa Clarita Valley, LA County, CA, Sep 14, 2009
Attachments: LA, Comments on Skyline Ranch DEIR, Santa Clarita, 2009-I-0113.pdf
Importance: High

From: Yolanda_Ledesma@fws.gov [mailto:Yolanda_Ledesma@fws.gov]
Sent: Monday, September 14, 2009 9:32 AM
To: Bush, Michele
Cc: Chris_Dellith@fws.gov; Colleen_Mehlberg@fws.gov
Subject: Notice of Completion and Availability of the DEIR, Skyline Ranch Project, County Permit No. 04-075, Santa Clarita Valley, LA County, CA, Sep 14, 2009
Importance: High

Subject letter will be mailed to Michele Bush today.

Yolanda M. Ledesma
OA/South Coast Division
U.S. Fish and Wildlife Office - Ventura
(805) 644-1766 ext 270



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
2009-FA-0113

September 14, 2009

Michele Bush
Department of Regional Planning
County of Los Angeles
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, California 90012

Subject Notice of Completion and Availability of the Draft Environmental Impact Report for the Skyline Ranch Project, County Permit No. 04-075 in the Santa Clarita Valley, Los Angeles County, California

Dear Ms. Bush:

This letter provides the U.S. Fish and Wildlife Service's (Service) comments on the subject Draft Environmental Impact Report (DEIR). The notice of availability was received in our office on July 28, 2009. The proposed project is located in the Santa Clarita Valley west of Sierra Highway, north of Highway 14 and the city of Santa Clarita.

The proposed project would occupy approximately 2,173 acres and would develop approximately 622 acres of the southern portion of the site, including 1,313 lots consisting of: 1,260 residential lots, a 22-acre elementary school site, 10 lots for park areas, 13 debris basin lots, 4 water tank/booster pump station lots, and 25 open space lots. Three quarters of the site (northern 1,551 acres) is proposed to remain undeveloped, with approximately 1,355 acres dedicated or designated as open space through the establishment of the Skyline Ranch Conservation Area (SRCA). Approximately 166 acres of undeveloped land in the northern portion of the site on the Cruzan Mesa would remain undeveloped and designated as a Non-Development/Continuing Use Area. Also, within the northern portion of the site, approximately 22 acres would be preserved as a Mitigation Exchange Area for 22 acres of preserve area within adjacent recorded Tract 46018.

The project site supports 12 vegetation communities including: coastal sage scrub, disturbed coastal sage scrub, coastal sage-chaparral scrub, chaparral, non-native grassland, disturbed, barren, holly-leaved cherry scrub, southern vernal pool, developed, sycamore riparian woodland and southern willow scrub. The dominant communities on the site are coastal sage scrub and mixed coastal sage-chaparral scrub. These communities are interspersed to varying degrees within the project site and provide habitat for various wildlife species.

According to Appendix D-1, the Biological Resources Assessment (BRA) of the DEIR, the federally listed species identified, or with the potential to occur on-site include: the federally endangered Nevin's barberry (*Berberis nevinii*), slender-horned spineflower (*Dodecahema leptoceras*), California orcutt grass (*Orcuttia californica*), Riverside fairy shrimp (*Streptocephalus woottoni*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), arroyo toad (*Bufo californicus*), least Bell's vireo (*Vireo bellii pusillus*), and southwestern willow flycatcher (*Empidonax traillii extimus*); the threatened spreading navarretia (*Navarretia fossalis*), vernal pool fairy shrimp (*Branchinecta lynchi*), Santa Ana sucker (*Catostomus santaanae*), California red-legged frog (*Rana aurora draytonii*), and coastal California gnatcatcher (*Polioptila californica*); and the candidate San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*). This letter includes our comments regarding the federally listed species you identified, as well as endangered California condor (*Gymnogyps californianus*) and Quino checkerspot butterfly (*Euphydryas editha quino*) as they have the potential to occur within the project site. Concurrent with your determination, we do not believe the site could support the Santa Ana sucker, unarmored threespine stickleback, arroyo toad, or California red-legged frog because there is no suitable habitat onsite and thus these species will not be further discussed herein.

The Service's responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines "take" to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Harass is defined by the Service as intentional or negligent actions that create the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species. Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways. If a project is to be funded, authorized, or carried out by a Federal agency, and may affect a listed species, the Federal agency must consult with the Service pursuant to section 7(a)(2) of the Act. If a proposed project does not involve a Federal agency but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit pursuant to section 10(a)(1)(B) of the Act.

As it is not our primary responsibility to comment on documents prepared pursuant to the California Environmental Quality Act (CEQA), our comments on the DEIR do not constitute a full review of project impacts. We are providing our comments based upon a review of sections addressing biological resources, project activities that have potential to affect federally listed species, and our concerns for listed species within our jurisdiction related to our mandates under the Act. Based upon our review, we have the following concerns regarding the DEIR's characterization of impacts to federally listed species.

Surveys: The BRA includes a summary of the biological survey information in Table I. This table includes information about surveys conducted for general site reconnaissance, coastal California gnatcatcher, sensitive plants, trees, and vegetation mapping. Surveys were conducted between 2002 and 2008 with the help of 11 biologists. The scope of the information displayed in the table is extremely large and difficult to decipher. We recommend that the table be revised to better convey the information it is intended to provide.

Information regarding the location of all biological surveys conducted within Skyline Ranch should be disclosed in the DEIR. Even though the currently proposed development site is located in the southern portion of the Skyline Ranch site, Section 5.0 of the DEIR discusses development alternatives outside the currently proposed development site. For the discussion to address the effects of alternative development options on biological resources, the entire Skyline Ranch site should have been surveyed; however, we are unable to confirm this with the information provided. It is especially important to survey portions of the site outside of the development footprint if areas not proposed for development are to be conserved for mitigation purposes pursuant to CEQA. We reiterate that we are unable to determine from the DEIR or the BRA if the entire Skyline Ranch (2,173 acres) was surveyed for biological resources, or if surveys were only conducted within the proposed development footprint.

A vast majority of the sensitive plant surveys were conducted in the spring of 2003 when 15 surveys were completed, followed by five surveys in 2005. While we recognize sensitive plant surveys require a substantial commitment of resources, it should be noted that surveys conducted 6 years ago should be not relied upon to characterize the extent of current site occupation by sensitive plant species. Furthermore, the BRA sensitive plant survey report submitted by Dr. Anuja Parikh and Dr. Nathan Gale is titled "Monosabian Assemblage Site". It unclear where the Monosabian Assemblage Site is located in regards to Skyline Ranch. The report states that survey site was bounded roughly by Sierra Highway to the southeast, Vasquez Canyon Road to the northeast, Bouquet Canyon Road to the northwest, and Plum Canyon Road to the southwest. The largest section of Plum Canyon Road lies primarily to the west of the project site but also bisects Skyline Ranch along Plum Canyon and the base of the Cruzan Mesa. The description of the sensitive plant surveys seems to indicate that surveys were only conducted above Plum Canyon Road, in the areas proposed for open space designations. Failure to survey the portion of the site that is proposed for development would inaccurately describe the impacts of the development on biological resources.

California Natural Diversity Database (CNDDDB): The BRA frequently references the CNDDDB and its role in determining which species may occur onsite. While the CNDDDB is a useful resource to better understand the distribution of rare species, it does not represent all occurrences of those species and cannot be relied upon for a definitive determination of presence of a species within a selected location. As such, species not listed in the CNDDDB in the project vicinity still have a potential to occur on the project site.

Furthermore, the references made to the CNDDDB were made from a search compiled in 2004, according to the BRA. This further limits the applicability of the CNDDDB to the biological

assessment of the project site. For example, page 28 of the BRA states that breeding coastal California gnatcatchers have not been found north of the Santa Clara River since the 1920's. Relying on information produced from the CNDDDB in 2004 would not reflect the breeding pair detected in nearby Bee Canyon in 2008 or the individual that was observed calling near San Francisquito Canyon in 2006 (CNDDDB 2009, occurrences 867, 853, respectively). We recommend that the information in the DEIR that has been derived from the CNDDDB in 2004 be updated to reflect current species records.

Quino checkerspot butterfly: Exhibit 8 of the BRA (page 31) includes the quino checkerspot in the map titled "USFWS Federally Listed Species Occurrences". The occurrence for the butterfly extends over a majority of the Skyline Ranch site; however, this map is the only place that the butterfly is acknowledged in either the DEIR or the BRA. We recommend that the BRA acknowledge why it has been excluded from the document.

Coastal California gnatcatcher: Contrary to the portrayal of species presence in the BRA (page 28), there are numerous observations of coastal California gnatcatchers surrounding the project site in the Newhall, Agua Dulce and Mint Canyon quadrangles of the 7.5-minute U.S. Geological Survey topographic map as recent as 2008 (CNDDDB 2009). In fact, an occurrence was observed by the Service in 1998 near the site in Plum Canyon, which crosses into the Skyline Ranch property (Rick Farris, Service, pers. obs. 1998). In addition, we have indications that the coastal California gnatcatcher may be expanding its range, as it has recently been observed in locations previously considered unoccupied, including an occurrence at the California State University, Channel Islands, in Camarillo, Ventura County. Suitable habitat occurs onsite including chaparral, coastal sage chaparral scrub, coastal sage scrub, and grassland vegetation.

According to Table I of the BRA, focused surveys for the coastal California gnatcatcher were conducted in 2003, 2005, 2006, and 2007. Understanding the methodology of surveys conducted for the coastal California gnatcatcher is important because the DEIR states that surveys were conducted according to Service protocol. There are many requirements for a survey to be completed according to protocol, including, but not limited to: from March 15 through June 30, a minimum of six surveys must be conducted at least 1 week apart; surveys must be conducted between 6:00 am and 12:00 pm; no more than 80 acres can be surveyed per biologist per day; and the permittee must provide information in a report to the Service including the location of the surveys and complete description of survey methods including number of acres surveyed per biologist per hour and how many total acres surveyed per biologist per day. None of the aforementioned information was available in the table submitted in the BRA, and we cannot confirm the surveys were conducted to Service protocol because survey reports were not submitted to the Service containing all the elements required by the protocol. At a minimum, the table should include information about the locations of the surveys as it is not apparent that the entire project site was surveyed according to Service protocol. Finally, the table includes numbers following coastal California gnatcatcher surveys under the "survey type" column, but the table key does not explain the numerical system.

More importantly, we consider the surveys contained in the BRA to no longer be valid for determining the presence or absence of the coastal California gnatcatcher onsite because they are greater than 1 year old. We recommend that surveys be conducted according to Service protocol immediately prior to project related activities, including vegetation removal and construction, to ensure that no coastal California gnatcatchers are present. If coastal California gnatcatchers are detected during the surveys, the Service should be notified immediately to determine if the activities will require an incidental take permit pursuant to section 10(a)(1)(B) of the Act or if a take exemption pursuant to section 7 of the Act would be required.

Finally, it is unclear from the documents whether coastal California gnatcatcher surveys were conducted over the entire Skyline Ranch. The effects of the project on the coastal California gnatcatcher may extend beyond the proposed development footprint due to indirect effects (e.g., cats, lighting, noise, fuel management), or if an alternative development site is chosen. We recommend that protocol level surveys be conducted over the entire Skyline Ranch site where suitable habitat exists to allow the DEIR to adequately address the direct and indirect effects of the project on the coastal California gnatcatcher.

Least Bell's vireo: According to the recovery plan for the species, the least Bell's vireo is an obligate riparian breeder, typically inhabiting structurally diverse woodlands along watercourses (Service 1998). They occur in a number of riparian habitat types, including cottonwood-willow woodlands/forests, oak woodlands, and mule fate scrub. Although least Bell's vireos are tied to riparian habitat for nesting, they have been observed extending their activities into adjacent upland habitats. Least Bell's vireos along the edges of riparian corridors maintain territories that incorporate both riparian and non riparian habitat, including coastal sage scrub.

The BRA states on page 28 and in Table III-4 that no suitable habitat exists onsite for the least Bell's vireo; however, Exhibit 5 depicts a stand of southern coast live oak riparian forest within the proposed development footprint. This vegetation community could potentially support the least Bell's vireo, but it is not discussed in the document. Later in the BRA, Exhibit 10 describes the area as holly leaved cherry scrub and sycamore woodland. Exhibit 16 highlights this area and illustrates the sycamore, oak, juniper, and cottonwood trees that will be removed during the project. In other words, we are concerned that the BRA's description of the habitat is inconsistent, and we are unable to evaluate the conclusions regarding the proposed project's impact on least Bell's vireo habitat. According to information in the BRA, suitable habitat may exist on the proposed development site, and if so, impacts to the least Bell's vireo should be addressed in the DEIR. Furthermore, if the habitat is suitable, we recommend protocol-level surveys for the species throughout the suitable habitat occurring on Skyline Ranch. According to Exhibit 10, suitable habitat may also exist in the southern willow scrub vegetation communities located between Plum Canyon and the Cruzan Mesa.

Condor: A substantial remaining concern is that the DEIR did not address potential impacts of the proposed action on the federally endangered California condor. California condors are known to roost, forage, and feed within the vicinity, and impacts to the species should be more fully evaluated in the final EIR. To ensure the most recent information regarding California

condor use of the project area is considered and incorporated into the final EIR, we recommend coordinating with our office and with Jesse Grantham, the Service's California condor recovery program coordinator. Mr. Grantham can be reached at (805) 644-5185.

Migratory Birds: The Service is concerned about potential impacts to migratory birds in the proposed project area during the construction of the Skyline Ranch development. We have conservation responsibilities and management authority for migratory birds under the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703 *et. seq.*) (MBTA). Any land clearing or other surface disturbance associated with the proposed actions should be timed to avoid potential destruction of bird nests or young of birds that breed in the area, as such destruction may be in violation of the MBTA. Under the MBTA, nests with eggs or young of migratory birds may not be damaged, nor may migratory birds be killed. If this seasonal restriction is not possible, we recommend that a qualified biologist survey the area for nests or evidence of nesting (e.g., mated pairs, territorial defense, carrying of nesting material, transporting food, etc.) prior to the commencement of land clearing activities. If nests or other evidence of nesting are observed, a protective buffer should be established around the nests and avoided to prevent destruction or disturbance to active nests.

Proposed land uses:

Skyline Ranch Conservation Area (SRCA): The proposed 1,355 acre SRCA would provide on-site mitigation for the proposed 622-acre residential development's anticipated impacts on biological resources. Land within the SRCA would be protected through voluntary conservation easements, land dedications, or land set asides within the northern area of the Skyline Ranch property. The area includes the Plum Canyon vernal pool and four smaller pools on the southern portion of the Cruzan Mesa; however, the Cruzan Mesa and 9 acres of open space on the northernmost boundary of the site will be excluded from the SRCA.

According to the DEIR, direct and indirect degradation of habitat would be prevented in part through the steep topography that separates the SRCA from the proposed development area and through the prohibition or restriction of uses within the SRCA. The DEIR does not confirm how the land will be preserved, and what land use protections will be guaranteed within the SRCA. The summary of environmental impacts discussed in the EIR (Table ES-1) states that there will be no adverse impacts to land within the SRCA; however, without knowing what activities will be prohibited or restricted within the SRCA it is difficult to determine how the project will impact the habitat within the SRCA. For example, the project proposes to extend the County Trail System through the SRCA and Cruzan Mesa, which could adversely impact the biological resources of the SRCA. While off-road vehicles, domestic pets, and other harmful activities may be discouraged from using the site according to the DEIR, the trail system will increase access to the SRCA and could potentially lead to adverse impacts to sensitive species and habitats. In conclusion, we are unable to confirm that the proposed project will have no adverse impacts to the SRCA because the DEIR offers few details about the levels of land use protections, activities, and enforcement that will be ensured throughout the site.

Non-Development/Continuing Use Area: The Cruzan Mesa is a biologically diverse system that supports three federally listed species according to the DEIR: the vernal pool fairy shrimp, California orcutt grass, and spreading navarretia. The county of Los Angeles has proposed to designate the area as the Cruzan Mesa Vernal Pools Significant Ecological Area due to the regionally significant resources found onsite.

The Service is concerned about the impacts of excluding the Cruzan Mesa from the land use protections offered by the proposed Skyline Ranch Conservation Area. According to the DEIR, the Non-Development/Continuing Use Area would remain as open space through a recorded land use restriction; however, it is unclear how current or future activities conducted onsite may affect federally listed species. The DEIR does not make a clear distinction between the land use restrictions of SRCA and Non-Development/Continuing Use Area, or how the two will be managed by the applicant. Pages 129 and 130 of the DEIR both state that some activities, including film-making may be approved in both the SRCA and the Non-Development/Continuing Use area. The DEIR characterizes both land use designations as conservation areas, but does not explain why the two are separated.

According to the DEIR, the Cruzan Mesa is the only area on the Skyline Ranch site that supports federally listed species, and we recommend that the site be given the strictest land use protections possible to support the conservation of the biological resources found on the Skyline Ranch property. The federally listed species found on the Cruzan Mesa occur within vernal pool systems. According to the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon, the major threats to vernal pool species include, but are not limited to: habitat loss and fragmentation, altered hydrology, invasive species, contaminants, inappropriate management and monitoring, overutilization, disease, and human waste, recreational use, and vandalism (Service 2005). The Cruzan Mesa and its vernal pool systems should be managed to protect vernal pool species from these threats through land use restrictions and/or active management.

Open Space: According to the DEIR, 9 acres of land on the northernmost portion of the Skyline Ranch property will remain as open space without conservation easements or restrictions. The site is surrounded by the Non-Development/Continuing Use Area and the SRCA. The DEIR does not explain the reasoning behind excluding the site from the SRCA or Non-Development/Continuing Use Area. The project description of the DEIR should address any plans for development or project activities within the open space area if it will not be protected as open space and the impacts of any future activities should be discussed.

Alternatives: The DEIR discusses three project alternatives that include residential development. Both the Reasonably Foreseeable On-Site Development and the Reduced Project A alternatives include residential development on the Cruzan Mesa. The Reduced Project B alternative would reduce the size of the currently proposed project in the southern portion of Skyline Ranch, and would not develop on the Cruzan Mesa. As previously discussed, the Cruzan Mesa is a biologically significant resource area and we agree with the DEIR's

determination that the Reduced Project B would be the environmentally superior alternative that meets the project objectives. We recommend the applicant pursue this development alternative.

Furthermore, if biological surveys were only conducted in the construction footprint of the originally proposed development, the DEIR would not be able to appropriately characterize the impacts of alternative developments outside of that area, nor the value of "conservation areas" in relation to the project impacts. Thus, the Reasonably Foreseeable On-Site Development and the Reduced Project A alternatives would not have accurately addressed the impacts to biological resources. The DEIR should more clearly state if the entire project site, including the Cruzan Mesa, was surveyed.

In summary, we find the DEIR to be lacking in the specificity of information regarding the presence of federally listed species and biological resources needed to accurately evaluate and characterize the impacts the project, as proposed, would have on these resources. We encourage that this information be gathered for evaluation by the applicant and the county of Los Angeles such that any impacts to federally listed species be avoided wherever possible or minimized to the maximum extent. We are willing and available to work with you to achieve this goal; however, any action that would result in the take of listed animal species would be subject to the prohibitions of section 9 of the Act, thus requiring some form of exemption, either through an incidental take permit or interagency consultation if a federal nexus exists.

We appreciate the opportunity to provide comments on the Skyline Ranch Residential Development DEIR. If you have any questions regarding our comments, please contact Colleen Mehlberg of our staff at (805) 644-1766, extension 221.

Sincerely,

/s/: Chris Dellith

Chris Dellith
Senior Biologist

cc:
Betty Courtney, California Department Fish and Game

LITERATURE CITED

- [CNDDB] California Department of Fish and Game, Natural Diversity Database. 2009. Element occurrence reports for *Polioptila californica*. Unpublished cumulative data current to September 2009.
- Rick Farris 1998. Personal observation. Fish and Wildlife Biologist, Ventura Fish and Wildlife Office. Ventura, California.
- U.S. Fish and Wildlife Service. 1998. Draft recovery plan for the least Bell's vireo. U.S. Fish and Wildlife Service, Portland, Oregon. 139 pp.
- U.S. Fish and Wildlife Service. 2005. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. U.S. Fish and Wildlife Service, Portland, Oregon. xxvi + 606 pp.

Baldwin, Alejandrina C.

From: Bush, Michele
Sent: Monday, September 14, 2009 4:53 PM
To: Baldwin, Alejandrina C.
Subject: FW: Skyline Ranch DEIR Comments
Attachments: Skyline Ranch Letter.doc; Saugus Well Production0001.pdf; Perchlorate Res _Chapter_.pdf

From: Katherine Squires [mailto:kat_268@att.net]
Sent: Monday, September 14, 2009 4:46 PM
To: Bush, Michele
Subject: Skyline Ranch DEIR Comments

Hello,

The attached files include the Sierra Club's DEIR comment letter for the proposed Skyline Ranch project along with several additional attachments.

Thank you,

Katherine Squires
Conservation Chair
Santa Clarita Sierra Club

Saugus Formation Wells Actions

Well	Lost Capacity (gpm)	Action Taken	Restored Capacity (gpm)
V-157	1,500	Replaced with Well V-206	1,500
NC-11	1,200	Taken out of service	0
Saugus 1	2,600	Rehabilitate well; install treatment	1,200
Saugus 2	2,600	Rehabilitate well; install treatment	1,200
Total	7,900		3,900

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Resolution of the Executive Committee of the Angeles Chapter

The Angeles Chapter opposes additional land use approvals in Santa Clarita that rely on water from the contaminated Saugus aquifer until clean up facilities to remove the ammonium perchlorate, NDMA and other pollutants from this ground water source are functioning.

Approved unanimously
7-23-06



September 12, 2009

Michele Bush
County of Los Angeles Dept. of Regional Planning
Impact Analysis Section
Room 1348
320 West Temple Street
Los Angeles, CA 90012

TITLE
Skyline Ranch Project No, 04-075

COMMENTS

As both residents of the Santa Clarita Valley and members of the Sierra Club, we are extremely concerned about the ramifications of the "Skyline Ranch Project." The proposed build-out of 1260 residential lots within the city of Santa Clarita is shocking when one considers the economic, environmental, and societal pressures of the times. The proposed Skyline Ranch project will substantially degrade the quality of the environment in northern Los Angeles County.

A recent trend of development corporations consists of attempts (and many have been successful) to redefine southern California by creating new developments in the midst of our most beautiful remaining open spaces. The proposed Skyline Ranch development area is one of these open spaces. It is situated in the heart of the city of Santa Clarita Valley.

- Infrastructure

Since year 2007, California has not needed thousands of new homes especially in newer towns such as Santa Clarita. If anything, people should be moving into homes in more urban areas where there are more jobs, public transportation, etc. Foreclosures, bankruptcies, and losses of adequately paying jobs have resulted in a surplus of unoccupied homes; including new homes. Many new homes and small businesses in the Santa Clarita Valley remain uncompleted and/or empty because of the recession, a sick economy, state and federal deficits, and a long-term lack of demand for more new homes. California has the worse debt and economy of any state in the country. Citizens have lost much income and savings over the last year and the project may soon be asking them to spend and buy in an isolated, remote area.

Due to the troubling economic times, many schools in the Santa Clarita Valley have seen a huge drop in enrollment and thus have lost state A.D.A. monies in addition to the extremely detrimental budget cuts coming from both the state and federal government. This has meant that local school districts have had to halt the building of new schools, increase class-sizes, and have either pink-slipped and or let-go of qualified teachers. How would a new development of over a thousand new homes make any of these problems better?

- Biology

Skyline Ranch is a wildlife linkage corridor and the animals that exist on or utilize the property will be losing their habitat and foraging grounds. Native habitat will be destroyed and many of the few pockets of open space will be just that, "islands" within the development. How will this be of any use to the animal species that frequent this wildlife corridor? This makes no sense. Animals that transition through the area (looking for food and water, etc.) will have nowhere to go. If allowed to be built, this project would sever the natural transition zones in the area prohibiting animals from crossing through necessary wildlife corridors. It would also destroy portions of an irreplaceable eco-region.

There are numerous significant impacts to coyotes, owls, toads etc... (many rare species who in many cases are already declining in numbers). However, the impacts always seem to be mitigated to non-significant levels by such things as: monitoring of property by a qualified biologist, relocation of animals, and/or limitations on human and pet access. We ask who the biologist would be? How often would the biologist be checking the property? Is he/she going to walk in front of the bulldozers to see if toads are about to be squished? Where would these animals be relocated to? How would relocating an animal(s) effect the biology of the relocation area and its native species? How can the limiting of human and pet access be enforced?

In other words, what the DEIR promises in mitigations for endangered or rare species is basically not possible.

One such example of an animal species in peril is that of the Black-tailed jackrabbit:

Years ago, one of our Sierra Club members, Don Mullally, was one of a group of people allowed on the land of the proposed project by Newhall Land and Farm to examine natural features and conditions. He was surprised to discover jackrabbits on land proposed for the housing project.

Apparently the hares existed on the part of the project located near the river due to much relatively level and gently sloping open land supporting brush, grasses, and herbs. Steep slopes of the Santa Susana Mountains with woodlands located a short distance south of the project are not inhabited by jackrabbits. In fact, jackrabbits have never been observed by myself or associates on the steep slopes and their canyons in the middle and upper parts of the Santa Susana Mountain

Range of Los Angeles County. Similarly, equivalent parts of the Santa Monica Mountains, San Gabriel Mountains, and Verdugo Mountains are also devoid of jackrabbits. Tongues of large valleys such as the San Fernando Valley extend into foothill canyons were formerly habitat for jackrabbits. However, for the most part those have been developed, and jackrabbits are now absent from them.

Jackrabbits were formerly common in all the large valleys of southern California. Don Mullally knows this because he observed the animals. Unfortunately, the California Department of Fish and Game, the Army Corps of Engineers, and the United States Fish and Wildlife Service, and the systems of state and county parks stood by doing nothing while the jackrabbits went extinct in the Santa Clarita Valley, San Fernando Valley, Los Angeles Basin, and the San Gabriel Valley. A few may continue to survive in the low hills and canyons on the northern side of the Simi Valley and in undeveloped locations in valleys east of San Gabriel Valley. The once hare-infested area of Cucamonga also seems to now be devoid of jackrabbits.

Presently the question is – What will be the fate of the jackrabbits on and near the Skyline Ranch project? How far will the people of the Los Angeles greater area need to travel to see a common jackrabbit? Incidentally, the collapse of the noted populations of jackrabbits led to the disappearance of Golden eagles in the Los Angeles Basin and greater area.

As mentioned above, the proposed project would result in the loss of suitable foraging habitat for a variety of species (including mammals such as mountain lions/mule deer, birds such as condors/raptors, reptiles, amphibians, etc.), and the direct loss of special status plant species. It is easy to see that the impacts on animal and plant species will be drastic.

However, the DEIR is very inconsistent when describing potential mitigation measures and other solutions to the problem. When mitigation measures are mentioned they are weak or vague. Case in point, the DEIR states repeatedly that the effects of development will be significant and ultimately unavoidable.

Also, for some reason the County allowed a destructive filming operation on the sensitive Cruzon Mesa, currently proposed for Significant Ecological Area (SEA) designation. This area contained habitat that supported the endangered fairy shrimp, inhabitants of rare California vernal pools such as that found in the Cruzan Mesa. A recent and destructive wildfire was also allowed to burn through this area. CEQA requires that investigation of biological resources must be reviewed on a baseline prior to destruction of native habitat. We believe that this DEIR is inadequate because it does not use the proper baseline biological surveys in the DEIR

Stating that the impacts to wildlife are unavoidable is not acceptable and the mitigation measures suggested are not enough.

- Traffic

People inhabiting the homes potentially created by the Skyline Ranch Development Plan will, for the most part, probably have employment at well paying jobs in distant cities. Each day many thousands of workers and their automobiles will be leaving or returning to the town from these cities. This proposed development will bring thousands of additional car trips a day onto our freeways and surface streets and increase air pollution which is already some of the worst in the nation. Despite the claims of local developers to the contrary, most people who buy homes in the proposed development will simply not be able to work and live in the same community. Jobs in the service sector of local small towns will not yield sufficiently high salaries and wages to meet monthly house payments and other necessary costs. All highways leading to big cities offering high wages will become more crowded with automobiles than they are at present. Traffic congestion was much worse before the poor economy and recession. Traffic on surface streets and along Interstate 5, Highway 14, and along Sierra Highway could become literally unbearable. New homes are not the answer to the needs and wishes of the people living in Santa Clarita Valley and neighboring areas. Traffic congestion is a major concern of the residents of the surrounding areas.

- Air Quality

Another serious concern with the DEIR is the substantial effect the proposed development would have on the worsening air quality that we have in our area. It is obvious that the cumulative air pollutant emissions in the area would contribute to the degradation of local and regional air quality. The Santa Clarita Valley already has some of the worst air quality in the nation. Katherine Squires, a local teacher, sees the effects of poor air quality on the children in her Canyon Country classroom. Each year she sees more and more students who suffer from asthma. The SCV already exceeds Federal air pollution standards for particulate matter generated from dust and diesel pollution.

In addition, there would be long term effects resulting from the additional traffic on our local roads and freeways. Climatologists agree that greenhouse gases are causing global warming and even the Supreme Court, in its decision several months ago, said that EPA must address Carbon Dioxide as a pollutant. These two facts alone suggest that further discussion of global warming should appear in this DEIR. The project should not be approved without making public transportation available to its future residents.

- Geology and Paleontology

The proposed development is situated in an area prone to extreme tectonic activity (at the same rate of uplift as that which created the Himalaya Mountains). The area is in a regional setting of demonstrable high seismic risk. Consider the aftermath of a major earthquake on the people that could potentially reside in the proposed 1260 units.

It is challenging for the reader to be more specific about the geology and paleontology of the area because the property has historically been off-limits to researchers and scientists. Such individuals have been denied access. Therefore, it is necessary to consult the few papers that discuss the area on and adjacent to the property (from many years ago). Past research demonstrates the fact that the site has important and rare megafauna including vertebrate remains of: camels, horses, antelopes, rhinos, and various carnivores. More research needs to be done before evaluating the "significance" of this project's ramifications.

This rich diversity of megafauna from the Late Miocene/Early Pleistocene (5-6 Million years old) can yield valuable information about paleoclimate, biostratigraphy, and chronostratigraphy. Unfortunately, it is hard to be specific about the Soledad Basin area's non-marine resources because paleontologic knowledge of this stratigraphic unit in the proposed project area has been severely hampered by the land owner's long-standing policy that forbids any research that might jeopardize their development plans. This lockout of research has also hampered detailed stratigraphic analysis of the nonmarine Mint and Saugus Formations in the critical area of the proposed development.

As their scientific tools improve with time, stratigraphic sections like the one proposed will be invaluable. This is the developers opportunity to leave a legacy that demonstrates they are a progressive corporation, much like the Tejon Ranch owners of the newly approved Tejon Ranch projects.

The paleontologic part of the DEIR is riddled with redundant and generalized non-informative statements. Details are sorely lacking, and these details are definitely needed before the merits of the DEIR can be determined by the readers of this document. It is extremely self-serving to mention the rich diversity of fossils in the various stratigraphic units and then to provide no details because independent researchers have been denied access to the area for decades.

The proposed project is excessively massive, and the impact on the geological and paleontological resources are permanent and unforgiving. Every effort must be made to preserve as much pristine area as possible.

Where will the fossils that are found during grading be stored? The developer should pay for the storage space and storage cabinets needed to house the fossils found on the site. Storage cabinets could be placed at the Natural History Museum of Los Angeles County. But of course, the question remains, has the Natural History Museum of Los Angeles County been contacted about receiving the material? Do they, in fact, have the space?

Additionally, there needs to be a guarantee that the paleo-monitors have a degree in geology and have had a course in paleontology/paleontology lab whereby they have learned to recognize invertebrate fossils. Hiring untrained paleo-monitors who have never had a course in the identification of invertebrate fossils would be unacceptable.

- Green Building Standards

The Sierra Club requests that green building standards be included as conditions of any approval that might be considered.

- Fire Hazard

This project is in an extremely high fire hazard zone. It was recently burned over by a destructive arson fire pushed by Santa Ana winds that burned 38,000 acres. Had this fire occurred after this project was built, many homes would have been lost.

The Sierra Club opposes further sprawl projects in the urban interface that are indefensible from wildfires. Such projects will cost enormous amounts of taxpayer dollars to fight future wildfires. Project approvals in high fire hazard zones should require, at the least, additional mitigation funding for fire fighting so that this burden is not placed on tax payers at a later date.

Further, there is inadequate fire service for this project and inadequate ingress and egress to provide swift emergency service and evacuation for residents.

- Water Resources

The area in which this project is located does not have sufficient ground water to support additional housing.¹ Therefore water to serve this project must come from the State Water Project (SWP) or the western reaches of the Santa Clara River.

The Water Supply Assessment (WSA) for the project does not include the recent Federal Court decisions and Biological Opinions that have reduced pumping from the Sacramento Delta², and thus reduced water availability to the SWP. A new Water Supply Assessment that includes the impact of reduced pumping required by these decisions must be included in the review of this project to determine whether the water supply is adequate to support the project.

¹ See well graphs available through Santa Clarita Water Co.

² *Natural Resources Defense Council v Kempthorne*, 506 F.Supp.2d 322 (E.D. Cal. 2007) (*Wanger* Decision - Delta smelt); and *Pacific Coast Federation of Fishermen's Associations, et al. v. Gutierrez, et al.*, No. 06-CV-00245-OWW-GSA (E.D. Cal. 2008) (*Wanger* Decision - Chinook salmon/steelhead).

Should cutbacks of state water supply continue, the only source of sufficient ground water is in the western end of the Santa Clarita Valley³. The Santa Clara River is not adjudicated, so this water is available to the project, however extensive piping and pumps must be installed to make it available to locations in the eastern portion of the Santa Clarita Valley.

Water in the western reaches of the Santa Clara River is currently also being considered for use by Newhall Ranch. Both projects cannot be supported by this water supply. A cumulative analysis must be conducted as required by CEQA and the SB610 to ensure an adequate water supply.

Ammonium Perchlorate Pollution

In 1997 ammonium perchlorate contamination was discovered in the Saugus and alluvial aquifers of the Santa Clarita Valley. Since that time, six municipal drinking water wells have been closed down⁴, some of them permanently. Since the Saugus Aquifer is the drinking water supply long depended on in Santa Clarita as the emergency drought back up as well as a major source of daily supply, its contamination has been a blow to the reliability of local water supplies.

Ammonium perchlorate pollution affects the function of the thyroid gland causing hypothyroidism. Reduced thyroid function in pregnant women may cause retardation in the fetus.

In 2000 the Castaic Lake Water Agency (CLWA) and other local purveyors filed litigation against the Whittiker Berrite project to force them to clean up the water supply or pay for the clean up. Several years later a settlement agreement was reached that provided for funding to clean up two of the Saugus wells polluted by this contamination and one of the Alluvial wells.

In 2004, the Sierra Club and Friends of the Santa Clara River won an appellate court decision requiring disclosure of the ammonium perchlorate pollution and requiring a time line for the clean up in CLWA's Urban Water Management Plan⁵.

Since then the Sierra Club has remained concerned that the facilities to provide this clean up continue to be delayed while thousands of additional housing units are approved. These facilities are still not operating as of the date of this letter.

In addition to these delays, it was previously represented that the two wells designated to provide "capture" and clean up of the ammonium perchlorate (Saugus Well 1 and 2) would be returned to their previous production levels. However, CLWA found that production was significantly reduced by 50% in those two wells by the clean up process.⁶

³ Groundwater Basin Yield, 2008, Ludhdroff and Scalmanini and GSI Solutions, Inc., 2009, hereby included by reference in this administrative record.

⁴ Stadium Well, Valencia Well Q2, Valencia Well 157, Saugus 1 and 2, NCWD 11

⁵ *Friends of the Santa Clara River v. Castaic Lake Water Agency et al.*, 2004, CalAp5

⁶ See attached chart of Saugus Well Production Chart

Due to these significant delays and reductions in water supply, the Angeles Chapter of the Sierra Club passed a resolution⁷ calling for the halt to housing approvals until the ammonium perchlorate treatment facilities are functioning to provide the community with its

Conclusion for Water Section

The Santa Clarita Water Co. is wholly owned by Castaic Lake Water Agency. It is in the interests of CLWA to promote projects that will buy additional state water project water from CLWA, the state water wholesaler for the Santa Clarita Valley. This fact creates a conflict of interest. We believe an independent source should provide the water supply information for this company's projects in order to ensure their accuracy. All agencies should carefully review the water supply information for errors or omissions.

The Sierra Club believes a monopoly control that does not separate the retailer from the wholesaler of water supply may create serious problems for our community. The potential unwanted outcome may lead to poor planning, direction of water resources to only certain projects or water hoarding that impedes communities in their efforts to fairly distribute this precious resource. Such serious ethical issues should be held in mind as this project is reviewed and addressed by the decision-makers.

Attachments:

- 1.Saugus Well Production Chart from information provided by Castaic Lake Water Agency
- 2.Sierra Club Resolution 7-23-06

CONCLUSION

The Sierra Club is concerned that if the proposed Skyline Ranch development plan succeeds with county government, the entire region in the heart of the Santa Clarita Valley will become nearly continuous urban and suburban development. The water situation could become unbelievably serious. Furthermore, many of the values of southern California will be forever lost (scenic open spaces, habitat for wildlife, and a rich variety of fossil resources etc.). The Skyline Ranch development plan could set in place a dangerous precedent. The National Sierra Club has a policy against urban sprawl projects such as this one due to their unsustainability and wasteful use of resources. It is requested that mitigation (including green building standards, a corridor for wildlife movement and public transportation for commuters that will live in the project) be provided that would reduce the disclosed impacts.

⁷ Resolution approved 7-23-06, attached

Sierra Club comments9

At this time the Sierra Club favors the development alternative. We want to ensure reduced density and to be guaranteed that our environmental concerns (lack of water and infrastructure, traffic, air quality, and wildlife corridors, etc.) are sufficiently addressed.

Sincerely,

Katherine Squires

Conservation Chair, Santa Clarita Group

Baldwin, Alejandrina C.

From: Bush, Michele
Sent: Monday, September 14, 2009 5:31 AM
To: Baldwin, Alejandrina C.
Subject: FW: CEQA filing fee exemption for Skyline Ranch Project(SCH#2004101090)

Good morning Alejandrina,

I wasn't sure if you received this email.

Michele

-----Original Message-----

From: Leslee Newton-Reed [mailto:LNEWTONREED@dfg.ca.gov]
Sent: Tuesday, September 01, 2009 3:47 PM
To: Bush, Michele
Subject: CEQA filing fee exemption for Skyline Ranch Project(SCH#2004101090)

Michele,

Thank you for your submittal of the CEQA filing fee exemption request. The Department of Fish and Game (Department) has determined that the Skyline Ranch Project (County of Los Angeles Department of Regional Planning acting as the CEQA lead agency) is not eligible for a no effect determination. Based on the documentation we have reviewed for the proposed project, the Department has determined that, for purposes of the assessment of CEQA filing fees [Fish and Game Code Section 711.4(c)], the project causes a physical disturbance to habitat [California Code of Regulations, Title 14, Section 753.5(d)]. Therefore, a CEQA filing fee of \$2,768.25 for an Environmental Impact Report must be paid for the project upon filing of the Notice of Determination to the County Clerk (check made payable to the appropriate county clerk). In addition, the County Clerk may charge a processing fee.

[Fish and Game Code Section 711.2(a) For purposes of this code, unless the context otherwise requires, "wildlife" means and includes all wild animals, birds, plants, fish, amphibians, reptiles, and related ecological communities, including the habitat upon which the wildlife depends for its continued viability and "project" has the same meaning as defined in Section 21065 of the Public Resources Code.]

Please contact me at (858) 467-4281 if you have any questions regarding this decision.

Thank you,
Leslee

Leslee Newton-Reed
CA Dept. of Fish and Game - South Coast Region
4949 Viewridge Ave.
San Diego, CA 92123
858-467-4281
858-467-4235 fax
LNEWTONREED@dfg.ca.gov

CEQA filing fee increase (January) and other information regarding no effect exemptions -
http://www.dfg.ca.gov/habcon/ceqa/ceqa_changes.html

Pursuant to Governor's Executive Order S-13-09, the office will be closed on the first, second, and third Friday of each month.



City of
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www.santa-clarita.com

September 14, 2009

Ms. Michelle Bush
Principal Regional Planning Assistant
Impact Analysis Section
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Bush:

Subject: DEIR Comments for VTTM 060922, Skyline Ranch – Pedestrian Crossing for School/Park

The City has reviewed the above-referenced EIR and as determined that the document adequately addresses project impacts, mitigation measures and project alternatives. However, there is one portion of the DEIR which we believe warrants further analysis and mitigation.

The pedestrian safety discussion on page 4.F-44 of the DEIR notes that pedestrian safety at the intersection of Skyline Ranch Road and Main Street South, in the vicinity of the school site, would be provided by, “fully improved streets with full width sidewalks,” and that children crossing Skyline Ranch Road at the school site would be able to use “the traffic signal adjacent to the school.” It should be noted that there is no signalized intersection depicted on the tentative tract map for this location, nor are there any mitigation measures proposed in the DEIR which would require installation of a traffic signal at this intersection. Page 4.F-45 of the DEIR goes on to state that “the plan includes all feasible measures to ensure a high level of pedestrian safety” and then stops short of specifying any actual pedestrian safety mitigation measures which must be implemented in order to mitigate potential pedestrian safety impacts.

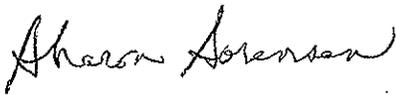
The City has a concern with pedestrian safety for both school children and other future residents who would be accessing the school site, the park site and the bike paths and trails at this intersection. The applicant’s proposal illustrated in Figure 2-8 of the DEIR (pages 2-16), addresses this concern through the use of a strategically located pedestrian bridge and a series of off-street paseos and a stairway which provides off-street linkages to the school site, the park site, the central bike paths and the community on the east side of Skyline Ranch Road. We believe this overall concept would effectively address the project’s overall pedestrian safety impact; however, the DEIR contains no mitigation measures requiring these pedestrian improvements and the project application has recently been amended to describe construction of the pedestrian bridge as “optional” to be paid for and constructed at the discretion of the school district. The school district would likely be unable to expend school funds for an improvement which would benefit the entire Skyline development. We therefore believe inclusion of a mitigation measure requiring the subdivider to construct the pedestrian bridge and paseo improvements as illustrated in EIR Exhibit 2-8 prior to the occupancy of the first unit on the northeast side of Skyline Ranch Road is necessary in order to mitigation potential pedestrian safety impacts.



Alejandrina Baldwin
Proposed VTTM 060922, Skyline Ranch
March 30, 2009
Page 2 of 2

Thank you for the opportunity to comment on the DEIR. Should you have any questions, or would like to discuss our comments; you may contact Associate Planner David Koontz, AICP, at 661-255-4330 or by email at dkoontz@santa-clarita.com.

Sincerely,



Sharon Sorensen
Senior Planner

SS:DK:kb
S:\CD\CURRENT\IR\IRP FILES\VTTM 60922 (Skyline Ranch)\vttm60922 Bush 9-13-09.doc

Attachment

cc: Paul Novak, 5th District Planning Deputy
Susan Tae, Supervising Regional Planner
James Bizelle, Pardee Homes
Lisa Webber, Planning Manager
Sharon Sorensen, Senior Planner
David Koontz, Associate Planner
Andrew Yi, City Traffic Engineer

Baldwin, Alejandrina C.

From: Bush, Michele
Sent: Tuesday, September 15, 2009 9:43 AM
To: Baldwin, Alejandrina C.
Subject: FW: Comments on county project 04-075-(5)

-----Original Message-----

From: Kathryn Marsailles [mailto:kmarsai@fastmail.fm]
Sent: Monday, September 14, 2009 11:34 PM
To: Bush, Michele
Subject: Comments on county project 04-075-(5)

These comments are in regard to environmental impact report for state clearinghouse number 2004101090 county project number 04-075-(5) vesting tentative tract map no. 060922 conditional use permit 04-075 oak tree permit case no. 04-075 highway realignment case no. 200900001.

I live at 17601 Sierra Hill St. and am concerned about the impact the the above proposed development. Firstly, since I have asthma, the detrimental affect on air quality caused by the extensive grading is worrisome.

The affects of the grading on runoff and possible flooding or mudslides for our area are of also of concern. The extension of a road to Sierra Highway, which is seems to be near to Sierra Cross, will probably cause significant congestion. Lastly, the report states that "Wildlife diversity on the site is moderate, commensurate with the rather homogeneous nature of the sage scrub and grassland-covered slopes and ridges that comprise most of the site." For your records I am including a list of wildlife that I have seen on my property over the last 8 years. I am not sure what the definition of "moderate wildlife diversity" is for this area, but I would encourage the county to preserve as much of the undeveloped sage scrub areas as possible as well as the other six vegetation communities Skyline Ranch supports according to your report. With so much of the Angeles National Forest having burned in this last fire, it might be wise to preserve more animal habitat.

Over the years on my property alone I have seen:

bobcats
coyotes
raccoons
king snakes
rattlesnakes
gopher snakes
a red coach whip
legless lizards
screech owls
great horned owls
tarantulas
tarantula wasps
"sun spiders" or solpugids
alligator lizards
fence lizards
roadrunners
rabbits
ground squirrels

monarch butterflies
yellow swallowtail butterflies
moths
mule deer
Southern California toads
oreoles
titmouse(mice?)
peregrine falcons
red-tailed hawks
robins
California quails (large flocks)
hummingbirds
ravens
crows
mourning doves
purple finches
yellow finches
scorpions
broad-winged katydid
cone-nose bugs
ten-lined June beetles
woodpeckers
Jerusalem crickets
And my husband might have seen a young mountain lion because it was a "bobcat, but it had a tail."

I am hoping that you will preserve as much of the natural habitat as you can.

Baldwin, Alejandrina C.

From: Bush, Michele
Sent: Tuesday, September 15, 2009 2:41 PM
To: Baldwin, Alejandrina C.
Subject: FW: SCAG Comments on the DEIR for the Skyline Ranch Project
Attachments: SCAG Comments on DEIR (I20090488).pdf

From: Bernard Lee [mailto:leeb@scag.ca.gov]
Sent: Tuesday, September 15, 2009 1:24 PM
To: Bush, Michele
Subject: SCAG Comments on the DEIR for the Skyline Ranch Project

Dear Ms. Bush,

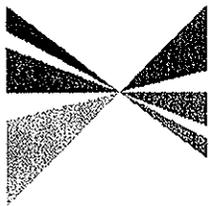
Attached are comments from the Southern California Association of Governments regarding the Draft Environmental Impact Report for the Skyline Ranch Project [I20090488].

Please contact me if you have any questions or encounter difficulty opening the attachment.

Thank you,
Bernard

Bernard Lee
Southern California Association of Governments
Office: 213.236.1895
Email: leeb@scag.ca.gov

 Please consider the environment before printing this email.



ASSOCIATION of GOVERNMENTS

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Keith Hanks, Azusa

Transportation
Mike Ten, South Pasadena

September 14, 2009

Ms. Michele Bush
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012
mbush@planning.lacounty.gov

RE: SCAG Comments on the Draft Environmental Impact Report for the Skyline Ranch Project [I20090488]

Dear Ms. Bush,

Thank you for submitting the **Draft Environmental Impact Report for the Skyline Ranch Project, County Project No. 04-075 [I20090488]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project, located on 2,173 acres (of which 622 acres would be developed), would consist of 1,260 residential lots.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision (CGV) that may be applicable to your project. The RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please provide a copy of the Final Environmental Impact Report (FEIR) for our review. If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1800. Thank you.

Sincerely,

Jacob Lieb, Mahager
Assessment, Housing & EIR

DOCS# 153232

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
SKYLINE RANCH PROJECT [SCAG NO. I20090488]**

PROJECT LOCATION

The proposed project is located in the Santa Clarita Valley west of Sierra Highway, north of Highway 14 (Antelope Valley Freeway) and the City of Santa Clarita. The project site includes various undeveloped parcels west of Sierra Highway (Mint Canyon) between the Santa Clara River and Vasquez Canyon.

PROJECT DESCRIPTION

The proposed Skyline Ranch project site occupies approximately 2,173 acres. The project is a request to develop on approximately 622 acres of the site, which includes 1,313 lots consisting of 1,260 residential lots, an approximately 11-acre elementary school site, 10 lots for park areas, 13 debris basin lots, four (4) water tank/booster pump station lots and 25 open space lots. Nearly three quarters of the site (the northern 1,551 acres) is proposed to remain undeveloped, with approximately 1,355 acres dedicated or designated as open space through establishment of the proposed Skyline Ranch Conservation Area (SRCA). Approximately 166 acres of undeveloped land in the northern portion of the site on the Cruzan Mesa would remain undeveloped and designated as a Non-Development/Continuing Use Area. Also within the northern portion of the site approximately 22 acres would be preserved as a Mitigation Exchange Area for 22 acres of preserve area within adjacent recorded Tract 46018. The project includes a Conditional Use Permit application due to Density-Controlled Development and Hillside Management Areas; and an Oak Tree Permit for the removal of one oak tree.

The project site is undeveloped except for the northern portion, known as Cruzan Mesa, which is currently being leased by a film production company as an outdoor movie location. Portions of Cruzan Mesa have been previously used for cattle grazing and are the site of sizable vernal pools. Remnants of an old landing strip are still present on Cruzan Mesa; based on available historical information, this landing strip had been in operation from at least the late 1950s until the late 1980s. Also within the project boundary are seven parcels (or 60 acres) under private ownership, which are not a part of the proposed project. These include five vacant parcels and two parcels with one single-family unit each. These parcels are outside of the proposed development area and access to these parcels would not be affected by the proposed project.

Large portions of the project site, located to the north, lie adjacent to undeveloped lands. The southern portion of the project site, the portion designated for development, lies adjacent to or in the vicinity of existing urban development. Residential development in the City of Santa Clarita lies adjacent to the southernmost edge of the west side of the project site, with residential development continuing southward into the larger city area. A smaller residential tract is located to the southeast of the project site along Sierra Highway.

In particular, within the immediate vicinity of the location of the proposed connection of the new access road that would extend from Whites Canyon Road to Sierra Highway just north of Adon Avenue are several multi-family residential developments, motels, and daycare/preschool facilities. Sierra Highway extends southeast and northwest from its closest point to the project site with limited strip commercial uses interspersed with residential development and industrial uses further to the north. Soledad Canyon Road is located approximately one mile south of the project site and provides the nearest major commercial activities to the project site.

The following approvals are required for the project.

- Vesting Tentative Tract Map approval (for the development of 1260 residential lots) pursuant to Subdivision Code Subsections 21.38.010 through 21.38.080;

- Conditional Use Permit for Density-Controlled Development pursuant to Zoning Code Subsection 22.56.205 and Hillside Management Areas pursuant to Zoning Code Subsection 22.56.215;
- Oak Tree Permit (for removal of one oak tree) pursuant to Zoning Code Subsections 22.56.2050 through 22.56.2260;
- Approval to construct a 70-foot non-standard right-of-way within a local interior street;
- Other approvals, subsequent to discretionary approval, including those from the following agencies:
 - County Sanitation Districts of Los Angeles County (Sewer Line Connection Permit);
 - Los Angeles County Department of Public Works (Building Permit, Grading Permit, Improvement Plan Permit, General Municipal Separate Storm Sewer System Permit, Flood Control Easement);
 - Los Angeles County Fire Department (Approval of Alternative cul-de-sac/turnaround on Beneda Lane).

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most current SCAG forecasts, which are the 2008 Regional Transportation Plan (RTP) Population, Household and Employment forecasts (adopted May 2008). The forecasts for your region, subregion, and county are as follows:

Adopted SCAG Regionwide Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted NLAC Subregion Forecasts (Unincorporated)¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	194,704	244,463	294,120	342,578	389,595	434,773
Households	58,090	74,714	92,232	105,907	119,114	129,981
Employment	46,820	56,539	62,745	70,041	77,831	85,289

Adopted NLAC Subregion Forecasts (Total)¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	719,989	839,942	960,006	1,076,970	1,190,463	1,299,449
Households	215,650	253,750	293,899	325,241	355,511	380,417
Employment	193,386	218,637	234,761	253,717	273,957	293,334

Adopted County of Los Angeles Forecasts (Unincorporated)¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

Adopted County of Los Angeles Forecasts (Total)¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	10,615,732	10,971,598	11,329,832	11,678,549	12,015,885	12,338,619
Households	3,357,798	3,509,580	3,666,631	3,788,732	3,906,851	4,003,501
Employment	4,552,398	4,675,875	4,754,731	4,847,436	4,946,420	5,041,172

1. The 2008 RTP growth forecast at the regional, subregional, and county levels was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

Chapter 4.R (Population, Housing and Employment) utilizes the 2008 RTP forecasts. In order to derive values for years 2007 and 2017, the preparers of the EIR have interpolated.

The 2008 **Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

SCAG Staff Comments:

SCAG staff finds the project meets consistency with RTP G4 and partial consistency with RTP G1, G5, and G6. RTP G2, G3, and G7 are not applicable to this project.

The proposed project meets partial consistency with RTP G1. Mobility pertains to the speed at which one may travel and the delay, or difference between the actual travel time and travel time that would be experienced if a person traveled at the legal speed limit. Table 4.F-16 (ICU and LOS Summary with Mitigation) indicates that all analyzed intersections meet Level of Service (LOS) requirements (LOS E per page 4.F-10), after accounting for improvements. Accessibility measures how well the transportation system provides people access to opportunities, such as jobs, education, shopping, recreation, and medical care. The proposed project site is located approximately two miles north of Highway 14, slightly challenging access to the rest of the region. Local access is provided via Sierra Highway.

With regard to RTP G4, the proposed project meets consistency. Productivity is a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. As mentioned previously, analyzed intersections near the proposed project site would perform at acceptable Levels of Service.

The proposed project meets partial consistency with RTP G5. Per page 4.H-40, the proposed project's operation would exceed SCAQMD thresholds for five out of six criteria pollutants, after mitigation measures have been applied. Table 4.H-7 (Estimated Operational Emissions Without Mitigation) indicates that Mobile Sources contribute to emissions in a significant manner. However, pages 4.S-7 to 4.S-9 discuss the low impact development standards and green building programs that the project intends to implement.

The proposed project meets partial consistency with RTP G6. The project site is located two miles from Highway 14, which provides regional access and is located near Sierra Highway, which provides local access. Pages 2-14 to 2-19 describe roadway improvements that will be required in order to provide sufficient access to the site. Three Santa Clarita Transit bus lines, operating on 30 minute headways, stop within a quarter mile of the project site.

GROWTH VISIONING

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

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

SCAG Staff Comments:

Where applicable, the proposed project meets partial consistency with Growth Visioning Principle 1. GV P1.3 is not applicable since the project is not a transit-oriented development.

The proposed project meets partial consistency with GV P1.1. The project site has moderately reasonable regional and local access (via Highway 14 and Sierra Highway, respectively), but will require additional roadway extensions to effectively serve the project. Three bus lines currently run within a quarter mile of the site, but only operate on 30 minute headways.

SCAG staff cannot determine consistency with GV P1.2. The North Los Angeles County subregion lags the SCAG region overall, as it relates to jobs/housing balance.

The proposed project meets consistency with GV P1.4. In addition to autos, other modes (public transit, walking, and biking) have been accounted for in the project's objectives on page 2-5.

Principle 2: Foster livability in all communities.

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

Where applicable, the proposed project meets partial consistency with Growth Visioning Principle 2. GV P2.4 is not applicable since there is not a single-family neighborhood on the project site.

SCAG staff cannot determine consistency with GV P2.1, as the existing site is largely undeveloped.

With regard to GV P2.2, SCAG staff cannot determine consistency, as the proposed project is almost exclusively residential.

The proposed project meets partial consistency with GV P2.3. One of the project objectives, listed on page 2-5, is to "Create a pedestrian friendly environment which encourages pedestrian access between neighborhoods, parks, and a public elementary school." However, the Mobility Objectives related to walkability seem to focus around pedestrian safety in the context of autos, as opposed to creating pedestrian-oriented environments.

Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

Where applicable, SCAG staff is unable to assess the proposed project's consistency with Growth Visioning Principle 3, based on the content in the DEIR. GV P3.2 and 3.5 are not applicable.

Principle 4: Promote sustainability for future generations.

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

SCAG Staff Comments:

The project meets partial consistency with Growth Visioning Principle 4.

As mentioned previously, the proposed project would be built on land that is largely undeveloped. Therefore SCAG staff cannot determine consistency with GV P4.1.

With regard to GV P4.2, the proposed project meets partial consistency. While it is not in an existing city, the southern portion of the project site lies adjacent to urbanized areas, including

portions that are within the City of Santa Clarita.

The proposed project meets consistency with GV P4.3 and P4.4. Pages 4.S-7 to 4.S-9 discuss the Los Angeles County low impact development standards, drought-tolerant landscaping standards, and green building development standards. In addition, pages 4.S-25 to 4.S-27 discuss additional green building standards that would be implemented by the project applicant.

CONCLUSION

Overall, the proposed project partially meets consistency with SCAG Regional Transportation Plan Goals and Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. Refer to the SCAG List of Mitigation Measures for additional guidance, which may be found here:

http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21018.7, and CEQA Guidelines Section 15097 (g).

