Regional Planning Commission Transmittal Checklist

Hearing Date
June 29, 2011
Agenda Item No.
6

Project Number: TR066952-(5)

Case(s): VESTING TENTATIVE TRACT MAP NO. 066952
CONDITIONAL USE PERMIT NO. 200700038

Planner: Jodie Sackett, Land Divisions Section

- ☒ Factual
- ☒ 8.5x11 and 11x17 Aerial GIS Maps
- ☒ Staff Report
- ☐ Draft Resolution / Draft Ordinance / 8.5x11 Map (ZC or PA)
- ☒ Draft Findings
- ☐ Draft Conditions
- ☒ Burden of Proof Statement(s)
- ☐ Environmental Documentation
- ☒ Correspondence
- ☐ Color Photos
- ☐ Aerial Image(s)
- ☒ Land Use Radius Map
- ☒ Tentative Tract / Parcel Map
- ☐ Site Plan / Floor Plans / Elevations
- ☒ Exhibit Map
- ☐ Landscaping Plans
- ☐ _____
- ☐ _____
- ☐ _____

Reviewed By: Noshi Paidar

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PROJECT NO. TR066952-(5)
VESTING TENTATIVE TRACT MAP NO. 066952
CONDITIONAL USE PERMIT NO. 200700038

RPC MEETING DATE	CONTINUE TO
AGENDA ITEM NO.	
PUBLIC HEARING DATE June 29, 2011	

APPLICANT	OWNERS	REPRESENTATIVE
Valley Vineyards, LLC	Leona Valley Estates Limited	Richard Doss, Pacific Coast Civil Engineering Inc.

REQUEST
Vesting Tentative Tract Map: To create 117 single-family lots, two private street lots and one water tank lot on 292 gross acres.
Conditional Use Permit ("CUP"): To ensure compliance with Non-Urban Hillside Management and Density-Controlled Development provisions, and for an onsite wastewater treatment facility and onsite project grading exceeding 100,000 cubic yards of combined cut/fill.

LOCATION/ADDRESS Bouquet Canyon Road and 87th Street West, Leona Valley	**ZONED DISTRICT** Leona Valley
ACCESS Bouquet Canyon Road	**COMMUNITY** Antelope Valley
	EXISTING ZONING A-2-2 (Heavy Agricultural – Two Acre Minimum Required Lot Area)

SIZE	EXISTING LAND USE	SHAPE	TOPOGRAPHY
292 gross (267 net) acres	Vacant	Rectangular	Variably sloping

SURROUNDING LAND USES & ZONING (WITHIN 500 FEET)

North: Single-family residences, vacant parcels / A-2-2, A-1-1 (Light Agricultural – One Acre Minimum Required Lot Area)	**East:** Vacant parcels / A-2-2
South: Single-family residences, vacant parcels / A-2-2	**West:** Single-family residences, vacant parcels / A-2-2

GENERAL PLAN	DESIGNATION	MAXIMUM DENSITY	CONSISTENCY
Antelope Valley Areawide Plan	N1 (Non-Urban 1)	139 DU	To be determined

ENVIRONMENTAL STATUS
The environmental determination is currently on hold.

DESCRIPTION OF SITE PLAN
The vesting tentative map and exhibit "A" dated February 4, 2009 depict 117 single-family lots, two private street lots and one water tank lot on 292 gross acres. Single-family lot sizes range from 1.5 to 10.5 gross acres and cover most of the project site. Each lot contains a building pad and associated grading, which, including grading associated with road paving, totals 2.3 million cubic yards of combined cut and fill material, to be balanced onsite. The overall footprint of the single-family lots exists in a broad range from the lower-lying portions of the project site, to the steeper slopes running below ridgelines and in some locations on top of or just below several hilltops and ridgelines existing on the property. Project open space as depicted, including within the individual single-family lots and private street lots, totals approximately 212 net acres (or 79 percent of the overall project net area). This open space includes approximately 122 acres of "greenbelts" for commercial vineyards covering 46 percent of the development. The two private street lots (Lot Nos. 119 and 120) constitute a proposed private drive circulation system, with 36 feet of paved width and 12 feet of unpaved road shoulders on each side containing bio swales and an interior trail system. Also included in the private drive system are proposed roundabouts at several intersections vegetated to assist with onsite water retention. The private drive system connects to 87th Street West to the north and Bouquet Canyon Road to the east, and there is a proposed gated entry at each point. A public multi-purpose trail is proposed onsite along 87th Street West then continuing along the northerly boundary of the subdivision, and connects offsite to the west at 87th Street West and east along Bouquet Canyon Road, respectively. The proposed water tank is located near the southwesterly corner of the development site and is accessed through Lot Nos. 62 and 65 via a 24 foot wide private driveway. Proposed along the water tank access driveway is a retaining wall with a maximum height of 10 feet. There are no Oak trees located on the subject property.

KEY ISSUES

Please refer to Page 2.

TO BE COMPLETED ONLY ON CASES TO BE HEARD BY THE BOARD OF SUPERVISORS

STAFF CONTACT PERSON		
RPC HEARING DATE (S)	RPC ACTION DATE	RPC RECOMMENDATION
MEMBERS VOTING AYE	MEMBERS VOTING NO	MEMBERS ABSTAINING
STAFF RECOMMENDATION (PRIOR TO HEARING)		
SPEAKERS* (O) (F)	PETITIONS (O) (F)	LETTERS (O) (F)

*(O) = Opponents (F) = In Favor

SUBDIVISION COMMITTEE RECOMMENDATION

☐ APPROVAL ☐ DENIAL

☐ No improvements ____ 20 Acre Lots ___ 10 Acre Lots ___ 2½ Acre Lots ___ Sect 191.2

☒ Street improvements __X__ Paving ___ Curbs and Gutters __X__ Street Lights

___ Street Trees ____ Inverted Shoulder ___ Sidewalks ___ Off Site Paving ____ft.

☒ Water mains and hydrants

☒ Drainage facilities

☐ Sewer ☐ Septic tanks ☒ Other Alternative Onsite Wastewater Treatment System (OWTS)

☒ Park dedication "in-lieu fee"

INDIVIDUAL AGENCY COMMENTS

Please refer to the attached reports and agency correspondence.

KEY ISSUES/OTHER

(CONTINUED FROM PAGE 1)

- **Vineyards within required open space:** Currently proposed are up to 122 acres of "greenbelt" lands reserved for commercial vineyards that are located within required project open space. According to current County policy and practice, commercial vineyards cannot be included as part of the required open space area for non-urban hillside management projects.
- **Non-urban hillside management & density:** The proposed development is a non-urban hillside project and a CUP for non-urban hillside management is required. Staff has determined that the current project design does not sufficiently reduce hillside impacts and that the project does not meet the CUP burden of proof.
- **Density-controlled development & project design:** As the project proposes lot sizes less than the required two acres, a CUP is required for density-controlled development (clustering). The proposed single-family lots are arranged into several "clusters" with many of these lots reduced to 1.5 acres, the minimum allowed per the CSD. Staff has determined that the clustering design is insufficient, as many of the lots need to be relocated or eliminated, in order to achieve less hillside disturbance, keep lots clustered in fewer portions of the project site, and allow open space to be set aside in separate fee lots.
- **Required net area & easements:** Many of the proposed single-family lots that are less than two acres in size will not have enough net lot area per the required zoning after easements for wastewater treatment, commercial vineyards and public trails are deducted. The project should be redesigned so that the minimum required net lot area can be met.
- **Onsite wastewater treatment:** The proposed wastewater treatment facilities are currently proposed to be maintained by an HOA. The size and type of proposed treatment facility requires maintenance through the creation of a separate maintenance district, and the project should be redesigned to reflect the creation of such a district.

PREPARED BY
Jodie Sackett

PROJECT NO. TR066952-(5)
CONDITIONAL USE PERMIT NO. 200700038
VESTING TENTATIVE TRACT MAP NO. 066952

STAFF REPORT

JUNE 29, 2011
REGIONAL PLANNING COMMISSION PUBLIC HEARING

PROJECT OVERVIEW

Valley Vineyards, LLC ("applicant") proposes a subdivision of land to create 117 single-family lots, two private street lots, and one water tank lot on 292.5 gross acres. Associated with the subdivision is a Conditional Use Permit ("CUP") for non-urban hillside management, density-controlled development, an onsite wastewater treatment facility, and project grading exceeding 100,000 cubic yards of combined cut and fill (a total of approximately 2.3 million cubic yards). The project site is located at Bouquet Canyon Road and 87th Street West, in the unincorporated community of Antelope Valley and within the Leona Valley Community Standards District ("CSD"), Fifth Supervisorial District of Los Angeles County.

Major project issues include the following:

- Vineyards within required open space: Currently proposed are up to 122 acres of "greenbelt" lands reserved for development with commercial vineyards that are located within required project open space. According to current County policy and practice, and consistent with the intent of the Hillside Management Ordinance, commercial vineyards are not consistent with the uses included as part of required open space area for non-urban hillside management projects. For this project, a non-urban hillside management development, the required open space would be 186 acres, or 70 percent of the project site. The commercial vineyards are proposed to occupy up to 122 acres of the designated open space area on the project site, which would result in less than 70 percent of the required open space being provided. Therefore, the project does not satisfy the open space requirement of the Hillside Management Ordinance.

- Non-urban hillside management & density: The proposed development is a non-urban hillside project and a CUP for non-urban hillside management is required. Staff has determined that the current project design does not sufficiently reduce hillside impacts nor provide the minimum required 70 percent of open space (due to the inclusion of a commercial vineyard within the open space), and, therefore, the project does not meet the CUP burden of proof.

- Density-controlled development & project design: As the project proposes lot sizes less than the required two acres, a CUP is required for density-controlled development (clustering). The proposed single-family lots are arranged into several "clusters" with many of these lots reduced to 1.5 acres, the minimum allowed per the CSD. Staff has determined that unless the clustering design were improved by relocating and/or eliminating many of the lots, in order to achieve less hillside disturbance, keeping lots clustered in fewer portions of the project site, allowing open space to be set aside in separate fee lots, and reducing the amount of grading which is significant in the current

proposal, the project does not meet the required burden of proof for density-controlled development.

- Required net area & easements: As proposed, many of the single-family lots that are less than two acres in size will not have enough net lot area per the required zoning after easements for wastewater treatment, commercial vineyards, public trails and open space are deducted. Without a project redesign, the minimum required net lot area of 60,000 square feet would not be met on these lots, and therefore, the project is inconsistent with the requirements of the Leona Valley Community Standards District ("CSD").

- Onsite wastewater treatment: As proposed, the wastewater treatment facility would be maintained by a homeowners association. However, the size and type of the proposed treatment facility necessitates maintenance through the creation of a separate maintenance district. Therefore, unless the project were redesigned to include the creation of such a district, the project does not satisfy the necessary wastewater treatment facility requirements.

DESCRIPTION OF THE SUBJECT PROPERTY

Location: The project site is located at Bouquet Canyon Road and 87th Street West, in the unincorporated community of Antelope Valley, in the Fifth Supervisorial District of Los Angeles County.

Existing Features: The subject property is approximately 292.5 gross (267 net) acres in size, rectangular in shape, with variably-sloping terrain, ranging from relatively level areas with slopes of up to 25 percent to steeply sloping terrain with slopes of 50 percent or more. There is existing scrub vegetation, with no Oak trees located on the subject site. The project site is currently vacant, although the is disturbed with dirt trails crossing through the property along a ridgeline and in multiple directions.

Access: Access to the subject property is provided by Bouquet Canyon Road, a Limited Secondary Highway under the Los Angeles County Master Plan of Highways, with 60 feet of existing right of way and approximately 32 feet of paved width. Access is also provided by 87th Street West, a public street, with 60 feet of existing right of way and approximately 28 feet of paved width.

Water and Sewer Service: Domestic water service to the project site is proposed to be provided by the California Water Service Company ("Cal Water"). As proposed, sewage disposal would be provided by a proposed private onsite septic system collectively serving the development that also acts as a decentralized wastewater treatment system. The treated water is proposed to be used for irrigation on the site.

ENTITLEMENTS REQUESTED

Vesting Tentative Tract Map No. 066952: A subdivision of land to create 117 single-family lots, two private street lots, and one water tank lot on 292.5 gross acres.

CUP No. 200900125: For non-urban hillside management, density-controlled development, an onsite wastewater treatment facility, and project grading exceeding 100,000 cubic yards of combined cut/fill.

EXISTING ZONING

Subject property: The subject property consists of 292.5 acres of A-2-2 (Heavy Agricultural – Two Acres Minimum Required Lot Area) zoning.

Surrounding area: Surrounding zoning within 500 feet of the subject property:

- North: A-2-2, A-1-1 (Light Agricultural – One Acre Minimum Required Lot Area)
- East: A-2-2, City of Palmdale
- South: A-2-2
- West: A-2-2

EXISTING LAND USES

Subject property: The subject property consists of two vacant parcels of land, with grading and drainage improvements existing on the northerly parcel.

Surrounding area: Surrounding land uses within 500 feet of the subject property:

- North: Single-family residences, vacant parcels
- East: Vacant parcels
- South: Single-family residences, vacant parcels
- West: Single-family residences, vacant parcels

PREVIOUS CASES/ZONING HISTORY

Previous cases:

- Parcel Map 4607: A subdivision of four single-family parcels on 275.7 gross acres recorded on November 21, 1974.

Zoning history: The current zoned district was created by Ordinance No. 6727 adopted on August 12, 1955.

PROJECT DESCRIPTION

The project proposes a total of 117 single-family lots dispersed throughout the approximately 292.5-acre site. The lots cover the majority of the project site, although the building pads located on each lot are concentrated in approximately eight groupings of development on the project site. The project also proposes to include up to 122 acres of "greenbelt" area, some or all of which is proposed to be used for commercial vineyard operations. The commercial vineyards and other proposed open space areas would be dispersed throughout the private

lots created on the project site and would be subject to easements, deed restrictions, or other mechanisms to set them aside as open or commercial vineyard space. The various elements of the proposed project are discussed in more detail below.

Site Design: The vesting tentative map and exhibit "A" dated February 3, 2011 depict 117 single-family lots, two private street lots and one water tank lot on 292 gross acres. Single-family lot sizes range from 1.5 to 10.5 gross acres and are dispersed throughout most of the project site. Each lot contains a building pad and associated grading, which, including grading associated with road paving, totals 2.3 million cubic yards of combined cut and fill material, to be balanced onsite. In 2009, the project was redesigned to reduce the number of single-family lots from 121 to 117 and reduce the overall amount of grading from 2.8 to 2.3 million cubic yards.

The proposed development is dispersed throughout the project site and spans the various types of terrain. The overall footprint of the single-family lots exists in a broad range from the lower-lying, and relatively level, portions of the project site to the steeper slopes running below ridgelines, and in some locations on top of or just below several hilltops and ridgelines, on the property. Project open space totals approximately 95.8 net acres (or 36 percent of the overall project net area), and is proposed to be contained within individual single-family lots, rather than in separate dedicated open space lots. The project also contains approximately 122 acres of "greenbelts" for commercial vineyards that would be contained within easements stretching through the project site.

The project is proposed to be a gated community, with a gated entrance provided at each of its two access points. The project is proposed to be accessed from 87th Street West on the north and Bouquet Canyon Road on the east. These two gated entry points would lead into a private drive circulation system within the project site. The two private street lots (Lot Nos. 119 and 120) comprise the proposed private drive circulation system, with 36 feet of paved width and 12 feet of unpaved road shoulders on each side containing bio swales and an interior trail system. Also included in the private drive system are proposed roundabouts at several intersections that are vegetated and assist with onsite water retention.

The proposed water tank is located near the southwesterly corner of the development site and is accessed through Lot Nos. 62 and 65 via a 24 foot wide private driveway. Proposed along the water tank access driveway is a retaining wall with a maximum height of 10 feet. There are no oak trees located on the subject property.

Grading: The project proposes a total of approximately 3.2 million cubic yards of earthwork that would include 1,160,000 cubic yards of cut and 1,160,000 cubic yards of fill, which are proposed to be balanced onsite.

Utilities: A public water connection is proposed for the project. The project also proposes a private septic system to be developed onsite that would collectively serve all of the proposed development. The private septic system would utilize an advanced wastewater treatment system whereby the treated water would be used for onsite irrigation. The system is proposed to be maintained by a Homeowner's Association.

Trails: A public multi-purpose trail is proposed onsite along 87th Street West continuing along the northerly boundary of the subdivision, connecting offsite to the west at 87th Street West and east along Bouquet Canyon Road, respectively.

*****PROJECT ANALYSIS*****

CONSISTENCY WITH THE ANTELOPE VALLEY AREAWIDE PLAN

LAND USE ELEMENT

The subject property is located within the N1 (Non-Urban 1 – Up to 0.5 Dwelling Units Per Gross Acre) land use category of the Land Use Policy Map of the Antelope Valley Areawide Plan ("Area Plan"), a component of Los Angeles Countywide General Plan ("General Plan"). The N1 category is a residential land use classification (Area Plan, p. VI-1). The subject project proposes a single-family residential development, which is consistent with the N1 land use designation of the Area Plan.

The Area Plan contains policies specifically directed at development within the Leona Valley, which are intended to maintain the rural character of the community. Leona Valley is a "designated rural community" of the Area Plan (see pp. IV-6 & IV-13). According to the Area Plan, in order to protect the rural character and equestrian lifestyle of the community, land use patterns and development in Leona Valley should consist of minimum two acre lot sizes, and local streets 24 feet in paved width with no curb, gutter or sidewalk, and trails (pp. IV-6, 7). The project proposes several elements that conflict with the intent to avoid urban-style development and maintain the rural character of the area. The project's proposed private street network does not have curbs, gutters, or sidewalks, which is consistent with Area Plan policy. However, the project proposes streets that are 50 percent wider than the Area Plan policy for local street width. The project proposes streets to be paved to a width of 36 feet, which conflicts with the rural character of the street infrastructure intended in the Area Plan. The project proposes an average lot size greater than two gross acres and new public trails, consistent with Leona Valley policies and the requirements of the Los Angeles County Department of Parks and Recreation ("Parks and Recreation"). However, the project also includes lots that do not meet minimum net area requirements as proposed (60,000 square feet minimum net area), and proposes to remove existing trails located on the project site. The lack of sufficient net lot area, the removal of existing trails, and the 50 percent increase in street width (by an additional 12 feet) are all inconsistent with the policy set forth in the Area Plan to maintain the existing rural character of the Leona Valley community.

Proposed Town & Country Plan

The draft update to the Area Plan titled, "Town and Country" was recently made available for public review on the Regional Planning website on March 28, 2011. The updated plan proposes a re-designation of the subject site land use category from Non-Urban 1 ("N1") to Rural Lands 10 ("RL10"). The land use designation RL10 requires a minimum gross lot area of 10 acres. According to the proposed plan, the subject property would be designated for a maximum of 29 dwelling units in order to maintain the existing rural character. Although the updated plan has not yet been adopted, and is not applicable to the current project, nevertheless it should be noted that the proposed project density of 117 dwelling units is inconsistent with the proposed RL10 land use designation and would not be consistent with the draft Town and Country Plan.

CONSISTENCY WITH THE GENERAL PLAN

LAND USE ELEMENT

The applicant is proposing a project located in a hillside management area that exceeds the low density threshold for the project site. As such, there are several policies and objectives within the Countywide General Plan ("General Plan") that apply to the proposed project. Of particular interest are those related to the preservation of hillside management resources and the provision of required open space for hillside management projects.

Non-Urban Hillside Management

Projects that are proposed for sites with slopes exceeding 25 percent and at densities exceeding the low density threshold require additional review and analysis to ensure that they are consistent with hillside resources. The applicant's slope density map indicates that slopes exceeding 25 percent exist on the subject property. The low density threshold for the subject project is 40 dwelling units, the midpoint density is 89 dwelling units, and the maximum density is 139 dwelling units. The proposed density of 117 dwelling units exceeds the low density threshold of 40 dwelling units. Therefore, according to the non-urban hillside development provisions of the General Plan (p. LU-29), a Hillside Management CUP is required.

The applicant's position on this matter is that the low density threshold is 80 dwelling units and the maximum density 139 dwelling units, thereby making the midpoint density 109 dwelling units. Please refer to the applicant's correspondence (Letter 3: "Hillside Management Density Calculations") dated October 29, 2010 for further details.

Required Open Space

A nonurban hillside management residential project for which a CUP is required must provide a minimum of 70 percent of the project site as open space. In order to preserve hillside resources and natural areas, minimize disturbance of the project site, and, in some circumstances to provide recreational opportunities, the General Plan includes several policies that guide what constitutes an allowable use within required open space areas. The project, as proposed, includes commercial vineyards within the required open space areas, and therefore, is not consistent with the applicable General Plan policies.

Agriculture and Open Space

In proposing the commercial vineyards as part of the required open space area, the applicant cited the agricultural nature of the vineyards as justification for allowing them to satisfy the open space requirement of a hillside management development. However, the General Plan Land Use Element indicates that agricultural uses are separate uses from open space (Table 3.1, p. III-3). The General Plan specifically establishes the Open Space land use designation that includes "public and privately owned lands committed to long term open space use...and include regional parks, beaches, golf courses, cemeteries, sanitary landfills and military reservations" (p. III-25). Conversely, agricultural uses are included within the Non-Urban land use classification (p. III-24), and are not considered to be part of the Open Space designation.

The General Plan goes on to list areas that may be eligible for open space easements and includes hillside management areas; however agricultural areas are not included in this list. Thus, the General Plan considers agriculture and open space as separate uses and does not consider agricultural uses as a type of open space. Therefore, based on General Plan policy, staff concludes that the project's proposed agricultural use (commercial vineyards) is generally not considered as open space, and specifically for hillside management areas is not consistent with the type of open space that will satisfy the open space requirement.

Commercial Agriculture as Required Open Space

The Land Use Element of the General Plan further describes uses that may be included in required open space for non-urban residential hillside development proposals: "common open space for passive recreation; areas graded for rounding of slopes to contour appearances; areas of scenic beauty; hiking, riding and bicycling trails; areas cleared for fire suppression, and landscaped areas adjacent to streets and highways" (p. III-67). The project proposes to develop the required open space area with commercial vineyards, which is not consistent with the types of uses that were intended to be allowed in the required open space areas. The intent of the open space requirement for hillside development was to preserve natural areas, minimize disturbance of the project site, and/or to provide recreational opportunities for the public. Thus, the vineyards are inconsistent with the General Plan policies governing the types of uses allowed in open space areas and, as such, would not count toward the required open space for a hillside development project. Golf courses, which are an example of a commercial use allowed within required open space areas for hillside projects, were found by the County to be compatible as such a use provides a recreational opportunity consistent with the activities listed in the General Plan as appropriate for open space. Therefore, based on General Plan policy and County practice, staff concludes the proposed commercial vineyards cannot be considered to satisfy the required open space for the proposed non-urban hillside residential development.

The applicant's position on this matter is that commercial agriculture is an acceptable type of open space. Please refer to the applicant's correspondence (Letter 11: "Agriculture/Vineyards as Open Space") dated September 25, 2008 for further details.

CONSISTENCY WITH THE ZONING ORDINANCE

Agriculture in the A-2 Zone

The Zoning Ordinance ("County Code") lists a number of permitted uses in the A-2 zone, and includes agriculture (crops—field, tree, bush, berry and row, including nursery stock) as well as single-family residences (Section 22.24.120). However, while the particular use is permitted by the zone, this does not mean the use is appropriate in meeting the required open space under the non-urban hillside management provisions of the County Code. While agriculture is a permitted use in the A-2 zone, it cannot be automatically concluded that agriculture is permitted to apply towards the required open space for non-urban hillside management projects. Furthermore, the same section of the County Code that allows "field, tree, bush, berry and row" crops as a permitted use, also allows a range of agricultural uses within the A-2 zone, including the raising livestock, including hogs, running dairies, and establishing feed lots. These uses would not be consistent with the intent of open space as described in the General Plan. Whether a use is permitted as an agricultural use in a zone and whether it satisfies the open space requirements of the Hillside Management Ordinance

are separate questions. Therefore, staff concludes that the fact an agricultural use may be permitted in the A-2 zone is not applicable to whether the use can count towards the open space requirements for hillside management for the subject project.

The applicant's position on this matter is that if a particular agricultural use (such as vineyards) is permitted by the zone which the project is subject to, it means that the use should be allowed to meet the open space requirements of the non-urban hillside management provisions of the County Code which the project is subject to. Please refer to the applicant's correspondence (Letter 4, p. 2: "Applicant response to staff summary of holds" and Letter 11: "Agriculture/Vineyards as Open Space") dated October 21, 2010 and September 25, 2008 for further details.

Applicability of Non-Urban Hillside Management

The County Code defines non-urban hillside management area as "those areas having a natural slope of 25 percent or more included within the non-urban classification of the general development policy map of the General Plan" (Section 22.08.080). The definition specifically cites areas classified, or designated, as non-urban on the General Plan map, which includes the subject property. In addition to the general development policy map, the General Plan also contains a separate Special Management Areas Map that includes hillside management areas and other resources. The "terrain where the natural slope is 25 percent or greater constitutes hillside management areas, [and is] shown in generalized form" (General Plan, p. II-39). Therefore, while the General Plan provides a map that generally depicts hillside management areas, the County Code, in its definition, lists two criteria for whether a property contains hillside management areas:

1) Contains areas with a natural slope of 25 percent or greater, and
2) Is within the non-urban classification of the General Plan.

As the subject property meets both parts of the above definition, the project does include hillside management areas. According to the County Code, a project located in a hillside management area that proposes a density exceeding the low density threshold, is required to get a Hillside Management CUP. For the proposed project, a low-density threshold of 40 dwelling units was calculated based on the applicable General Plan, Area Plan, and Zoning Code provisions. The proposed density of 117 units for the project exceeds the low density threshold. Therefore, staff concludes that the development is subject to the non-urban hillside management provisions of the County Code and a CUP for non-urban hillside management is required (Section 22.56.215).

Pursuant to the Department's consistent application of the HM Ordinance requirements, a project site that contains hillside management areas as defined above, and proposed development that exceeds the low density threshold is required to obtain a HM CUP.

The applicant's position on this matter is that those portions of the project site that have slopes less than 25 percent (approximately 133 acres) should not be subject to hillside management provisions. Please refer to the applicant's correspondence (Letter 3: "Hillside Management Density Calculations") dated October 29, 2010 for further details.

Required Open Space for Hillside Management

The County Code describes uses that may be included in required open space for non-urban residential hillside development proposals: "undisturbed natural areas, open space for passive recreation, private yards, parks and open recreational areas, riding, hiking and bicycling trails, landscaped areas adjacent to streets and highways, greenbelts, areas graded for rounding of slopes to contour appearance, such other areas as the hearing officer deems appropriate" (Section 22.56.215.J1). As the proposed vineyard is a commercial agricultural use, and is not a type of use intended to be included within required open space as listed above in the County Code, it does not satisfy the required open space for a non-urban hillside management project. As such, the vineyards area (up to 122 acres of the development) would not be included in the total open space being provided pursuant to the non-urban hillside management requirements. With this deduction, there would be only approximately 36 percent (or 95.8 net acres) of the project site being preserved as open space. Since the exclusion of the commercial vineyards from the open space area places the proposed development below the minimum required 70 percent required open space, the project does not meet the provisions of the County Code indicated above.

In addition, currently, the applicant is proposing all required open space within private single-family lots. Although in some instances on non-urban hillside management projects required open space has been counted within private lots, staff believes that required open space is best protected when dedicated in separate fee lots.

Midpoint Density

As earlier indicated, the project is subject to the non-urban hillside management provisions of the County Code, which stipulate one dwelling unit per five acres (1DU/5ac) for 0 to 25 percent slopes. Thus, the low density threshold should be calculated using a density of 1DU/5ac for the 0 to 25 percent sloping terrain located on the subject property (Section 22.56.215.E.1.a.i). The subject project is proposing a total of 26.6 dwelling units allowed within the 0 to 25 percent slopes, 14.3 dwelling units allowed within the 25 to 50 percent slopes, and zero dwelling units allowed within the over 50 percent slopes. This yields a low density threshold of 40 dwelling units for the development. With a low density threshold of 40 dwelling units, and a maximum density of 139 dwelling units, the midpoint density for the subject project is 89 dwelling units.

In considering the current project density of 117 dwelling units, which is 28 units above the established midpoint, staff has indicated in its Subdivision Committee reports that the proposed density is inappropriate, based on the project's lack of consistency with County policy related to the use of open space as an agricultural/commercial use, and lack of compliance with the non-urban hillside management and density-controlled development provisions of the County Code.

The applicant's position on this matter is that the County Code does not require that the project be held to a "midpoint density", and that staff should recommend approval of the current density (117 units) so long as it is below the maximum density of 139 units. Please refer to the applicant's correspondence (Letter 3: "Hillside Management Density Calculations" and Letter 4: "Applicant response to staff summary of holds") for further details.

Density-Controlled Development (Clustering)

The applicant is proposing a "clustered" project in order to reduce the minimum required lot size for some of the lots proposed in the project from 2 acres to 1.5 acres, which is the minimum size allowed for a density-controlled development project according to the Leona Valley CSD. The applicant contends that the clustering of the proposed locations of the building pads, rather than clustering of the lots themselves, satisfies the density-controlled development requirements, thereby entitling the project to include lots that are less than the 2-acre minimum size required by the project site's zoning.

Section 22.08.040 of the Zoning Code defines density-controlled development as a concentration of dwelling units on a portion or portions of a project site where the remainder of the project site shall be "free of buildings or structures", with the intent that "the use of smaller lots" would result in "retaining the remaining portion" of the project "in permanent open space." Clustered development typically concentrates development on one main portion of the project site, leaving the remaining area of the project site free of structures and development. Often that remaining portion is set aside as a separate open space lot or lots in order to facilitate the orderly preservation and maintenance of that area. The proposed project disperses single-family lots in eight separate groups throughout the entirety of the project site, rather than concentrating development in a particular area. As proposed, the project does not meet the "concentration" provision of the County Code. In addition, only 65 of the proposed 117 single-family lots (or 56 percent) are less than the minimum required two acres in area, which significantly limits the benefits of density-controlled development for the preservation of the remaining area as open space.

Staff implementation of density-controlled development for land divisions requires that such projects cluster lots (not just building pads or structures), so that the remaining area is set aside as separate open space fee lots. This configuration of residential development and open space has been found by the County to be consistent with the General and Area Plan policies related to "clustering," as well as found consistent with the definition and related provisions of density-controlled development stated above in the County Code to be more protective of natural resources by placing development (i.e. single-family lots) within a smaller footprint. As proposed, the project results in overdevelopment and excessive grading of the subject site. Given the fact that the proposed project does not meet the definition and established standards of a density-controlled development and does not propose a sufficient clustering design, staff concludes that the density-controlled development provisions of the County Code have not been met.

The applicant's position on this matter is that the project sufficiently utilizes a "clustered" design, since the building pads of all 117 lots are divided into several distinct "clusters" located throughout the development site. Please refer to the applicant's correspondence (Letter 4, p. 1: "Applicant response to staff summary of holds") for further details.

CONSISTENCY WITH THE SUBDIVISION ORDINANCE

Waiver Request for Street Frontage

The Subdivision Code requires that lots have 50 feet of frontage on a public street. Here, the applicant is proposing a system of private streets, rather than public streets, within the project site. Therefore, the applicant is requesting a waiver of public street frontage

requirements pursuant to Section 21.24.040 of the Subdivision Code. The intent of proposing a private street system is to allow for the development of a nonstandard roadway that would be 36 feet in paved width and would include "bio swales" adjacent to the roadway that allow storm water to be retained onsite and infiltrate back into the ground. The proposed private street configuration, as discussed above, is inconsistent with the policies applicable to rural development in the Leona Valley community, and as proposed, the streets would be approximately 50 percent wider than the street width intended for the area. In addition, although in principle staff agrees with the technique of using low-impact street designs in rural hillside areas, the overall project design and density lead to a use of the technique in inappropriate areas such as those located on steeper slopes and ridgelines.

LEONA VALLEY COMMUNITY STANDARDS DISTRICT ("CSD")

Minimum Required Area in the CSD

As explained above, the applicant proposes to provide open space and commercial vineyard areas within the individual private lots created by this subdivision. The open space and commercial vineyard areas are proposed to be contained within easements, and areas included within easements are not counted towards the net area of a lot to satisfy minimum lot area requirements. Along with the various easements required for various utility services, the areas on the lots covered by easements for open space and the commercial vineyard use are in some cases significant. On several of the proposed lots, these areas cover substantial portions of the lot, resulting in the lot falling below the minimum required net lot area of 60,000 feet.

The Leona Valley CSD establishes a required area of 1.5 acres for clustering and density transfer projects. Section 22.52.100 defines "required area" in several ways, including area as part of a recorded subdivision and where gross and net area requirements are clarified. As the proposed lots are not yet recorded, the CSD required area of 1.5 acres translates to a minimum gross lot area of 1.5 gross acres and a minimum net lot area of 60,000 square feet. The easements proposed for the commercial vineyard areas, utilities and open space easements must be subtracted from the required net lot area calculations in order to meet the definition of net area. Therefore, many of the proposed single-family lots will fall below the minimum net lot area requirement, as such the project is not in compliance with the provisions of the CSD.

The applicant's position on this matter is that the aforementioned easements do not need to be deducted from the net area calculations. Please refer to the attached tentative map dated February 3, 2011, which includes a "lot summary table" that does not exclude the applicable easements from the net area calculation.

CONDITIONAL USE PERMIT

A CUP is requested for non-urban hillside management, density-controlled development, an onsite wastewater treatment facility, and onsite grading exceeding 100,000 cubic yards of earthwork. Section 22.56.040 of the County Code states that the project must meet the following general burden of proof:

A. That the requested use at the location will not:

1. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or
2. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or
3. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

B. That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.

C. That the proposed site is adequately served:
1. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and
2. By other public or private service facilities as are required.

Non-Urban Hillside Management

In addition to the standard burden of proof required for a CUP, the applicant must also meet the following hillside management ("HM") burden of proof required for such projects (Sec. 22.56.215.F):

A. That the proposed project is located and designed so as to protect the safety of current and future community residents, and will not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood, mud flow, or erosion hazard; and

B. That the proposed project is compatible with the natural, biotic, cultural, scenic and open space resources of the area; and

C. That the proposed project is conveniently served by (or provides) neighborhood shopping and commercial facilities, can be provided with essential public services without imposing undue costs on the total community, and is consistent with the objectives and policies of the General Plan; and

D. That the proposed development demonstrates creative and imaginative design, resulting in a visual quality that will complement community character and benefit current and future community residents.

Burden of Proof Determination

Staff has determined that the burdens of proof for the CUP have not been met, due to the following factors:

1. *Over-disturbance of the hilltops and ridgelines located within the project site:* Five of the eight hilltops located on the project site will be disturbed with proposed grading, building pads, and/or streets. Per general CUP burden Item A.2, this site disturbance is materially detrimental to the enjoyment and value of adjacent properties and property owners that currently enjoy the unaltered vistas contained on the property. Further, per HM CUP burden Item B, this site disturbance is incompatible with the natural, scenic and open space resources of the Leona Valley community which depends on such resources to maintain the overall character and desirability of the community. In addition to offsite views, onsite open space and scenic resources

exist. Several of the project site's hilltops form a ridgeline that includes an existing dirt trail that will have to be removed should the project design remain unchanged. A proposed publicly-dedicated multi-use trail located along a lower elevation at the peripheries of the project site does not necessarily compensate for the loss of this existing resource. The project should be redesigned to significantly reduce and/or eliminate the disturbance of these areas.

2. *Over-disturbance of 50 percent or greater sloping areas located within the project site:* Grading for 13 single-family lots and more than 600 linear feet of private drives will disturb the steeper 50 percent or greater slopes. As with No. 1 above, the disturbance of these slopes is detrimental to surrounding properties and incompatible with the community's natural resources, both of which depend on hillsides, ridgelines, hilltops and slopes remaining in an undisturbed and natural state. The project should be redesigned to significantly reduce and/or eliminate the disturbance of these areas.

3. *Substantially less than the required 70 percent of open space for non-urban hillside management projects:* As the commercial vineyards do not count towards required open space, the development currently has only 98.5 acres (or 38 percent) of open space allocated to meet the HM open space requirement, not meeting the minimum 70 percent required by the HM CUP. This is inconsistent with HM CUP burden Item D, since designated open spaces within each single-family lot will not result in a visual quality that will benefit the future community residents. Such open spaces will be disturbed by commercial vineyard easements running thorough the single-family lots. The project should be redesigned so that the commercial vineyard is contained within a separate lot or lots, allowing the commercial and residential portions of the project to maintain a better visual character and receive more enjoyment from current and future residents.

4. *Lack of required separate dedicated open space for density-controlled development projects:* Currently, only the proposed building pads of the development are clustered, and not single-family lots, leaving no remaining open space to be set aside in separate lots. With no properly defined open space areas, the project does not achieve a sufficient clustering design and thus, as stipulated in general CUP burden Item B, does not accommodate the features prescribed by Title 22 (such as concentrated areas of development that leave open areas free from disturbance per the definition of density-controlled development contained in Section 22.08.040). The project should be redesigned with smaller and fewer single-family lots in order to achieve separate open space lots resulting in definable clusters and a sufficient clustering design.

5. *Over-development of the project site (28 percent over the midpoint density):* The project density of 117 lots makes a sufficient clustering design infeasible and also leads to an excessive amount of project grading totaling over 2.3 million cubic yards of cut and fill material (or an average of 19,658 cubic yards per lot). Per general CUP burden Item B, the project site is not large enough to accommodate the 117-lot clustered residential hillside development with associated commercial vineyard, decentralized wastewater treatment system, water tank, private street system and public trails, since the open space, grading, drainage and easement requirements, along with the applicable Area Plan, zoning and CSD provisions, make such a large development and associated features infeasible within the area of the existing project site. To feasibly accommodate a similar-type development within the existing site

area, the project should be scaled down to include fewer single-family lots (maximum of 89) and a separate, smaller commercial vineyard area on its own lot that can be independently operated and maintained.

6. *Onsite wastewater treatment facility is infeasible*: Although private septic systems provided on each single-family lot are consistent with lower-density residential subdivisions of the proposed type in rural areas, the proposed system is a self-described "advanced treatment system" that will send treated water from each individual lot to collection areas dispersed throughout the site, allowing the treated waste water to be used for irrigation or otherwise infiltrate back into the ground. This system, while theoretically feasible, constitutes a public facility that must be properly maintained. Currently, the Los Angeles County Department of Public Works does not feel that the system, as proposed, can be properly maintained by a Homeowner's Association. As such, the project does not meet general CUP burden Item C.2, since the site is not adequately served by required public facilities. While the use of treated water for irrigation is a sustainable project feature, the method of maintenance should be upgraded to a maintenance district or other similar entity that can be sufficiently responsible for the advanced treatment system. Or, the project should be redesigned to propose standard septic systems if the creation of such maintenance district is not desirable or feasible.

Related to Point 5, density, in November 2010, staff proposed additional amenities for the project that would help justify the additional density being proposed above the midpoint of 89 dwelling units. These amenities included the following: additional trail amenities (such as interior "private" trails that connect to the public trails, a stable/shelter, parking areas, and rail fencing along portions of the trail route); extra fire access ways to the surrounding area; dedicate one lot for an onsite community center; build to higher green building standards beyond what the County Code requires (i.e., certify buildings at the LEED Silver level or higher); and agree to repair and/or upgrade an existing offsite senior center located in the nearby community. Although the applicant has indicated a willingness to provide the amenities, the subsequent tentative map revision submitted in February 2011 did not include any of the above amenities.

The applicant's burden of proof responses are attached.

ENVIRONMENTAL DETERMINATION

In accordance with State and County environmental reporting guidelines, staff prepared an Initial Study for the project in June 2007 and a revised Initial Study in June 2008, initially determining that a Mitigated Negative Declaration ("MND") is required. However, according to Section 15270 of the California Environmental Quality Act ("CEQA") Guidelines, CEQA does not apply to projects that are denied. Because staff is recommending denial of the proposed project, the MND is not being proposed for Commission consideration or action at this time.

AGENCY COMMENTS AND RECOMMENDATIONS

Subdivision Committee

The Los Angeles County Subdivision Committee ("Subdivision Committee") consists of the Departments of Regional Planning, Public Works, Fire, Parks and Recreation, and Public Health. The Subdivision Committee has reviewed the vesting tentative tract map and exhibit "A" dated August 10, 2010. Currently, a Regional Planning hold exists on the project related to the proposed density and overall project design (open space, grading and clustering). Additionally, a hold has been placed on the project by Public Works and Public Health related to the proposed wastewater treatment facility. The Department "holds" indicate that based on the project as proposed and the information submitted, the Departments do not recommend approval of the project. Fire and Parks and Recreation have issued clearances for the development.

In previous Subdivision Committee meetings from April 2007, November 2007, March 2008, March 2009 and March 2011, Regional Planning has recommended that the project be redesigned to reduce the density to a maximum of 89 dwelling units, create separate open space lots, reduce grading, reduce disturbance to hillsides and steep slopes, create a separate commercial vineyard lot, and cluster single-family lots in conformance with density-controlled development provisions. Thus far, the applicant has not redesigned the project to meet any of these recommendations.

All agency correspondence is attached.

COMMUNITY COMMENTS

General Comments

At the time of writing, staff has received a total of 48 letters from community members with 55 persons either opposed to or concerned with the proposed development. No letters have been received in support. Community concerns from the aforementioned letters are summarized below:

- Density too high to maintain overall rural community character
- Gated development inconsistent with rural community character
- Lots and building pads too small to support equestrian use
- Water supply/lack of water
- Lack of water for a large vineyard operation
- Too much traffic on Bouquet Canyon Road and 87th Street West
- Impacts to hillsides, existing views
- Removal of existing onsite trails
- Light, noise and traffic impacts to residents, horseback riders, wildlife
- Sewage and groundwater impacts
- Air quality impacts from additional vehicles
- Increased fire hazard in community (and lack of sufficient existing fire resources)
- Infeasibility of proposed advanced wastewater treatment system
- Inconsistency with adopted Area Plan (density, land use pattern, seismic hazards)
- Impacts to cultural resources (Native American lands)

- Impacts to local school capacity

Town Council Comments

Since 2007, the Leona Valley Town Council ("town council") has been engaged in several meetings with the applicant to discuss the details of the development, via the scheduled town council meetings. During this same time period, the town council has also met with staff to review project documents and discuss the project design and case processing procedures. The town council has submitted to staff an abundance of letters and documents expressing their opposition to the subject project for the following reasons:

- Lot size (too small) and density (too high)
- Lack of compliance with seismic safety management (overall density too high)
- Errors in calculation for density, and gross and net lot area
- Lack of sufficient undisturbed set-aside open space
- Incorrect trail alignment and removal of existing trails
- Disturbance of viewsheds by proposed drainage basins, water tank
- Various errors and inconsistencies regarding onsite seismic areas, drainage, flood areas, and water flow
- Lack of a sufficient clustering design
- Lack of sufficient information regarding proposed bio-swales
- General lack of consistency with existing rural character

Detailed town council comments on the above issues are provided in the town council letter dated June 6, 2011 (attached). Additional town council comments on the above issues and other issues (including many of the general community concerns listed above) can be found in additional correspondence received from the town council since 2007 (see attached).

All community correspondence is attached.

PREVIOUS PUBLIC HEARINGS AND PROCEEDINGS

On March 2, 2011, the subject project was heard before the Los Angeles County Regional Planning Commission ("Commission"). During this hearing, the Commission, after hearing a brief presentation from staff and testimony from the Leona Valley Town Council, removed the case from the hearing calendar and instructed staff to return to the Commission on or before June 29, 2011. The Commission directed this action so that staff could review additional materials that had been recently submitted by the applicant, work with the town council related to the project design and environmental determination, obtain additional input from the town council and local community, and assess the proposed development against the proposed Town and Country Plan.

Subsequent to the March 2, 2011 hearing, staff met with the applicant to further discuss and review the project. The applicant also met with other County departments as well as the community. After several meetings, no changes were proposed to the project, and staff continued to maintain the position that the project did not comply with applicable General Plan and Area Plan policies, and that the project did not satisfy the necessary requirements of the Zoning and Subdivision Codes to support the entitlements that the applicant was requesting.

Pursuant to your Commission's direction, staff prepared the project to come back before your Commission on or before the end of June 2011. Upon receiving notice from staff that the matter would be set for a public hearing before the Commission on June 29, 2011, the applicant requested that the hearing date be continued. Given the Commission's direction, as well as the fact that public hearing notices had been prepared for mailing and publication informing the public of the date of the hearing, Staff informed the applicant that any request for further continuance would need to be considered by the Commission. The applicant spoke during the public comment period at the Commission meeting on June 1, 2011, informing the Commission of the applicant's request for a continued hearing date. Staff continued to support setting the matter for public hearing in June, consistent with the Commission's direction and the public's expectation of when the matter would be considered. The applicant subsequently sent the Deputy Director an email on June 2, 2011, informing the Department that the applicant had failed to post the public hearing notice as required on the project site, and cited that as a justification for requiring a continuance of the public hearing. After learning that the site had not been posted, despite the fact that public hearing notices had been mailed and published in accordance with Code requirements, staff worked with the applicant to ensure that the site was expeditiously posted so that the hearing could take place as the public had been informed it would.

LEGAL NOTIFICATION AND POSTING

Notification was provided as listed below:

- Hearing Notices: On January 31, 2011, hearing notices were mailed to all property owners as identified on the current Assessor's record within 1,000 feet of the subject property, as well as those persons listed on the project's courtesy mailing list, for an approximate total of 75 notices regarding the hearing scheduled for March 2, 2011. On May 26, 2011, hearing notices were mailed to all property owners as identified on the current Assessor's record within 1,000 feet of the subject property, as well as those persons listed on the project's courtesy mailing list, for an approximate total of 75 notices notifying the public of the hearing scheduled for June 29, 2011.

- Website Posting: On February 1, 2011, a copy of the library package containing the notice of hearing, vicinity map, draft factual, department reports, open space exhibit and conceptual greenbelt exhibit was posted on the Regional Planning website. Since February 1, 2011, additional materials have been posted to the website, to include correspondence received and a second hearing notice for the June 29, 2011 public hearing.

- Project Site Posting: On January 27, 2011, two large hearing notice signs were posted at the property frontages along Bouquet Canyon Road and 87th Street West informing the public of the hearing scheduled for March 2, 2011. On June 7, 2011, two large hearing notice signs were posted along the property frontages informing the public of the hearing scheduled for June 29, 2011.

- Library Package: On January 27, 2011, project materials, including a vesting tentative tract map, exhibit "A", land use map, draft factual, department reports, open space exhibit and conceptual greenbelt exhibit were sent to the Quartz Hill Library.

- Newspaper Advertisement: On January 29, 2011, the public hearing notice was published in the Antelope Valley Press and La Opinion newspapers informing the public of the hearing schedule for March 2, 2011. On May 28, 2011, the public hearing notice was published in the Antelope Valley Press and La Opinion newspapers informing the public of the hearing scheduled for June 29, 2011.

STAFF CONCLUSION

SUMMARY

As discussed in the relevant sections of this report, staff has determined that the proposed development is inconsistent with the provisions of the General Plan, Area Plan, and County Code. In addition, staff has determined that the burden of proof for the requested CUP has not been satisfied. Further, at the Commission's request the project was analyzed in the context of the updated Town and Country Plan proposed for the area and was determined to be a project that would not be consistent with that plan were it applicable to the proposed development. This has been communicated to the applicant on many occasions since the submittal of the original application, including during meetings with the Regional Planning staff, at Subdivision Committee meetings in April 2007, November 2007, March 2008, March 2009, and March 2011, and in recent correspondence to the applicant dated March 3, 2011, attached for your Commission's reference, in which staff responded directly to a number of concerns raised by the applicant regarding the Department's position on the project Accordingly, because the project cannot be found consistent with applicable General Plan and Area Plan provisions, and does not satisfy the required burden of proof for approval of the CUP or the Tract Map, staff recommends that the Commission deny the proposed project.

Although a determination was originally made that an MND was the appropriate environmental document for the project, because it is staff's opinion that the project as proposed cannot be found consistent with the applicable provisions of the General Plan, Area Plan, or Zoning and Subdivision Codes, pursuant to Section 15270 of the CEQA Guidelines, staff is not recommending that the Commission consider or take action on the draft MND that had been prepared. Rather, as that section states, CEQA does not apply to projects that the County disapproves.

CONCLUSION

In conclusion, because the proposed project is inconsistent with applicable policies of the General Plan and Area Plan and does not satisfy the Code requirements for approval of the requested entitlements, staff recommends that the project be denied.

STAFF RECOMMENDATION

Staff recommends that the vesting tentative tract map and CUP be denied.

<u>Suggested Motion</u>: "I move that the Regional Planning Commission close the public hearing and deny Vesting Tentative Tract Map No. 066952 and Conditional Use Permit No. 200700038 subject to the attached findings."

Attachments:

1. Factual
2. Draft findings
3. Correspondence
   a. Community
   b. Applicant
   c. Town Council
   d. Agency
   e. Press articles
4. CUP burdens of proof
5. Site photos
6. GIS-Net map
7. Thomas Brothers Guide map page
8. Land use map
9. Vesting tentative tract map and exhibit "A" dated February 3, 2011

NP:jds
6/16/11

FINDINGS OF THE
LOS ANGELES COUNTY COMMISSION
PROJECT NO. TR066952-(5)
VESTING TENTATIVE TRACT MAP NO. 066952

1. The Los Angeles County Regional Planning Commission ("Commission") conducted a duly noticed public hearing in the matter of Vesting Tentative Tract Map No. 066952 ("TR 066952") on March 2 and June 29, 2011. TR 066952 was heard concurrently with Conditional Use Permit ("CUP") No. 200700038.

2. TR 066952 is a request for a subdivision of land to create 117 single-family lots, two private street lots, and one water tank lot on 292 gross acres.

3. CUP No. 200700038 is a related request for non-urban hillside management performance review, density-controlled development, a proposed wastewater treatment facility and onsite grading exceeding 100,000 cubic yards of cut and fill material.

4. The subject site is located at Bouquet Canyon Road and 87th Street West, in the unincorporated community of Antelope Valley and the Leona Valley Community Standards District ("CSD"), Fifth Supervisorial District of Los Angeles County.

5. The subject property is approximately 292 gross acres (267 net acres) in size, rectangular in shape, with variably-sloping terrain. The site has 133 acres of land within the zero to 25 percent slopes, 143 acres of land within the 25 to 50 percent slopes, and 16 acres of land in areas with greater than 50 percent slopes.

6. The project proposes 1,160,000 cubic yards of cut grading and 1,160,000 cubic yards of fill grading, to be balanced onsite.

7. The subject site contains no Oak trees.

8. Primary access to the subject property is provided by Bouquet Canyon Road, a Limited Secondary Highway under the Los Angeles County Master Plan of Highways, with 60 feet of existing right of way and approximately 32 feet of paved width. Access is also provided by 87th Street West, a public street, with 60 feet of existing right of way and approximately 28 feet of paved width.

9. The project site consists of 292.5 acres of A-2-2 (Heavy Agricultural – Two Acres Minimum Required Lot Area) zoning.

10. As the project proposes single-family lots with less than the minimum required gross lot area of two acres in the A-2-2 zone, a CUP for density-controlled development (clustering) is required.

11. The surrounding area within a radius of 500 feet is zoned the following:
    - North: A-2-2, A-1-1 (Light Agricultural – One Acre Minimum Required Lot Area)
    - East: A-2-2, City of Palmdale
    - South: A-2-2
    - West: A-2-2

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12. The subject property is currently vacant. It is surrounded by the following land uses within a radius of 500 feet:
    - North: Single-family residences, vacant parcels
    - East: Vacant parcels
    - South: Single-family residences, vacant parcels
    - West: Single-family residences, vacant parcels

13. The project is consistent with the A-2-2 zoning designation for allowed residential uses. Single-family residences are permitted in the A-2-2 pursuant to Section 22.24.070 of the Los Angeles County Code ("County Code") (Zoning Ordinance).

14. Approximately 122 acres of commercial vineyards are proposed within the development. Commercial vineyards are an allowed use within the A-2-2 zone.

15. The entire 122 acre commercial vineyard portion of the project site is proposed as counting towards the required project open space for non-urban hillside management. The County Code describes uses that may be included in required open space for non-urban residential hillside development proposals: "undisturbed natural areas, open space for passive recreation, private yards, parks and open recreational areas, riding, hiking and bicycling trails, landscaped areas adjacent to streets and highways, greenbelts, areas graded for rounding of slopes to contour appearance, such other areas as the Commission deems appropriate" (Section 22.56.215.J1). As the proposed vineyard is a commercial agricultural use, and is not a type of acceptable open space listed above in the County Code, it cannot be counted toward the required open space for non-urban hillside management.

16. A total of 65 single-family lots have less than two gross acres of area (or 80,000 net square feet) required within the A-2-2 zone. The applicant has requested a CUP for density-controlled development pursuant to Section 22.56.205 of the County Code, in order to utilize reduced lot sizes to achieve a "clustered" development. The project is inconsistent with the provisions of density-controlled development, as a) not enough of the proposed single-family lots are reduced to the minimum lot size of 1.5 net acres; b) there are too many "clusters" of mixed reduced and non-reduced single-family lots spread throughout too much of the project site; and c) no open space is dedicated in a separate fee lot or lots. Due to this, the project is inconsistent with the purpose of density-controlled development and clustering to preserve natural site features (such as hillsides, ridgelines and biota) with a significant portion of undeveloped and permanently dedicated open space.

17. The subject property is located within the N1 (Non-Urban 1 – Up to 0.5 Dwelling Units Per Gross Acre) land use category of the Land Use Policy Map of the Antelope Valley Areawide Plan ("Area Plan"), a component of Los Angeles Countywide General Plan ("General Plan").

18. As slopes greater than 25 percent exist on the subject property, the applicant was required to submit a slope density study to determine if a CUP for hillside management is required. The applicant's slope density map indicates that slopes exceeding 25 percent exist on the subject property, and that the low density threshold for the subject project is 40 dwelling units. Therefore, the proposed density of 117 dwelling units exceeds the low density threshold, and, according to the non-urban hillside development provisions of the General Plan (p. LU-29), a hillside management CUP is required.

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19. As a CUP for non-urban hillside management is required, a minimum of 70 percent (186 net acres) of dedicated open space is also required for the development. With 122 acres of easements for commercial agriculture excluded, the project proposes approximately 95.8 net acres (or 36 percent) of open space to be preserved within individual single-family lots and the proposed water tank lot. As such, the proposed development does not meet the minimum 70 percent open space requirements of the General Plan and Section 22.56.215 of the County Code.

20. Within the development, five of the eight hilltops and portions of 50 percent or greater slopes located on the project site will be significantly disturbed with proposed grading, building pads, and/or streets, which, per the CUP burden of proof, is materially detrimental to the enjoyment and value of adjacent properties and property owners that currently enjoy the unaltered vistas contained on the property.

21. The development proposes to cluster building pads and not single-family lots, leaving no remaining open space to be set aside in separate lots. With no properly defined open space areas, the project does not achieve a sufficient clustering design and thus, per the CUP burden of proof, does not accommodate the features prescribed by Title 22 (such as concentrated areas of development that leave open areas free from disturbance per the definition of density-controlled development contained in Section 22.08.040).

22. The Los Angeles County Departments of Public Works does not feel that the advanced wastewater treatment system, as proposed, can be properly maintained by a Homeowner's Association. As such, the project does not meet the CUP burden of proof, since the site is not adequately served by required public facilities.

23. The project lacks the minimum required 70 percent of dedicated open space, and proposed open spaces within each single-family lot will be disturbed by commercial vineyard easements. Per the hillside management CUP burden of proof, the lack of sufficient open space area and design will not result in a visual quality that will benefit the current and future community residents.

24. The development proposes a density of 117 dwelling units, which is 28 dwelling units above the determined midpoint density of 89 dwelling units for the project. The lack of a sufficient clustered design, (in terms of the size, extent and location of proposed grading and development), lack of minimum required open space, and lack of compliance with the County Code in relation to street width and street frontage, results in a project that will cause too much overall disturbance to existing natural features located on the site. Per the hillside management CUP burden of proof, the project site is not large enough to accommodate the proposed 117-lot non-urban hillside development with associated commercial vineyard, decentralized wastewater treatment system, water tank, private street system and public trails, since the open space, grading, drainage and easement requirements, along with the applicable Area Plan, zoning and CSD provisions, make such a development and associated features infeasible within the area of the existing project site.

25. The aforementioned site disturbance of density, grading, lot size, lot layout, streets, and lack of separate dedicated open space, in addition to the removal of an existing trail located along a ridgeline on the subject site, is, per the hillside management CUP burden of proof, incompatible with the natural, scenic and open space resources of the Leona Valley

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community, which depends on such resources to maintain the overall character and desirability of the community.

26. The proposed project does not comply with the provision of the Leona Valley Community Standards District ("CSD") related to local street widths of 24 feet or less, as streets with a paved width of 36 feet are proposed.

27. The proposed subdivision does not meet the criteria for a waiver of street frontage pursuant to Section 21.24.040 of the County Code, as topographic conditions, title limitations, and/or the existing development pattern do not make the strict application of such street standards impossible or impractical, to the extent that such application can be reasonably accommodated within a development that is smaller in size, has a better design, has reduced hillside impacts, and complies with the provisions of the General Plan, Area Plan, and County Code.

28. The proposed project is inconsistent with the General Plan, as it utilizes proposed agricultural areas (commercial vineyards) that are not considered open space, does not provide the minimum sufficient amount of open space required for non-urban hillside management projects, and does not have a design that is consistent with the requirements of non-urban hillside management.

29. The proposed project is inconsistent with the Area Plan, as it utilizes private streets that are greater than the maximum allowed 24 feet in paved width, proposes single-family lots that are unable to meet the minimum net area requirements of 60,000 square feet after all easements are subtracted, and proposes to remove an existing open space resource (trail) located along an existing ridgeline.

30. In previous Subdivision Committee meetings from April 2007, November 2007, March 2008, March 2009 and March 2011, Regional Planning has recommended that the project be redesigned to reduce the density to a maximum of 89 dwelling units, create separate open space lots, reduce grading, reduce disturbance to hillsides and steep slopes, create a separate commercial vineyard lot, and cluster single-family lots in conformance with density-controlled development provisions. Thus far, the applicant has not redesigned the project to meet any of these recommendations.

31. Correspondence received for the subject project includes a total of 48 letters from community members with 55 persons either opposed to or concerned with the proposed development. No letters have been received in support. Community concerns from the aforementioned letters are summarized below:

    - Density too high to maintain overall rural community character
    - Gated development inconsistent with rural community character
    - Lots and building pads too small to support equestrian use
    - Water supply/lack of water
    - Lack of water for a large vineyard operation
    - Too much traffic on Bouquet Canyon Road and 87th Street West
    - Impacts to hillsides, existing views
    - Removal of existing onsite trails

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- Light, noise and traffic impacts to residents, horseback riders, wildlife
- Sewage and groundwater impacts
- Air quality impacts from additional vehicles
- Increased fire hazard in community (and lack of sufficient existing fire resources)
- Infeasibility of proposed advanced wastewater treatment system
- Inconsistency with adopted Area Plan (density, land use pattern, seismic hazards)
- Impacts to cultural resources (Native American lands)
- Impacts to local school capacity

32. Correspondence received for the subject project since 2007 also includes comments from the Leona Valley Town Council ("town council"), which has been engaged in several meetings with the applicant to discuss the details of the development, via the scheduled town council meetings. During this same time period, the town council has also met with staff to review project documents and discuss the project design and case processing procedures. The town council has submitted to staff an abundance of letters and documents expressing their opposition to the subject project for the following reasons:

    - Lot size (too small) and density (too high)
    - Lack of compliance with seismic safety management (overall density too high)
    - Errors in calculation for density, and gross and net lot area
    - Lack of sufficient undisturbed set-aside open space
    - Incorrect trail alignment and removal of existing trails
    - Disturbance of viewsheds by proposed drainage basins, water tank
    - Various errors and inconsistencies regarding onsite seismic areas, drainage, flood areas, and water flow
    - Lack of a sufficient clustering design
    - Lack of sufficient information regarding proposed bio-swales
    - General lack of consistency with existing rural character

33. On March 2, 2011, the Commission heard a presentation from staff and testimony from the town council. No other testimony was heard. At the request of the town council, the Commission removed the case from the hearing calendar and instructed staff to return to the Commission on or before June 29, 2011. The Commission directed this action so that staff could review additional materials recently submitted by the applicant, work with the town council related to the project design and environmental determination, obtain additional input from the town council and local community, and assess the proposed development against the proposed draft Town and Country Plan.

34. On June 29, 2011, the Commission heard a presentation from staff, the applicant and the town council. Additional testimony was heard [RESERVED].

35. On June 29, 2011, the Commission, after hearing all testimony and considering all facts of the case presented, denied TR 066952.

36. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is the Los Angeles County Department of Regional Planning ("Regional Planning"), 13th Floor, Hall of Records, 320

DRAFT

West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Land Divisions Section, Regional Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING COMMISSION CONCLUDES:

A. The subdivider has not demonstrated the suitability of the subject property for the proposed use. Establishment of the proposed use at such location is not in conformity with good zoning practice.

B. The proposed subdivision and the provisions for its design and improvement are not consistent with the goals and policies of the General Plan and Area Plan.

C. The site is not physically suitable for the density and type of development proposed, since it will not be adequately served by public sewer facilities to meet anticipated needs.

THEREFORE, in view of the findings of fact and conclusions presented above, TR 066952 is **denied**.

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FINDINGS OF THE
LOS ANGELES COUNTY COMMISSION
PROJECT NO. TR066952-(5)
CONDITIONAL USE PERMIT NO. 200700038

1. The Los Angeles County Regional Planning Commission ("Commission") conducted a duly noticed public hearing in the matter of Conditional Use Permit ("CUP") No. 200700038 on March 2 and June 29, 2011. CUP No. 200700038 was heard concurrently with Vesting Tentative Tract Map No. 066952 ("TR 066952").

2. CUP No. 200700038 is a request for a non-urban hillside management residential development project, density-controlled development, a proposed wastewater treatment facility, and onsite grading exceeding 100,000 cubic yards of cut and fill material.

3. TR 066952 is a related request for a subdivision of land to create 117 single-family lots, two private street lots, and one water tank lot on approximately 292.5 gross acres.

4. The subject site is located at Bouquet Canyon Road and 87th Street West, in the unincorporated community of Antelope Valley in the Fifth Supervisorial District of Los Angeles County.

5. The subject property is located within the N1 (Non-Urban 1 – Up to 0.5 Dwelling Units Per Gross Acre) land use category of the Land Use Policy Map of the Antelope Valley Areawide Plan ("Area Plan"), a component of Los Angeles Countywide General Plan ("General Plan"). The N1 designation allows for single-family residential uses.

6. The project site is zoned A-2-2 (Heavy Agricultural – Two Acres Minimum Required Lot Area), and is located in the Leona Valley Community Standards District ("CSD"). The A-2-2 zone allows for single-family residential development.

7. The subject property is approximately 292.5 gross acres (267 net acres) in size, rectangular in shape, with variably-sloping terrain, ranging from relatively flat portions to steeply sloping portions spread throughout the site. The site has 133 acres of land within the zero to 25 percent slope category, 143 acres of land within the 25 to 50 percent slope category, and 16 acres of land in areas with greater than 50 percent slopes.

8. The project proposes 1,160,000 cubic yards of cut grading and 1,160,000 cubic yards of fill grading, to be balanced onsite.

9. The subject site contains no oak trees.

10. Primary access to the subject property is provided by Bouquet Canyon Road, a Limited Secondary Highway under the Los Angeles County Master Plan of Highways, with 60 feet of existing right of way and approximately 32 feet of paved width. Access is also provided by 87th Street West, a public street, with 60 feet of existing right of way and approximately 28 feet of paved width.

11. The surrounding area within a radius of 500 feet is zoned the following:
    - North: A-2-2, A-1-1 (Light Agricultural – One Acre Minimum Required Lot Area)
    - East: A-2-2, City of Palmdale

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- South: A-2-2
- West: A-2-2

12. The subject property is currently vacant. It is surrounded by the following land uses within a radius of 500 feet:
    - North: Single-family residences, vacant parcels
    - East: Vacant parcels
    - South: Single-family residences, vacant parcels
    - West: Single-family residences, vacant parcels

13. The project proposes development of 117 residential units on property that contains slopes exceeding 25 percent. As slopes greater than 25 percent exist on the subject property, the applicant was required to submit a slope density study to determine if a CUP for hillside management is required. Projects that exceed the low density threshold for development on the project site are required to obtain a hillside management CUP in order to allow development above the low density threshold. Based on the slope characteristics of the property, the low density threshold for the subject project is 40 dwelling units. Therefore, the proposed density of 117 dwelling units exceeds the low density threshold, and, according to the non-urban hillside development provisions of the General Plan (p. LU-29), and of Section 22.56.215 of the Zoning Code, a hillside management CUP for the proposed development is required.

14. As part of the requirements for a CUP for non-urban hillside management, a minimum of 70 percent of dedicated open space is required to be preserved on the project site. For the proposed project, approximately 186 net acres of open space would be required. However, the project proposes to provide 95.8 net acres of open space, and 122 acres reserved for development with commercial vineyards. According to Section 22.56.215.J1 of the Zoning Code, open space areas required for hillside management projects include "undisturbed natural areas, open space for passive recreation, private yards, parks and open recreational areas, riding, hiking, and bicycling trails, landscaped areas adjacent to streets and highways, greenbelts, areas graded for rounding of slopes to contour appearance, [and] such other areas as the Commission deems appropriate." Consistent with the Zoning Code and established County policy and practice, commercial development such as the proposed vineyards is not consistent with the uses contemplated for open space areas required to be preserved as part of a hillside management project. Therefore, the approximately 122 acres proposed to be developed with commercial vineyard uses are not credited towards the project's open space requirement. As such, the project only provides approximately 36 percent open space and does not meet the 70 percent open space requirement for a nonurban hillside management project.

15. The 122 acres proposed for commercial vineyard development would be included within the individual private lots created throughout the project site and subject to easements. With that 122 acres the project would provide only approximately 95.8 net acres (or 36 percent) of open space. This open space would also be located within the individual single-family lots to be created from the project site and within the proposed water tank lot. Although the Zoning Code allows for required open space areas to be provided within individual private lots, established County policies and practice support the provision of such open space in separate open space lots in order to facilitate the preservation and maintenance of such

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open space. As noted above, the proposed project does not meet the minimum open space requirements for a nonurban hillside management project. Additionally, the project's proposed configuration of open space does not satisfy the intent of the hillside management policies and requirements set out in the General Plan and Section 22.56.215 of the County Code, which call for the preservation of hillside resources.

16. Within the development, five of the eight hilltops and portions of 50 percent or greater slopes located on the project site will be significantly disturbed with proposed grading, building pads, and/or streets, which, per the CUP burden of proof, is materially detrimental to the enjoyment and value of adjacent properties and property owners that currently enjoy the unaltered vistas contained on the property.

17. The project site is zone A-2-2, which requires a minimum lot size of 2 acres. A total of 65 of the proposed single-family lots are less than the two gross acres (or 80,000 net square feet) required within the A-2-2 zone. Therefore, the project requires a density-controlled development CUP pursuant to Section 22.56.205 of the County Code, in order to utilize reduced lot sizes to achieve a "clustered" development. Clustering is intended to concentrate development on a portion or portions of the property, thereby allowing the remaining portions of the property to be undeveloped and preserved as open space. The project is inconsistent with the provisions of density-controlled development ordinance, because the project does not include a sufficient number of reduced lot sizes to allow for adequate concentration of development. Only 65 of the proposed 117 single-family lots are proposed to be reduced the minimum allowable lot size of 1.5 net acres. The average lot size for the project is 2.5 acres. The proposed development includes too many "clusters" of mixed reduced and two-acres or larger single-family lots spread throughout the entirety of the project site. Contrary to the intent of the density-controlled development ordinance, the proposed project development is not concentrated on a limited portion of the project site, but rather is dispersed throughout the site. Additionally, the open space being provided as part of the project is located within individual private lots and the water tank lot. No open space is proposed to be dedicated in a separate fee lot or lots. Although, the Zoning Code allows for open space to be preserved through a variety of mechanisms, dedication of a separate fee lot or lots facilitates the preservation and maintenance of the required open space. Due to this, the project is inconsistent with the purpose and requirements of density-controlled development and clustering intended to preserve natural site features (such as hillsides, ridgelines and biota) with a significant portion of undeveloped and permanently dedicated open space.

18. The development proposes to cluster building pads and not single-family lots, leaving no remaining open space to be set aside in separate lots. With no properly defined open space areas, the project does not achieve a sufficient clustering design and thus, per the CUP burden of proof, does not accommodate the features prescribed by Title 22 (such as concentrated areas of development that leave open areas free from disturbance per the definition of density-controlled development contained in Section 22.08.040).

19. The Los Angeles County Departments of Public Works does not support the proposed advanced wastewater treatment system to be maintained by a Homeowner's Association. As such, the project would not be adequately served by required public facilities, and therefore, the project does not satisfy a required element of the CUP burden of proof.

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20. The proposed project does not demonstrate creative and imaginative will not result in a visual quality that will complement community character and benefit current and future community residents. Although the applicant characterizes the inclusion of commercial vineyards within the proposed project as creative and imaginative design, the project lacks the minimum required 70 percent of dedicated open space, and the open spaces and commercial vineyard proposed to be provided are located within each single-family lot. The areas of the single-family lots proposed for the commercial vineyards will be subject to easements and will include commercial activities attendant with commercial agricultural uses in areas that are intended to be reserved as open space designed to protect hillside resources. Per the hillside management CUP burden of proof, the lack of sufficient open space area and design will not result in a visual quality that will benefit the current and future community residents. Additionally, the design of the project utilizing an insufficient number of smaller clustered single-family lots and scattering the developed areas throughout the entirety of the project site does not constitute creative or imaginative design. The proposed project does not result in the concentrated development contemplated by the County Code to enhance and preserve open space portions of the project site. Further, the dispersal of single-family lots and building pads throughout the various terrain of the project site does not respect the natural topography and hillside character of the site, and instead proposes to located single-family units in some cases just under ridgelines and hilltops on the site.

21. The development proposes a density of 117 dwelling units, which is 28 dwelling units above the determined midpoint density of 89 dwelling units for the project site. The lack of a sufficient clustered design, (in terms of the size, extent and location of proposed grading and development), lack of minimum required open space, and lack of compliance with the County Code in relation to street width and street frontage, results in a project that will cause too much overall disturbance to existing natural features located on the site. Per the hillside management CUP burden of proof, the project site is not large enough to accommodate the proposed 117-lot non-urban hillside development with associated commercial vineyard, decentralized wastewater treatment system, water tank, private street system and public trails, since the open space, grading, drainage and easement requirements, along with the applicable Area Plan, zoning and CSD provisions, make such a development and associated features infeasible within the area of the existing project site.

22. The aforementioned site disturbance of density, grading, lot size, lot layout, streets, and lack of separate dedicated open space, in addition to the removal of an existing trail located along a ridgeline on the subject site, is, per the hillside management CUP burden of proof, incompatible with the natural, scenic and open space resources of the Leona Valley community, which depends on such resources to maintain the overall character and desirability of the community.

23. The proposed project does not comply with the provision of the Leona Valley Community Standards District ("CSD") providing for local street widths of 24 feet or less intended to preserve the rural character of the area. Rather, it proposes streets that are 50 percent wider in paving width (a total of 36 feet of paving) than the street infrastructure contemplated for the area.

24. The proposed subdivision does not meet the criteria for a waiver of street frontage pursuant to Section 21.24.040 of the County Code, as topographic conditions, title limitations, and/or the existing development pattern do not make the strict application of such street standards

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impossible or impractical, to the extent that such application can be reasonably accommodated within a development that is smaller in size, has a better design, has reduced hillside impacts, and complies with the provisions of the General Plan, Area Plan, and County Code.

25. The proposed project is inconsistent with the General Plan, as it utilizes proposed agricultural areas (commercial vineyards) that are not considered open space, does not provide the minimum sufficient amount of open space required for non-urban hillside management projects, and does not have a design that is consistent with the requirements of non-urban hillside management.

26. The proposed project is inconsistent with the Area Plan, as it utilizes private streets that are greater than the maximum allowed 24 feet in paved width, proposes single-family lots that are unable to meet the minimum net area requirements of 60,000 square feet after all easements are subtracted, and proposes to remove an existing open space resource (trail) located along an existing ridgeline.

27. County staff has worked with the applicant since the original filing of the application regarding the issues that have been raised related to the project's inconsistencies with the General Plan, Area Plan, and the County Code. In previous Subdivision Committee meetings from April 2007, November 2007, March 2008, March 2009 and March 2011, Regional Planning has recommended that the project be redesigned to reduce the density to a maximum of 89 dwelling units, create separate open space lots, reduce grading, reduce disturbance to hillsides and steep slopes, create a separate commercial vineyard lot, and cluster single-family lots in conformance with density-controlled development provisions. Thus far, the applicant has not redesigned the project to meet any of these recommendations.

28. Correspondence received for the subject project includes a total of 48 letters from community members with 55 persons either opposed to or concerned with the proposed development. No letters have been received in support. Community concerns from the aforementioned letters are summarized below:

    - Density too high to maintain overall rural community character
    - Gated development inconsistent with rural community character
    - Lots and building pads too small to support equestrian use
    - Water supply/lack of water
    - Lack of water for a large vineyard operation
    - Too much traffic on Bouquet Canyon Road and 87th Street West
    - Impacts to hillsides, existing views
    - Removal of existing onsite trails
    - Light, noise and traffic impacts to residents, horseback riders, wildlife
    - Sewage and groundwater impacts
    - Air quality impacts from additional vehicles
    - Increased fire hazard in community (and lack of sufficient existing fire resources)
    - Infeasibility of proposed advanced wastewater treatment system
    - Inconsistency with adopted Area Plan (density, land use pattern, seismic hazards)
    - Impacts to cultural resources (Native American lands)

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- Impacts to local school capacity

29. Correspondence received for the subject project since 2007 also includes comments from the Leona Valley Town Council ("town council"), which has been engaged in several meetings with the applicant to discuss the details of the development, via the scheduled town council meetings. During this same time period, the town council has also met with staff to review project documents and discuss the project design and case processing procedures. The town council has submitted to staff an abundance of letters and documents expressing their opposition to the subject project for the following reasons:

    - Lot size (too small) and density (too high)
    - Lack of compliance with seismic safety management (overall density too high)
    - Errors in calculation for density, and gross and net lot area
    - Lack of sufficient undisturbed set-aside open space
    - Incorrect trail alignment and removal of existing trails
    - Disturbance of viewsheds by proposed drainage basins, water tank
    - Various errors and inconsistencies regarding onsite seismic areas, drainage, flood areas, and water flow
    - Lack of a sufficient clustering design
    - Lack of sufficient information regarding proposed bio-swales
    - General lack of consistency with existing rural character

30. On March 2, 2011, the Commission heard a presentation from staff and testimony from the town council. No other testimony was heard. At the request of the town council, the Commission removed the case from the hearing calendar and instructed staff to return to the Commission on or before June 29, 2011. The Commission directed this action so that staff could review additional materials recently submitted by the applicant, work with the town council related to the project design and environmental determination, obtain additional input from the town council and local community, and assess the proposed development against the proposed draft Town and Country Plan.

31. After the March 2, 2011 hearing, Planning staff met with the applicant and again discussed the issues surrounding the project's inconsistencies with the applicable provisions of the General Plan, Area Plan, and County Code. To date, no revisions to the project have been proposed to address these issues.

32. In response to the Commission's direction at the March 2, 2011 hearing, Planning staff prepared the project to be brought back before the Commission before the end of June 2011. On May 26, 2011, Planning staffed mailed notices of the June 29, 2011 hearing to the public and the applicant. On May 28, 2011, public hearing notices were published in the Antelope Valley Press and La Opinion newspapers, notifying the public of the June 29, 2011 hearing date. The applicant received notice of the fact the matter would be set for the hearing before the Commission on June 29, 2011, and in fact, requested a continuance from Planning staff on May 24, 2011 by email and later from the Commission during the public comment period at the Commission's June 1, 2011 meeting. When the applicant was informed that the matter would be considered on June 29, 2011, and that any requests for further continuance would need to be presented to the Commission at that time, the applicant informed Planning staff that the site had not been posted with the required hearing

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notice, and cited that failure to post as a justification for further continuance of the hearing. Upon learning that the site had not been properly posted, Planning staff worked with the applicant to ensure that the required notices were expeditiously posted on the site and confirmed the posting on June 7, 2011. Therefore, with the notice provide by the Commission at the March 2, 2011 hearing that the matter would be continued to June 2011, along with the mailed, published, and posted notice, the public was adequately notified of the public hearing.

33. On June 29, 2011, the Commission heard a presentation from staff, the applicant and the town council. Additional testimony was heard [RESERVED].

34. On June 29, 2011, the Commission, after hearing all testimony and considering all facts of the case presented, denied CUP No. 200700038.

35. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is the Los Angeles County Department of Regional Planning ("Regional Planning"), 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Land Divisions Section, Regional Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING COMMISSION CONCLUDES:
For the requested CUP for a nonurban hillside management development project, density-controlled development, wastewater treatment facility, and onsite grading exceeding 100,000 cubic yards of cut and fit material:

A. That the proposed project is not consistent with the General Plan and Area Plan; and

B. That the requested use at the proposed location will be materially detrimental to the use, enjoyment and valuation of property of other persons located in the vicinity of the site; and [will it also constitute a menace to public health, safety, or general welfare because it proposes wastewater treatment that may not adequately function to treat wastewater? If yes, add that to the findings and make that statement here too. Will it also be materially detrimental to the use, enjoyment or valuation of the property of other persons living in the vicinity because it will be out of character with the rural nature of the surrounding community? I think the fact that it proposed urban style street infrastructure, and would be the only gated community in the area, with a development that is inconsistent with the surrounding residential develompent means that this finding should be included. Make the statement here, and add a finding above that says why it's materially detrimental.]

C. That the proposed site is not adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this title, or as is otherwise required in order to integrate said use with the uses surrounding the area; and

D. That the proposed site is not adequately served by other public or private service facilities as are required; and, therefore,

Additionally, for the hillside management CUP:

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A. That the proposed project is not compatible with the natural, biotic, cultural, scenic and open space resources of the area; and

B. That the proposed project is neither conveniently served by (nor provides) neighborhood shopping and commercial facilities, and is not provided with essential public services without imposing undue costs on the total community, and is not consistent with the objectives and policies of the General Plan, and

C. That the proposed development does not demonstrate creative and imaginative design, resulting in a visual quality that will complement community character and benefit current and future community residents; and, therefore,

THEREFORE, in view of the findings of fact and conclusions presented above, CUP No. 200700038 is **denied**.

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LAUREN
DEVELOPMENT INC.

February 12, 2007

Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, Ca 90012

Subject: Burden of Proof Statement Regarding Conditional Use Permit (associated with TTM 066952)

The following statements are provided as substantiation of the compatibility of the proposed project with the community of Leona Valley, the development's consistency with adopted county plans and policies for the area, and the adequacy of existing infrastructure and community services to support the future residents of the site.

The proposed project will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area.

The circulation system within the development has been designed to minimize the number of vehicles accessing the project through the existing Leona Valley community to the north and northwest of the project, thus eliminating the adverse environmental impacts associated with additional traffic in residential neighborhoods.

- Most vehicles will use Bouquet Canyon Road for access, not existing 87th Street West which goes through the existing community. The connection road between 87th Street West and Lost Valley Ranch Road will be dedicated as a public street, while all other streets in this development will be private. Access onto the remaining private streets will be controlled by gates, with only residents and their guests able to enter the development.
- The owners of the one hundred thirteen proposed lots east of the public connection road will tend to drive eastward to exit the project onto Bouquet Canyon Road rather than take the connection road north through the smaller surface streets within Leona Valley.
- The owners of the thirteen proposed lots west of the connection road will have access over the private streets east of the connection road (by a gate card or a remote control device) so they too will be able to use Bouquet Canyon Road for their main access into and out of this development.
- Guests will not be able to use the access gates off the connection road; Guests will only be able to call homeowners and gain access through the gate at the main project entry on Bouquet Canyon Road.
- Existing 86th Street will not be extended into the proposed development. No traffic from this development will impact residents on 86th Street West.

This project will comply with the supplemental zoning regulations (Leona Valley Community Standards District) adopted to protect the lifestyles of the surrounding areas.

This development will be compatible with the rural standards desired by the residents of Leona Valley – and demanded by the Leona Valley Community Standards District. Street improvements, exterior lighting, and fencing will be carefully implemented, as follows: No sidewalks are proposed. Curbs and gutters will be the "rolled" type rather than the more conventional vertical curbs found in less rural areas. There will be no street lights, and any lighting proposed on private parcels will be sensitively designed to minimize off-site illumination. Fencing will all be split rail or other open fencing; Other than retaining walls (if any) there shall be no view-obscuring perimeter fences or walls.

The proposed project will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site.

Property values in the surrounding community will likely increase due to the introduction of new upscale housing. While the existing nearby properties are for the most part well maintained, in this area housing is on average well over 30 years old. It is not uncommon for new home developments to increase the value of nearby older homes. As this project will, on average, bring newer and larger homes into the community than presently exist, this development will enhance the community rather than degrade it.

Residents of the existing homes on Lost Valley Ranch Road west of the project site currently have no legal access to their homes through the project site. Further, the dirt road through the site that is used for this access is unpaved and often impassable during and after heavy rainfall. This connection road will be dedicated as a public street and paved, thus improving the enjoyment and valuation of homes on Lost Valley Ranch Road.

Publicly accessible equestrian and hiking trails will be provided through the site, thus adding an important link in the local trail system. Hikers and equestrians currently trespass across the property over a number of loosely defined paths. The plan incorporates two riding and hiking trails through the site so that these uses will be able to continue, but in a more defined area.

As described above, the project will be consistent with the Leona Valley Community Standards District regulations and the Hillside Management regulations, which are meant to protect the enjoyment and valuation of properties in the vicinity of this site.

The proposed project will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

Vehicular access will be limited to the site, as all interior streets except the connection road between 87th Street West and Lost Valley Ranch Road will be private and gated. This will enhance the safety and general welfare of the homeowners in this development.

Vehicular traffic on Bouquet Canyon Road (from non-owners or their guests) will not have access through the site onto the existing streets within the community of Leona Valley, thus enhancing the safety and general welfare of the community.

The brush covered site is regularly trespassed upon. Trash and remnants of makeshift campfires can be seen on the property, and the site was burned by a brush fire during the last

three years. Development of the site will remove a source of brush fires that can impact neighboring residential areas.

The site of the proposed project is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in the Los Angeles County Development Code or as is otherwise required in order to integrate said use with the uses in the surrounding area.

The site is subject to numerous requirements, notably base zoning of A-2-2, the supplemental zoning regulations in the Leona Valley Community Standards District, and the Hillside Management regulations. The project is consistent with all of these.

The large lot sizes are appropriate for the community of Leona Valley. Most residential lots in Leona Valley are zoned A-1-1, with some of these lots actually being less the minimum 1 acre size required by that zone. Other residential zones in the vicinity of the property are zoned A-2-2, and here too many lots are less than the minimum 2 acre size required by that zone. The subject property is subject to the Hillside Management Regulations and the Leona Valley Community Standards District regulations, which allow lots to be a minimum of 1.5 acres. The range of lot sizes on the subject development will be consistent with and appropriate for the community.

Clustering of lots and reduced lot sizes in rural hillside areas are allowed in the Antelope Valley Areawide General Plan, the Leona Valley Community Standards District, and the Hillside Management Ordinance. Specifically:

- The Antelope Valley Areawide General Plan designates the site as Non-Urban 1 (N-1) and allows 1 du per 2 acres, or 146 du.
- Policy #9 of the Antelope Valley Areawide General Plan encourages clustering of lots.
- The base zoning is Heavy Agriculture with a two acre minimum (A-2-2), or 146 du.
- The zoning code (ref 22.12.040) states that supplemental zoning districts supercede the base zoning.
- The supplemental zoning is the Leona Valley Community Standards District, which has a 1 du per 2.5 acre (gross) density, or 117 du. If the site is within a hillside area, lots may be clustered to a 1.5 acre minimum lot size (ref 22.44.122.C.7).
- The site is within a hillside area. Slope density calculations per the Hillside Management Ordinance yield a "Low Density Threshold" of 80 du and a "Maximum Density" of 139 du.
- The Hillside Management Ordinance (ref 22.56.215.J.1.d.ii) states that the number of units allowed in Non-Urban hillside areas shall be determined by the slope density calculations rather than by the zoning.

Therefore up to 139 lots are allowed on this property, and the 121 lots proposed are consistent with that limitation.

In order for this development to be compatible with the rural standards desired by the residents of Leona Valley – and demanded by the Leona Valley Community Standards District – street improvements, exterior lighting, and fencing will be carefully and sensitively implemented. No sidewalks are proposed. Curbs and gutters will be the "rolled" type rather than the conventional vertical curbs found less rural areas. There will be no

street lights, and any lighting proposed on private parcels will be sensitively designed to minimize off-site illumination. Fencing will all be split rail or other "open" style fencing; Other than retaining walls there shall be no view-obscuring perimeter fences or walls.

The site will not be entirely mass graded; on many parcels only a small percentage of the lot will be graded as a homesite, and such grading will be done with sensitivity to the existing terrain. The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact. Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that the houses will not obstruct the ridgeline. For example, the homesites along the south side of this ridge will be approximately 40 to 90' lower than the ridge, while pads on the north side of the ridge will be approximately 70 to 100' lower.

Given the large size of the lots proposed on this site, actual pad sizes could have been much larger. However to minimize grading the actual homesites on each lot will only be 10,000 to 31,000 square feet.

The two riparian corridors on the site will be largely untouched. The existing wetlands area near the southeast corner of the site (approximately one acre) will not be graded. The smaller riparian area (approximately one half acre) along the existing dirt connection road between 87th Street West and Lost Valley Ranch Road will have very limited grading. This physical condition of this second riparian area will actually be improved upon because, with the dirt road paved, erosion into the streambed and other negative impacts presently occurring will be minimized.

The site of the proposed project is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate.

Bouquet Canyon Road is adequate to serve this development.

Acceleration and deceleration lanes are proposed along Bouquet Canyon Road near the development's main entry to ease access to and from this development.

As discussed above, the design of this development's street system will discourage use of and impacts upon the residential streets in the existing community of Leona Valley.

East of the intersection of Bouquet Canyon Road and Elizabeth Lake Road, Elizabeth Lake Road is currently being widened to accommodate the development of the adjacent Ritter Ranch (in the city of Palmdale).

The site of the proposed project is adequately served by other public or private service facilities as are required.

California Water Company has indicated a willingness to provide domestic water service to this development, as that company currently has infrastructure in the streets immediately north of this property.

The Antelope Valley Union High School District has indicated the site is within their district boundaries and that the subdivision will be served by the Quartz High School (Grades 9-12).

The Westside Union School District has indicated that the site is within their boundaries and that the subdivision will be served by their Leona Valley School (Grades K-8).

This project will pay developer school fees to the appropriate school districts, thus increasing the districts' ability to serve their students.

This project will pay park fees (Quimby fees) to the county, thus increasing the county's ability to provide recreational facilities for its residents.

Preliminary geotechnical analysis of the site indicates percolation rates are appropriate for private sewerage disposal systems.

The closest Los Angeles County Fire Station, at 8723 Elizabeth Lake Rd., is only approximately 1.25 miles from the site.

The proposed project is located and designed so as to protect the safety of current and future residents, and will not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood, mud flow or erosion hazard.

The site is currently a hazard to adjacent residential areas because trespassers are attracted to the site and light makeshift campfires and leave trash on the property. Development will end these activities, thus improving the safety of nearby homes.

The road connecting 87th Street West and Lost Valley Ranch Road is unimproved and immediately adjacent to a small watercourse. Heavy rains regularly erode this road and cause dirt and automobile related pollutants to flow into the creek. Paving this street will protect the creek from pollution and erosion.

Grading plans will be prepared by a licensed civil engineer and reviewed by a soils engineer and geologist. Grading of the site will be overseen and supervised by appropriate professionals and conducted in accordance with industry standards.

All graded slopes will be landscaped, thus reducing the potential for erosion and slope failures.

The private streets within the community will be gated, thus increasing the security and safety of residents.

Acceleration and deceleration lanes are provided near the main project entry on Bouquet Canyon Road, thus increasing the safety of those driving into and out of the development.

The proposed project is compatible with the natural, biotic, cultural, scenic, and open space resources of the area.

The development will be compatible with the rural, open space feel of the Leona Valley community, primarily because of the large lots being created, the substantial portions of the site that will be ungraded, and the strict compliance with the Hillside Grading ordinance. Lots will range in size from 1.5 acres to 17 acres. The site will not be "mass graded" with the entire property either cut or filled to create building sites. Rather, grading will be limited to only about 50.5 % of the property; in many parts of the site, a homesite on one lot will be graded separately from the pad on the adjoining lot instead of running long tiers of graded pads together. Given the large size of the lots proposed on this site, actual pad sizes could have been much larger. However to minimize grading the actual homesites on each lot will only be 10,000 to 31,000 square feet.

The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact. Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that the houses will not obstruct the ridgeline. For example, the homesites along the south side of this ridge will be approximately 40' to 90' lower than the ridge, while pads on the north side of the ridge will be approximately 70' to 100' lower.

The two riparian corridors on the site will be largely untouched. The existing wetlands area near the southeast corner of the site (approximately 1 acre) will not be graded, while the smaller riparian area along the existing dirt road connection between 87th Street West and Lost Valley Ranch Road (approximately 29,000 square feet) will have only approximately 1,000 square feet impacted by grading. This physical condition of this second riparian area will actually be improved upon because, with the dirt road paved, erosion and pollution into the streambed will be minimized.

Publicly accessible hiking and equestrian trails are proposed for the development. These trails will provide an important link in the local trail system as outlined in the Antelope Valley Area Plan Trails Plan, thus allowing nonresidents to enjoy the rural nature of the area.

The proposed project is conveniently served by (or provides) neighborhood shopping and commercial facilities, can be provided with essential public services without imposing undue costs on the total community, and is consistent with the objectives and policies of the General Plan.

Additional residents in this area will result in increased customers at the commercial enterprises (market, restaurants, service station, etc.) in the Leona Valley community center near Elizabeth Lake Road and 90th Street West, approximately 1.5 miles northwest of the site.

When completed, residents of this development may also patronize the 73 acres of Community Commercial and Neighborhood Commercial uses in the adjacent Ritter Ranch development.

Residents of this development may patronize the Regional Antelope Valley Mall and other commercial businesses approximately 8 miles to the east, or neighborhood commercial enterprises in Quartz Hill approximately 5 miles northeast of the site.

Publicly accessible hiking and equestrian trails are proposed for the development. These trails will provide an important link in the local trail system as described in the Antelope Valley Area Plan Trails Plan and thus allow nonresidents to enjoy the rural nature of the area. Therefore this project is consistent with Policies #161 and #166 of the Antelope Valley Areawide General Plan.

The equestrian and hiking trail proposed to parallel the connector road between 87th Street West and Lost Valley Ranch Road will be near the existing riparian area. This is consistent with Policies #153 and #162 of the Antelope Valley Areawide General Plan that encourage such joint use.

The development is consistent with the objective of protecting the rural character of Leona Valley as contained in the Antelope Valley Areawide General Plan, the Leona Valley Community Standards District regulations and the Hillside Management Ordinance. These regulations include measures such as large lots, rolled curbs and no street lights.

This project is consistent with all applicable policies and plans. Clustering of lots and reduced lot sizes in rural hillside areas are allowed in the Antelope Valley Areawide General Plan, the Leona Valley Community Standards District, and the Hillside Management Ordinance. Specifically:

- The Antelope Valley Areawide General Plan designates the site as Non-Urban 1 (N-1) and allows 1 du per 2 acres, or 146 du.
- Policy #9 of the Antelope Valley Areawide General Plan encourages clustering of lots.
- The base zoning is Heavy Agriculture with a two acre minimum (A-2-2), or 146 du.
- The zoning code (ref 22.12.040) states that supplemental zoning districts supercede the base zoning.
- The supplemental zoning is the Leona Valley Community Standards District, which has a 1 du per 2.5 acre (gross) density, or 117 du. If the site is within a hillside area, lots may be clustered to a 1.5 acre minimum lot size (ref 22.44.122.C.7).
- The site is within a hillside area. Slope density calculations per the Hillside Management Ordinance yield a "Low Density Threshold" of 80 du and a "Maximum Density" of 139 du.
- The Hillside Management Ordinance (ref 22.56.215.J.1.d.ii) states that the number of units allowed in Non-Urban hillside areas shall be determined by the slope density calculations rather than by the zoning.

Therefore up to 139 lots are allowed on this property, and the 121 lots proposed are consistent with that limitation.

The project's design is sensitive to policies of the Antelope Valley Areawide General Plan which deal with the protection of natural areas, particularly #125 which addresses protecting riparian areas.

Policy #135 of the Antelope Valley Areawide General Plan encourages development which is sensitive to natural topographic features. By protecting the ridgeline that extends across this property, the proposed project is consistent with that policy.

The proposed project development demonstrates creative and imaginative design resulting in a visual quality that will complement community character and benefit current and future residents.

In keeping with the rural nature of the Leona Valley community, the entire site will not be mass graded; on many parcels only a small portion of the lot will be graded as a pad, and such grading will be done with sensitivity to the existing terrain. The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact. Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that the houses will not obstruct the ridgeline. For example, the homesites along the south side of this ridge will be approximately 40' to 90' lower than the ridge, while pads on the north side of the ridge will be approximately 70 to 100' lower.

Given the large size of the lots proposed on this site, actual pad sizes could have been much larger. However to minimize grading the actual homesites on each lot will only be 10,000 to 31,000 square feet.

The two riparian corridors on the site will be largely untouched. The existing wetlands area near the southeast corner of the site (approximately one acre) will not be graded. The smaller riparian area (approximately 29,000 sq. ft.) along the existing dirt road connection between 87th Street West and Lost Valley Ranch Road will only have about 1,000 sq. ft. impacted. This physical condition of this second riparian area will actually be improved upon because, with the dirt road paved, erosion into the streambed and other negative impacts presently occurring will be minimized.

The above statements prove the compatibility of the proposed project with the community of Leona Valley, the development's consistency with adopted county plans and policies for the area, and the adequacy of existing infrastructure to serve the site.

Very truly yours,

Valley Vineyards, LLC
By Lauren Development, Inc.,
It's Operatiing Manager

John L. Allday
Vice President

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818 575-9983 FAX 818 575-9987
johna@laurendevelopment.com

JUNE 29, 2011

REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

STAFF RESPONSE LETTER TO THE APPLICANT DATED MARCH 3, 2011

TR066952 staff responses, revised 3-3-11

"Standing County practices" are ***bold italicized***.

COUNTYWIDE GENERAL PLAN CONSISTENCY

LAND USE ELEMENT

Agriculture and Open Space

The Countywide General Plan ("General Plan") Land Use Element indicates that agricultural uses are separate uses from open space (Table 3.1, p. III-3). The General Plan specifically establishes the Open Space land use designation that includes "public and privately owned lands committed to long term open space use...and include regional parks, beaches, golf courses, cemeteries, sanitary landfills and military reservations" (p. III-25). Conversely, agricultural uses are included within the Non-Urban land use classification (p. III-24). The General Plan goes on to list areas that may be eligible for open space easements and includes hillside management areas; however agricultural areas are not included in this list. Thus, the General Plan considers agriculture and open space as separate uses and does not consider agricultural uses as a type of open space. Therefore, based on General Plan policy, staff concludes that the project's proposed agricultural use ("vineyards") is generally not considered as open space, and specifically for hillside management areas may not be counted towards meeting the open space requirement.

Commercial Agriculture as Required Open Space

The Land Use Element of the General Plan further describes uses that may be included in required open space for non-urban residential hillside development proposals: "common open space for passive recreation; areas graded for rounding of slopes to contour appearances; areas of scenic beauty; hiking, riding and bicycling trails; areas cleared for fire suppression, and landscaped areas adjacent to streets and highways" (p. III-67). The vineyards are proposed as a commercial agricultural use, which is not an acceptable type of open space listed in the General Plan. Thus, the vineyards cannot be counted towards required open space for hillside development proposals. ***Golf courses, which are an example of a commercial use allowed within the required open space for hillside projects, were found by the County to be compatible as it provides a passive recreational use as listed in the General Plan.*** Therefore, based on General Plan policy and County practice, staff concludes the proposed commercial vineyards cannot be counted towards the required open space for the proposed non-urban hillside residential development.

ZONING ORDINANCE COMPLIANCE

Agriculture in the A-2 Zone

The Zoning Ordinance ("County Code") lists a number of permitted uses in the A-2 zone, and includes agriculture (crops—field, tree, bush, berry and row, including nursery stock) as well as single-family residences (Section 22.24.120). However, while the particular use is permitted by the zone, this does not mean the use is appropriate in meeting the required open space under the non-urban hillside management provisions of the County Code. While agriculture is a

permitted use in the A-2 zone, it cannot be automatically concluded that agriculture is permitted to apply towards the required open space for non-urban hillside management projects. Furthermore, the same section of the County Code that allows "field, tree, bush, berry and row" crops as a permitted use, also allows a range of agricultural uses within the A-2 zone, including the raising livestock, including hogs, running dairies, and establishing feed lots. These uses would not be consistent with the intent of open space as described in the General Plan. Whether a use is permitted as an agricultural use in a zone and whether it satisfied the open space requirements of the Hillside Management Ordinance are separate questions. Therefore, staff concludes that the fact an agricultural use may be permitted in the A-2 zone is not applicable to whether the use can count towards the open space requirements for hillside management for the subject project.

Non-Urban Hillside Management

The County Code defines non-urban hillside management area as "those areas having a natural slope of 25 percent or more included within the non-urban classification of the general development policy map of the General Plan" (Section 22.08.080). The definition specifically cites areas classified, or designated, as non-urban on the General Plan map, which includes the subject property. In addition to the general development policy map, the General Plan also contains a separate Special Management Areas Map that includes hillside management areas and other resources. The "terrain where the natural slope is 25 percent or greater constitutes hillside management areas, [and is] shown in generalized form" (General Plan, p. II-39). Therefore, while the General Plan provides a map that generally depicts hillside management areas, the County Code, in its definition, lists two criteria for whether a property contains hillside management areas:

1) Contains areas with a natural slope of 25 percent or greater, and
2) is within the non-urban classification of the General Plan.

As the subject property meets both parts of the above definition, the project does include hillside management areas. Once it was determined that the property contains hillside management areas, a low-density threshold of 40 dwelling units was calculated, and the proposed density of 117 units exceeds the threshold. Therefore, staff concludes that the development is subject to the non-urban hillside management provisions of the County Code and a CUP for non-urban hillside management is required (Section 22.56.215).

Pursuant to the Department's consistent application of the HM Ordinance requirements, a project site that contains hillside management areas as defined above, and proposed development that exceeds the low density threshold is required to obtain a HM CUP.

Required Open Space for Hillside Management

The County Code describes uses that may be included in required open space for non-urban residential hillside development proposals: "undisturbed natural areas, open space for passive recreation, private yards, parks and open recreational areas, riding, hiking and bicycling trails, landscaped areas adjacent to streets and highways, greenbelts, areas graded for rounding of slopes to contour appearance, such other areas as the hearing officer deems appropriate" (Section 22.56.215.J1). As the proposed vineyard is a commercial agricultural use, and is not a type of acceptable open space listed above in the County Code, it may not be counted toward the required open space for non-urban hillside management. Therefore, since the vineyards may not be used as required open space for the project, the vineyards area (up to 122 acres of

the development) must be deducted from the total open space being provided pursuant to the non-urban hillside management requirements. With this deduction, there would be approximately 95.8 net acres of the project site being preserved as open space. Since the exclusion of the commercial vineyards from the open space area places the proposed development below the minimum required 70 percent required open space (approximately 95.8 net acres, or 36 percent), the project does not meet the provisions of the County Code indicated above. ***Although in some instances on non-urban hillside management projects required open space has been counted within private lots, it is the Department's opinion that required open space is best protected when dedicated in separate fee lots.***

Non-Urban Hillside Management & Density

As earlier indicated, the project is subject to the non-urban hillside management provisions of the County Code, which stipulate one dwelling unit per five acres (1DU/5ac) for 0 to 25 percent slopes. Thus, the low density threshold should be calculated using a density of 1DU/5ac for the 0 to 25 percent sloping terrain located on the subject property (Section 22.56.215.E.1.a.i). The subject project has a total of 26.6 dwelling units allowed within the 0 to 25 percent slopes, 14.3 dwelling units allowed within the 25 to 50 percent slopes, and zero dwelling units allowed within the over 50 percent slopes. This yields a low density threshold of 40 dwelling units for the development. With a low density threshold of 40 dwelling units, and a maximum density of 139 dwelling units, the midpoint density for the subject project is 89 dwelling units.

Current County practice, which is based on the Commission's previous discussions and recent direction on similar cases, utilizes the midpoint density as a measurement tool for determining a reasonable starting density for non-urban hillside management projects. According to this standing practice, the midpoint density is the appropriate starting point for nonurban hillside management projects. Other factors such as project design, community benefits and infrastructure costs can then affect the appropriate project density, justifying density that may be either above or below the midpoint. Furthermore, nowhere in the County Code or General/Area Plans does it stipulate that a nonurban hillside management project is automatically entitled to the maximum allowable density. In general, project density is a major factor of many discretionary residential projects, and when determining what is considered an appropriate project density, staff considers not only the project design and potential community benefits but also the totality of issues, including but not limited to County Code compliance, General/Area Plan consistency, community/agency comments, potential environmental impacts, and overall community compatibility. In considering the current project density of 117 dwelling units, which is 28 units above the established midpoint, staff has indicated in its previous Subdivision Committee reports that the current project density is inappropriate, based on the project's lack of consistency with County policy related to the use of open space as an agricultural/commercial use, and lack of compliance with the non-urban hillside management and density-controlled development provisions of the County Code.

Density-Controlled Development (Clustering)

Density-controlled development is defined as a "concentration of dwelling units on a portion or portions" of the project where the remainder of the project shall be "free of buildings or structures", and "the use of smaller lots" should be used for "retaining the remaining portion" of the project "in permanent open space" (Section 22.08.040). The proposed project disperses single-family lots in eight individual groups throughout the entire project site, not meeting the "concentration" provision of the County Code. In addition, only 65 of the proposed 117

single-family lots (or 56 percent) are less than two acres in area, thereby severely limiting the benefits of density-controlled development of preserving remaining area as open space.

According to established County practice, density-controlled development projects cluster lots (not just building pads or structures), such that the remaining area is set aside as separate open space fee lots. This configuration of residential development and open space has been found by the County to be consistent with the General and Area Plan policies related to "clustering," as well as found consistent with the definition and related provisions of density-controlled development stated above in the County Code to be more protective of natural resources by placing development (i.e. single-family lots) within a smaller footprint.

As earlier indicated, the proposed development does not cluster single-family lots, and no remaining open space area is shown in separate fee lots. In addition, due to the overall project density, the project has an inadequate clustering design of too many "clusters" and too few smaller-sized lots, which results in overdevelopment of the subject site. Given the fact that the proposed project does not meet the definition and established standards of a density-controlled development and does not propose a sufficient clustering design, staff concludes that the density-controlled development provisions stated in the County Code have not been met.

CONDITIONAL USE PERMIT ("CUP")

Burden of Proof.

As explained above, the project requires a CUP for non-urban hillside management development. The project also triggers a CUP pursuant to the density-controlled development provisions of the County Code. Although the applicant believes that the proposed development is not subject to the non-urban hillside management or the density-controlled development provisions of the County Code, the applicant nevertheless has submitted a "burden of proof statement" for the CUP. However, the burden of proof responses relate to the non-urban hillside management aspects of the development, such as lot sizes, pad sizes, pad elevations, and grading, but do not include any specific discussion of how the development meets criteria related to density-controlled development. In the March 3, 2008 Subdivision Committee report comments, staff requested that additional burden of proof responses be submitted for density-controlled development, but as of date no such material has been received.

Related to non-urban hillside management and density-controlled development, staff believes that the burden of proof for the CUP has not been met, due to the following factors affected by the current project design:

- *Over-disturbance of the hilltops and ridgelines located within the project site:* Five of the eight hilltops located on the project site will be disturbed with proposed grading, building pads, and/or streets.
- *Over-disturbance of 50 percent or greater sloping areas located within the project site:* 13 single-family lots contain development that will disturb the steeper 50 percent or greater slopes.
- *Lack of the required 70 percent of required open space for non-urban hillside management projects:* As the commercial vineyards operation should not be counted towards required open space, the development currently has only 98.5 acres (or 38 percent) of open space.

- *Lack of required separate dedicated open space for density-controlled development projects:* Only building pads are clustered, not single-family lots, leaving no remaining open space to set apart the developed and undeveloped areas.
- *Over-development of the project site (28 percent over the midpoint density):* Leads to an overall poor clustering design (eight individual "clusters" spread throughout) and excessive amount of project grading totaling 2.3 million cubic yards of cut/fill material for 117 single-family lots and associated infrastructure and improvements.

Grading

As the proposed development grading exceeds 100,000 cubic yards of cut/fill material, a CUP for grading is required (Section 22.08.070.G). With respect to cumulative grading amounts, the County Code states "any excavation [cut] or fill, or combination thereof ... which will involve a volume of earth greater than 100,000 cubic yards" requires a CUP. For purposes of determining whether a CUP for grading is required pursuant to Title 22 of the County Code, the Department considers the cumulative grading amounts. ***Cumulative grading amounts are important because cut and fill alter the landform differently, requiring an analysis of the two grading techniques both individually and together.***

Minimum Required Area in the CSD

The Leona Valley CSD establishes a required area of 1.5 acres for clustering and density transfer projects. Section 22.52.100 defines "required area" in several ways, including area as part of a recorded subdivision and where gross and net area requirements are clarified. As the proposed lots are not yet recorded, the CSD required area of 1.5 acres translates to a minimum gross lot area of 1.5 gross acres and a minimum net lot area of 60,000 square feet. The easements proposed for the commercial vineyard areas must be subtracted from the required net lot area calculations in order to meet the definition of net area. Therefore, many of the proposed single-family lots will fall below the minimum net lot area requirement, and the development will not be in compliance with the CSD and County Code.

STAFF CONCLUSION

In conclusion, staff recommends that in order to achieve a better clustered, non-urban hillside development, the project should consider the following:

1. Reducing density
2. Eliminating development on ridgelines and in the 50 percent or greater slopes most affected
3. Reducing overall cumulative project grading amount
4. Redesigning with fewer "clusters" and larger contiguous areas of protected open space
5. Placing open space into dedicated lots
6. Placing the commercial vineyard operation into a separate lot, away from the single-family lots but still on-site within the same development

Staff would like to meet and discuss alternative designs that address the above concerns.

JUNE 29, 2011

REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

<u>PRESS ARTICLES</u>

"The Mountain Yodeler" * March 1, 2009

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Bill Ford, president of Valley Vineyards, gives residents an update on his plans to build 117 homes in Leona Valley.

Leona Valley Developers Move Ahead with Plans

Valley Vineyards, the proposed 300-acre development to off of 87th Street West in Leona Valley, will be completely in compliance with the town's community standards, according to Bill Ford, company president.

Ford told the town council at its February 9 meeting that he has made many changes in the plans, including a reduction in the number of homes to 177, an increase in open space from 182 to 212 acres and a decrease in the amount of grading that will be done.

In addition, Ford assured the standing-room-only crowd that there will be no curbs, gutters, street lights or retention basins.

Land set aside for biking and hiking trails has been increased by seven miles, street widths are now projected at 28 feet and fences will not obstruct views, according to Ford.

The interior of the development will feature 12-foot-wide horse and pedestrian trails.

Ford said the development will have an advanced sewage treatment system that will capture the effluent from the septic tank and treat it on site. "Our 117 houses will have the same (ecological) footprint as three houses (elsewhere) on a septic tank," he said. According to Ford, each house will have its own treatment system. This secondarily treated water will be used for irrigation. "It's an existing technology, widely used on the east coast," said Ford.

Ford advised the council that none of these plans have been approved yet, but they are now going through the system.

The main area of concern expressed at the meeting by residents of 87th Street was an increase of traffic on their already stressed dirt road. Ford replied that the development would have a gate to keep people from using this route as a shortcut to Bouquet Canyon. He reassured the audience that he is not building a "walled community" and that if they don't want the gate, he won't build it.

The other concern was the availability of water. Resident Juanita Kirkpatrick asked if a "will serve" letter had been obtained and questioned how new residents could be supplied with water when existing ones are being told to cut back.

Ford said his company has obtained the will serve letter under the condition that it will supplement the water company's water somewhere in its system - not necessarily in the Leona Valley area.

Power Lines

from page 1

several attendees of the February town meeting referred to as a "disgusting, hideous blight."

"It seems that in our society today, aesthetics is put at the bottom of the list," said Love. "We are a small community and it seems that we are not respected. This is the last viable, rural community in north L.A. County. Why do this to us? I'm sure that the final results will be determined on the basis of expediency and cost effectiveness," she said.

"I believe environmental modifications can be made to make (Segment D) viable," said Love. "Can you modify it to eliminate some of the problems?" she asked.

Justin Seastrand, U.S.D.A. Forest Service representative, stepped up and simply said, "Yes."

But it was the Forest Service that approved the hated mid-slope power lines that are now being constructed on Bouquet Canyon and against which residents fought tooth and nail in 2007 and 2008.

James Walker, Lakes Town Council president, told the engineers that our area is becoming the "Signal Hill of today," referring to the visual blight of oil derricks that ruined that neighborhood in the early 1900s.

He also raised his concern that power companies will continue to widen the corridor and keep adding more towers. "You have to increase your renewable energy by 30% by 2030. These lines won't do it," said Walker. "You'll have to increase them again. You'll say 'We'll just ease it out and take some more houses.'"

If there is a bright side to this project it is that LADWP's preferred route, which goes up Johnson Hill, crosses Elizabeth Lake Road and continues down San Francisquito Canyon Road, has been modified to save 11 houses that would have been taken by eminent domain.

*

(p.1)

"The Mountain Yodeler"

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Tuesday, May 1, 2007 Volume 7, Number 18

Leona Valley Residents Brace for Impact of Gated Community

By Louisa Stephen
Staff writer

Leona Valley residents have just learned of a proposed new development located west of Bouquet Canyon Road east of 87th Street West and south of Lost Valley Ranch Road.

Developer John Allday presented a tentative tract map to the Leona Valley Town Council for Valley Vineyards Estates, a 121-lot housing development on approximately 300 acres. Allday estimated that it would be about two years before construction would begin.

"This project will help the community by setting the stage for future developments," Mr. Allday told town council members and residents who filled the LVIA community building on the evening of April 9, 2007.

Residents expressed major concerns regarding fire safety, water availability, groundwater pollution, loss of wildlife habitat, increased traffic and degraded or lost equestrian trails, among other potential problems associated with a development in a rural area.

Leona Valley resident and equestrian Marcy Watton told the developer, "You're going to change the character of our valley. When you say that you're setting a precedent for other developers, I believe you."

The gated community would have a homeowners' association, which Allday assured the audience would not supercede the Leona Valley Community Standards District (CSD). He also said that there might be two gates, possibly made of wrought iron, for controlled vehicular access only.

Watton said, "I think a gated community is antithetical to what we stand for out

See New Development, p. 2

Petersen Ranch Owner Dies

By Dahlia Grossman

Bob Petersen, 80, owner of Petersen Ranch in Lake Hughes, Elizabeth Lake and Leona Valley, died of cancer on March 25.

Known worldwide as a giant in the publishing industry and founder of *Hot Rod Magazine, Motor Trend Magazine* and many others, Petersen considered the Lakes and Valleys his second home.

According to Gary Williams, caretaker of Petersen Ranch, Petersen started buying property in this area in the late 1950s and early 1960s and spent a lot of time at the ranch, where he was host to many politicians and movie stars.

In recent years, he opened his ranch to The Lakes Woman's Club, who held their annual district meeting on the scenic property.

Petersen cared deeply for the Lakes and Valleys Communities and was always upgrading the ranch and trying to protect the wildlife, according to Williams. Williams said Petersen was very con

the community, including a gift of computers, bleachers, a playground, and 21 acres of land to H.E.L.U.S," said Williams. "He also donated a large amount of money towards the purchase of the Lakes Community Center property," he said.

Petersen and his wife Margie had two sons, both of whom were killed in the crash of a small plane in the Rocky Mountains during a 1975 skiing vacation. Petersen rarely spoke of the tragedy that took the lives of Bob, 10, and Ritchie, 9, but said in a 1995 interview with *The Los Angeles Times* that he had never really recovered from the loss.

Petersen is survived by his wife, who requested that

5-1-07 * (p.2)

LV Development

from page 1

out here."

The plan for Valley Vineyards Estates was submitted to the county on February 5, 2007; Allday stated that he would meet with county representatives to discuss the project on April 23, 2007.

Members of the Leona Valley Town Council will not be able to speak at that meeting, but will present some of the questions residents have raised about the project. Town Council President Rich Thomas said that the council feels that the project is extremely important; they will be following it closely.

The main entry to the development would be off of Bouquet Canyon Road. The developers propose paving Lost Valley Ranch Road and making it a dedicated public street, thereby maintaining the existing access for residents.

All of the other streets, except for one, would be private. Allday said that traffic would have a minimum impact on the homes on 87th Street West.

Residents voiced their concerns about traffic, including daily commuters and evacuation in the event of a natural disaster such as fire or earthquake. One resident was worried about access and egress, recalling the fire evacuations of 2003 and reminding people that the San Andreas Fault runs through Leona Valley.

"If something catastrophic happens, those two little roads aren't going to be very helpful with all those people packed onto the hills," she said.

Allday noted that his company has also observed necessary governmental regulations regarding zoning and the CSD. He added, "I've been coming to your meetings for the last 10 months and sitting in the back, listening, trying to find out what the issues were and desires and needs of the community."

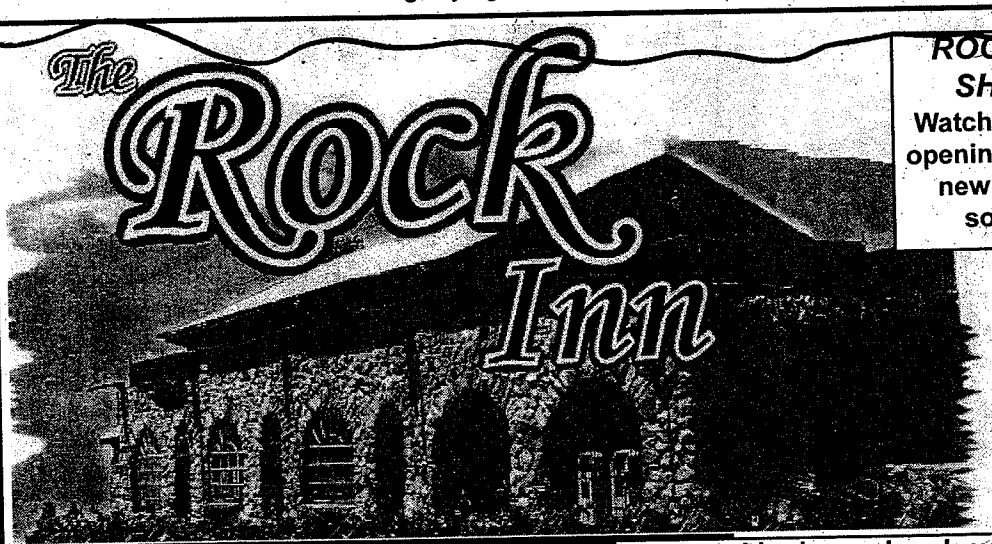
If the general response at the meeting is any indication, Leona Valley residents are opposed to the idea of their rural area being developed.

Allday told the audience that the company had made numerous pre-planning studies ,which included plant and animal inventories, wetland analyses and archeological and geological studies of the hilly terrain.

The ridgelines would be preserved according to the plan. Because of the topography, almost 50% of the land will not be graded. The developer told the audience that he is entertaining the idea of growing grapes on the slopes. He suggested that the homeowners' association would have to hire someone to manage such a project.

Allday's company, Lauren Development, Inc., is located

See LV Development, page 37



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(p.3)

5-1-07 *

Volume 7 Number 6

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criminals received better treatment than their victims.

Common Sense took a beating when you couldn't defend yourself from a burglar in your own home and the burglar could sue you for assault.

Common Sense finally gave up the will to live after a woman failed to realize that a steaming cup of coffee was hot, spilled a little in her lap, and was promptly awarded a huge settlement.

Common Sense was preceded in death by his parents, Truth and Trust; his wife, Discretion; his daughter, Responsibility; and his son, Reason.

He is survived by his three stepbrothers: I Know My Rights, Someone Else Is To Blame, and I'm a Victim.

Not many attended his funeral because so few realized he was gone.

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Lake Elizabeth
1031

The Mountain Yodeler Tuesday, May 1, 2007

LV Gated Community

from page 2

in Agoura Hills. The company has been planning the development for about a year.

Allday said that the Hillside Management Ordinance would have allowed for 139 units and the Leona Valley CSD allows 117 units. The tentative tract map allows for 121 units and incorporates clustering. Although the Leona Valley CSD specifies a minimum lot size of 2.5 acres, it does allow clustering of houses (placing them closer together) to 1.5 acre lots in hillside management areas.

The Leona Valley CSD reads, in pertinent part:

Clustering is allowed only within projects located in hillside management areas (areas over 25 per cent slope) and must satisfy findings of the Hillside Management Ordinance as set out at Section 22.56.215.

Allday, who brought a giant reproduction of the CSD document to the meeting, has done his homework.

When asked about the size of the houses, Allday said that the company had not spoken to an architect, but that the one-story houses would be about 3,000 to 5,000 square feet or larger.

Limited water in the area was a major concern for many attending the meeting. According to Allday, California Water Service has given the developer a "will serve" notice, but stressed that they can't provide 100% of the water and that the developer may have to supplement the water supply by drilling wells either on or off the site.

Allday was also questioned about water pipes and potential rate increases directly relating to the project. He said: "We, the builders, will be responsible for any off-site improvements necessary to bring water to the site."

One resident of Lost Valley Ranch Road asked if water would be depleted from other parts of the valley if the developers drilled wells for so many new houses. Leona Valley Town Council Vice-President and Treasurer Bill Elliott pointed out that an Environmental Impact Report would have to be commissioned for the property. He also stated that water will be one of the issues that the town council will discuss with the county.

Another member of the audience noted that many housing developments have lush vegetation which uses up valuable water and would be inappropriate for the high desert. She added, "I have no landscaping because I don't want to impact my neighbors' water." She asked if the homeowners' association could possibly monitor water use and encourage the use of native plants.

All in accordance with the rules of the Leona Valley CSD, there will be no sidewalks, curbs or gutters. Streets will be 24 feet wide unless the county determines that a safety issue exists, in which case they will be wider. Mr. Allday said that unless directed to include them by the county, there will be no street lights, either.

Mr. Allday has promised to dedicate an equestrian trail to the county and said that the trail would not be impeded by any gates.

John Grimm, a local firefighter, asked if the developer would consider upgrading the existing volunteer fire station. Allday replied that they would follow county recommendations.

There was apprehension about dramatically increasing the number of houses in Leona Valley and the effect this might have on the community. Allday told residents that the school district had given his company "will serve" letters.

Many residents are bracing themselves for the anticipated 7,000 or so new houses at Ritter Ranch and are not happy about any additional developments in the area. Watton told the town council, "Don't let them erode our Community Standards District and the character of our community."

Allday confirmed that Lauren Development, Inc. also owns approximately 250 to 300 acres of additional land in Leona Valley on Godde Hill Road which is being considered for development after the Valley Vineyards Estates project is finished. Plans have not been submitted at this time. "When that plan gets further along I will be bringing it before the town council, also," said Allday.

At the end of the meeting, Town Council President Rich Thomas said, "This is going to set the standard, I believe, for a lot of other big increases out here in Leona Valley. This is why I think the long-range plan that we've been working on is so important: Where are we going and what's this place going to look like in the next five or 10 years?"

Louis Royce II Graduates with Honors

On March 30, in the outskirts of Helena, Montana, the Montana Law Enforcement Academy held its 130th graduation ceremony for Law Enforcement agencies across the state. Fifty-seven men and women from 31 different agencies completed the 12-week course with 46 attaining the "Rock Hard" Award and 10 earning awards for outstanding merit in different fields.

Former Lake Hughes resident Louis Royce II was one among those honored, earning both the "Rock Hard" Award and the "Jimmy Kaaro Memorial Award (academics) In Recognition Of Louis Royce II For Attaining the Highest Academic Record During The Course Of Study In the M.L.E.A. Basic #130" presented by the Montana Sheriffs and Peace Officers Association.

Volume

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JUNE 29, 2011

REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

CORRESPONDENCE BETWEEN STAFF AND THE TOWN COUNCIL

(2007-2009)

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Tuesday, January 13, 2009 6:56 PM
To: Sackett, Jodie
Subject: RE: Valley Vineyards - TTM 066952

Thanks Jodie. Please keep in mind that California Water Service is supplying will serve letters-with conditions. The conditions should be removed. The prior condition was basically Cal Water would provide water if the Developer would find the water. Mr. McCarthy verbally stated in our meeting that this is inadequate.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Tuesday, January 13, 2009 6:27 PM
To: Bill Ford
Cc: Alexanian, Sorin; Tae, Susan; Bush, Michele; John Allday; Alice Wollman; McCarthy, Paul; Tegart, Patricia; Becky Valenti
Subject: RE: Valley Vineyards - TTM 066952

Hi Bill,

The only correspondence we have received from the public as of today has come forwarded to us from the LVTC. This would include the letters stating residents' concerns given by the LVTC at a meeting with staff held on August 25, 2008. The LVTC gave us hard copies of those letters at the meeting, and the letters have been available for public review in the case file since August 25, 2008. I do not believe we have received any individual e-mails or letters from residents concerned with the project. You may wish to check with Michele Bush to see if she has received any public correspondence.

We will soon be arranging a public hearing with the Regional Planning Commission in order for the Commission to hear your presentation and decide on the key issues presented by staff. This will be a full public hearing, to include posting, noticing and comment from the public. Before staff can tentatively schedule a public hearing, you must provide more information regarding your new proposed sewage treatment system to Public Works and Public Health (with a copy to Land Divisions, Regional Planning), to include additional information related to offsite facilities, if applicable. Also, you must consult with Public Works and Michele Bush of Impact Analysis regarding your new sewage system and proposed "phased grading". These new project features must be evaluated by staff before your case is presented at the public hearing.

The environmental determination must be completed before your case is scheduled for hearing. In addition, Paul McCarthy of Impact Analysis is concerned that your water will-serve letter is outdated, from 2007. Please send Paul McCarthy of Impact Analysis and Becky Valenti of Public Health an updated water will-serve letter to verify that the proposed water supply is sufficient.

In anticipation of the public hearing, please submit 17 copies of your revised tract map and Exhibit "A" showing 117 lots and offsite treatment facilities, as proposed in your project revision. Also, please submit 17 copies of an updated 500-foot land use radius map, 17 copies of a phasing map, and an updated mailing package for the upcoming hearing, which includes two sets of mailing labels, one photocopy of the labels, one 1000-foot radius ownership map corresponding to the mailing labels, and a signed affidavit.

If you have photos or other materials that you would like the Commission to review prior to the hearing, please provide 17 sets of those materials as well. If you need more information, I would be happy to clarify.

E-mail Correspondence from LVTC.
4/17/07 - 1/13/09 (30 attachments)

Regards,

Jodie Sackett
Land Divisions Section

From: Bill Ford [mailto:billf@laurendevelopment.com]
Sent: Tuesday, January 13, 2009 12:48 PM
To: Sackett, Jodie
Cc: Alexanian, Sorin; 'john'
Subject: Valley Vineyards - TTM 066952

Jodie,

Recently another department gave me several letters received by the county from residents of Leona Valley. These letters apparently came from your office. It would be a great help if you would be kind enough to forward on to me all letters and e-mails received from the public concerning our development. I have been tasked with the job of reaching out to the community and as a start I would like to address each persons concerns by either responding with additional or updated information, or if necessary amending the TTM to incorporate improvements that they may have suggested. If the file is available, and it would be easier for you, I would be happy to come to our office and review it for these documents.

Thank you in advance for your assistance.

Bill Ford

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Thursday, November 20, 2008 11:29 AM
To: Sackett, Jodie
Subject: RE: TR066952, complaint letters, traffic study

I don't believe there is anything else.

By the way, last Saturday, we held a special Town Hall meeting on Water and Chloramines. Representatives from California Water Service were guest speakers. They (Chris Whitley) reiterated at that meeting that no developer/development will be provided with water unless the Developer locates the water and bring it in themselves.

A.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Thursday, November 20, 2008 11:25 AM
To: Alice Wollman
Subject: RE: TR066952, complaint letters, traffic study

Yes, I did locate the items provided by you at our most recent meeting. I forwarded everything to Public Works, which included the "traffic deficiencies" document and the complaint letters. Let me know if there is anything else.

Thanks,

Jodie Sackett
Land Divisions Section

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Thursday, November 20, 2008 10:05 AM
To: Sackett, Jodie
Subject: RE: TR066952, complaint letters, traffic study

I believe we gave you a report. Do you still have that?

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Thursday, November 20, 2008 10:03 AM
To: Alice Wollman
Subject: FW: TR066952, complaint letters, traffic study

Hi Alice,

You gave me some letters regarding traffic when we met back in August. Do you have anything else regarding traffic?

Thanks,

Jodie Sackett
Land Divisions Section

From: Pletyak, Jeff [mailto:JPLETY@dpw.lacounty.gov]
Sent: Thursday, November 20, 2008 9:43 AM
To: Sackett, Jodie
Subject: RE: TR066952, complaint letters, traffic study

Were you able to compile the complaint letters regarding traffic? We are working with the developer (Mr. Allday) to complete our review of the traffic study. Prior to us meeting with him, we would like to know the community's traffic concerns so that they could be considered during the next iteration of the traffic study.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Tuesday, August 12, 2008 12:01 PM
To: Pletyak, Jeff
Subject: RE: TR066952, complaint letters, traffic study

Hi Jeff,

Sorry for the delay in response. I included the complaint letters and traffic study in the same e-mail, but they are two different issues. The complaint letters do not all relate to the traffic concerns, although some probably do. I am meeting with a town Council representative next week, and will be able to forward more information to you then.

Thanks for your help,

Jodie Sackett
Land Divisions Section

From: Pletyak, Jeff [mailto:JPLETY@dpw.lacounty.gov]
Sent: Monday, August 04, 2008 1:34 PM
To: Sackett, Jodie
Cc: Chon, James
Subject: RE: TR066952, complaint letters, traffic study

Hi Jodie

We are not aware of any previous situations where an additional traffic study is submitted to us for review. To help us make a determination whether we can accept it, we would like to review the complaint letters (or get a sense of the complaints) you have received regarding the proposed project. Upon reviewing the letters, we will report back to you on the procedures for processing the Town Council's traffic study.

If you have any questions, please contact me at (626) 300-4721.

From: Chon, James
Sent: Monday, August 04, 2008 9:37 AM
To: 'Sackett, Jodie'
Cc: Pletyak, Jeff
Subject: RE: TR066952, complaint letters, traffic study

Jeff Pletyak (copied) now heads over the Traffic Studies Section. He can respond to you on this.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Monday, August 04, 2008 9:30 AM
To: Chon, James
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Hello James,

I wasn't sure who to forward this to, but my supervisor, Susie Tae, suggested you might be able to help. The Leona Valley Town Council has hired their own consultant to conduct a traffic study regarding the proposed subdivision TR 066952. I am the case planner currently assigned to the project for Regional Planning. I am not sure if your department/section accepts additional traffic studies submitted by parties not representing the owner/applicant. Would you be able to clarify?

Thanks,

Mr. Jodie Sackett
Land Divisions Section

From: Sackett, Jodie
Sent: Monday, August 04, 2008 9:11 AM
To: 'Alice Wollman'
Cc: Bush, Michele
Subject: RE: TR066952, complaint letters, traffic study

Hi Alice,

Complaint letters can go directly to me. Traffic study should go to Public Works, although I'm not sure how it will be considered, since Public Works usually relies on the traffic study submitted by the applicant (Mr. Allday). I will let you know who to send the traffic study to.

Thanks,

Jodie Sackett
Land Divisions Section

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Monday, August 04, 2008 8:51 AM
To: Sackett, Jodie
Subject: RE: Cultural Resources-Valley Vineyard (TR066952)

I have a stack of complaint letters regarding the traffic that I still have to scan. Where shall I send the documents once scanned.

Also, we have an engineer reviewing the traffic study. Once complete, I would like to know where to send that as well.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Monday, August 04, 2008 8:48 AM
To: Alice Wollman
Cc: Bush, Michele
Subject: RE: Cultural Resources-Valley Vineyard (TR066952)

Hi Alice,

Thanks for the attachments. Please forward all future material related to environmental impacts directly to Ms. Michele Bush of our Impact Analysis Section. She has replaced Mr. Daniel Fierros as the assigned environmental planner.

Thanks!

Jodie Sackett
Land Divisions Section

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Monday, August 04, 2008 8:36 AM
To: Sackett, Jodie
Subject: FW: Cultural Resources-Valley Vineyard

I think your mailbox was full. I am re-sending.

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Friday, August 01, 2008 10:44 AM
To: 'jsackett@planning.lacounty.gov'
Subject: Cultural Resources-Valley Vineyard

The Developer's expert report indicates that cultural resources are not likely to exist on the subject site. Attached is a newspaper article from the Antelope Valley Press, dated in 1990, which indicates that the Saint Anthony Ranch (90th West & Lost Valley Ranch Road), which is contiguous to the site, was part of a greater Indian Village. This information is easily accessible through the newspaper archives or through the public library. I am also including the Antelope Pardee commentary on cultural resources within the vicinity. Your department (through Julie Lowry) has considerable evidence that extensive artifacts remain untouched and presently exist in Leona Valley, and likely remain undisturbed on the subject site. While the "expert" did believe the topography of this parcel prohibited the likelihood of artifacts, this is simply not the case. There is a confirmed Indian burial ground on Elizabeth Lake Road, east and west of Godde Hill Road, covering steep terrain. Furthermore, because there was a competing tribe to the east (in Palmdale) the ridges and slopes were often used as look-out points while the women worked in the lower village. It is our understanding that there is a natural spring on the site, which provides an intermittent water resource; and Lost Valley Ranch Road is a natural stream, which attracts wildlife for hunting.

Attached is the 1990 article; as well as the Antelope Pardee Commentary on Segment 1, Cultural Resources. Your Department (Lowry) has further knowledge as to the extent of cultural resources in Leona Valley, which I believe, was shared with the environmental section earlier this year. Photographs were already provided to Ms. Lowry as part of the Significant Ecological Area expansion study.

Respectfully,

Alice Benoit

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Respectfully,

Alice Benoit

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Tuesday, August 26, 2008 9:20 AM
To: Sackett, Jodie
Subject: Valley Vineyard-One More Time
Attachments: Minutes 051407 water ten miles away.doc

I found one more document; the minutes at this meeting indicate they could find water ten miles away-in a completely different location to supplement Cal Water's system.

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]

Sent: Tuesday, August 26, 2008 8:40 AM

To: Sackett, Jodie

Subject: Valley Vineyard, Leona Valley

Attachments: Minutes 082707 water shut down and discussion of conditional will serve.doc; 021108 Minutes regarding maintenance and vineyard use.doc; 081307 Minutes Conditional Will Serve Letter.doc; 102207 Minutes regarding new non producing well.doc; 121007 Minutes Conditional Will Serve.doc

Here are more meeting minutes, where Chris Whitley, an official with California Water Service. He specifically discusses the water supply and the conditional will serve. I have also included minutes regarding the maintenance of the vineyard, which you may want to send to the County legal eagles.

Thanks,

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Monday, August 25, 2008 10:57 PM
To: Sackett, Jodie
Subject: Valley Vineyards, Ridgelines
Attachments: View from S of Bouquet facing north.pdf; Picture 62 vv.pdf; Picture 55 vv.pdf; Picture 61 vv.pdf

Attached are the ridgeline images from Google Earth. Marshall Adams is working on the larger map, but these are the identified significant ridgelines. I am not positive, but I think that is all of the images that potentially involve that site.

A.

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]

Sent: Monday, August 25, 2008 10:42 PM

To: Sackett, Jodie

Subject: Valley Vineyards, Leona Valley

Attachments: 0608 Minutes Sewage Treatment Plant.doc; Minutes 051407 Sewage Treatment Plant.doc; 081104 Special Water Meeting.doc; St Anthony Indian Village.pdf; Leona Valley Indians Santa Clarita Signal.pdf; Singleton Bouquet Letter.jpg; Dave Singleton Letter 1.jpg; Leona Valley Western Pond Turtle 2.pdf; Biologists email on the Stickleback in Bouquet.pdf

Hi Jodie,

You are a blessing. Sometimes I feel like we are lost lambs and it is difficult for us to figure out what we are doing right and wrong. Thank you for providing us with some direction.

I am looking over our old meeting minutes. Valley Vineyards indicated as early as May 2007 that they were going to be putting in an on site sewage treatment plant. Attached are the minutes from that meeting; and then again in June 2008. I highlighted the pertinent areas.

I have attached the water meeting minutes again for your review. I have highlighted what I believe is important. We will attempt to transcribe the entire meeting; the minutes are a synopsis;

I have attached the article on the Village at the Saint Anthony Ranch, which is contiguous to their property; as well as some old and new Indian documents; and info on the Western Pond Turtle, which was found in the Amargosa, to the north. The red legged from has been observed in the Upper Bouquet Creek on the east side of the project. Fish and Game would not let anyone repair via tractor clearing any properties along Bouquet Canyon Road in north Leona Valley as well as Lost Valley and 87th Street and 86th Street West. They had sited both the red legged frog and the three-spine stickleback fish.

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Monday, August 04, 2008 8:51 AM
To: Sackett, Jodie
Subject: RE: Cultural Resources-Valley Vineyard (TR066952)

I have a stack of complaint letters regarding the traffic that I still have to scan. Where shall I send the documents once scanned.

Also, we have an engineer reviewing the traffic study. Once complete, I would like to know where to send that as well.

From: Sackett, Jodie [mailto:jsackett@planning.lacounty.gov]
Sent: Monday, August 04, 2008 8:48 AM
To: Alice Wollman
Cc: Bush, Michele
Subject: RE: Cultural Resources-Valley Vineyard (TR066952)

Hi Alice,

Thanks for the attachments. Please forward all future material related to environmental impacts directly to Ms. Michele Bush of our Impact Analysis Section. She has replaced Mr. Daniel Fierros as the assigned environmental planner.

Thanks!

Jodie Sackett
Land Divisions Section

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Monday, August 04, 2008 8:36 AM
To: Sackett, Jodie
Subject: FW: Cultural Resources-Valley Vineyard

I think your mailbox was full. I am re-sending.

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Friday, August 01, 2008 10:44 AM
To: 'jsackett@planning.lacounty.gov'
Subject: Cultural Resources-Valley Vineyard

The Developer's expert report indicates that cultural resources are not likely to exist on the subject site. Attached is a newspaper article from the Antelope Valley Press, dated in 1990, which indicates that the Saint Anthony Ranch (90th West & Lost Valley Ranch Road), which is contiguous to the site, was part of a greater Indian Village. This information is easily accessible through the newspaper archives or through the public library. I am also including the Antelope Pardee commentary on cultural resources within the vicinity. Your department (through Julie Lowry) has considerable evidence that extensive artifacts remain untouched and presently exist in Leona Valley, and likely remain undisturbed on the subject site. While the "expert" did believe the topography of this parcel prohibited the likelihood of artifacts, this is simply not the case. There is a confirmed Indian burial ground on Elizabeth Lake Road, east and west of Godde Hill Road, covering steep terrain. Furthermore, because there was a competing tribe to the east (in Palmdale) the ridges and slopes were often used as look-out points while the women worked in the lower village. It is our understanding that there is a natural spring on the site, which

provides an intermittent water resource; and Lost Valley Ranch Road is a natural stream, which attracts wildlife for hunting.

Attached is the 1990 article; as well as the Antelope Pardee Commentary on Segment 1, Cultural Resources. Your Department (Lowry) has further knowledge as to the extent of cultural resources in Leona Valley, which I believe, was shared with the environmental section earlier this year. Photographs were already provided to Ms. Lowry as part of the Significant Ecological Area expansion study.

Respectfully,

Alice Benoit

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Monday, August 04, 2008 8:36 AM
To: Sackett, Jodie
Subject: FW: Cultural Resources-Valley Vineyard
Attachments: cultural.pdf; St Anthony Indian Village.pdf

I think your mailbox was full. I am re-sending.

From: Alice Wollman [mailto:AliceWollman@Roadrunner.com]
Sent: Friday, August 01, 2008 10:44 AM
To: 'jsackett@planning.lacounty.gov'
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Attached is the 1990 article; as well as the Antelope Pardee Commentary on Segment 1, Cultural Resources. Your Department (Lowry) has further knowledge as to the extent of cultural resources in Leona Valley, which I believe, was shared with the environmental section earlier this year. Photographs were already provided to Ms. Lowry as part of the Significant Ecological Area expansion study.

Respectfully,

Alice Benoit

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Friday, August 01, 2008 10:33 AM
To: Sackett, Jodie
Subject: Biological Study Involving Valley Vineyard
Attachments: Pink Route.pdf; Segment 1.pdf

Attached is the Segments 1 (pink) and 2 study of the Antelope Pardee Renewable Energy Project. The importance of this project is that Southern California Edison had two Alternate routes (Alt 5 & 4). Both bisect the Valley Vineyard property on Bouquet Canyon. The Segment 2 study is next to the site. As such, these studies are specific to the site and community. The studies were conducted in 2005/2006 and include plant life and animal/bird species. As you can see, vast volumes of information are lacking in the study conducted by the Developer. This study was completed by a disinterested third party, which was utilized by the California Public Utilities Commission, Edison, Bureau of Land Management, the United States Forest Service and others. The study is done at nearly the exact time that the Developer had their study completed. Clearly, there is a difference in findings. The findings of the Leona Valley Town Council Development and CSD Committees closely mimic those found by Antelope Pardee (Aspen).

Please keep in mind, Both Alt 5 (Seg 1) and Alt 4 (Seg 2) went through the Bouquet property. But Seg 2 also intersects the Godde property (at the top northern corner). Seg 2 is also very close to the Bouquet property (because of it's proximity to Ritter) so most of the bio impacts can be directly linked to Valley Vineyards. If I remember correctly the bio reports had to cover ALL surrounding property for 1.5 miles on either side of the projected transmission line as that was the distance they were allowed to move the line based on terrain and their ability to put it in as the line was drawn on the maps. It was always stated by Aspen and Edison that the lines on the maps were an "approximation" and only the final engineering could determine where the lines actually went.

I can also provide the environmental study for the Ritter property, which is located across the street from the subject site, if needed. I believe the site specific studies should be sufficient.

Please forward these more in depth studies to the appropriate personnel.

Respectfully,

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@Roadrunner.com]
Sent: Friday, August 01, 2008 10:05 AM
To: Sackett, Jodie
Subject: Leona Valley Plant Study
Attachments: Native Plant Species of Leona Valley.pdf

The Leona Valley Community Standards District Committee has completed a year long study pertaining to the native plant species in our community. This should be considered in the Valley Vineyard subdivision findings. Numerous plants were found to be located on, at our around the subject property. This is not solely based on resident observation, but a professional study completed in 2006, which involved the Vineyard and surrounding properties.

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@roadrunner.com]
Sent: Monday, March 17, 2008 9:52 AM
To: Sackett, Jodie
Subject: FW: Leona Valley Meeting Minutes-Valley Vineyards Project Presentations
Attachments: 121007 Minutes.doc; 011408 Meeting Minutes.doc; 031008 Meeting Minutes.doc; 021108 Minutes.doc

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From: Alice Wollman [mailto:AliceWollman@roadrunner.com]
Sent: Monday, March 17, 2008 9:22 AM
To: Jodie Sackett (jsacektt@planning.lacounty.gov); 'dfierros@planning.lacounty.gov'
Cc: 'Richard Thomas '
Subject: Leona Valley Meeting Minutes-Valley Vineyards Project Presentations

Hi,

I am sending you our meeting minutes from the last few months. After reading, you will find that there are a lot of un-answered questions and concerns.

Is Valley Vineyard required to re-do their plan because it does not comply to County clustering requirements? I have heard repeatedly that it is out of compliance in terms of layout, density and open space (including from someone in the Environmental Section of the Planning Department). Also, according to our 1986 maps, the property is in a Significant Ecological Area; and it is in the proposed 2009 S.E.A. Are there any special requirements when developing a project in an S.E.A.? We can discuss by email-phone or in person.

It is my understanding that by next year, the density calculations will change because of the S.E.A. designation with a 25% density reduction for the S.E.A. and an additional 25% reduction for one or more hazard designation. Is that correct?

We have actual physical rainfall totals for Leona Valley going back a few decades. Even though we are in zip code 93551-we don't have the same rainfall as that zip code because we are up in the mountains (93551 is mostly Palmdale) and our rates are much greater. I don't know if you need this information.

Thanks,

Alice Benoit
Leona Valley Town Council
661-270-0463

Sackett, Jodie

From: Alice Wollman [AliceWollman@roadrunner.com]
Sent: Friday, January 11, 2008 10:02 PM
To: Fierros, Daniel; Norman Hickling; Sackett, Jodie; McClendon, Bruce
Subject: Leona Valley Town Council Letter

Attachments: 010608 Planning Letter.pdf

010608 Planning Letter.pdf (39...

Richard Thomas, President of the Leona Valley Town Council requested that I send via email the attached letter to your office.

Respectfully,

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@roadrunner.com]
Sent: Friday, January 11, 2008 5:41 PM
To: Sackett, Jodie
Subject: Letter from Richard Thomas, Leona Valley Town Council

Attachments: 010608 Allday Letter.pdf

010608 Allday Letter.pdf (142 ...

I am sending this at the request of Richard Thomas of the Leona Valley Town Council. (See Attached).

Sackett, Jodie

From: Alice Wollman [AliceWollman@roadrunner.com]
Sent: Sunday, September 09, 2007 12:49 PM
To: Sackett, Jodie
Subject: Fw: Leona Valley--Valley Vineyards Tract 66952
Attachments: 081307 Minutes.doc; Cultural Sources Investigation.pdf; Leona Valley Indians Santa Clarita Signal.pdf

----- Original Message -----
From: Alice Wollman
To: dfierros@planning.lacounty.gov ; Jodie Sackett
Sent: Sunday, September 09, 2007 12:30 PM
Subject: Leona Valley--Valley Vineyards Tract 66952

Attached are the meeting minutes from the August 2007 Town Council meeting. The meeting has specific information pertaining to the project and water issues in Leona Valley. In addition, I have attached a Cultural Resources Report done for a property in Leona Valley (included on your disk) as well as an article on the concern to protect said resources.

Respectfully,

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Alice Wollman [AliceWollman@adelphia.net]
Sent: Wednesday, April 18, 2007 7:31 PM
To: Sackett, Jodie
Subject: Re: TENTATIVE TRACT MAP 066852, VALLEY VINEYARDS-LEONA VALLEY

Attachments: 081104 Special Meeting.doc

081104 Special Meeting.doc (37...

Thanks Jodie.

Attached herein are meeting minutes from August 2004; I am sending this to you because it was a meeting with AVEK and California Water Service when we had the community water shut off for a couple of days. It lends proof that there is a shortage of water in the community.

Alice Wollman-Benoit
Assistant to the Leona Valley Town Council

Sackett, Jodie wrote:
> Thank you Alice. I will print-out the information you sent and keep
> it in the file until I receive the originals.
>
> Regards,
>
> Jodie
>
> -----Original Message-----
> From: Alice Wollman [mailto:AliceWollman@adelphia.net]
> Sent: Tuesday, April 17, 2007 10:20 PM
> To: Sackett, Jodie
> Subject: TENTATIVE TRACT MAP 066852, VALLEY VINEYARDS-LEONA VALLEY
>
> Dear Mr. Sackett,
>
> Richard Thomas, President of the Leona Valley Town Council has
> requested that I send you the committee analysis of the proposed
> Valley Vineyards project. In addition, I have included a copy of our
> meeting minutes for our April 9, 2007 Town Council meeting. Mr. Thomas
> will be sending you a signed original of said documents postally. If
> you have additional questions or should require some assistance,
> please feel free to contact Mr. Thomas directly.
>
> Respectfully,
>
> Alice Wollman-Benoit
> Assistant to the Leona Valley Town Council
>
> cc: Norman Hickling, Deputy to Supervisor Antonovich
>
>

Sackett, Jodie

From: Alice Wollman [AliceWollman@adelphia.net]
Sent: Tuesday, April 17, 2007 10:20 PM
To: Sackett, Jodie
Subject: TENTATIVE TRACT MAP 066852, VALLEY VINEYARDS-LEONA VALLEY

Attachments: Minutes 040907.doc; April 16 2007 Valley Vineyard Letter.doc

Minutes 040907.doc (53 KB) April 16 2007 Valley Vineyard ...

Dear Mr. Sackett,

Richard Thomas, President of the Leona Valley Town Council has requested that I send you the committee analysis of the proposed Valley Vineyards project. In addition, I have included a copy of our meeting minutes for our April 9, 2007 Town Council meeting. Mr. Thomas will be sending you a signed original of said documents postally. If you have additional questions or should require some assistance, please feel free to contact Mr. Thomas directly.

Respectfully,

Alice Wollman-Benoit
Assistant to the Leona Valley Town Council

cc: Norman Hickling, Deputy to Supervisor Antonovich

Sackett, Jodie

From: Alice Wollman [AliceWollman@adelphia.net]
Sent: Tuesday, April 17, 2007 10:20 PM
To: Sackett, Jodie
Subject: TENTATIVE TRACT MAP 066852, VALLEY VINEYARDS-LEONA VALLEY

Attachments: Minutes 040907.doc; April 16 2007 Valley Vineyard Letter.doc

Minutes 040907.doc (53 KB) April 16 2007 Valley Vineyard ...

Dear Mr. Sackett,

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Respectfully,

Alice Wollman-Benoit
Assistant to the Leona Valley Town Council

cc: Norman Hickling, Deputy to Supervisor Antonovich

Sackett, Jodie

From: alicewollman@adelphia.net
Sent: Saturday, December 15, 2007 11:26 AM
To: billf@laurendevelopment.com
Cc: nhickling@bos.co.la.ca.us; Sackett, Jodie; Fierros, Daniel
Subject: Leona Valley CSD Update

Attachments: Vineyard Tract CSD Cover Letter 121507.pdf; CSD Draft December 13, 2007.pdf

Vineyard Tract CSD Cover Lette... CSD Draft cember 13, 2007.pc

Mr. Ford,

As per your request.

Respectfully,

Alice Benoit
Leona Valley Town Council

Sackett, Jodie

From: Rrych@cs.com
Sent: Monday, September 15, 2008 3:12 PM
To: Sackett, Jodie
Subject: Lauren Development-Leona Valley

Hey Jodie: Thanks for your due diligence on the Valley Vineyard project. Your letter put the project in the proper prospective.

Thanks again, Richard Thomas
Leona Valley Town Council

Sackett, Jodie

From: Rrych@cs.com
Sent: Monday, August 18, 2008 12:46 AM
To: Sackett, Jodie
Subject: Re: TR066952 Valley Vineyards (John Allday)

Hi Mr. Sackett: 1:00 on Monday, 25th is OK with both Alice and myself. Please confirm if this is OK with your staff and let me know the location.

We look forward to meeting with you.

Richard Thomas, LVTC

Sackett, Jodie

From: Rrych@cs.com
Sent: Thursday, August 14, 2008 5:36 PM
To: Sackett, Jodie
Cc: Rrych@cs.com; AliceWollman@roadrunner.com
Subject: Re: TR066952 Valley Vineyards (John Allday)

Hi Mr. Sackett:

Alice can't make it on Monday, August 18 but, we BOTH can attend a meeting in LA on August 25, at 3:00 PM. Will that work?

Thanks,

Richard Thomas

Sackett, Jodie

From: Rrych@cs.com
Sent: Monday, August 11, 2008 5:29 PM
To: Sackett, Jodie
Cc: Rrych@cs.com
Subject: Re: TR066952 Valley Vineyards (John Allday)

Mr. Sackett:
Thanks for the information.

We do have some important documents that you need to up date your files.
1). An environmental study showing the potential impact of this project.
2). A traffic study bringing forward some of the problems with the project.
3). Letters from citizens protesting the development.
4). Other documents that you should have to complete your file.

In that these documents will require some explanation I am proposing that myself and Alice Wollman meet with you and your staff in order to present these materials to you.

Please suggest some possible dates and let's set up a meeting.

Thanks,
Richard Thomas

President, Leona Valley Town Council

Sackett, Jodie

From: Rrych@cs.com

Sent: Thursday, December 06, 2007 1:14 PM

To: johna@laurendevelopment.com

Cc: alicewollman@roadrunner.com; MrWaters@roadrunner.com; robertwood8401@sbcglobal.net; tccprez@adelphia.net; lvtc_jan@yahoo.com; NHickling@lacbos.org; Sackett, Jodie; Fierros, Daniel

Subject: Re: Material for Your Website

Hi John: thanks for the info. We need to research weather or not we can put this much information on our "free" web site. If we can, we will.

On another subject, your topic for Monday's meeting will be WATER availability for your project. We read almost every day about water shortages and how Lancaster has put various building project on hold because on water problems. It seems even with a will serve letter the water companies will not guarantee water supply.

Thanks again for the info and we look forward to your presentation.

Rich Thomas

Sackett, Jodie

From: Rrych@cs.com
Sent: Wednesday, June 06, 2007 10:46 PM
To: Sackett, Jodie
Subject: Re: TR066952

Hi Mr. Sackett: Thanks for the info. What is the next step in the process as far as the County is concerned? When can we expect Mr. Allday to respond to the list of our Towns' concerns that we sent to you recently? I have a Town Council meeting this Monday and I'm sure that this topic will surface.

We are all very thankful to you for helping us to get our concerns in front of the various County agencies.

Please keep us informed as this Project develops.

Thanks for your assistance.

Rich Thomas, President-Leona Valley Town Council 661 270 0099

Sackett, Jodie

From: Rrych@cs.com
Sent: Tuesday, April 17, 2007 10:22 PM
To: Sackett, Jodie
Subject: Re: Tract 066952

Hi Jodie: By now you should have received an email outlining our concerns for your use at the meeting. Also attached is a copy of the Town Council minutes as you requested. The presentation by John Allday starts on page 4. I am also sending you a hard copy on this material by mail. If you don't get the email or the hard copy, please let me know ASAP.
Also, would it be OK if one person from the Town Council attended the Plan Review Meeting as an observer? This is getting to be a hot topic with the citizens and the TC needs to be up to speed on activities relating to this development.

Thanks for your assistance in this important matter and hope the information will be helpful.

Richard Thomas LVTC President

Sackett, Jodie

From: Rrych@cs.com
Sent: Tuesday, April 10, 2007 10:06 PM
To: Sackett, Jodie
Subject: Re: Tract 066952

Hi Jodie: Mr. Alday made a presentation to the Town Council and a packed house of citizens. There is much interest concerning this Valley Vineyard Project. A special committee of the Council will make a summary of the input and will forward this, along with the minutes of the meeting, as soon as possible.

Thanks for your help.

Richard Thomas, President Leona Valley Town Council

Sackett, Jodie

From: tccprez@adelphia.net
Sent: Wednesday, December 05, 2007 4:51 PM
To: Jan Powell
Cc: Fierros, Daniel; Alice Benoit; Sackett, Jodie; Robert Wood; Norm Hickling; Mike Waters; John L. Allday; Rich Thomas
Subject: Re: Material for Your Website

---- Jan Powell <lvtc_jan@yahoo.com> wrote:
> Thank you, John
> Jan Powell
>
> "John L. Allday" <johna@laurendevelopment.com> wrote:
> <!--[endif]-->
> Richard: <!--[if !supportEmptyParas]--> <!--[endif]-->
> As we agreed at our recent meeting, we have compiled all documents submitted to the county regarding our Valley Vineyards community. To facilitate your agreed placement of this information on your website (http://leonavalleytowncouncil.org), we have converted them all to .pdf format. There are a total of 71 files (about 1 gigabyte) of information, which is far too much to attach to this email. Therefore we are sending these files to you in a flash drive which you may attach to your computer and upload onto your website. (I'll pick up the flash drive from you Monday night at your meeting after you have finished loading the files onto your computer.)
> <!--[if !supportEmptyParas]--> <!--[endif]-->
> If you would like any assistance uploading them onto your website, give me a call.
> <!--[if !supportEmptyParas]--> <!--[endif]-->
> You should receive these files via FedEx Thursday or Friday at the latest. We look forward to seeing them on your website.
>
>
>
> John
> 818-575-9983 x 2
> 805-432-3125 (cell)
>
> <!--[if !supportEmptyParas]-->
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> ---
> Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.
WELL ALL, I HAVE NO IDEA ON HOW TO UPLOAD THESE TO OUR WEBSITE. I HOPE ONE OF YOU DO. OR, IF WE CANNOT HANDLE OURSELVES, DO WE HAVE TO GET MR. ELLIOTT INVOLVED?
LARRY

Sackett, Jodie

From: WILLIAM ELLIOTT [bill_and_pam_elliott@prodigy.net]
Sent: Sunday, October 28, 2007 6:44 PM
To: Elliott, William; Bill Ford
Cc: NHickling@lacbos.org; Sackett, Jodie; Rrych@cs.com; AliceWollman@roadrunner.com; robertwood8401@sbcgolbal.net; tccprez@adelphia.net; Fierros, Daniel; Hunt Braly; John L. Allday; Bill & Pam Elliott
Subject: RE: Leona Valley Community Standards District Regulations Reference: Valley Vineyards, LLC; TT 066950; TT 066952
Attachments: 1338658863-CSD Committee Response to Bill Ford's Offer to supprt CSD effort 28 Oct 2007.pdf

Please find attached a letter to:
William D. Ford
President
Valley Vineyards, LLC
By Lauren Development, Inc
It's Operating Manager

See E-mail CC List for distribution.

Norm
Please forward to Mitch Glazer at County Planning, he is not on the CC list and I do not have his address.
Thanks
Bill

"Elliott, William" <william.elliott@lmco.com> wrote:

> Bill
> Thanks for the letter. I will discuss this with the CSD Committee at our next meeting.
> Bill
>
> ---
>
> **From:** Bill Ford [mailto:billf@laurendevelopment.com]
> **Sent:** Monday, October 15, 2007 3:02 PM
> **To:** Elliott, William
> **Cc:** NHickling@lacbos.org; jsackett@planning.lacounty.gov; Rrych@cs.com; AliceWollman@roadrunner.com; robertwood8401@sbcgolbal.net; tccprez@adelphia.net; dfierros@planning.lacounty.gov; 'Hunt Braly'; 'John L. Allday'
> **Subject:** Leona Valley Community Standards District Regulations
>
> Please find attached a letter to:
>
> Mr. Bill Elliot
> Chairman, CSD Revisions Committee
> Leona Valley Town Council

With copies to:

Norm Hickling, asst to Supv. Antonovich
Richard Thomas, LVTC
Alice Wollman, LVTC
Robert Wood, LVTC
Larry Tylor, LVTC
Jodie Sackett, County Planning
Daniel Fierros, County Planning

With additional copies to:
John Allday, Lauren Development, Inc.
Hunt Braly, Hacker-Braly, LLP

Reference: Valley Vineyards, LLC; TT 066950; TT 066952

Sackett, Jodie

From: Elliott, William [william.elliott@lmco.com]
Sent: Monday, October 15, 2007 4:37 PM
To: Bill Ford
Cc: NHickling@lacbos.org; Sackett, Jodie; Rrych@cs.com; AliceWollman@roadrunner.com; robertwood8401@sbcgolbal.net; tccprez@adelphia.net; Fierros, Daniel; Hunt Braly; John L. Allday; Bill & Pam Elliott
Subject: RE: Leona Valley Community Standards District Regulations

Bill
Thanks for the letter. I will discuss this with the CSD Committee at our next meeting.
Bill

From: Bill Ford [mailto:billf@laurendevelopment.com]
Sent: Monday, October 15, 2007 3:02 PM
To: Elliott, William
Cc: NHickling@lacbos.org; jsackett@planning.lacounty.gov; Rrych@cs.com; AliceWollman@roadrunner.com; robertwood8401@sbcgolbal.net; tccprez@adelphia.net; dfierros@planning.lacounty.gov; 'Hunt Braly'; 'John L. Allday'
Subject: Leona Valley Community Standards District Regulations

Please find attached a letter to:

Mr. Bill Elliot
Chairman, CSD Revisions Committee
Leona Valley Town Council

With copies to:

Norm Hickling, asst to Supv. Antonovich
Richard Thomas, LVTC
Alice Wollman, LVTC
Robert Wood, LVTC
Larry Tylor, LVTC
Jodie Sackett, County Planning
Daniel Fierros, County Planning

With additional copies to:
John Allday, Lauren Development, Inc.
Hunt Braly, Hacker-Braly, LLP

Reference: Valley Vineyards, LLC; TT 066950; TT 066952

Sackett, Jodie

From: Jan Powell [lvtc_jan@yahoo.com]
Sent: Wednesday, December 05, 2007 4:11 PM
To: John L. Allday; Rich Thomas
Cc: Alice Benoit; Mike Waters; Robert Wood; Larry Tyler; Jan Powell; Norm Hickling; Sackett, Jodie; Fierros, Daniel
Subject: Re: Material for Your Website

Thank you, John
Jan Powell

"John L. Allday" <johna@laurendevelopment.com> wrote:

<!--[endif]-->
Richard:
<!--[if !supportEmptyParas]--> <!--[endif]-->
As we agreed at our recent meeting, we have compiled all documents submitted to the county regarding our Valley Vineyards community. To facilitate your agreed placement of this information on your website (http://leonavalleytowncouncil.org), we have converted them all to .pdf format. There are a total of 71 files (about 1 gigabyte) of information, which is far too much to attach to this email. Therefore we are sending these files to you in a flash drive which you may attach to your computer and upload onto your website. (I'll pick up the flash drive from you Monday night at your meeting after you have finished loading the files onto your computer.)
<!--[if !supportEmptyParas]--> <!--[endif]-->
If you would like any assistance uploading them onto your website, give me a call.
<!--[if !supportEmptyParas]--> <!--[endif]-->
You should receive these files via FedEx Thursday or Friday at the latest. We look forward to seeing them on your website.

John
818-575-9983 x 2
805-432-3125 (cell)
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JUNE 29, 2011

REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

<u>AGENCY CORRESPONDENCE</u>

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

June 7, 2011

Ms. Elaine Macdonald
ETI Antelope Valley Trail Coordinator
43031 40th Street East
Lancaster, California 93535

Dear Ms. Macdonald:

VALLEY VINEYARDS PROJECT NO. TR066952
87TH STREET WEST AND BOUQUET CANYON ROAD, LEONA VALLEY

Thank you for your correspondence dated April 7, 2011, to Mayor Michael D. Antonovich in which you express your concerns regarding trails, rural lifestyle, backyard space and density for the proposed subdivision project (Valley Vineyards), located at 87th Street West and Bouquet Canyon Road in Leona Valley. The Department of Parks and Recreation will address your trail concerns, as the Department of Regional Planning will address all non-trail concerns.

Please be advised, per the 2007 Adopted County Trails Map, this Department has required from the sub-divider of the subject property, over two (2) miles of trails, which include twenty (20) foot wide trail easements and two large blanket trail easements for a segment of the Leona Valley Loop Trail. Planning staff, upon review of the most recent tract map, have requested additional trail amenities as follows:

- A "primitive" staging area on the east side of 87th Street West, within the northern sector of lot 104 to allow off-street parking for multiuse trail users, and;

- A trail connection from the intersection of the existing 87th Street West and proposed "B" Street. This proposed connector trail will meander southeast then southwest (through the northeastern portion of lot 65, lot 61, 60, 59, 58, 57, 56, 55, southern end of lot 65, and lot 62), circumventing the proposed water tower (within lot 118), for connectivity to the granite mountain trail marked as "trail" on the most recent tract map received by Regional Planning on February 3, 2011.

The project is currently being considered through public hearings by the Los Angeles County Regional Planning Commission (Commission). As is customary, your letter will be added to the administrative file for this project and will be forwarded to the Commission for their consideration as part of the public record.

Additionally, in response to your May 17, 2011 e-mail request to Mr. Frank Moreno of the Research and Trails Planning Section regarding the use of the departments GPS unit(s), staff will be contacting you to discuss this further by June 20, 2011. At that time, we can also discuss with you your inquiry pertaining to Antelope Valley trail data in the General Plan.

Thanks again for writing, if you have additional questions or concerns, please contact Frank Moreno of the Research and Trails Planning Section at (213) 351-5136. Our office hours are Monday through Thursday, 7 a.m. to 5 p.m.

Sincerely,

John Wicker for

Russ Guiney
Director

RG:NG:RE:tls/#11-089

c: Fifth Supervisorial District (S. Nemer, E. Vizcarra, N. Hickling)
Parks and Recreation (R. Guiney, N. E. Garcia, F. Moreno, K. Michelson)
Regional Planning (R. Bruckner)

From: Elaine Macdonald
Antelope Valley ETI Trail Coordinator
43031 40th Street East
Lancaster, CA 93535
661-946-1976 emac@antelecom.net

Barrel Springs Riders
ETI Corral 138

To: Department of Regional Planning
Jodie Sackett, Project number TR066952
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Supervisor 5th District Michael Antonovich
500 West Temple Street, Room 869
Los Angeles, California 90012

Re: Proposed Valley Vineyards Development
Vested Tentative Tract Map TR066952

April 7th, 2011

Dear Mr. Sackett and Supervisor Antonovich,

I am writing this letter on behalf of the Equestrian Trails Inc. My position in the ETI organization is acting Area Trail Coordinator for the Antelope Valley. For the last 25 years I have been the representative voice for our equine communities. ETI is dedicated to the acquisition and preservation of trails.

There is unfinished business with the Lauren Developer regarding trails through the proposed development. In our past meetings with Mr. Robert Ettleman- County Parks & Recreation, we pointed out the elimination, by the developer, of a historically used trail that is identifiable on a map of the area. The trail is the "Granite Mountain Trail." This trail is an important connection from Leona Valley to the Angeles National Forest trails. The Granite Mountain Trail also permits access to another historically used trail leading to the ridge between Leona Avenue and Lost Valley Road. Along with the "Granite Trail," there is a couple of other long established "Community Trails" that are in danger of being lost in the proposed development. Surely some other agreement can be negotiate to keep the "Communities' Trails," and "Granite Mountain Trail."

Equestrians Trails Inc. is also concerned with the possible rural life-style loss if the Lauren Development proposal is passed as it is now presented. It would be difficult to keep horses and other livestock. Each lot should have enough backyard space to keep corrals, barns, horse trailers and farm type equipment. The ideal situation would be to accommodate each lot to connect with the community trails. Preservation of the rural life -style in Leona Valley is a must. Please keep the density low, similar/or the same as the surrounding parcel densities.

Thank you for your consideration,

Elaine Macdonald
ETI Antelope Valley Trail Coordinator

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

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

February 1, 2011

IN REPLY PLEASE REFER TO FILE: LD-1

TO: Paul McCarthy
Impact Analysis Section
Department of Regional Planning

Attention Michele Bush

FROM: for Steve Burger
Land Development Division
Department of Public Works

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)
TRACT NO. 066952
RCUP 200700038, RENV 200700035
VALLEY VINEYARDS SUBDIVISION
LEONA VALLEY COMMUNITY STANDARD DISTRICT

Thank you for the opportunity to review the IS/MND for Tract No. 066952. The project proposes to subdivide 3 parcels into 117 single-family residential lots; 2 private driveway/fire lanes lots; and 1 water tank lot on 292.50 gross acres. The project is located west of Bouquet Canyon Road and south of Elizabeth Lake Road within the unincorporated County area of Leona Valley.

As discussed with the developer, Mr. John Allday, this IS/MND is not recommended for circulation at this time. The following comments are for your consideration and relate to the environmental documents only:

Services-Sewage

Prior to circulation of the IS/MND, the roles and responsibilities of reviewing and approving the sewage disposal system plans between the Health Department and the Department of Public Works needs to be coordinated, outlined, and agreed upon by both departments.

There are no existing public sewer facilities within proximity of the project, and the subdivider proposes to use private sewer systems. The use and installation of a private sewage system (septic/spray irrigation system) must be approved by the Department of Public Health. Please contact Public Health at (626) 430-5380 for additional information and requirements.

If you have any questions regarding sewage comment, please contact Julian Garcia at (626) 458-4921 or jugarcia@dpw.lacounty.gov.

Hazards-Flood/Water Quality

1. **HAZARDS–2. Flood (page 6)**

   a. **SETTINGS/IMPACTS**

      i. Question d.

         - Check off the "Maybe" box and discuss project design features for debris control and hydromodification including detention basin and Low-Impact Development (LID) retention features used for mitigation.
         - The Interim Peak-Flow Standard is not applicable to this project.

      ii. Question e.

         - Check off the "Maybe" box and discuss project design features for debris control and hydromodification including detention basin and LID retention features used for mitigation.

         - Discuss methodology and drainage standards used for runoff discharged to the City of Palmdale's jurisdiction and whether the proposed discharge is acceptable to the City of Palmdale.

   b. **STANDARD CODE REQUIREMENTS**

      Check off the box for "Approval of Drainage Concept by DPW."

   c. **MITIGATION MEASURES**

      Check off the "Project Design" box and discuss project design features such as debris control, detention basin, and LID retention features.

2. **RESOURCES–1. Water Quality (pages 9 and 10)**

   a. **SETTINGS/IMPACTS**

   Question b.

   Clarify how the required separation of evapotranspiration/infiltration (ET/I) areas from drainage courses shall be achieved for ET/I Area "C." The exhibit provided as part of this environmental document review shows that ET/I Area "C" is almost entirely within the limits of one of the drainage courses.

   b. **STANDARD CODE REQUIREMENTS**

   Add and check box for "County Code, Title 12–Chapter 12.84 (LID standards)."

If you have any questions regarding flood/hazard comments, please contact Liz Calderon at (626) 458-4921 or licalderon@dpw.lacount.gov.

Other-Environmental Safety

Should any operation within the proposed project include the construction, installation, modification, or removal of underground storage tanks or industrial waste treatment or disposal facilities, Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

If you have any questions regarding environmental safety comment, please contact Corey Mayne at (626) 458-3524 or cmayne@dpw.lacounty.gov.

Services-Traffic/Access

See Public Works' Traffic and Lighting Division comments letter dated May 19, 2009 (copy attached), for the Revised Traffic Impact Analysis.

If you have any questions regarding traffic/access comment, please contact Jacques Gilbert at (626) 300-4794 or jgilbert@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Toan Duong at (626) 458-4921 or tdoung@dpw.lacounty.gov.

JY:ca
P:\CEQA\CDM\DRP – TR 066952_CUP200800038_Leona Valley vineyards_IS-MND.doc

Attach.

cc: Department of Public Health (Patrick Nejadian)

COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

ALFONSO MEDINA, REHS
Director of Environmental Protection Bureau
5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5280 • FAX (626) 960-2740

www.publichealth.lacounty.gov

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Michael D. Antonovich
Fifth District

NOV 16 2010

November 12, 2010

John L. Allday
Lauren Development, Inc.
P.O. Box 790
Agoura Hills, CA 91376

SUBJECT: VALLEY VINEYARDS PROJECT; VESTING TENTATIVE TRACT MAP 66952 BOUQUET CANYON ROAD, LEONA VALLEY

Dear Mr. Allday:

This letter supersedes the Department of Public Health's letter dated May 28, 2010, regarding the conditions of approval for Vesting Tentative Tract Map 66952.

The Department's Land Use Program has reviewed the preliminary report to determine the feasibility of installing onsite wastewater treatment systems (OWTS) for the proposed subdivision. The preliminary report contains data obtained from percolation testing, soil profile excavations and exploratory borings to determine groundwater depth. This data tends to support the premise that the wastewater dispersal needs for the proposed subdivision may be achieved through the installation of individual "centralized" OWTS on lots 29, 35, 36, 58, 77, 78, 81, 97, 99 and 100 and the installation of four (4) regionally designated "decentralized" OWTS to meet the wastewater dispersal needs for the remaining 107 lots, as proposed.

Based on the information described above, the Department of Public Health recommends approval of the tentative map with the following conditions:

1. Authorizations from the County Department of Public Works – Building and Safety Division (B&S) and the Regional Water Quality Control Board for the proposed decentralized OWTS shall be required prior to **final map approval**.

2. An approval from B&S for the proposed configuration of wastewater lines, including a universal wastewater line to convey effluent from 107 lots to their respective decentralized dispersal systems, shall be required **prior to final map approval**.

3. Proof availability for a qualified entity to ensure proper operation and maintenance of the proposed decentralized OWTS shall be required **prior to final map approval.** The qualified entity shall be accepted and supported by the County of Los Angeles.

   Note: At the time of development, if public sewer is available within 200 feet of any part of a building or exterior drainage, all wastewater plumbing from existing and future development shall be connected to such public sewer.

   Note: The applicant is advised that in the event that the requirements of the Plumbing Code cannot be met on certain parcels due to required grading, geological limitations, required setbacks and floor or surface/ground water related concerns, or for any other pertinent reasons, conformance with all applicable requirements cannot be achieved, the Department of Public Health will not recommend issuance of any building permits.

4. Documentation of an approved potable water source meeting the requirements of Public Health and Public Works shall be submitted **prior to final map approval**.

Please note that this consent is intended for the subdivision review process only that encompasses the requirements applicable to OWTS. It does not authorize approval of the final map until the conditions listed above have been satisfactorily fulfilled. In addition, any changes to the configuration of the proposed sewage disposal system and/or the proposed water supply shall render this consent null and void, and consequently, additional review/analysis by the Department will be required.

If you have any questions regarding the above conditions or need additional information, please contact Patrick Nejadian, Chief Environmental Health Specialist of the Land Use Program, at (626) 430-5390.

Sincerely,

Alfonso Medina, REHS
Director of Environmental Protection Bureau

AM:pn

c: Paul Novak, Fifth Supervisorial District
Susan Tae, Department of Regional Planning ✓
Dennis Hunter, Department of Public Works
Kaveh Razavi, Department of Public Works
Angelo J. Bellomo
Patrick Nejadian

CALIFORNIA WATER SERVICE COMPANY
1720 North First Street, San Jose, CA 95112

Statement of Water Service To New Subdivisions

June 15, 2009

Director of Public Works
County of Los Angeles
900 South Fremont Avenue
Alhambra, CA 91803-1331

Attn: Land Development Division
Water Code Enforcement Subunit

Re: Valley Vineyard Estates South (TT 066952) in Leona Valley, CA.

To Whom It May Concern:

This letter is to certify that the proposed water system for the above referenced development will be operated by California Water Service Company (Cal Water) as requested by Lauren Development, Inc.

The proposed water distribution system for the above referenced subdivision will, during normal operating conditions, meet the requirements as provided in Chapter 20.16 of Title 20 of the Los Angeles County Code (Water Code) and as shown on the plans and specifications approved by the Department of Public Works. This includes meeting minimum domestic flow requirements as required by Section 20.16.070 and minimum fire flow and fire hydrant requirements as required by Section 20.16.060.

Cal Water agrees to serve the above referenced developments subject to the rules, regulations, and requirements of Cal Water, the California Public Utilities Commission (CPUC), and the Antelope Valley East-Kern Water Agency (AVEK).

If you have any questions, please call me at (408) 367-8344.

Sincerely,

Shawn L. Heffner
Director of Corporate Development & Real Estate

June 3, 2009

TO: Paul McCarthy
Department of Regional Planning

Attention Daniel Fierros

FROM: Steve Burger
Land Development Division
Department of Public Works

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)
VALLEY VINEYARDS
TRACT NO. 066952
CONDITIONAL USE PERMIT NO. RCUP 200700038
RENV 200900027
LEONA VALLEY COMMUNITY STANDARD DISTRICT

We reviewed the IS/MND for the proposed project. The project proposes to subdivide 3 parcels into 121 lots and is located within the unincorporated County area of Leona Valley. The following comments are for your consideration and relate to the environmental documents only:

Description of Project

Reconcile inconsistencies in the grading quantities disclosed in the tentative map/application (1,160,000 cubic yard) and in the IS (1,033,350 cubic yard).

If you have any questions regarding grading comment, please contact Andy Narag at (626) 458-5916.

Hazards-Flood/Water Quality

- Hazards Flood Section:

  1. Under the Standard Mitigation Measures Section, the box for drainage concept approval by Public Works should be checked. Public Works' approval of the drainage concept is required prior to the project being cleared by the Subdivision Committee for a scheduled public hearing.

2. Also add to this page the following: "Comply with Low-Impact Development requirements per County Code Section 12.84.460."

3. Check the box for mitigation through project design.

4. Correct spelling errors (building, DPW).

- Resources Water Quality Section:

1. Section B, second part: The response to the question "Is the project site located in an area having known septic tank limitations due to high groundwater or other geotechnical limitations or is the project proposing on-site systems located in close proximity to a drainage course?" Should be either "yes" or "maybe" as there are well defined drainage courses within and around the project site to warrant further evaluation of potential impacts. Provide boring data to Public Works' Geotechnical Materials Engineering Division to verify that historic water tables will not constitute an impediment to the use of private sewage systems.

2. Check yes under Section C.

3. Check yes under Section D.

4. Add Low-Impact Development/National Pollutant Discharge Elimination System compliance under Section D.

5. Check the box for mitigation through project design.

6. Add the following to the comments section: "Comply with Low-Impact Development requirements per County Code Section 12.84.460."

7. We disagree with the IS that the proposed project has less than significant or no impact on the water quality. The conclusion should be changed to "Less than significant impact with project mitigation."

If you have any questions regarding hydrology comments, please contact Christopher Sheppard at (626) 458-4921.

Traffic/Access

We disagree with the IS that the proposed project does not have the potential to significantly impact the County roadways and intersections in the area. The project's Traffic Impact Analysis indicates that the addition of the project traffic will warrant the installation of a traffic signal at the intersection of Elizabeth Lake Road at Bouquet Canyon Road. However, we generally agree with the Traffic Impact Analysis that the installation of the signal will mitigate the project's impact at the intersection of Elizabeth Lake Road at Bouquet Canyon Road. We expect to establish the conditions such that the project will be solely responsible for the installation of the signal.

If you have any questions regarding traffic comments, please contact Jacques Gilbert at (626) 300-4794.

Hazards-Sewage

There are no existing public sewer facilities within proximity of the project and the subdivider proposes to use private sewer systems. The use and installation of a private sewage system (septic/spray irrigation system) must be approved by the Department of Public Health. Please contact (626) 430-5380 for additional information and requirements.

If you have any questions regarding sewer comments, please contact Tony Khalkhali at (626) 458-4921.

Utilities-Water

We disagree with the IS that the proposed project has less than significant/no impact on water supply. The applicant must submit a technical water supply study including facts and substantial evidence to support the conclusion that there is a less than significant impact on water supply as a result of the proposed project. The scope of the study should include all the elements of an SB610 water supply assessment. The water supply study should be prepared/approved, with the cooperation of the retail water company, and included in the CEQA document to the satisfaction of Public Works prior to the project being cleared by Subdivision Committee for a scheduled public hearing.

If you have any questions regarding sewer and water comments, please contact Andy Narag at (626) 458-5916.

If you have any other questions or require additional information, please contact Toan Duong at (626) 458-4945.

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bc: Traffic and Lighting (Pletyak)

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
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Telephone: (626) 458-5100
http://dpw.lacounty.gov

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

MAY 21 2009

IN REPLY PLEASE
REFER TO FILE: T-4

May 19, 2009

Mr. Frank Lee
Kunzman Associates
1111 Town and Country Road, Suite 34
Orange, CA 92868-4667

Dear Mr. Lee:

VALLEY VINEYARDS
TENTATIVE TRACT MAP NO. 066952
REVISED TRAFFIC IMPACT ANALYSIS (MARCH 11, 2008)
RESPONSE LETTER (MAY 9, 2009)
LEONA VALLEY AREA

As requested, we have reviewed the revised Traffic Impact Analysis (TIA) and subsequent response letter from the developer dated May 9, 2009, (copy enclosed) for the proposed Valley Vineyards project. The project site is located west of Bouquet Canyon Road and south of Elizabeth Lake Road in the unincorporated County of Los Angeles area of Leona Valley.

We generally agree with the TIA that the traffic generated by project alone will have a significant impact to the County intersection listed below. As indicated in the developer's response letter, the required improvements shall be the sole responsibility of the project. The traffic signal shall be installed and operational concurrently with the installation of a curb, gutter, first lift of asphalt pavement, and temporary traffic detection loops if needed.

<u>Elizabeth Lake Road at Bouquet Canyon Road</u>

Install traffic signal. Please note, per AB 1581 and the guidelines that Caltrans will be adopting, this signal is to include detection for bicyclists.

A 40-foot-scale site plan of the project showing access locations in relationship to adjacent intersections and driveways shall be submitted to our Land Development Division for review and approval prior to the issuance of a building permit.

If you have any questions regarding this review, please contact Ms. Nayiri Vartanian of our Traffic Studies Section at (626) 300-4778.

Very truly yours,

GAIL FARBER
Director of Public Works

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

NV:cn
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Enc.

cc: Department of Regional Planning (Susan Tae)
Lauren Development (John Allday)

LAUREN
DEVELOPMENT INC.

May 5, 2009

Mr. Jeffrey F. Pletyak, P.E.
Senior Traffic Engineer
Traffic and Lighting Division
Los Angeles County Department of Public Works
1000 South Fremont Avenue
Alhambra, CA 91803-1331

Re: Traffic Impact Analysis, VTTM 066952, Dated March 11, 2008

Dear Mr. Pletyak:

You have stated that your department will be recommending to the Planning Commission that a condition be added to the approval of VTTM 066952 requiring that this project be solely responsible for the installation of a traffic signal for the intersection of Bouquet Canyon Road at Elizabeth Lake Road. This condition will also be added to the mitigations listed in the Mitigation Monitoring Program that will also be approved by the Planning Commission. We agree with this condition.

Very truly yours,

Valley Vineyards, LLC
By: Lauren Development, Inc.
It's Operating Manager

John L. Allday
Vice President

P. O. Box 790 Agoura Hills, CA 91376
818 575-9983 ext 2 FAX 818 575-9009
johna@laurendevelopment.com

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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http://dpw.lacounty.gov

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

IN REPLY PLEASE
REFER TO FILE: T-4

May 19, 2009

Mr. Frank Lee
Kunzman Associates
1111 Town and Country Road, Suite 34
Orange, CA 92868-4667

Dear Mr. Lee:

VALLEY VINEYARDS
TENTATIVE TRACT MAP NO. 066952
REVISED TRAFFIC IMPACT ANALYSIS (MARCH 11, 2008)
RESPONSE LETTER (MAY 9, 2009)
LEONA VALLEY AREA

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<u>Elizabeth Lake Road at Bouquet Canyon Road</u>

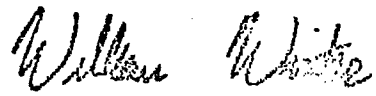
Install traffic signal. Please note, per AB 1581 and the guidelines that Caltrans will be adopting, this signal is to include detection for bicyclists.

A 40-foot-scale site plan of the project showing access locations in relationship to adjacent intersections and driveways shall be submitted to our Land Development Division for review and approval prior to the issuance of a building permit.

If you have any questions regarding this review, please contact Ms. Nayiri Vartanian of our Traffic Studies Section at (626) 300-4778.

Very truly yours,

GAIL FARBER
Director of Public Works



WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

NV:cn
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Enc.

cc: Department of Regional Planning (Susan Tae)
Lauren Development (John Allday)

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BOYLE | AECOM
Consulting Engineers

March 26, 2009

To: John L. Allday / Bill Ford
Lauren Development, Inc.
5655 Lindero Canyon Rd., Ste 126,
Westlake Village, Ca 91362

Re: The Vineyards Project, Leona Valley
AVEK Water Agency - Water Service Agreement (WSA)

Dear Mr. Allday / Mr. Ford,
In follow-up to our meeting on February 10th regarding your request for WSA information from AVEK for the turnout located at 81st St. West and Elizabeth Lake Rd. (south side) in Leona Valley, please see the below comments and attached documents.

In 1978, an AVEK agreement was established with Gail Boyle for delivery of treated water for agricultural use through the mentioned turnout. The turnout was constructed in the 1980's for the benefit of Richard and Gail Boyle who owned property adjacent to the current Vineyard Project location along Bouquet Canyon Rd.

In 1999, an Agreement & Warranty of Succession in Interest gave Leona Valley Estates Ltd. the rights of the WSA-78-3 previously held by Boyle. Along with this, a 25% right of water through the turnout was then assigned to Allan and Valerie Copeland from LV Estates. Leona Valley Estates Ltd. still retains 75% of the interest in WSA-78-3 as of Jan. 19, 2004. Although AVEK will continue to honor this combined interest in the WSA, our current policy will not allow it to be divided any further.

As mentioned in our meeting, AVEK's water supply is taken solely from the State Water Project (SWP) aqueduct and is to be considered supplemental and interruptible. AVEK water should not be viewed as a source of secure water when seeking a will-serve letter for your project and cannot be used for required fire protection flows.

With our Agency's efforts to gain a more beneficial use of the SWP water, we continue to work in establishing groundwater banking within the Antelope Valley. Once established, banking will allow for a more reliable supply through local storage (although delivery systems still remain interruptible). Banking is not currently operational in the Valley but our hope is that participants such as California Water Service will benefit.

6500 WEST AVENUE N • PALMDALE, CALIFORNIA 93551
(661)943-3201 • FAX (661) 943-3204

We would advise that you continue to work with California Water Service and LA County Water Works in securing additional supply through their systems.

Please contact us if you need further information.

Thank you,

Tom Barnes
Resources Manager
AVEK Water Agency
E-Mail:tbavekwa@aol.com

Attached:
WSA-78-3: AVEK Water Service Agreement
MWSA-78-3: Memo. of Water Service Agreement (Property Lien)
Agreement & Warranty of Succession in Interest
Assignment of Water Service Agreement (25% to Copeland)
Letter to treated water agric. customers

CC (via e-mail):
Chris Whitley – California Water Service
David Pedersen – LA County Water Works

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

DEAN D. EFSTATHIOU, Acting Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

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APR 21 2008

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

IN REPLY PLEASE
REFER TO FILE: T-4

April 16, 2008

Mr. Frank Lee
Kunzman Associates
1111 Town and Country Road, Suite 34
Orange, CA 92868-4667

Dear Mr. Lee:

VALLEY VINEYARDS
TENTATIVE TRACT MAP NO. 069952
REVISED TRAFFIC IMPACT ANALYSIS (NOVEMBER 30, 2007)
LEONA VALLEY AREA

As requested, we have reviewed the revised Traffic Impact Analysis (TIA) for the proposed development located west of Bouquet Canyon Road and south of Elizabeth Lake Road in the unincorporated County of Los Angeles area of Leona Valley.

The proposed project consists of 121 single-family detached residential dwelling units. The proposed project is estimated to generate approximately 1,158 vehicle trips net new daily, with approximately 91 and 122 net new vehicle trips in the a.m. and p.m. peak hour, respectively.

The revised TIA is incomplete and shall be revised to address the comments below. Based on these revisions, additional comments may be forthcoming after subsequent review:

- A traffic signal warrant analysis shall be conducted for the intersection of Elizabeth Lake Road at Bouquet Canyon Road for the following conditions: Existing, Existing + Ambient Growth, and Existing + Ambient Growth + Project Traffic.

The project shall be fully responsible for the installation of a traffic signal if the project-generated traffic alone warrants the signal. If the cumulative traffic generated by the project plus other related projects warrants the signal, the project shall contribute its proportionate share for the installation of a traffic signal. Pro-rata shares per County

guidelines shall be submitted to Public Works prior to the completion of the TIA. All associated figures, calculations, tables, and recommendations shall be corrected accordingly.

Written comments from the City of Palmdale regarding the California Environmental Quality Act impacts noted in the study shall be submitted to Public Works and included with the project environmental document.

A 40-foot-scale site plan of the project showing access locations in relationship to adjacent intersections and driveways shall be submitted to our Land Development Division for review and approval prior to the issuance of a building permit.

If you have any questions regarding this review, please contact Mr. Ron Matsuoka of our Traffic Studies Section at (626) 300-4769.

Very truly yours,

DEAN D. EFSTATHIOU
Acting Director of Public Works

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

RM:cn
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cc: Department of Regional Planning (Susan Tae)

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

DONALD L. WOLFE, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

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

IN REPLY PLEASE
REFER TO FILE: T-4

September 26, 2007

Mr. William Kunzman
Kunzman Associates
1111 Town and Country Road, Suite 34
Orange, CA 92868-4667

RECEIVED
OCT 01 2007

Dear Mr. Kunzman:

VALLEY VINEYARDS
TENTATIVE TRACT MAP NO. ~~069952~~ 06695~~2~~
TRAFFIC IMPACT ANALYSIS (JULY 31, 2007)
LEONA VALLEY AREA

As requested, we have reviewed the Traffic Impact Analysis for the proposed development located west of Bouquet Canyon Road and south of Elizabeth Lake Road in the unincorporated County of Los Angeles area of Leona Valley.

The proposed project consists of 121 single-family detached residential dwelling units. The proposed project is estimated to generate approximately 1,158 vehicle trips net new daily, with approximately 91 and 122 net new vehicle trips in the a.m. and p.m. peak hour, respectively.

The Traffic Impact Analysis is incomplete and shall be revised to address the comments below. Based on these revisions, additional comments may be forthcoming after subsequent review:

- Page 40, Table 6, Other Development Traffic Generation - All related projects within the area of influence that may be built before or approximately the same time of this project's build out year must be included in the report. The following related projects shall be added to the related project list. It is unlikely the following related projects will be completely built-out before the occupancy of the proposed project; therefore, a justified percentage of the following related projects' generated trips may be used. All associated figures, calculations, and tables shall be corrected accordingly.

    a. TT 51508 – Ritter Ranch
    b. TT 52200 – Joshua Ranch

We recommend the project consult with the City of Palmdale to obtain their concurrence with the California Environmental Quality Act impacts noted in the study. Written comments from the City shall be submitted to Public Works and included with the project environmental document.

We believe that the study should address potential safety and operational issues that may occur along the County portion of Bouquet Canyon Road, as a result of the increased traffic. We request the study be revised to include a Highway Safety Study that analyzes the feasibility of installing improvements, such as passing lanes, turnouts, and localized widening.

A 40-foot-scale site plan of the project showing access locations in relationship to adjacent intersections and driveways shall be submitted to Mr. Matthew Dubiel of our Land Development Review Section for review and approval prior to the issuance of a building permit.

If you have any questions regarding this review, please contact Mr. Ron Matsuoka of our Traffic Studies Section at (626) 300-4769.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

RM:cn
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cc: Department of Regional Planning (Susan Tae)

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AUG 09 2007

PALMDALE

a place to call home

JAMES C. LEDFORD, JR.
Mayor

MIKE DISPENZA
Mayor Pro Tem

STEVEN D. HOFBAUER
Councilmember

STEPHEN KNIGHT
Councilmember

TOM LACKEY
Councilmember

38300 Sierra Highway

almdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

Auxiliary aids provided for

communication accessibility

n 72 hours' notice and request.

August 7, 2007

Mr. Daniel Fierros
Impact Analysis Section
Los Angeles County Regional Planning
320 West Temple Street
Los Angeles, CA 90012

RE: Project No. TR066952

Dear Mr. Fierros:

Thank you for the opportunity to review the above-referenced project located west of Bouquet Canyon Road adjacent to the incorporated boundary of the City of Palmdale (APN 3206-003-001, 3206-003-007 and 3206-003-008). The City of Palmdale has reviewed the project and makes the following comments:

The project is located adjacent to the Ritter Ranch Specific Plan within the City of Palmdale. The area of the Specific Plan contiguous to the project site is designated SFD-Estates (Single Family Dwelling Units, Minimum 2 acre lot size). This area will develop with rural street standards and a landscape buffer along Bouquet Canyon Road in order to blend with the rural nature of Leona Valley. The proposed project appears to be consistent with the Specific Plan designation and should not pose any impacts to adjacent land uses.

mmp

The Initial Study indicates that there is a potential impact due to liquefaction, however, review of the adjacent site within City boundaries found that the area east of Bouquet Canyon Road also has potential impacts due to hydroconsolidation, expansive soils and fault hazards. As it is likely that these effects affect the west side of Bouquet Canyon Road, the City recommends that mitigation measures for impacts to soils be expanded to encompass these potential impacts.

mmp

The project intends to balance over 1,000,000 cubic yards of cut/fill quantities on less than 300 acres. While this is technically feasible, the City believes that undue impacts to view sheds and excessive and

unnecessary grading impacts to wildlife including plants, animals and habitat could be a potential impact of this activity.

map

Two natural drainages transect the site and could be areas rich in cultural resources. Mitigation for impacts to cultural resources should be expanded to require archeological and Native American monitoring during all grading activities.

The compliance section of the mitigation monitoring report indicates that subsequent owners shall be responsible for submitting compliance reports to the Department of Regional Planning on a yearly or as required basis. The City believes that once transfer of ownership to individual homeowners occurs, compliance will cause an undue burden to these property owners.

Thank you for the opportunity to comment on the plans. If we can be of further assistance, please contact Amy Brislen or me at 661/267-5200.

Sincerely,

Asoka Herath
Director of Planning

Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

RECEIVED
JUL 16 2007

July 11, 2007

Paul McCarthy
Los Angeles County Department of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Re: Project No. TR066952

Dear Mr. McCarthy:

The Antelope Valley Air Quality Management District (District) has reviewed the project notice for Project No. TR066952, a proposed project for a Tentative Tract Map to subdivide three parcels, 292.49 acres into 121 single family residential lots. ~~The proposed project will trigger District Rule 403.2 fugitive dust control requirements. The District requests that a condition~~ be placed on the project requiring a District-approved Dust Control Plan to cover all project phases.

and

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726.

Sincerely,

Alan J. De Salvio
Supervising Air Quality Engineer

RNB/AJD

Clean Cities
Antelope Valley

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO
ATTENTION OF:

Office of the Chief
Regulatory Division

July 9, 2007

RECEIVED
JUL 12 2007

Los Angeles County, Department of Regional Planning
Attention: Daniel Fierros
320 West Temple Street
Los Angeles, California 90012

Re: Project Number TR066952, APN 3206-003-007, -001, -008

Dear Mr. Fierros:

Thank you for the opportunity to comment on the project referenced above. Based on our preliminary review of the information submitted, we have determined that the proposed project may require a U.S. Army Corps of Engineers permit.

A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Specifically, grading activities within Bouquet Canyon for the construction of a residential community may entail discharge of fill into a water of the United States.

If you or the project proponents have any questions, please contact Phuong Trinh at (213) 452-3372. Please refer to this letter and SPL-2007-771-PHT in your reply.

Sincerely,

Kenneth Wong
Project Manager, North Coast Branch
Regulatory Division

COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JOHN F. SCHUNHOFF, Ph.D.
Chief Deputy

Environmental Health
TERRANCE POWELL, R.E.H.S.
Acting Director of Environmental Health

Bureau of Environmental Protection
Land Use Program
5050 Commerce Drive, Baldwin Park, CA 91706-1423
TEL (626)430-5380 · FAX (626)813-3016
www.lapublichealth.org/eh/progs/envirp.htm

RECEIVED
JUL 12 2007

BOARD OF SUPERVISORS

Gloria Molina
First District

Yvonne B. Burke
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Zev Yaroslavsky
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District

July 9, 2007

RFS No. 07-0016819

Daniel Fierros
Los Angeles County
Department of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, CA 90012

RE: Project No. TR066952/RENVT200700035/RCUPT200700038
Location: West of, and Abutting Bouquet Canyon Road
APN: 3206-003; 007, 001, and 008.

A Notice of Consultation was received by the County of Los Angeles Department of Public Health concerning a Negative Declaration with modified project for the above address. The Department had previously issued conditions of approval for the tentative tract map. Those conditions shall also suffice for this project excepting that the conditions shall be met prior to approval of the CUP:

1. **Prior to CUP Approval**, a report demonstrating the feasibility of installing a private sewage disposal system on each lot shall be submitted to this Department for review and approval. The report shall conform to the requirements outlined in the interim document, "Procedures for Application for Approval of Private Sewage Disposal System Construction." The report shall consist of soil profile logs, exploratory boring(s) to determine the historic high ground water mark, and percolation testing to substantiate the viability of installing private sewage disposal systems on each lot. Testing on each lot shall be in an area likely to be utilized as a disposal field. **It is the responsibility of the applicant to demonstrate to the Department that each lot is suitable for building.**

2. Public sanitary sewers are not available within 200 feet of any part of the proposed subdivision and each lot is dependent upon the use of an individual private sewage disposal system.

3. **The applicant is advised that in the event that the requirements of the plumbing code cannot be met on certain lots, due to future grading or for any other reason, the County of Los Angeles Department of Public Health will deny issuance of a building permit on these lots.**

4. It is purported that this is a high ground water area. The applicant is advised to contact the Lahotan Branch of the California Regional Water Quality Control Board concerning discharge permits.

5. Potable water will be supplied by the **California Water Company**, a public water system. **Prior to CUP Approval**, the applicant will provide a current letter on water company letterhead stating the company will supply potable water to the entire subdivision on individual meters and will maintain all water supply infrastructure up to each lateral.

The applicant is advised that all requested documents should be sent directly to the address below:

County of Los Angeles Department of Public Health
Land Use Program
5050 Commerce Drive
Baldwin Park, CA 91706-1423
Attention: Becky Valenti

If you have any questions or need additional information, please contact me at (626) 430-5380.

Respectfully,

Becky Valenti, E.H.S. IV
Land Use Program

State of California - The Resources Agency ARNOLD SCHWARZENEGGER, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

July 20, 2007

RECEIVED
JUL 23 2007

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

Notice of Consultation for
Project Number TR066952
Los Angeles County

Dear Mr. Fierros:

The Department of Fish and Game (Department) reviewed the Notice of Consultation and Draft Initial Study (IS) for the above-referenced project. The project consists of the approval for a Tentative Tract Map to subdivide 3 parcels, 292.49 acres into 121 lots for single-family homes. The current property is vacant and undeveloped. The project is located on Bouquet Canyon Road approximately 1.5 miles west of Angeles National Forest within the community of Leona Valley.

Because the Notice of Consultation did not include detailed information on the flora and fauna existing on the site including the potential for special status species, the Department recommends that a [redacted] be performed to identify sensitive biological [redacted] A biological constraints analysis will assist the lead agency in deciding upon the level of CEQA documentation that will be necessary to address impacts to biological resources below a level of significance in a Draft Mitigated Negative Declaration (DMND) or if impacts cannot be reduced below a level of significance, a Draft Environmental Impact Report (DEIR).

To enable Department staff to adequately review and comment on the project we recommend the following information, where applicable, be included in the CEQA document for the project.

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats (Attachment 1).

   a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.

   b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

   c. Rare, threatened, and endangered species to be addressed should include all those

which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380).

d. The Department's Wildlife Habitat Data Analysis Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.

2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.

a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.

c. If a Draft Environmental Impact (DEIR) is prepared for the project, cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to removal/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.

e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.

f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1- September 1) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends

a minimum 500-foot buffer for all active raptor nests).

3. If a DEIR is prepared for the project, the DEIR should include a range of alternatives to be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, Joshua tree woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

   a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with offsite mitigation locations clearly identified.

   b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).

   c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

   a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

   b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

5. The Department opposes the elimination of watercourses including concrete channels and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses (including drainages depicted as a blue line on a topographic map and other drainages not depicted on a topographic), whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of a drainage.

a. The Department requires a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a SAA may be a project that is subject to CEQA. To facilitate our issuance of the Agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

The Department recommends that the above concerns are addressed in a Mitigated Negative Declaration prior to Lead Agency approval of the proposed project.

Thank you for this opportunity to provide comments. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Environmental Scientist, at (626) 797-3170.

Sincerely,

Kevin Hunting
Acting Regional Manager

cc: Ms. Terri Dickerson, Laguna Niguel
Mr. Scott Harris, Pasadena
Ms. Jamie Jackson, Altadena
HCP-Chron
Department of Fish and Game

State Clearinghouse, Sacramento

Attachments

SPH:sph
spharris/LA County Notice of Counsultation/Proj.TR066952.doc

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

a. Experience conducting floristic field surveys;
b. Knowledge of plant taxonomy and plant community ecology;
c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project

area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.

c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.

e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:

a. Project description, including a detailed map of the project location and study area.
b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
c. Detailed description of survey methodology.
d. Dates of field surveys and total person-hours spent on field surveys.
e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
h. Recommended measures to avoid impacts.
i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
l. Name of field investigator(s).
m. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.

S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh

S1.2	Southern Foredunes Mono Pumice Flat Southern Interior Basalt Flow Vernal Pool
S2.1	Venturan Coastal Sage Scrub Diegan Coastal Sage Scrub Riversidean Upland Coastal Sage Scrub Riversidean Desert Sage Scrub Sagebrush Steppe Desert Sink Scrub Mafic Southern Mixed Chaparral San Diego Mesa Hardpan Vernal Pool San Diego Mesa Claypan Vernal Pool Alkali Meadow Southern Coastal Salt Marsh Coastal Brackish Marsh Transmontane Alkali Marsh Coastal and Valley Freshwater Marsh Southern Arroyo Willow Riparian Forest Southern Willow Scrub Modoc-Great Basin Cottonwood Willow Riparian Modoc-Great Basin Riparian Scrub Mojave Desert Wash Scrub Engelmann Oak Woodland Open Engelmann Oak Woodland Closed Engelmann Oak Woodland Island Oak Woodland California Walnut Woodland Island Ironwood Forest Island Cherry Forest Southern Interior Cypress Forest Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes Active Desert Dunes Stabilized and Partially Stabilized Desert Dunes Stabilized and Partially Stabilized Desert Sandfield Mojave Mixed Steppe Transmontane Freshwater Marsh Coulter Pine Forest Southern California Fellfield White Mountains Fellfield
S2.3	Bristlecone Pine Forest Limber Pine Forest

FACSIMILE

Department of Fish and Game

Director's Office

1416 - 9th Street, Room 1207
Sacramento, CA 95814
(916) 653-7667; Fax 653-7387

TO: Daniel Fierros

Fax: 213-626-0434

From: Lisa Toof for Kevin Hunting

Date: 7/20/2007 12:58 PM

No. of Pages: (including cover sheet) 9

Message: Subject: Notice of Consultation for Project number TR066952 / Los Angeles County

CONFIDENTIAL COMMUNICATION

THIS FACSIMILE TRANSMISSION COMMUNICATION (FAX) FROM THE DIRECTOR'S OFFICE OF THE CALIFORNIA DEPARTMENT OF FISH AND GAME IS INTENDED FOR USE ONLY BY THE INDIVIDUAL OR ENTITY NAMED AS THE RECIPIENT HEREOF AND MAY CONTAIN INFORMATION WHICH IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR AND ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERror PLEASE NOTIFY THIS OFFICE BY TELEPHONE IMMEDIATELY AT (916) 653-7667, AND RETURN THE ORIGINAL MESSAGE TO THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU FOR YOUR CONSIDERATION.

State of California – The Resources Agency

ARNOLD SCHWARZENEGGER, *Governor*

DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201

July 20, 2007

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

Notice of Consultation for
Project Number TR066952
Los Angeles County

Dear Mr. Fierros:

The Department of Fish and Game (Department) reviewed the Notice of Consultation and Draft Initial Study (IS) for the above-referenced project. The project consists of the approval for a Tentative Tract Map to subdivide 3 parcels, 292.49 acres into 121 lots for single-family homes. The current property is vacant and undeveloped. The project is located on Bouquet Canyon Road approximately 1.5 miles west of Angeles National Forest within the community of Leona Valley.

Because the Notice of Consultation did not include detailed information on the flora and fauna existing on the site including the potential for special status species, the Department recommends that a biological constraints analysis be performed to identify sensitive biological resources, vegetative communities, avoidance and/or mitigation measures. A biological constraints analysis will assist the lead agency in deciding upon the level of CEQA documentation that will be necessary to address impacts to biological resources below a level of significance in a Draft Mitigated Negative Declaration (DMND) or if impacts cannot be reduced below a level of significance, a Draft Environmental Impact Report (DEIR).

To enable Department staff to adequately review and comment on the project we recommend the following information, where applicable, be included in the CEQA document for the project.

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats (Attachment 1).

   a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.

   b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

   c. Rare, threatened, and endangered species to be addressed should include all those

which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380).

d. The Department's Wildlife Habitat Data Analysis Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.

2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.

a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.

c. If a Draft Environmental Impact (DEIR) is prepared for the project, cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to removal/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.

e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.

f. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (February 1- September 1) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If project activities cannot avoid the breeding bird season, nest surveys should be conducted and active nests should be avoided and provided with a minimum buffer as determined by a biological monitor (the Department recommends

a minimum 500-foot buffer for all active raptor nests).

3. If a DEIR is prepared for the project, the DEIR should include a range of alternatives to be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, Joshua tree woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

   a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed with offsite mitigation locations clearly identified.

   b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).

   c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

   a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

   b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

5. The Department opposes the elimination of watercourses including concrete channels and/or the canalization of natural and manmade drainages or conversion to subsurface drains. All wetlands and watercourses (including drainages depicted as a blue line on a topographic map and other drainages not depicted on a topographic), whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations. The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of a drainage.

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

a. Experience conducting floristic field surveys;
b. Knowledge of plant taxonomy and plant community ecology;
c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project

area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.

c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.

e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:

a. Project description, including a detailed map of the project location and study area.
b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
c. Detailed description of survey methodology.
d. Dates of field surveys and total person-hours spent on field surveys.
e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
h. Recommended measures to avoid impacts.
i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
l. Name of field investigator(s).
m. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

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S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh

S1.2	Southern Foredunes
	Mono Pumice Flat
	Southern Interior Basalt Flow Vernal Pool
S2.1	Venturan Coastal Sage Scrub
	Diegan Coastal Sage Scrub
	Riversidean Upland Coastal Sage Scrub
	Riversidean Desert Sage Scrub
	Sagebrush Steppe
	Desert Sink Scrub
	Mafic Southern Mixed Chaparral
	San Diego Mesa Hardpan Vernal Pool
	San Diego Mesa Claypan Vernal Pool
	Alkali Meadow
	Southern Coastal Salt Marsh
	Coastal Brackish Marsh
	Transmontane Alkali Marsh
	Coastal and Valley Freshwater Marsh
	Southern Arroyo Willow Riparian Forest
	Southern Willow Scrub
	Modoc-Great Basin Cottonwood Willow Riparian
	Modoc-Great Basin Riparian Scrub
	Mojave Desert Wash Scrub
	Engelmann Oak Woodland
	Open Engelmann Oak Woodland
	Closed Engelmann Oak Woodland
	Island Oak Woodland
	California Walnut Woodland
	Island Ironwood Forest
	Island Cherry Forest
	Southern Interior Cypress Forest
	Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes
	Active Desert Dunes
	Stabilized and Partially Stabilized Desert Dunes
	Stabilized and Partially Stabilized Desert Sandfield
	Mojave Mixed Steppe
	Transmontane Freshwater Marsh
	Coulter Pine Forest
	Southern California Fellfield
	White Mountains Fellfield
S2.3	Bristlecone Pine Forest
	Limber Pine Forest

July 12, 2007

Daniel Fierros
Los Angeles County
Department of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, California 90012

RECEIVED
JUL 16 2007

Subject: Project No. TR0066952

Permit No: RENVT20070034
Location: West of and Abutting Bouquet Canyon Road; APN 3206-003-007, 001 & 008

Dear Mr. Fierros:

Thank you for the information you conveyed to me earlier this week. This is the first subdivision for Leona Valley; therefore, it is important for us to become educated on procedures as well as to act prudently on behalf of our community.

We received the Notice of Consultation on July 6, 2007, fifteen calendar days subsequent to the date of the letter, which was June 21, 2007. It is our understanding that the response period is thirty days from the date of the letter. Unfortunately, much of it appears to have been spent at the post office rather than in the hands of the Leona Valley Town Council. This is not uncommon for our rural location. Considering the potential impact of this project on the community, the pre-existing time delay and the due diligence that is required to make a well-documented response to this notice, we respectfully request a ten-business day extension for this portion of the process.

Your assistance in this matter is greatly appreciated.

Respectfully,

Richard Thomas

Richard Thomas
President, Leona Valley Town Council
661 270 0099

Cc: Norman Hickling, Deputy to Supervisor Antonovich
File

Jacqueline Ayer On behalf of the
ACTON TOWN COUNCIL
P.O. BOX 810
Acton, CA 93510

To: Paul McCarthy, Supervising Regional Planner
~~Bruce McGlenden, Director of Regional Planning~~

From: Jacqueline Ayer
Number of Pages: 4 (not including cover sheet)
Fax: (213) 626-0434

Attached please find a copy of the Acton Town Council's comments on the Initial Study prepared by the Impact Analysis Section pursuant to Tentative Parcel Map 061971. Thank you for your time and attention to this matter.

Jacki

ACTON TOWN COUNCIL

P.O. BOX 810 ACTON, CALIFORNIA 93510

President
Ray Garwacki Jr.
269-8080

Vice President
Dick Morris
547-5273

Secretary
Michael Hughes
269-1342

Treasurer
Jim Connelly
269-5675

Jacki Ayer
269-1981

Ray Billet
947-2796

Bill Davis
269-3682

Mike Foster
714-3349

Katherine Tucker
274-9794

Daniel Fierros
Impact Analysis Section
Department of Regional Planning
Fax Number: (213) 626-0434
[Fax transmission of four (4) page]

January 17, 2008

Subject: Acton Town Council response to the Department of Regional Planning Notice of Consultation Dated December 20, 2007

Reference: Project Number TR061971

Dear Mr. Fierros;
The Acton Town Council appreciates receiving the Notice of Consultation for the referenced project in accordance CEQA regulations. Please integrate the following comments on the Initial Study into your final CEQA analysis prepared for this project.

GENERAL COMMENTS ON THE PROPOSED PROJECT
The Acton CSD hillside protection provisions applies to all land divisions (Section 22.44.126.C.12 of the County Code) and it includes the following provisions:

22.44.126.C.1 Hillside resources are among the most important features of the Acton community. Hillside regulations shall be enforced by a specific written analysis in each case, demonstrating conformance with the following objectives. Development plans shall comply with the following objectives:
a. Preserve to the greatest extent possible existing natural contours and natural rock outcropping features. Structures and required provisions for access and public safety should be designed to minimize encroachment on such features by the use of such techniques as curvilinear street designs and landform grading designs which blend any manufactured slopes or required drainage benches into the natural topography;
b. Preserve to the greatest extent possible the natural silhouette in significant ridgeline areas. Significant ridgelines are the ridgelines that surround or visually dominate the Acton landscape either through their size in relation to the hillside or mountain terrain of which they are a part, or through their visual dominance as characterized by a silhouetting appearance against the sky, or through their visual dominance due to proximity and view from existing development, freeways and highways designated as Major, Secondary or Limited Secondary on the Highway Plan.

The Acton Town Council notes that the map provided with the Notice of Consultation does not indicate the location of any structures nor does it indicate the route that will be used to access these structures. It is unlikely that the Department of Regional Planning (DRP) will be able to generate a specific written analysis that this project will preserve existing natural contours or ridgeline areas without such information. Moreover, the Acton Town Council notes that this project includes a ridge that runs along the edge of Escondido Highway (a designated secondary highway). It is not clear whether or not the

proposed project will impact this ridge and the extent to which it will modify the ridge silhouette. Over the last decade, numerous developments which substantially scar the hillsides through extensive grading and contour destruction have been approved. The Acton Town Council seeks to curtail this practice, and therefore requests that the applicant indicate the size and location of all building pads that will be graded for residential and accessory uses as well as the access routes that will be employed. In addition, the Acton Town Council requests that Staff proved a written analysis which specifies how the project design will preserve the existing natural contours and hillsides. To ensure hillside preservation, the Acton Town Council suggests that all graded pads and access routes which are indicated on the approved tentative map also be included on the final map. Any subsequent relocation of the pads or access routes will require both an amended map and a revised written analysis.

No slope analysis information was provided with the Notice of Consultation, so the Acton Town Council is unable to ascertain whether or not a hillside management CUP is necessary pursuant to Section 22.56.215 of the County Code. However, because the project includes substantial acreage with slopes exceeding 25%, the Acton Town Council recommends that this possibility be considered.

SPECIFIC COMMENTS ON THE INITIAL STUDY CHECKLIST

1) The Acton Town Council notes that the general information provided with the Notice of Consultation indicates that "a total of 20,000 cubic yards of dirt will be required to grade and balance on site if the project site is developed in the future". However, DRP concludes that this project will not "entail substantial grading" (Hazard 1f). The Acton Town Council considers 20,000 cubic yards of dirt to be a substantial volume, and therefore does not agree with DRP's conclusion on this matter.

2) Nearly all of the project frontage along Escondido Highway is located in a hillside area with slopes that exceed 30%. Much of the Parcel 2 frontage on Escondido highway appears to have a 50% slope. It seems likely that, to access any structure which complies with the 50 foot setback requirement mandated by the Acton CSD, the slope area along the highway frontage will be substantially altered (i.e. graded). Therefore, the Acton Town Council does not agree with DRP's determination that this project will not entail substantial "alteration of topography" (Hazard 1f).

3) As indicated in the Initial Study, the project site includes a major drainage course, and it abuts a major FEMA-designated flood zone (Hazards 2a and 2b). In addition to these elements, the project drains to the downtown section of Acton, which continues to experience substantial flooding problems. These problems are exacerbated by new development which increases impervious surface areas in the community and therefore increases runoff to the downtown area. The Acton CSD addresses this impact by limiting the total impervious surface area permitted on each residential parcel created by the proposed project to 10% of the total area (22.44.126.C.4). The Acton Town Council recommends that that this requirement be imposed on the project and clearly articulated as a condition of approval.

4) Rural areas such as Acton which mitigate flood hazards by relying on the natural drainage process are always susceptible to debris deposition. The potential increase in runoff to downtown Acton that is created by this project necessarily implies an increase in debris deposition as well. Therefore, the Acton Town Council suggests that this project could contribute to debris deposition from runoff, and recommends that the Initial Study Checklist be amended to reflect this condition (Hazard 2.d).

5) The project proposes a private sewage disposal system, and the project site abuts a major FEMA-designated flood zone and includes a major drainage course. Therefore, the Acton Town Council suggests that Resource Item 1b of the Initial Study checklist be amended to reflect these circumstances.

6) The project is not located in an existing or proposed Significant Ecological Area. Therefore, the Acton Town Council suggests that any inference to such a circumstance be removed from the Initial Study checklist (Resource Item 3a) Form – can not be [illegible]

7) Fuel Modification Plans mandated by the LA County Fire Department generally require removal of existing vegetation in only a narrow (< 50 foot) buffer zone around structures. Since the total area devoted to structures will be fairly small (<10% as described above), the Acton Town Council disagrees that Fuel Modifications required for this project will remove most of the existing vegetation (Resource Item 3b). We do note, however that the applicant is likely to remove substantial habitat areas for reasons other than to address fuel modification requirements. For example, given the steep topography and the on-site drainage course, it is likely that substantial areas of vegetation will be removed just to create a building pad and provide access thereto. – yes on I.1.

8) The Acton Town Council does not agree with DRP's conclusion that the proposed project will not be inconsistent with applicable Hillside Management criteria. For reasons provided above, the Acton Town Council contends that the information included with the Notice of Consultation is inadequate to make such a determination, particularly in light of Acton CSD requirements.

9) The Acton Town Council recommends that the Land Use section (Item e) of the Initial Study Checklist indicate that the Acton CSD requires that appropriate equestrian trails be considered in all land divisions. Because the proposed project is located on Escondido Highway (which is an established equestrian route) and Jones Canyon Road (where numerous equestrian-oriented residents are located), the Acton Town Council maintains that equestrian trails along these routes are necessary to achieve General Plan and Acton CSD goals.

CONCLUSIONS

The Acton Town Council notes that the Department of Public Works intends to restrict access to the parcels created by PM 061971 from Escondido Highway. Therefore, access to parcels 1 and 2 will be taken from Jones Canyon Road. Unfortunately, Parcel 1 has no frontage on Jones Canyon Road, so Parcel 1 is effectively inaccessible. As you may be aware, the Subdivision Map Act does not encourage the creation of parcels that are made deliberately inaccessible, therefore the map must be modified to properly demonstrate access to Parcel 1 over Parcel 2 (either with a. private drive, fire lane, etc). Moreover, this subdivision is configured such that access to either parcel from Jones Canyon Road is only possible by crossing a mapped blue line stream. The initial study checklist does not mention the fact that access for this project is via a blue line stream and it does not address the impacts of such. The Acton Town Council contends that, to comply with CEQA, the map must be revised to demonstrate a viable access to all parcels from Jones Canyon Road which is properly configured to mitigate potential blue line stream impacts. B.?

Finally, the transmittal letter which accompanied the Initial Study Checklist indicates that DRP has made the preliminary determination that a Negative Declaration is the appropriate environmental document, rather than an Environmental Impact Report (EIR). The Acton Town Council concurs that an EIR may

not be necessary for this project, and that a Negative Declaration could be warranted ***if and only if*** the following conditions are met: 1) The applicant amends the map in accordance with the Acton Town Council recommendations to show proper access, pad locations, and blue line stream mitigation measures; 2) Ensure compliance with the hillside contour and ridge line preservation provisions contained in the Acton CSD by restricting locations of the building pads and access routes on the final map that is recorded; 3) The Department of Public Works shall provide a specific written analysis confirming that the pad locations, access routes, and subdivision design conforms with the hillside preservation objectives contained in the Acton CSD; 4) DRP records a restrictive covenant on the property that is signed by the applicant and runs with the land and which restricts the total permitted impervious surface area on each lot to comply with Acton CSD requirements; and 5) The Department of Parks and Recreation records appropriate trail dedication documents. The Acton Town Council anticipates that these conditions will adequately avoid potentially significant impacts and will not burden the applicant with the expense and inconvenience of developing and maintaining a mitigation monitoring plan in perpetuity.

Please note; this letter should not be construed by any Section within the Department of Regional Planning as either an approval or disapproval of the referenced project; the Acton Town Council has not received adequate information to make such a determination, nor has the Acton Town Council heard from the applicant,. The intent of this letter is to 1) recommend measures for reducing project impacts that are of concern to the community of Acton and 2) identify errors in the Initial Study Checklist that should be corrected to ensure CEQA compliance. Please note also that this letter has been submitted within the 30 day time limit requested in the referenced Notice of Consultation and in accordance with CEQA and the California Permit Streamlining Act.

Sincerely,

The Acton Town Council

Cc: Paul McCarthy, Supervising Regional Planner (via fax)
B. McClendon (via fax)
N. Hickling (via electronic mail)

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO
ATTENTION OF:

Office of the Chief
Regulatory Division

July 9, 2007

RECEIVED
JUL 12 2007

Los Angeles County, Department of Regional Planning
Attention: Daniel Fierros
320 West Temple Street
Los Angeles, California 90012

Re: Project Number TR066952, APN 3206-003-007, -001, -008

Dear Mr. Fierros:

Thank you for the opportunity to comment on the project referenced above. Based on our preliminary review of the information submitted, we have determined that the proposed project may require a U.S. Army Corps of Engineers permit.

A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Specifically, grading activities within Bouquet Canyon for the construction of a residential community may entail discharge of fill into a water of the United States.

If you or the project proponents have any questions, please contact Phuong Trinh at (213) 452-3372. Please refer to this letter and SPL-2007-771-PHT in your reply.

Sincerely,

Kenneth Wong
Project Manager, North Coast Branch
Regulatory Division

JUNE 29, 2011 REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

<u>CORRESPONDENCE FROM THE LEONA VALLEY TOWN COUNCIL (2004-2011)</u>

1. **(6-8-11) Letter to staff regarding general project comments, map drawing errors**
2. **(5-30-11) Letter to staff regarding project hazard mitigation**
3. **(5-16-11) Letter to staff regarding wastewater treatment permit requirements**
4. **(5-4-11) Letter to staff regarding analysis of proposed project OWTS (with booklet attached)**
5. **(8-20-08) Letter regarding project traffic study deficiencies (with concern letters attached)**
6. **(1-6-08) Letter to the applicant regarding posting of documents on the town council website**
7. **(1-6-08) Letter to staff regarding applicant responses to the draft Initial Study**
8. **(10-27-07) Letter to the applicant regarding comments on proposed draft CSD changes**
9. **(9-10-07) Article forwarded to staff regarding cultural resources**
10. **(9-10-07) Study forwarded to staff regarding cultural resources located in the project vicinity**
11. **(8-6-07) Full response to staff's draft Initial Study**
12. **(4-16-07) General letter of concern regarding the subject project**
13. **(4-9-07) General town council meeting minutes forwarded to staff**
14. **(3-27-07) E-mail invitation to the applicant forwarded to staff**
15. **(8-11-04) Town council meeting minutes forwarded to staff (re: community water supply)**

Leona Valley Town Council

P.O. Box 795 • Leona Valley • CA 93551

JUN - 8 2011

June 6, 2011

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street
13th Floor
Los Angeles, California

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007-00038 Exhibit A Map Dated June 4, 2010

Dear Mr. Sackett:

The Leona Valley Town Council Land Use Committee has completed an analysis of the above referenced proposal in terms of its density, application of clustering, dedication of open space and general mathematical errors that are carried out throughout the plat map submission and application. These errors and several miss-suppositions have resulted in an over-statement of the permissible amount of residential dwelling units as well as where and how these dwellings are placed on the site. Herein we are providing our findings, corrections and resolutions to some of the errors. We believe that this tract map needs to be re-drawn to reflect the corrected density allowance and figures; appropriately apply the clustering rule and adjust the calculations contained throughout their submission documents. Our input is not considered an approval of the tract map, merely a correction of the errors contained therein.

In an effort for neutrality, we did not review the County file pertaining to density and other errors until after we completed our independent analysis. Therefore, some of the issues that we have indicated as an area of concern or conflict with existing policies, may be duplicated in the Planning Department analysis. We have now had an opportunity to review the County findings and wish to applaud the Planning staff for their due diligence and emphasis on retaining the rural character of the community while adhering to the policies in the Antelope Valley Area Wide Plan and the County General Plan.

Minimum Lot Size and Density.
According to the Leona Valley Community Standards District, the minimum lot size requirement within the Leona Valley Community Standard District is 2.5 Acres and within a defined Hillside Management Area with clustering as small as 1.5-acres.

> **22.44.122 Leona Valley Community Standards District.**
> 6. Required Area. Standard residential lots or parcels shall contain a gross area of not less than two and one-half acres. Clustering and density transfer shall be permitted in accordance with the provisions of the Antelope Valley Area Plan, provided that no lots contain less than one and one-half gross acres. Clustering is allowed only within projects located in hillside management areas (areas over 25 percent slope) and must satisfy findings of the Hillside Management Ordinance as set out at Section 22.56.215.

According to Pacific Coast Engineering, Inc. (see letter in County file dated October 29, 2010) the subject property is not in a Hillside Management Area. Our analysis of the General Plan's Special Management Area Map and the Antelope Valley Areawide General Plan's Hazards and Resources Map has also come to the same conclusion. The Vesting Tentative Tract Map No. 066952 dated June 4, 2010 and the CUP No. 2007-00038 Exhibit A Map Dated June 4, 2010 is not in a defined Hillside Management Area. Therefore, the Clustering lot size of 1.5 allowed in the Leona Valley CSDs does not apply and the minimum lot size of 2.5 acres is therefore required.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 201

According to the AV Wide Area Plan, all areas having a natural slope of 25% or more are subject to the conditions in section D.1.c) (1).

The following was taken from the Antelope Valley Areawide General Plan starting on page VI-22
D.1.c) Non-urban Hillside Management Areas are defined as lands characterized by natural slopes of 25% or greater and designated for a Non-urban level of development on the Land Use policy Map. All such areas meeting this definition will be subject to the following general conditions of development.
(1) Allowable Densities: Development shall be subject to the following density standards:

%Slope	Low Density Threshold	Maximum Density	Minimum or Natural Area Req'd
25 - 50	1 du/10 acres	1 du/2 acres	70%
Greater than 50	N/A	1 du/20 acres	70%

All residential development proposals exceeding the low density" threshold shall be subject to the Hillside Management Performance Review Procedures and criteria found in Appendix A on page III-59 f.f. of the Land Use Element of the Countywide Plan.

The Leona Valley CSDs supersedes the N-1 AV Areawide Plan Land Use Policy Map Non-urban 1 of 0.5 dwelling Units per acres and requires 1 dwelling Unit per 2.5 acres. As can be seen by reading the AV Areawide Plan, the land that is less than 25% Slope is not conditioned by the AV Areawide Plan's Hillside Management requirements. Therefore, the 133 acres (see applicants Exhibit D) that is less than 25% Slope cannot be divided by less than 10 6,400 square feet (2.5 acres). The Hillside Management conditions defined by D.1.c) only applies to the land at 25% or greater. Section D.1.c) defines the lowest density threshold as 1 dwelling Unit per 10 Acres. This falls well within the Leona Valley CSD requirements. It should be noted that the Leona Valley's CSDs is the minimum lot size and does not stop the County's Department of Regional Planning or other Departments from **imposing larger lot sizes** to facilitate lower densities when safety, conformity with surrounding land uses, complimenting existing development patterns and/or other reasons dictate.

For the land exceeding 25% slope the Applicant has chosen to use the 1 dwelling Unit per 10 acres, see exhibit D as provided by the applicant in the County files. For the land exceeding 50% slope the applicant has no choice, the only allowed density is 1 Dwelling Unit per 20 Acres. If we calculate the allowed density using Leona Valley's CSDs the maximum permissible density is 68 Dwelling Units:

	Acres	Leona Valley CSDs 2.5 Acres	Required open space
	133.2	@ 2.5 acres = 53.28 DU	
	143.2	@ 10 Acres = 14.32 DU	70%
	16	@ 20 acres = .8 DU	70%
Totals	292.4	68 DU	111.44 Acres of Open space

On the last page of the same letter, Pacific Coast Engineering, Inc. has incorrectly used the Land Use density for the N-1 areas, Leona Valley's CSD supersedes the 0.5 DU/Acres in the Land Use section of the Antelope Valley Areawide Plan.

Seismic Safety Management Area
The subject property is part of a Seismic Safety Management Area, which includes the properties identified within the Alquist-Priolo Seismic Special Studies Zone and other seismic areas. The subject property is situated in the Sleepy Valley Quadrant of the San Andreas Rift Zone, a special study and management area. The site is traversed by an earthquake fault and as the name "rift zone" implies, scattered through the area are un-named and often unseen earth fractures throughout the Leona Valley community. The geotechnical review completed by the County of Los Angeles (2008) indicates the southwestern portion of the proposed subdivison (in the area of the proposed water tank site) is located in an area of earthquake-induced landslides as per the State of California Seismic Hazard Evaluation Map. A fault mapped by the State of California is shown traversing the site. Based on the State of California Seismic Hazards Maps, the subject site is located in an area with a potential for liquefaction and may be subject to secondary effects of

seismic shaking. According to the Antelope Valley Area Wide Plan, densities in these areas, unless already committed to a higher density (the subject site is not), must be restricted to residential uses at very low densities of 0.5 d.u./acre, provided that primary structures do not cross a trace fault. All critical use facilities (such as waste treatment facilities) would be prohibited in this zone. Because this proposed development is in a Seismic Safety Management Area, the Leona Valley CSDs allowable minimum lot size of 65,340 Sq. Ft. (1.5 Acres) does not apply. The Seismic Safety Management Area supersedes the CSDs.

According to the Antelope Valley Area Wide Plan, residential development may be permitted to **only** those densities prevalent within the surrounding area. (Page VI-18). The density as proposed for this project does not conform to the densities prevalent in the **immediate** surrounding area. The Developer included an analysis of all of Leona Valley, including that portion that was divided by the Frank Hall family in the 1920s, before zoning regulations. When restricting the analysis to the neighborhood or parcel area in which the subject property is located (Leona Valley CSD portion of APN: 3206), the densities are far lower and the project must compliment the character of the prevalent surrounding density. In the last 20 years, 96 homes have been built in Leona Valley or 4.8 homes per year. The project exceeds the total number of homes built in all of Leona Valley in the last 20 years. The median lot size of those homes built throughout Leona Valley over the last 20 years is 3.23-acres, which includes those located in the "urban" core of the community, those lots that were divided in the 1920s, and prior to zoning regulations.

When we isolate the subject's parcel area of 3206 within the Leona Valley Community Standards District, which is a sparsely populated section of Leona Valley, we find that only 6 homes have been built in this area in the last 20 years, or .3 homes per year. The average size lot for a home built in 1991 or later in the Leona Valley CSD portion of Parcel Area 3206 is 8.206-acres. The Draft Antelope Valley Area Wide Plan (Town and Country) reduces the density of the subject site substantially, to one dwelling unit per 20-acres. It should also be noted that throughout Leona Valley, hillside management areas have never been developed to such a high density (historically developed with one home per five or more acres as per development trends). In the City of Palmdale, directly east of Bouquet Canyon Road, (calls for a hillside management density of one-dwelling per 50 acres of land as per the Palmdale General Plan. This "surrounding use" argument is substantiated by the Antelope Valley Area Wide Plan, Section A.1.a)(5)(b), Page VI-3, which states, "At least fifty percent (50%) of the topographically similar land within 1,000-foot radius of the subject property is within parcels smaller than or equal to the average parcel size of the proposed property. The Valley Vineyards proposal is out of compliance with this Section.

As part of the County of Los Angeles goal on resource conservation in the Antelope Valley Area Wide Plan, Agricultural Opportunity Areas were established. Leona Valley is, in fact, located in an Agricultural Opportunity Area (see Antelope Valley Areawide Plan's Hazard Resource Map), the status of which has not been officially abandoned by the County of Los Angeles Department of Regional Planning. As per page VI-14 of the Antelope Valley Area Wide Plan, "extensions of urban and suburban residential uses greater than one dwelling unit per 2-acres will be strongly discouraged". Proposing residential lot sizes of 1.5-acres is less than what is indicated in the Antelope Valley Area Wide Plan. Because this proposed development is in an Agricultural Opportunity Area as defined by the Antelope Valley Area Wide Plan, the Leona Valley CSDs allowable minimum lot size of 65,340 Sq. Ft. (1.5 Acres) does not apply.

Based on these factors, clustering to 1.5-acres is not supported by current County code for a variety of reasons. As per the last hearing before the County of Los Angeles Planning Commission, it was requested by the Commission that a study be completed to ascertain the difference in density based on the existing Antelope Valley Area Wide Plan and the draft Town & Country Plan. Further, there is already language in the Antelope Valley Area Wide Plan which indicates the density "may be permitted to **only** those densities prevalent within the surrounding area", which is in fact, **one dwelling per 8.206-acres**. The property is located in a "draft" Significant Ecological Area and as per the Antelope Valley Area Wide Plan, must be treated as if it is a Significant Ecological Area. Therefore, this high-density proposal is not in line with the County's existing policies.

Based upon the Antelope Valley Areawide Plan's general philosophy to minimize the density in nonurban areas, wildlife linkages with Angeles National Forest (via Bureau of Land Management property), proximity to watershed, seismic conditions, is not an infill project, density is not prevalent with the surrounding area,

and the pending approval of Town and Country to 1 dwelling unit per 20-acres, it is recommended that the project be approved as a compromise of these figures (1 dwelling unit per 8.2 acres versus 1 dwelling unit per 20-acres) or with 1 dwelling unit per 10-acres, or 29 single-family residences. This is in compliance with the Non-Urban Hillside Management low threshold density as indicated in the Antelope Valley Area Wide Plan.

This argument is supported by the precedent established by the County's requirements imposed on VTTM No. 71169. The Applicant for TR 71169 requested a minimum lot size of 5 acres and was told by the Subdivision department that 1 dwelling unit per 10 acres was required.

Maps Errors.
The Applicants submitted maps; (1) Vested Tentative Tract Map and (2) CUP Exhibits. These two maps have very different General Notes. The CUP map is missing two notes that are on the VTTM that actually apply to the CUP process.

5. SUPPLEMENT ZONING DESIGNATION: "LEONA VALLEY COMMUNITY STANDARDS DISTRICT," ALLOWING 1 UNIT PER 2.5 ACRE (GROSS) DENSITY ON FLAT SITES, OR, IF THE SITE IS WITHIN A HILLSIDE AREA, LOTS MAY BE CLUSTERED TO A 1.5 ACRE MINIMUM LOT SIZE. (NO CHANGE PROPOSED)

16. LOTS EXCEEDING 2 ACRES IN SIZE SHALL BE RESTRICTED FROM FURTHER SUBDIVISION.

The Applicant is required to submit a CUP for this development for several reasons. One of the major reasons is that the Applicant wishes to develop the property with a higher housing density than the "Low Density Threshold" 1 Dwelling Unit per 10 Acres.

(1) Allowable Densities: Development shall be subject to the following density standards:

%Slope	Low Density Threshold	Maximum Density	Minimum or Natural Area Req'd
25 - 50	1 du/10 acres	1 du/2 acres	70%
Greater than 50	N/A	1 du/20 acres	70%

All residential development proposals exceeding the low density" threshold shall be subject to the Hillside Management Performance Review Procedures and criteria found in Appendix A on page III-59 f.f. of the Land Use Element of the Countywide Plan.

Gross Available Area.
The gross area claimed by the applicant and the assessor's map do not agree. The available area claimed by the applicant on the map (Figure 1) is more than identified by the assessor's data. See Appendix A for additional details.

The discovered discrepancy is approximately 0.3% error; if the 0.3% is applied to all 120 lots it is approximately a 311 squared foot error to each lot. If the error is applied to a lot of 1.5 acres the approximate error is 196 square feet. Because the size of the lots has been misrepresented by the applicant this could explain the errors, in square feet, identified in the Lot Size Error section of this document.

GENERAL NOTES:

1. ASSESSOR PARCEL NUMBERS 3206-003-001, 3206-003-008

2. GROSS AREA: 292.5 ACRES

Figure 1 Image from applicants' map

Assessor Parcel Number 3206-003-007 is missing from the applicant's map and needs to be added.

Gross Vs Net Error
In the review of the Tentative Tract Map for TR 066952 it has come to our attention that the Lot Summary Table that is used to define Gross and Net area of each lot in acres is in error.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

The Applicant has chosen to use clustering for their development. The Antelope Valley Area Plan's Non-urban Hillside Management section requires 70% of the developed area to be maintained in an open or natural condition. Instead of defining a dedicated 70% open space area for the project, the Developer has instead decided to use the 70% open space on each lot which is a violation of code as per the AV Plan and the General Plan, which indicates this space to be "set aside". The Developer has stated that each lot will be deed restricted to include this open space that cannot be used by the home owner. Therefore, the "net area" of each lot is less than the "gross area" as presently defined on the p lot plan and inappropriately includes the 70% open space. This open space should not be treated as an open space easement.

The Developer has decided to use Clustering for the development; therefore, the Tract Map should clearly define the Open space on the tract map. An exhibit is not a binding part of the tract map.

Lots 1, 2, 3, 4, 5, 51, and 107 through 117 appear to have easements (trails, retentions basin, and roads). The actual net lot size is less than the indication on the map.

Lot Size Error
Several of the lot sizes were checked using the County's GIS SUB-NET (http://planning.lacounty.gov/subnet) (see Figure 2) application on Department of Regional Planning's website. By using the polygon tools provided and the Feb 3, 2011 Tract Map provided by Valley Vineyards, LLC, several of the Tract Map lots were checked for accuracy. When the tool was used to determine the square footage of the lots it was determined that some of the lots defined as 1.5 acres were less than the required square footage of 65,340 sq. ft. The Applicant has indicated that the minimum lot size is to be 1.5 acres, in compliance with the clustering rule of the current Leona Valley Community Standards District. The necessary square footage required to fulfill this requirement must not be less than 65,340 sq. ft (1.5-acres). See Table 1 for details. It seems the Engineering firm responsible for the map has rounded up the squared feet incorrectly; this is unacceptable when dealing with the legal description for real property. This must be corrected before the public hearing.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

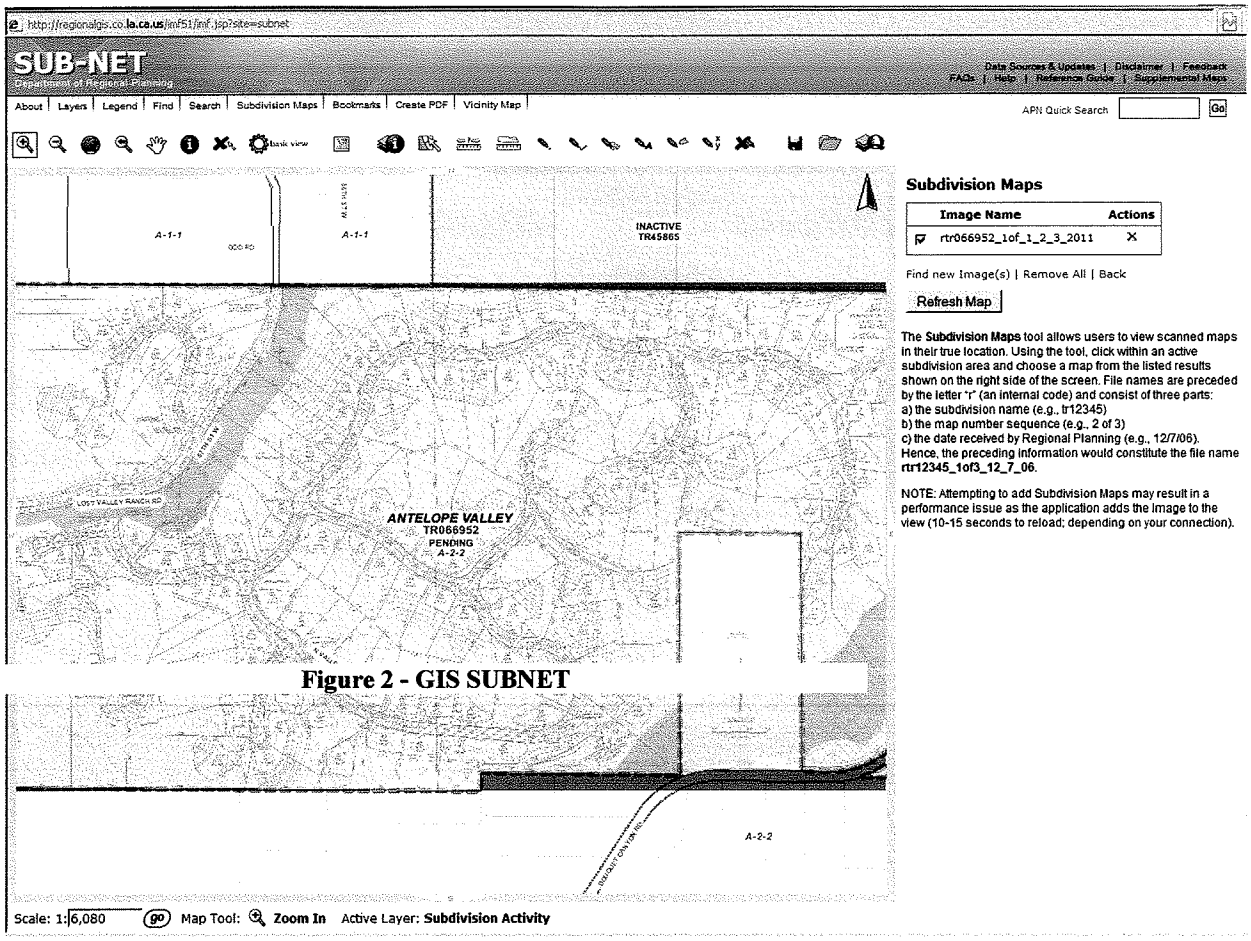


Figure 2 - GIS SUBNET

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

TR 066952 Lot Number	Gross Acre	Net Acre	Required square feet (Gross Acre x 43,560 sq. ft.)	Measured lot size in Sq. ft.	70% Open Space Required per Lot	Maximum size of building pad	Measured Pad size in Sq. ft.	Includes grade area
34	2.3	2.3	100,188.0	99,684.4	70,131.6	30,056.4	14,993.4	41,572.1
51	1.5	1.5	65,340.0	64,830.7	45,738.0	19,602.0	13,015.3	
52	1.5	1.5	65,340.0	65,140.7	45,738.0	19,602.0	18,883.5	
53	1.5	1.5	65,340.0	63,530.3	45,738.0	19,602.0	19,501.8	
64	1.5	1.5	65,340.0	65,933.8	45,738.0	19,602.0		
84	1.5	1.5	65,340.0	65,202.9	45,738.0	19,602.0	19,986.1	23,739.7
87	1.5	1.5	65,340.0	65,019.7	45,738.0	19,602.0	15,902.1	22,391.0
88	1.8	1.8	78,408.0	77,007.8	54,885.6	23,522.4	20,193.6	29,470.6
94	1.5	1.5	65,340.0	65,330.2	45,738.0	19,602.0		
95	1.5	1.5	65,340.0	65,163.8	45,738.0	19,602.0		
96	1.5	1.5	65,340.0	64,594.7	45,738.0	19,602.0	19,422.1	27,602.0
108	1.5	1.5	65,340.0	65,061.7	45,738.0	19,602.0		
110	1.5	1.5	65,340.0	64,826.6	45,738.0	19,602.0	21,113.3	
111	1.5	1.5	65,340.0	63,563.5	45,738.0	19,602.0	18,514.5	
112	1.5	1.5	65,340.0	66,588.1	45,738.0	19,602.0	25,880.6	
113	1.5	1.5	65,340.0	63,252.6	45,738.0	19,602.0		
114	1.5	1.5	65,340.0	63,233.2	45,738.0	19,602.0		
115	1.5	1.5	65,340.0	65,319.0	45,738.0	19,602.0		
116	1.5	1.5	65,340.0	66,054.0	45,738.0	19,602.0		
118	1.5	1.5	65,340.0	64,764.2	45,738.0	19,602.0	40,366.9	
119	2.0		87,120.0		60,984.0	26,136.0	has no open space	
120	26.5		1,154,340.0		808,038.0	346,302.0	has no open space	

Table 1

Gross vs. Net is being pointed out to the County because of the applicant's decision to use clustering (requiring 70% open space). A significant amount of natural open space is required within the subdivision in order to support the application of the clustering methodology, but has been applied incorrectly. According to the Antelope Valley Area Wide Plan, those properties that are in a "potential" Significant Ecological Area must be treated as if in a Significant Ecological Area. The subject property has been a Draft Significant Ecological Area since 2007/2008 (under consideration since 2004). There are specific guidelines on how open space land is treated in a Significant Ecological Area. The above table and how the property is divided are entirely erroneous with respect to this policy.

According to current County Code, Open Space Land shall not be less than 70% of the **net area** of a residential development in a non-urban hillside management area. The Antelope Valley Area Wide Plan further requires that the development be designed to be highly compatible with biotic resources present including **setting aside** of appropriate and sufficient undisturbed areas. "Setting aside" open space land does not mean dedicating the open space as part of a lot in fee simple ownership, nor does it mean it is set aside for a vineyard for the sole and profitable future use of the Developer. Setting aside land means an entirely separate parcel that is deed restricted in an open and natural state in perpetuity for conservation purposes. Therefore, the lots as divided and presented are entirely out of compliance with this requirement.

There is also a significance that County places on net and gross area in the building codes and ordinances. The Lot Summary Table as submitted needs to be updated and instead of acres, needs to re-define the lot size in terms of square feet. This is clearly illustrated to ensure the minimum lot size is met.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

Taken From the AV Wide Area Plan:

c) Non-urban Hillside Management Areas
(3) Open or Natural Area Standards: The following provisions shall apply for the preservation of natural areas: A minimum of 70 percent of the Hillside Area to be included in a development proposal shall be retained in an open or natural condition.

Within these required natural areas, replacement of vegetation required for fire suppression purposes or recreational riding and hiking trails (requiring minimum grading) will be permitted.

Open space is defined as untouched, native vegetation, etc. According to the Antelope Valley Area Plan, dedicated open space must remain in a "natural" state.

To maintain the character of Leona Valley this area needs to be maintained in its "natural condition".

While verifying the lot sizes we discovered that the building pad size on some of the lots was larger than the clustering allows, which is 30% of the site. If you include the grading of many of the lots, the total disturbed soil is greater than the allowed 30% of the lot. This also illustrates the actual building pad area and the graded area needs to be defined on the Lot Summary Table to ensure that the clustering method used by the Developer is adhered to. Because the Developer has decided to use clustering, the terms and definition of the open space needs to be clearly defined on the tract map. The Lot Summary Table needs to include the Building Pad Area, Open Space Area, and the Graded Area. Furthermore, each lot on the tract map needs to be identified relative to the open space.

In reviewing the plot plan for lots 118, 119, and 120, we have determined that these are not truly "lots"; however, the Developer has chosen to call them lots, therefore, lots 118, 119, and 120 need to have the same methodology applied and 70% open space needs to be allocated to them as well.

The county's definition of net area is:

Title 22.08.010 A.

A. "**Net area**" means that portion of a lot, or parcel of land which is:
1. Not subject to any easement or included as a proposed public or private facility such as an alley, highway or street except as provided in subparagraph 3, or other necessary public site within a proposed development project;
2. Subject to an easement where the owner of the underlying fee has the right to use the entire surface except that portion where the owner of the easement may place utility poles or minor utility structures;
3. Subject to that portion of a highway easement or private street easement shown on an alternate cross-section in Section 21.24.090 of Title 21 of this code, Subdivisions, marked with an Asterisk (*);
4. That portion of a corner lot or corner parcel of land not to exceed five percent of the net area within a corner cutoff.

Open Space Errors

The open space that is defined for the Non-urban hillside Management is not called out on the Tract Map. The Assessor's documentation indicates the combined area of 3 206-003-001, 3206-003-007, and 3 206-003-008 is 292.74, therefore, 204.22 acres needs to be indicated on the Tract Map as open space. This open space needs to be identified on the Tract Map in order to be binding; the Open Space Exhibit as presented is not binding.

Parcel Number	Acres	Square Feet	Required 70% Open Space in Square Feet	Required 70% Open Space in Acres
3206-003-008	137.85	6,004,746.00	4,203,322.20	96.495
3206-003-001	152.97	6,663,373.20	4,664,361.24	107.079
3206-003-007	0.92	40,075.20	28,052.64	0.644
Total	291.74	12,708,194.40	8,895,736.08	204.218

Table 2

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

Trail System Error
Currently the existing horse trails go up and over the hills on the property, along the ridge. The developer has moved the trails to the periphery of the tract. This is unacceptable. The proposed trails, within reason, need to be along the location of the existing trails. The proposed horse trail transitioning through the lot 120 ET/I Area A no longer aligns with the trail on the other side of the entrance off of Bouquet Canyon Road. The alignment was modified and is not conducive to horseback riding; the Developer added the retention basin without consideration of the trail alignment. This needs to go back through the Trail Committees. The horse trail goes through ET/I Are a A. The Environmental Protection Agency guidebook for Evapotranspiration Systems indicates that contact with animals and humans should be avoided by the use of fencing. Therefore, placement of an equestrian trail through an ET-bed is not appropriate as this a health risk to those using the trail – including the animals.

View Shed
Lot 120 ET/I Area A is visible from the scenic roadway of Bouquet Canyon Road. In addition, according to the Advance Treatment System manuals and Federal Government Design requirements, the ET field needs to be fenced to protect the public from inadvertent contact with the ET soil, plants and bed. The ET/I facility needs to be moved to a less observable and more concealed location.

The Tank lot (118) is directly in the viewshed of the residents of Lost Valley Ranch Road. This is also a known cultural resource to the community as the Easter Sunrise Service is held on Lost Valley Ranch Road. Lots 69 and 70 would be a better location. The existing residents should not have to look at the infrastructure of new tract homes.

Lot 120 Area C ET/I are in the view shed of the residents on Lost Valley Ranch Road. People traveling along 87th Street and Lost Valley Ranch Rd. will have to look at the ET/A systems. Existing residents should not have to look at the Tract Home infrastructure.

> Taken from AV Wide Are Plan.
> c) Non-urban Hillside Management Areas
> (2) Density Transfer and Clustering: Density transfer and or clustering from steeper slopes to more gently rolling level land is encouraged as a means of preserving the natural terrain, minimizing grading and reducing exposure to natural hazards. Where a cluster concept is employed, development should minimize adverse visual impacts on neighboring residential uses.

Bench Mark Data Error
Bench Mark data on the Tract Map is in error and needs to be corrected.

Flood Plain Error
Lot 63 is in a flood plain. This portion of the stream washes out often. Lot 63 needs a retaining wall to protect the building pad.

Lot 120 (Area C) ET/I is in a flood plane area subject to erosion. The ET/I facility needs to be back from the Blue Line Stream, in compliance with State and Federal laws and regulations. This area is subject to large amounts of runoff and erosion. Not only will the evapotranspiration facility be damaged should it remain in this location, there is a chance that neighboring properties and critical watershed are at risk because of the probable contamination. The contaminants and pathogens can be carried by the blue line stream into critical and protected wetlands. The design of the ET/I should include a retaining wall.

The Public road connecting 87th Street to Lost Valley Ranch Road is not protected from erosion from the Blue Line Stream it runs parallel to.

Legal Lot Errors
Lot 77 and 78 do not look like legal lots.

Seismic Hazard Zones Error
The applicant's map does not indicate the seismic hazards on the Vesting Tentative Tract No. 066952.

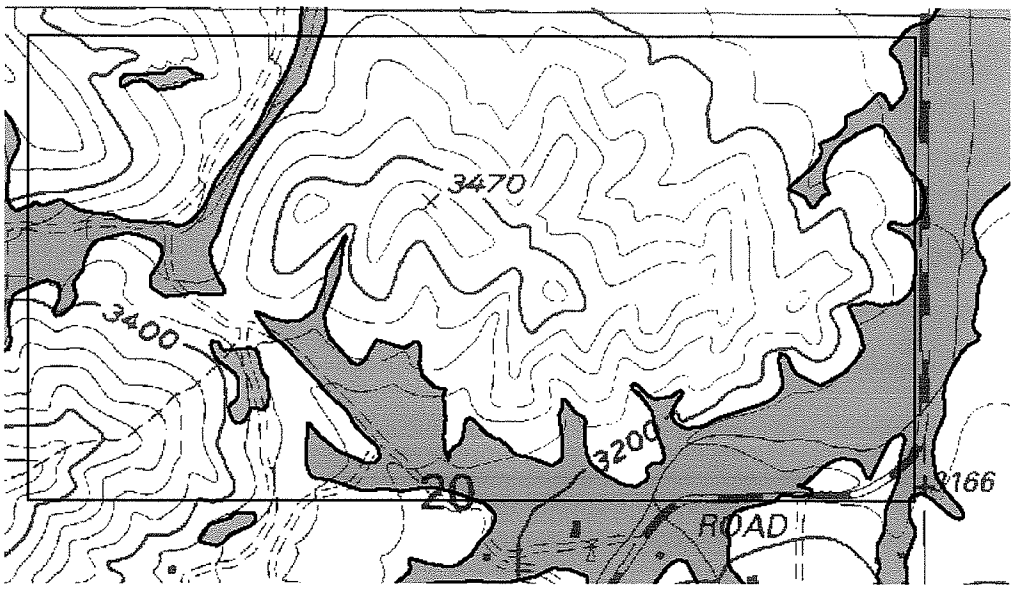
Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

Lots 1, 2, 3, 4, 5, 6, 7, 45, 60, 61, 59, 58, 52, 51, 49, 48, 47, 46, part of Lot 120 ET/I Area B, 88, 87, 86, 85, 84, 83, 82, 81, 80, 79, 78, 77, 76, 65, 6 4, 63, and 62, Part of Lot 120 ET/I Are a A, and lots 97 through 105 are in a defined Liquefaction Zones, this area should be restricted use.

The lots in the Northwest corner of the map are in an Earthquake Induced Landslide area.

The Tract Map needs to be updated with the "Restricted Use" zones.

Reference = http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_slev.pdf



Liquefaction

Areas where historical occurrence of liquefaction, or local geological, geotechnical and ground-water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Earthquake-Induced Landslides

Areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Other Errors
The Open space exhibit (dated Feb 4, 2009) has not been updated to reflect the latest changes to the plot map (dated Feb 2, 2011).

Runoff, Water Flow and Drainage
The Tentative Tract map does not indicate the runoff or the updated water flow for each lot and street. The map does not depict all of the drainage as indicated in the 1974 subdivision (as follows):

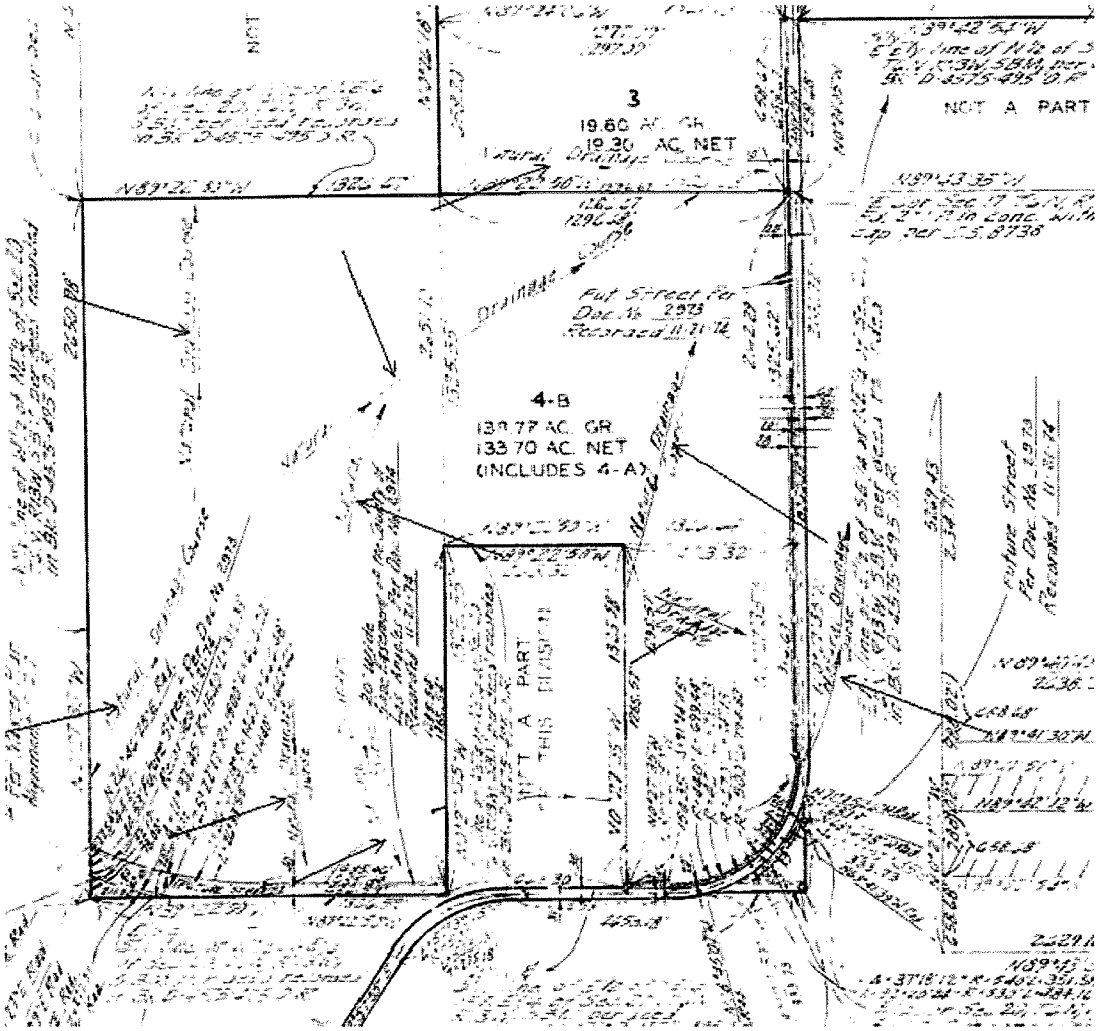
Just on the other side of lot 112, in the Southeast corner of 3205-004-025, is a small pond. The pond gets its water from the Applicants property. The Applicant has proposed a change to the existing water flow and the drainage for the property will no longer will feed this species dependent pond. This pond drainage inlet

needs to be reviewed by the Lahotan Branch of the California Regional Water Quality Control Board and the water source for this pond needs to be protected.

Photograph of pond as seen from trail: May 2011

In the vicinity of the propo sed Water Tank Site is a natural spring. This is in th e area of the existing wat er tanks. The Tract Map does not indicate the spring on the map. This needs to be reviewed by the Lahotan Branch of the California Regional Water Quality Control Board and protected.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010



Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

Classic Approach to Clustering
We disagree with the way the cluste ring rule has b een applied to this proje ct including the layout, design and proposed implementation of this project. The plot plat allows for development and land disturbance over a large portion of the parcel and the "set aside" area is distributed throughout the project rather than setting aside one section of land as undisturbed as a separate site and deed restricted for conservation purposes. The following is an exam ple of clustering with dedicated open space in a higher density location in Los Angeles County.

Classical Clustering in a Higher Density Area
Note: No wildlife linkage in this example

Bioswales
Bioswales do not indicate the level of the comp action of the soil. For the bioswales to function correctly the soil compaction has to be less than that required for road and building pad designs. The Tract map does not define the type of soil required for the bioswale to function correctly. The bioswale should keep the runoff contained and contiguous properties should be protected. The traditio nal method of grading and compaction cannot be used in the bioswale areas. If the area of the bioswales is compacted along with the road and the building pads there will not be any percolation of the runoff.

Rural Character Errors
The density requested by the Developer is not in keeping with the existing rural character of Leona Valley. The Tract Map still indicates a gated and private subdivision. During the 2007 and the Feb 2011 Leona Valley public meetings in which the Developer presented the proposed subdivision, the residents indicated that the closed nature of a guarded, gated and private subdivision is not in keeping with Leona Valley's rural areas or open and friendly environment. The Developer did not listen to the public.

During the same Leo na Valley public meetings, the re sidents expressed numerous concerns over the private streets and the exit point of 87 th Street We st. The privat e streets are again contrary to a rural environment. As pe r the Antelope Valley Area Wide Plan (Page VI-21, d (1), "Wherever possible, access from adjacent interior streets should be prohibited." 87th Street, as an adjacent interior street, should not be an alternative exit poi nt for this project as alternati ves are available. The Developer did not listen to th e Leona Valley resid ents and ignored the Antelope Valley Area Wi de Plan by not chan ging the design for public streets. Removing the exit on 87th Street West is strongly recommended.

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

Appendix A

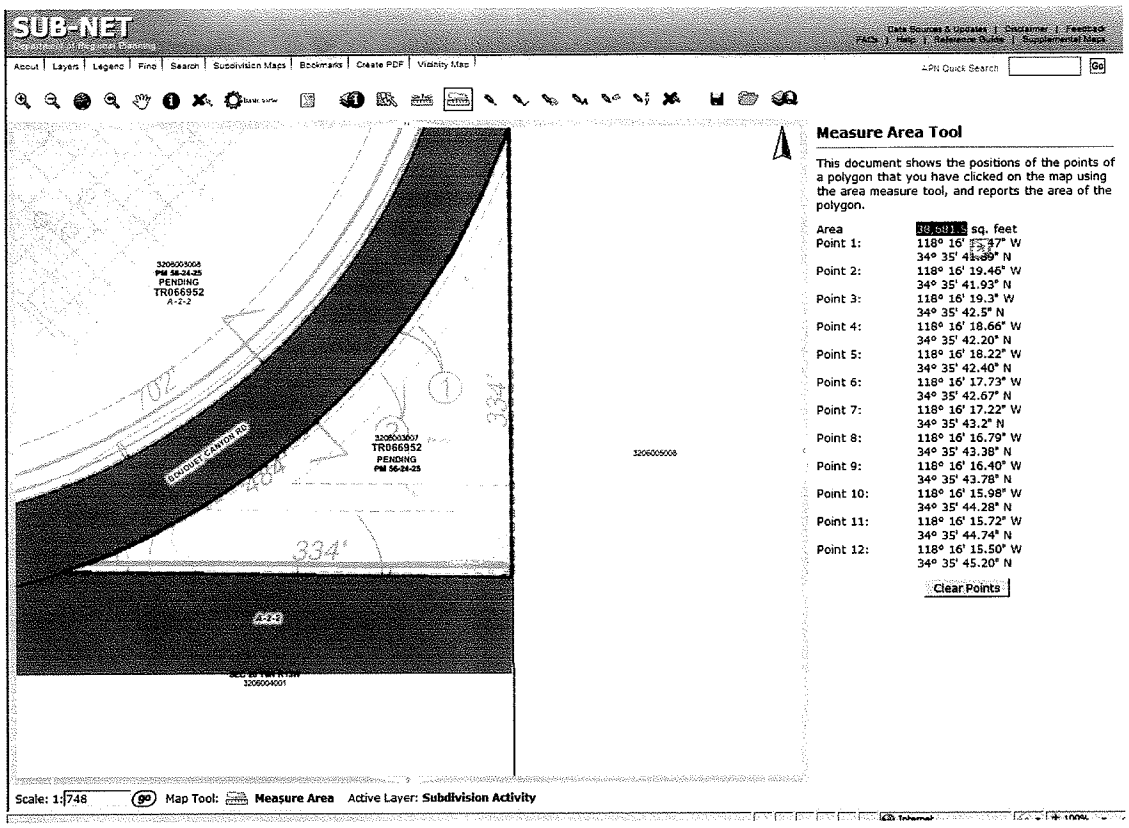
Details for: 3206003008

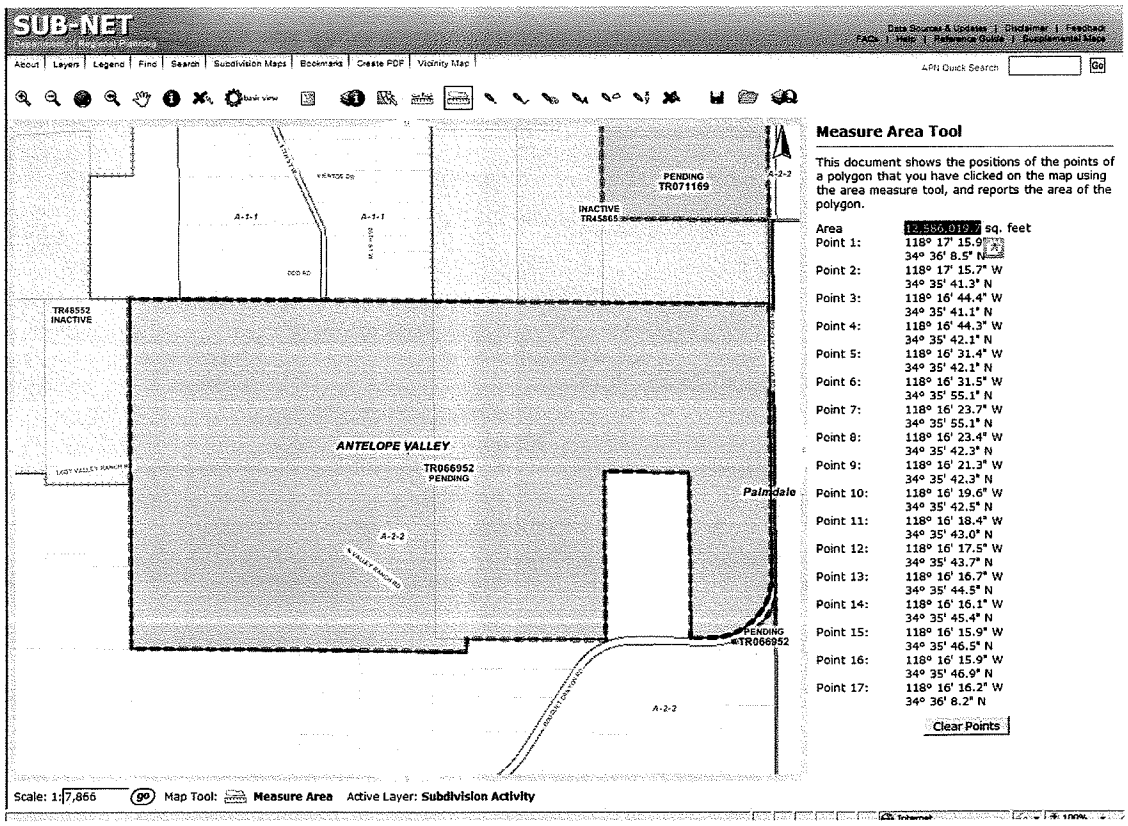
APN	3206003008
TRA Number	09587
Current Roll Year	2009
Current Land Value	726257
Improvement Year	2009
Improvement Value	0
Site Address	00000 VAC/80 STW/VIC BOUQUET CYN
City, State, and ZIP	ANAVERDE CA 935510000
Mailing Address	01901 AVE OF THE STARS STE 1100
City, State, and ZIP	LOS ANGELES CA 900670000
Recording Date	19900604
Zoning Code	LCA22*
Use Code	580V
Last Sale Amount	3000030
Last Sale Date	19870413
BLD1 Design Type	
BLD1 QCS	
BLD1 Year Built	0
BLD1 No. of Units	0
BLD1 No. of Bedrooms	0
BLD1 No. of Baths	0
BLD1 SQ Feet	0
Legal Description	*TR=PARCEL MAP AS PER BK 56 PG 24-25 OF
Legal Description (2nd)	P M LOT 4B
Assessor Map	View Image

Details for: 3206003001

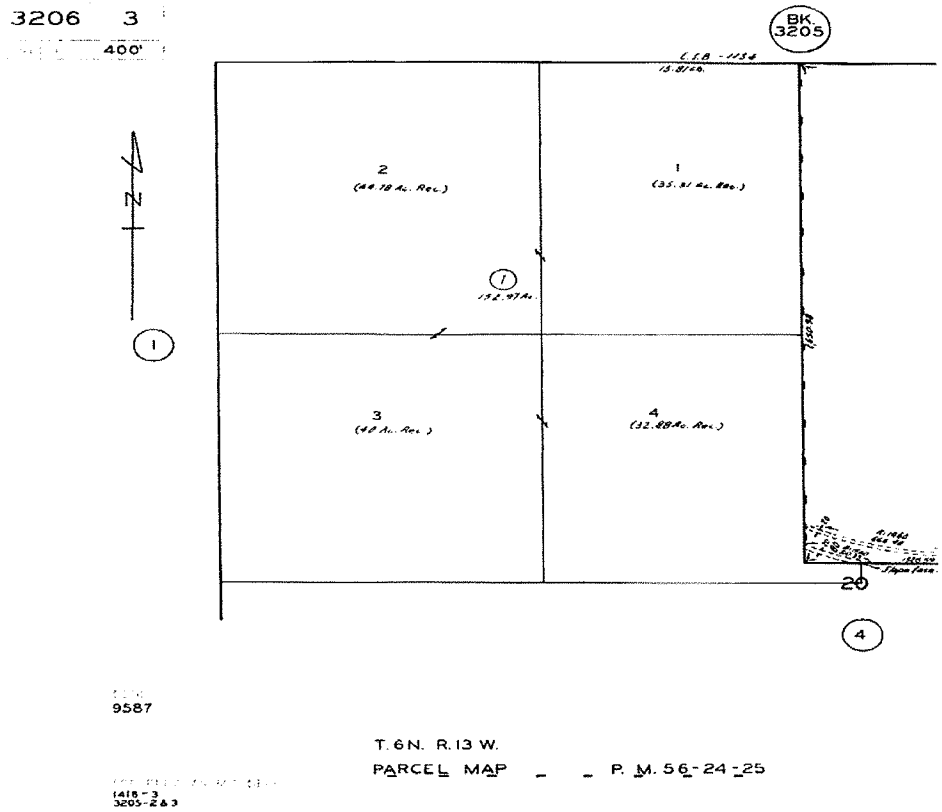
APN	3206003001
TRA Number	09587
Current Roll Year	2009
Current Land Value	1026217
Improvement Year	2009
Improvement Value	0
Site Address	00000 VAC/VIC AVE P/90 STW
City, State, and ZIP	ANAVERDE CA 935510000
Mailing Address	01901 AVE OF THE STARS STE 1100
City, State, and ZIP	LOS ANGELES CA 900670000
Recording Date	19900525
Zoning Code	LCA22*
Use Code	580V
Last Sale Amount	720007
Last Sale Date	19890925
BLD1 Design Type	
BLD1 QCS	
BLD1 Year Built	0
BLD1 No. of Units	0
BLD1 No. of Bedrooms	0
BLD1 No. of Baths	0
BLD1 SQ Feet	0
Legal Description	152.97 ACS LOTS 1,2,3,4 IN
Legal Description (2nd)	SEC 20 T 6N R 13W
Assessor Map	View Image

Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010





Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010



Subject: Valley Vineyards Drawing Errors
Reference: Vesting Tentative Tract Map No. 066952 dated June 4, 2010
CUP No. 2007=00038 Exhibit A Map Dated June 4, 2010

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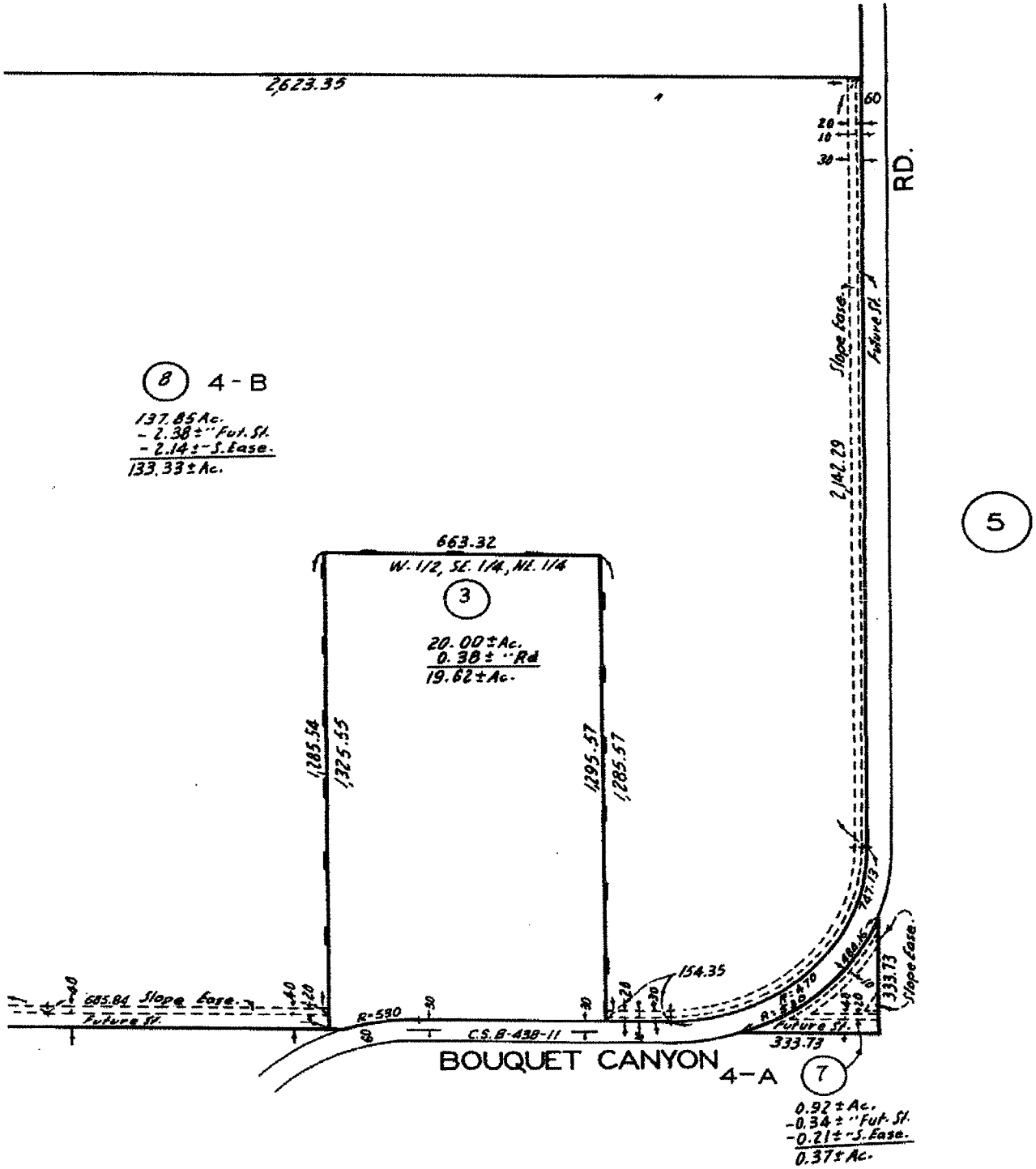


(2)

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

RECEIVED
JUN - 6 2011

May 30, 2011

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street
13th Floor
Los Angeles, California

Subject: Hazard Mitigation
Attachments: Southern California Scenario S2 and S21, District 5 Hazard Mitigation Workshop.

Dear Mr. Sackett:

The attached two San Andreas Scenarios are being used by the County of Los Angeles Office of Emergency Management (http://lacoa.org/) Hazard Mitigation Study. As can be read in the reports and seen in the data, Leona Valley will experience heave ground movement even when the epicenter is more than 140 kilometers away. However, as demonstrated by the 9012.07 Census Tract (2000), due to the low Dwelling Unit Density, the damage figures are light. As can be seen in the data, when the County is considering subdivision of properties in the Leona Valley area, they should use the lowest possible density to mitigate the hazards to life, property, economic impacts, emergency services and workload of the first responders.

Table 4. Southern California Scenario Earthquakes and Associated Economic Losses

	Scenario Earthquakes	M	Economic Losses ($M)		
			Buildings Related	Transportation System	Utility System
S2	San Andreas Fault – Southern M7.8	7.8	20,515	503	1,489
S21	San Andreas Fault – 1857	7.8	12,586	367	1,257

The data files can be found on the

California Geological Survey - 2010 Earthquake Loss Estimation
http://www.consrv.ca.gov/cgs/rghm/loss/Pages/2010_analysis.aspx

Southern California Scenario S2 can be found here:
ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/CalEMA2009//Appendix%20A/S2%20San%20Andreas%20Fault_Southern%20Scenario.pdf

Southern California Scenario S21 can be found here:
ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/CalEMA2009//Appendix%20A/S21%20San%20Andreas%20Fault%20-%201857%20Scenario.pdf

The 2010 Summary Document can be downloaded here:
ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/2011%20Annualized%20Losses/2011_Annualized_Summary.pdf

HAZUS Annualized Earthquake Loss Estimation for California

Rui Chen and Chris J. Wills
California Geological Survey
April 2011

Summary

Comprehensive estimation of the scale and extent of damage, social disruption, and economic losses due to potential earthquakes provides useful information for local and state officials in developing earthquake hazard mitigation strategies and preparing emergency response and recovery plans. Accurate loss estimation, however, is difficult to accomplish because of changing earthquake risk due to continuing development, particularly in earthquake-prone urban areas, and because of changes in input ground motion values from evolving knowledge in seismic hazard assessment. Significant research developments have occurred in the past few years in ground motion prediction, rupture source characterization, and our ability to more accurately account for the effects of near surface soil conditions on surface ground motions in probabilistic seismic hazard analyses (PSHA). This study evaluates the effects of these latest developments on annualized earthquake loss (AEL) estimation, using HAZUS-MH, a geographic information system-based multi-hazard (MH) loss estimation tool developed by the Federal Emergency Management Agency. AEL is a long term measure of earthquake risk. We also estimated annualized building related loss as percentage of the building replacement value, or annualized percent earthquake loss (APEL). Because it is normalized by the building replacement value, APEL is a better indicator of relative damage in different geographic areas than building-related loss. It is also a better indicator of how estimated relative earthquake losses have been changing over time.

Annualized loss estimation used probabilistic ground motions calculated using the United States Geological Survey (USGS) PSHA models developed for the 2008 Update of the United States National Seismic Hazard Maps and incorporating the effect of local soil conditions. The 2008 USGS PSHA models use Next Generation Attenuation (NGA) relations and the earthquake source parameters of the 2007 Working Group on California Earthquake Probabilities. AELs were estimated at three levels of geographic resolution: census tract, county, and Metropolitan Statistical Area (MSA). Our calculations show that the lower PSHA ground motions predicted by the NGAs translate directly to substantially lower annual earthquake loss estimations in California. Estimated annualized losses using PSHA ground motions incorporating site soil conditions are much higher than those assuming a uniform rock site condition.

We estimated the statewide average earthquake loss due to building damage to be approximately $2.8 billion per year, nearly 82% of this loss occurring in the top four MSAs with the highest estimated annual losses (Table 1). These MSAs are Los Angeles-Long Beach-Santa Ana, San Francisco-Oakland-Fremont, Riverside-San Bernardino-Ontario, and San Jose-Sunnyvale-Santa Clara. The ten counties with the highest seismic risk measured by estimated annualized earthquake loss are Los Angeles, Alameda, Santa Clara, Orange, San Bernardino, Riverside, Contra Costa, San Francisco, San Mateo, and Ventura. Los Angeles County tops the list with an estimated annual loss of nearly one third of statewide loss and more than 3.5 times the loss in the 2nd-ranking county, Alameda (Table 2). Statewide APEL is 0.103%. San Benito, Imperial, and Alameda Counties rank the top three in terms of APEL, reflecting the relatively high ground motion hazards in these areas. The distribution of estimated annual building losses on census tract level shows relatively higher values along the coast and in highly urbanized areas (Figure 1). On the other hand, higher APELs are estimated along the San Andreas Fault System, generally reflecting higher ground motion hazards (Figure 2). Estimated injuries are mostly not life threatening. Fatality, however, could occur with an estimated annual rate ranging from a few individuals in some high risk counties up to 30 individuals in Los Angeles County.

Table 1. Ten California Metropolitan Statistical Areas with the Highest Estimated Annualized Building Loss and the Highest Annualized Percent Building Loss

Rank	Area	AEL ($M)	% of State Total	Rank	MSA	APEL (%)
1	Los Angeles-Long Beach-Santa Ana	1102.8	39.0	1	El Centro	0.190
2	San Francisco-Oakland-Fremont	643.9	22.8	2	San Francisco-Oakland-Fremont	0.152
3	Riverside-San Bernardino-Ontario	316.4	11.2	3	San Jose-Sunnyvale-Santa Clara	0.146
4	San Jose-Sunnyvale-Santa Clara	243.5	8.6	4	Riverside-San Bernardino-Ontario	0.141
5	Oxnard-Thousand Oaks-Ventura	82.1	2.9	5	Oxnard-Thousand Oaks-Ventura	0.131
6	San Diego-Carlsbad-San Marcos	71.2	2.5	6	Santa Rosa-Petaluma	0.120
7	Santa Rosa-Petaluma	55.7	2.0	7	Los Angeles-Long Beach-Santa Ana	0.118
8	Santa Barbara-Santa Maria-Goleta	36.6	1.3	8	Santa Barbara-Santa Maria-Goleta	0.114
9	Sacramento-Arden-Arcade—Roseville	32.5	1.1	9	Santa Cruz-Watsonville	0.112
10	Vallejo-Fairfield	32.4	1.1	10	Napa	0.112

Table 2. Ten California Counties with the Highest Estimated Annualized Building Loss and the Highest Estimated Percent Building Loss

Rank	County	AEL ($M)	% of State Total	Rank	County	APEL Loss (%)
1	Los Angeles	903.1	31.9	1	San Benito	0.202
2	Alameda	247.9	8.8	2	Imperial	0.190
3	Santa Clara	235.4	8.3	3	Alameda	0.180
4	Orange	199.7	7.1	4	San Bernardino	0.155
5	San Bernardino	177.7	6.3	5	Humboldt	0.151
6	Riverside	138.7	4.9	6	San Mateo	0.146
7	Contra Costa	129.5	4.6	7	San Francisco	0.146
8	San Francisco	122.6	4.3	8	Santa Clara	0.144
9	San Mateo	111.2	3.9	9	Contra Costa	0.137
10	Ventura	82.1	2.9	10	Los Angeles	0.131

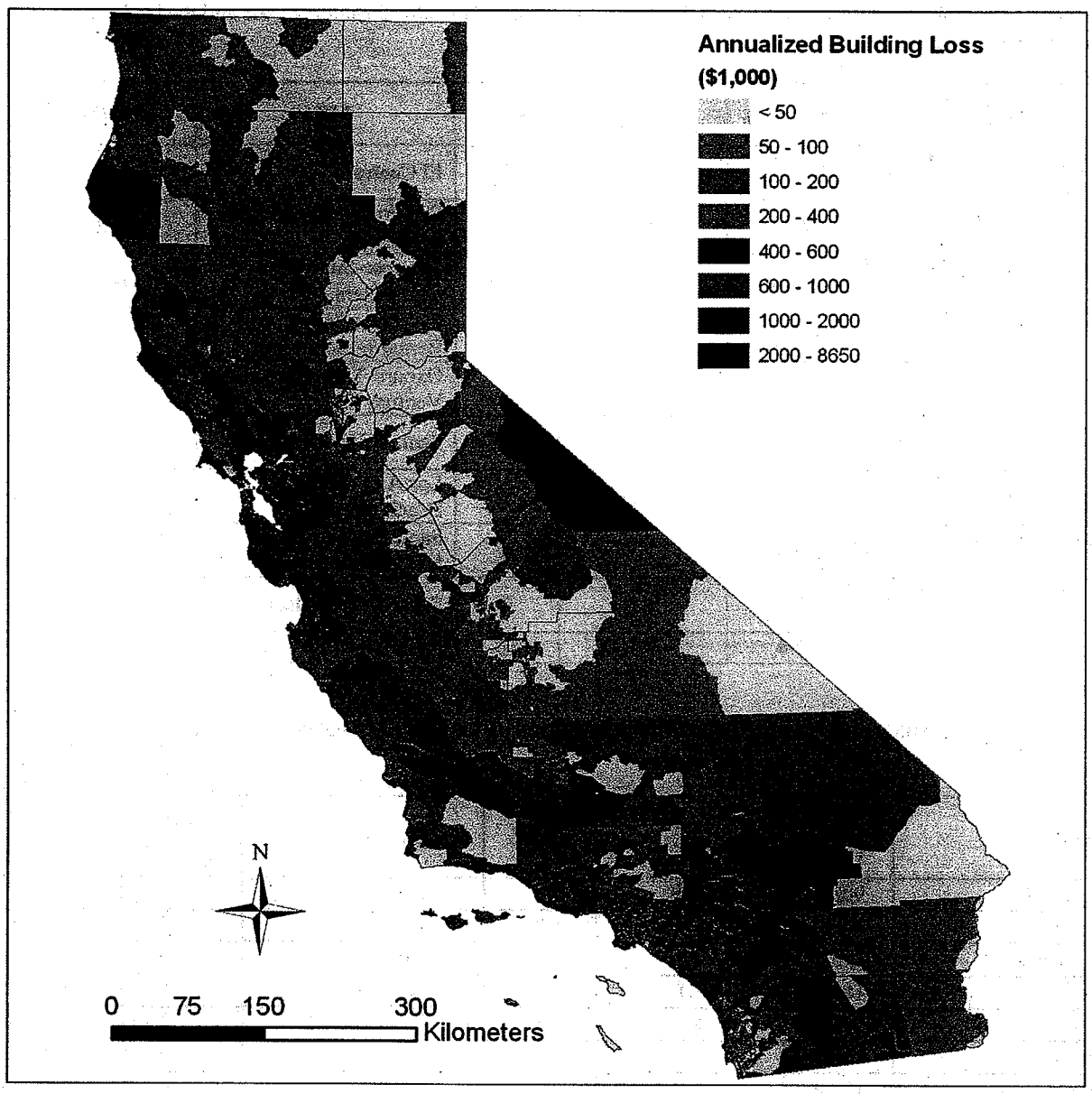


Figure 1. Distribution of seismic risk in California by estimated annualized building loss on census tract level based on ground motions calculated using the 2008 USGS PSHA models and incorporating site-specific V_{S30} values.

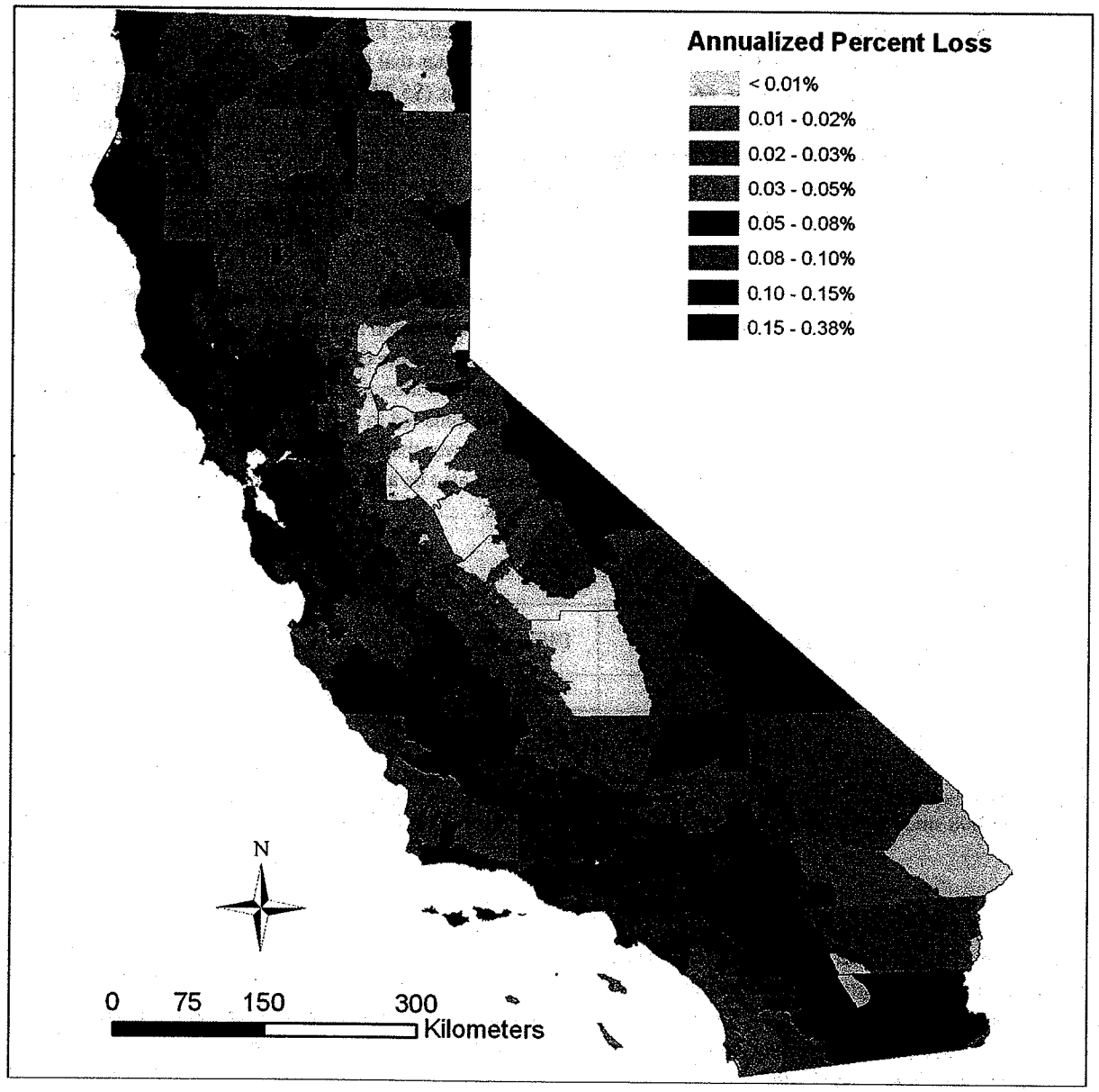


Figure 2. Distribution of estimated annualized building percent loss by census tract based on ground motions calculated using the 2008 USGS PSHA models and incorporating site-specific V_{S30} values.

An early study by FEMA (2008) using HAZUS default ground motions [i.e., the 2002 USGS PSHA data calculated using ground motion prediction equations (GMPE) and source models developed before 2003] indicates that the annualized earthquake loss to building stock in California is about $3.5 billion per year, 66 percent of the national loss ($5.3 billion). It estimated an APEL of 0.145% for California. California ranks number one in the nation in both estimated AEL and APEL. In a study conducted in 2005, CGS quantified annualized building-related losses using the PSHA ground motions similar to those used in the FEMA 2008 study. The 2005 study, however, used the HAZUS default data on built environment and demographics that are about 10 years older than the data used in both our current study and the FEMA 2008 study. The CGS 2005 study estimated an AEL of $2.2 billion and an APEL of 0.138 for California.

In comparison, our calculations yielded a statewide AEL that is about 19% lower than the FEMA 2008 estimation and 29% higher than the CGS 2005 estimation (see Table 3). We believe the difference between our estimation and that of the FEMA 2008 study is primarily due to the use of NGAs. The difference between our current estimate and that of the CGS 2005 study is attributed mainly to the compound effects of increase in building exposure and generally decreased ground motion predictions. Specifically, increase in building exposure led to increase in AEL, whereas decrease in ground motion predictions led to decrease in APEL. This postulation is supported by the comparison of APEL: our current APEL estimation is about 28% lower than the FEMA 2008 estimation and about 25% lower than the CGS 2005 estimation. To a lesser extent, these differences may also be attributed to the different methods used to incorporate site effects among the FEMA 2008, CGS 2005, and our current studies.

Table 3. Comparison of AELs and APELs from Various Studies

Study	Building Value ($M)	AEL ($M)	Difference[1] (%)	APEL (%)	Difference[1] (%)
CGS 2010	2,721,165	2,829	-	0.104	-
FEMA 2008	2,416,552[2]	3,504	-19.3	0.145	-28.3
CGS 2005	1,590,000	2,200	28.6	0.138	-24.9

[1]Difference is computed using Equation 4 in this report
[2]Building value for FEMA 2008 study is back calculated using AEL and APEL reported in FEMA (2008)

Conclusions

- Estimated AEL due to building damage is $2,829 million per year and estimated statewide APEL is 0.103%. Los Angeles County ranks the top on the county list with an estimated AEL of nearly one third of statewide loss.
- Generally lower ground motions predicted by the NGAs compared to older GMPEs translate to lower estimated statewide building loss (25% – 28% lower) as reflected by differences in estimated AELs from the current study and FEMA 2008 study; and by differences in estimated APELs between the current study and FEMA 2008 as well as CGS 2005 studies. On the other hand, increase in building exposure lead to increase in AEL as reflected by differences in estimated AELs from the current study and CGS 2005 study.
- Higher values of estimated annual building losses are distributed along the Pacific Coast and in highly urbanized areas, such as San Francisco Bay area and Los Angeles. Higher percent losses occur along the San Andreas Fault System, generally reflecting higher ground motion hazards.

Ground motion text files can be downloaded from CGS ftp site: ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/PSHA_2010/ or by clicking on the file names given below:

1. Convert_for_HazardMap160.out: ground motions for V_{S30} = 160 m/s
2. Convert_for_HazardMap216.out: ground motions for V_{S30} = 216 m/s
3. Convert_for_HazardMap287.out: ground motions for V_{S30} = 287 m/s
4. Convert_for_HazardMap377.out: ground motions for V_{S30} = 377 m/s
5. Convert_for_HazardMap489.out: ground motions for V_{S30} = 489 m/s
6. Convert_for_HazardMap609.out: ground motions for V_{S30} = 609 m/s
7. Convert_for_HazardMap760.out: ground motions for V_{S30} = 760 m/s

8. GMforHazardMap_ V_{S30}.out: ground motions incorporating grid point-specific V_{S30} values. In this file, ground motion values are zero at locations where V_{S30} is 0 (e.g., in water bodies).

The first seven files contain ground motions for the seven V_{S30} values and the last one contains ground motions incorporating grid-point V_{S30} values. Each file includes acceleration values for 4 spectra periods (peak ground acceleration and spectral accelerations at 0.2, 0.3, and 1.0 seconds) and 3 exceedance probability levels (2%, 5%, and 10% in 50 years).

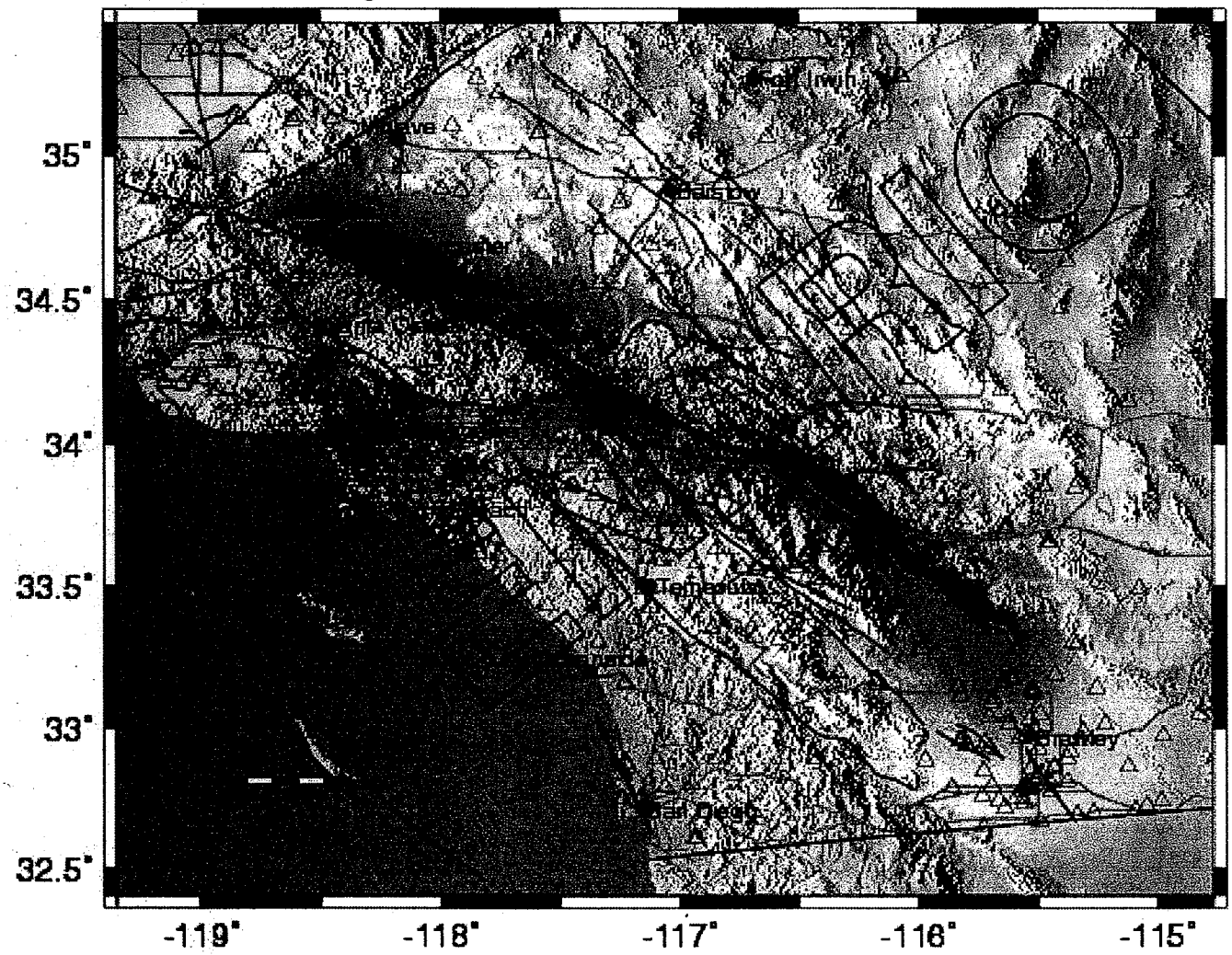
See CGS 2009 Study for a complete set of selected HAZUS scenario results. These results can also be viewed by clicking the scenario names in Table 4.

Table 4. List of CGS 2009 Scenario Earthquakes

Northern California Scenarios		Southern California Scenarios	
N1	SAF_SAS+SAP+SAN+SAO	S1	Verdugo Fault
N2	SAF_SAS+SAP+SAN	S2	San Andreas Fault – Southern M7.8
N3	SAF_SAP+SAN+SAO	S3	Chino Hills Fault
N4	SAF_SAS+SAP	S4	San Joce -Carro Prieto Fault
N5	SAF_SAS	S5	Hosgri Fault
N6	SAF_SAP	S6	Elsinore Fault (Julian)
N7	SAF_SAN+SAO	S7	North Channel Slope
N8	SAF_SAN	S8	Puente Hills Fault
N9	SAF_SAO	S9	San Joaquin Hills Fault
N10	HRC_HS	S10	Elsinore Fault
N11	HRC_HN	S11	Raymond Fault
N12	HRC_HS+HN	S12	Whittier Fault
N13	HRC_RC	S13	Imperial Valley Fault
N14	HRC_HN+RC	S14	San Andreas Fault – Coachella Valley
N15	HRC_HS+HN+RC	S15	San Andreas Fault – Southern M7.4
N16	CLV_CS	S16	San Jacinto Fault
N17	CLV_CC	S17	Newport – Inglewood Fault
N18	CLV_CS+CC	S18	Palos Verdes Fault
N19	CLV_CN	S19	Santa Monica Fault
N20	CLV_CC+CN	S20	Rose Canyon Fault
N21	CLV_CS+CC+CN	S21	San Andreas Fault – 1857
N22	CGV_CON		
N23	CGV_GVS	**UCERF 2-Based Scenarios**	
N24	CGV_CON+GVS	U1	SAF_CO
N25	CGV_GVN	U2	SJ_SBV+SJV+A+C
N26	CGV_GVS+GVN	U3	SJ_A+C
N27	CGV_CON+GVS+GVN	U4	HRC_RC+HN+HS
N28	SGF_SGS	U5	HRC_RC
N29	SGF_SGN	U6	SAF_SAO+SAN+SAP+SAS
N30	SGF_SGS+SGN	U7	SAF_SAP+SAS
N31	GNV_GS	U8	Imperial
N32	GNV_GN	U9	Palos Verdes
N33	GNV_GS+GN	U10	Newport-Inglewood
N34	MTD		
N35	GV		

-- Earthquake Planning Scenario --
ShakeMap for Saf South7.8 Scenario

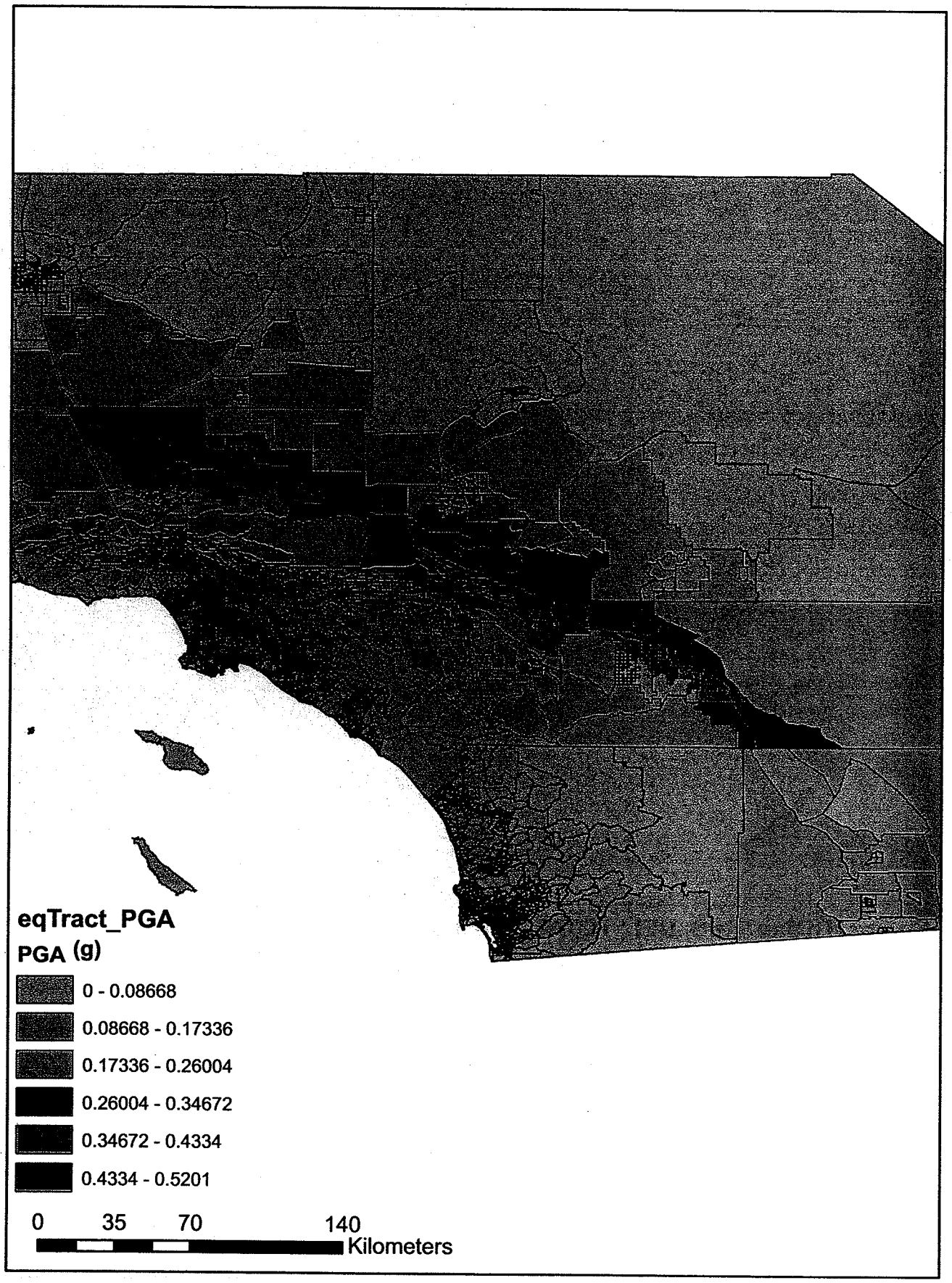
Scenario Date: Thu Aug 3, 2006 05:00:00 AM PDT M 7.8 N33.92 W116.47 Depth: 10.0km



PLANNING SCENARIO ONLY -- Map Version 1 Processed Thu Feb 8, 2007 11:47:37 AM PST

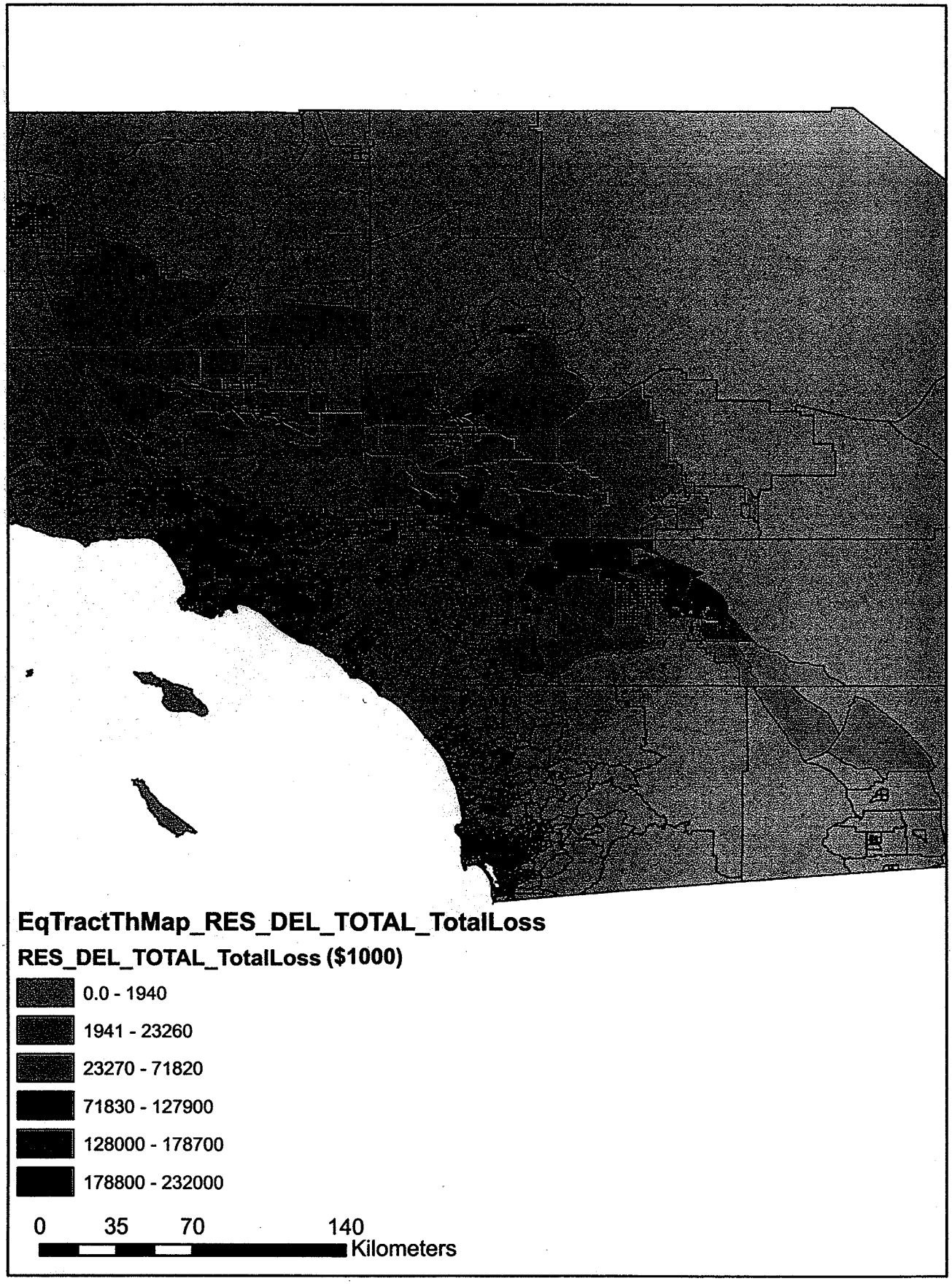
PERCEIVED SHAKING	Not felt	Weak	Light	Moderate	Strong	Very strong	Severe	Violent	Extreme
POTENTIAL DAMAGE	none	none	none	Very light	Light	Moderate	Moderate/Heavy	Heavy	Very Heavy
PEAK ACC.(%g)	<.17	.17-1.4	1.4-3.9	3.9-9.2	9.2-18	18-34	34-65	65-124	>124
PEAK VEL.(cm/s)	<0.1	0.1-1.1	1.1-3.4	3.4-8.1	8.1-16	16-31	31-60	60-116	>116
INSTRUMENTAL INTENSITY	I	II-III	IV	V	VI	VII			

Peak Ground Acceleration by Census Tract



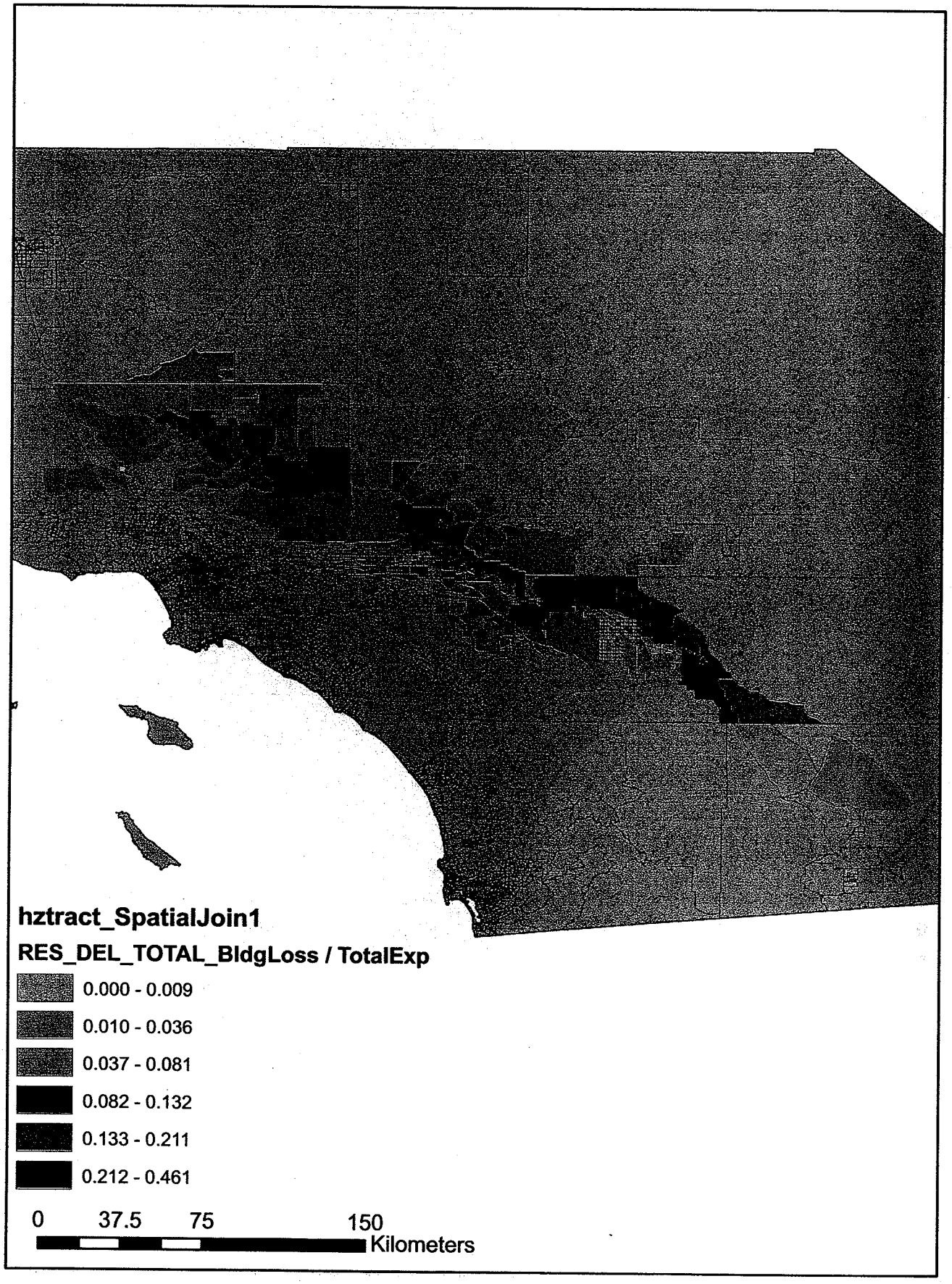
S2 San Andreas Fault - Southern Scenario M 7.8

Total Building Loss by Census Tract



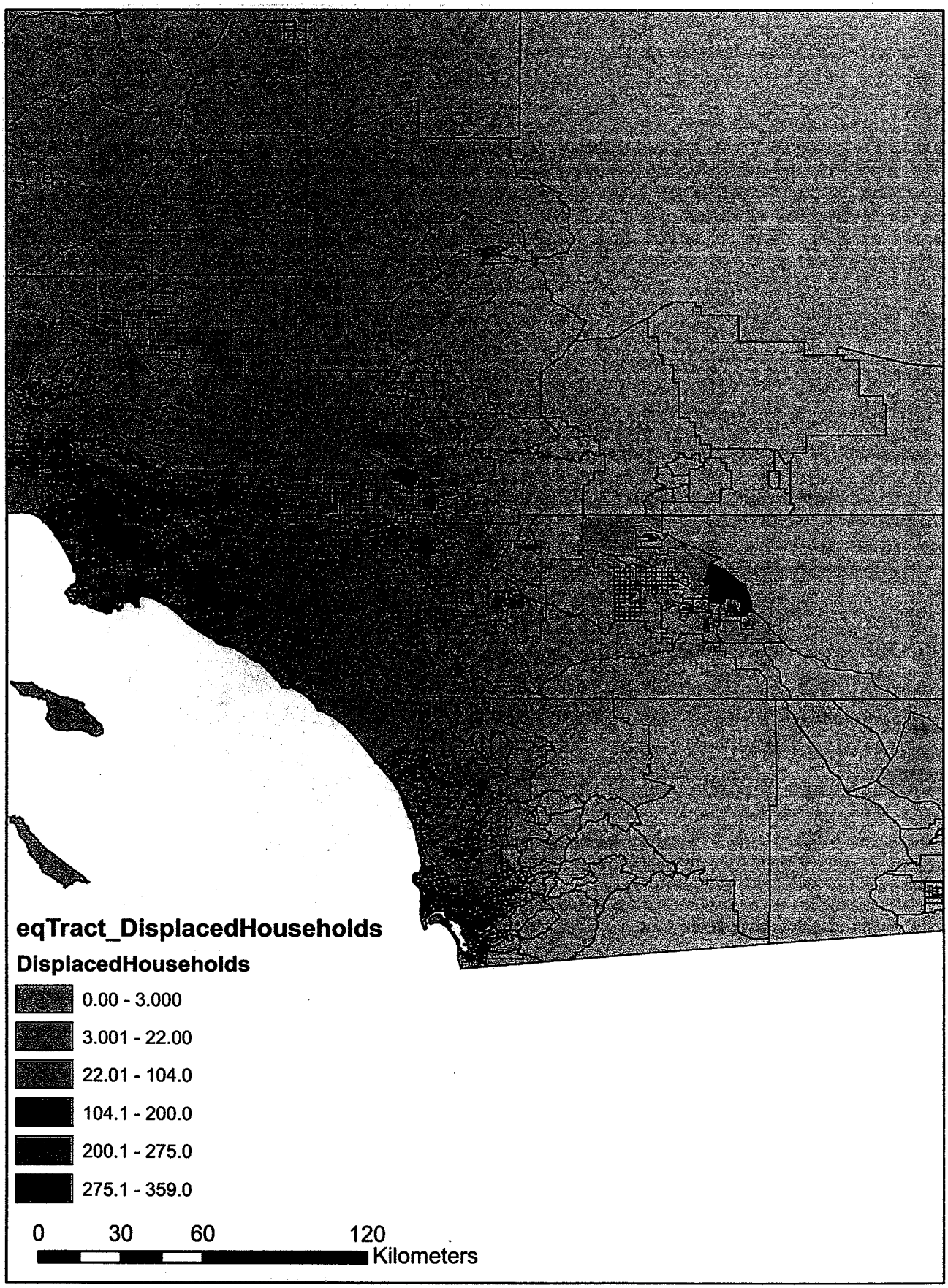
S2 San Andreas Fault - Southern Scenario M 7.8

Building Loss Ratio by Census Tract



S2 San Andreas Fault - Southern Scenario M 7.8

Displaced Households by Census Tract



Name	CountyName	Owner	DamHeight	MaxStorage	PGA	PGV	Sa03	Sa10
WIDE CANYON	RIVERSIDE	RIVERSIDE COUNTY FCWCD	84.00	0.00	0.480	44.000	1.040	1.200
LAKE CUYAMACA	SAN DIEGO	LAKE CUYAMACA REC & PARK	17.00	5600.00	0.480	44.000	1.040	1.200
CUYAMACA	SAN DIEGO	HELIX WATER DISTRICT	40.00	17540.00	0.480	44.000	1.040	1.200
FAIRMONT	LOS ANGELES	CITY OF LOS ANGELES	121.00	9082.00	0.520	44.000	1.120	1.160
LITTLE MOUNTAIN	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	28.00	150.00	0.480	40.000	1.040	1.080
WIGGINS NO 2	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	19.00	284.00	0.520	40.000	1.120	1.040
DEVILS CAN DYKE	SAN BERNARDINO	CITY OF SAN BERNARDINO	15.00	119.00	0.520	40.000	1.120	1.040
AMARGOSA CREEK	LOS ANGELES	CITY OF PALMDALE	65.00	1976.00	0.520	40.000	1.120	1.040
SMALL CANYON	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	68.00	36.00	0.480	36.000	1.080	0.960
HAROLD RESERVOIR	LOS ANGELES	PALMDALE WATER DISTRICT	30.00	7200.00	0.520	32.000	1.080	0.920
PERRIS HILL RES	SAN BERNARDINO	CITY OF SAN BERNARDINO	31.00	32.00	0.400	28.000	0.880	0.800
EAST SIDE DETENTION DIKE NO. 1	RIVERSIDE	DOI BR	0.00	21000.00	0.400	28.000	0.840	0.720
WEST SIDE DETENTION DIKE NO. 2	RIVERSIDE	DOI BR	26.00	630.00	0.400	28.000	0.840	0.720
WEST SIDE DETENTION DIKE NO. 4	RIVERSIDE	DOI BR	37.00	4900.00	0.400	28.000	0.840	0.720
MIN HOT SPRINGS L	SAN BERNARDINO	CAMPUS CRUSADE FOR CHRIST	54.00	45.00	0.440	28.000	1.000	0.720
YUCAIPA NO 3	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	35.00	47.00	0.400	24.000	0.880	0.680
YUCAIPA NO 2	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	49.00	170.00	0.400	24.000	0.880	0.680
YUCAIPA NO 1	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	42.00	152.00	0.400	24.000	0.880	0.680
SAN VICENTE STO POND	SAN DIEGO	RAMONA MUN WATER DISTRICT	30.00	161.00	0.360	24.000	0.760	0.680
PEARBLOSSOM SP BN	LOS ANGELES	STATE DEPT OF WATER RESOU	20.00	142.00	0.320	24.000	0.680	0.640
TAHCHEVAH	RIVERSIDE	RIVERSIDE COUNTY FCWCD	42.00	1720.00	0.320	20.000	0.680	0.600
DAY CREEK DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	90.00	0.00	0.400	24.000	0.880	0.600
DEER CANYON DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	78.00	147.00	0.400	24.000	0.880	0.600
SAN ANTONIO DAM	LOS ANGELES	CESPL	160.00	11880.00	0.400	24.000	0.880	0.600
LAKE GREGORY	SAN BERNARDINO	SAN BERNARDINO CO REG PK	90.00	3360.00	0.440	20.000	0.920	0.560
TAHQUITZ CR DEBRIS	RIVERSIDE	RIVERSIDE COUNTY FCWCD	32.00	0.00	0.280	16.000	0.600	0.480
DIAMOND VALLEY LAKE	RIVERSIDE	METROPOLITAN WATER DIST	284.00	0.00	0.360	16.000	0.720	0.480
GOODHART CAN DTN BN	RIVERSIDE	METROPOLITAN WATER DIST	15.00	0.00	0.360	16.000	0.720	0.480
BOUQUET CANYON	LOS ANGELES	CITY OF LOS ANGELES	190.00	46405.00	0.280	16.000	0.600	0.440
ALTA LOMA BASIN 1	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	30.00	185.00	0.280	16.000	0.520	0.400
ALTA LOMA BASIN 2	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	22.00	85.00	0.280	16.000	0.520	0.400
DEMENS CR DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	35.00	133.00	0.280	16.000	0.520	0.400
FAIRMONT NO 2	LOS ANGELES	CITY OF LOS ANGELES	24.00	0.00	0.320	16.000	0.680	0.400
SCHOOLHOUSE DB	LOS ANGELES	LOS ANGELES COUNTY DPW	38.00	0.00	0.200	12.000	0.400	0.360
JURUPA BASIN	SAN BERNARDINO	COUNTY OF SAN BERNARDINO	0.00	0.00	0.240	12.000	0.440	0.360

GREEN VAL LAKE	SAN BERNARDINO	GREEN VALLEY MUTUAL WATER	56.00	316.00	0.320	16.000	0.640	0.360
DRY CANYON	LOS ANGELES	CITY OF LOS ANGELES	66.00	1660.00	0.280	12.000	0.560	0.360
DRINKWATER	LOS ANGELES	CITY OF LOS ANGELES	105.00	112.00	0.280	12.000	0.560	0.360
MOJAVE DAM	SAN BERNARDINO	CESPL	200.00	179400.00	0.320	16.000	0.640	0.360
DESILTING BASIN 6	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	22.00	0.00	0.240	12.000	0.440	0.320
SINALOA	VENTURA	SINALOA LAKE OWNERS ASSOC	30.00	0.00	0.200	12.000	0.360	0.320
LOS ANGELES RES	LOS ANGELES	CITY OF LOS ANGELES	130.00	11800.00	0.200	12.000	0.320	0.320
CUCAMONGA CR DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	60.00	1170.00	0.240	12.000	0.440	0.320
WEST SIDE DETENTION DIKE NO. 3	RIVERSIDE	DOI BR	19.00	1300.00	0.240	12.000	0.480	0.320
LOWER SAN FERNANDO	LOS ANGELES	CITY OF LOS ANGELES	125.00	12000.00	0.200	12.000	0.320	0.320
UPPER SAN FERNANDO	LOS ANGELES	CITY OF LOS ANGELES	82.00	2388.00	0.200	12.000	0.320	0.320
CHANNEL DIV DIKE	LOS ANGELES	CITY OF LOS ANGELES	42.00	662.00	0.200	12.000	0.320	0.320
YARNELL DEBR BN	LOS ANGELES	CITY OF LOS ANGELES	42.00	216.00	0.200	12.000	0.320	0.320
L VAN NORMAN BYPASS	LOS ANGELES	CITY OF LOS ANGELES	78.00	280.00	0.200	12.000	0.320	0.320
PIGEON PASS	RIVERSIDE	RIVERSIDE COUNTY FCWCD	36.00	1400.00	0.240	12.000	0.440	0.320
GRASS VALLEY	SAN BERNARDINO	ARROWHEAD LAKE ASSOCIATIO	35.00	505.00	0.280	12.000	0.560	0.320
LAKE ARROWHEAD	SAN BERNARDINO	ARROWHEAD LAKE ASSOCIATIO	190.00	56400.00	0.280	12.000	0.560	0.320
BEAR VALLEY	SAN BERNARDINO	BIG BEAR MUNICIPAL WD	80.00	74000.00	0.280	12.000	0.600	0.320
CEDAR LAKE	SAN BERNARDINO	FIRST CONGR CHURCH OF LA	28.00	37.00	0.280	12.000	0.600	0.320
GLEN MARTIN	SAN BERNARDINO	GLEN MARTIN PROPERTIES CO	55.00	46.00	0.280	12.000	0.600	0.320
NEW L ARROWHEAD	SAN BERNARDINO	COUNTY OF SAN BERNARDINO	225.00	2270.00	0.280	12.000	0.560	0.320
LITTLEROCK	LOS ANGELES	LITTLE ROCK CREEK ID	124.00	3700.00	0.240	12.000	0.520	0.320
CASTAIC	LOS ANGELES	STATE DEPT OF WATER RESOU	340.00	365000.00	0.280	12.000	0.560	0.320
SEVEN OAKS DAM	SAN BERNARDINO	CESPL	550.00	145600.00	0.280	12.000	0.600	0.320
Bear Creek Diversion	San Bernardino	Southern California Ediso	7.80	103.00	0.280	12.000	0.600	0.320
Santa Felicia	Ventura	United Water Conservation	213.00	88000.00	0.200	12.000	0.360	0.320
Elderberry Forebay	Los Angeles	Los Angeles, City of	180.00	28200.00	0.280	12.000	0.560	0.320
Cedar Springs	Los Angeles	California Department of	203.00	75000.00	0.280	12.000	0.560	0.320
San Gabriel	Los Angeles	San Gabriel Hydroelectric	320.00	44600.00	0.280	12.000	0.600	0.320
SALTON SEA DIKE	IMPERIAL	DOI FWS	18.00	0.00	0.200	12.000	0.440	0.320
MARSHBURN RETD BN	ORANGE	COUNTY OF ORANGE	27.00	0.00	0.160	12.000	0.280	0.280
GALIVAN RETD BASIN	ORANGE	COUNTY OF ORANGE	20.00	0.00	0.160	12.000	0.280	0.280
ORCHARD ESTATES RETD BN	ORANGE	COUNTY OF ORANGE	21.00	0.00	0.160	12.000	0.280	0.280
HANSEN RECREATIONAL LAKE	LOS ANGELES	CITY OF LOS ANGELES	50.00	0.00	0.160	12.000	0.280	0.280
DECLEZ DETENTION	RIVERSIDE	SAN BERNARDINO CO FC DIST	30.00	480.00	0.200	12.000	0.400	0.280
WEYMOUTH MEM RES	LOS ANGELES	METROPOLITAN WATER DIST	18.00	184.00	0.200	12.000	0.360	0.280

PORTER ESTATE	LOS ANGELES	PORTER RANCH DEVELOPMENT	41.00	240.00	0.160	8.000	0.280	0.240
CHATSWORTH	LOS ANGELES	CITY OF LOS ANGELES	45.00	18486.00	0.160	8.000	0.280	0.240
ELYSIAN	LOS ANGELES	CITY OF LOS ANGELES	71.00	187.00	0.160	8.000	0.280	0.240
HANSEN DAM	LOS ANGELES	CESPL	97.00	44990.00	0.160	8.000	0.280	0.240
LOPEZ DAM	LOS ANGELES	CESPL	50.00	209.00	0.160	8.000	0.320	0.240
SANTA FE DAM	LOS ANGELES	CESPL	92.00	45409.00	0.160	8.000	0.320	0.240
MOCKINGBIRD CAN	RIVERSIDE	CITY OF RIVERSIDE	74.00	2905.00	0.160	8.000	0.320	0.240
FOSTER	RIVERSIDE	IDYLLWILD CO WATER DIST	38.00	0.00	0.200	8.000	0.440	0.240
BIG DALTON	LOS ANGELES	LOS ANGELES COUNTY DPW	153.00	1331.00	0.200	8.000	0.440	0.240
YORBA	ORANGE	COUNTY OF ORANGE	45.00	1722.00	0.160	8.000	0.240	0.240
SAWPIT DB	LOS ANGELES	LOS ANGELES COUNTY DPW	82.00	273.00	0.160	8.000	0.320	0.240
SANTA ANITA DB	LOS ANGELES	LOS ANGELES COUNTY DPW	56.00	386.00	0.160	8.000	0.320	0.240
LA TUNA DB	LOS ANGELES	LOS ANGELES COUNTY DPW	47.00	384.00	0.160	8.000	0.320	0.240
BAILEY DB	LOS ANGELES	LOS ANGELES COUNTY DPW	43.00	65.00	0.160	8.000	0.320	0.240
LIVE OAK RES	LOS ANGELES	METROPOLITAN WATER DIST	105.00	0.00	0.200	8.000	0.360	0.240
GARVEY RES	LOS ANGELES	METROPOLITAN WATER DIST	160.00	1850.00	0.160	8.000	0.280	0.240
LIVE OAK	LOS ANGELES	LOS ANGELES COUNTY DPW	76.00	330.00	0.200	8.000	0.360	0.240
SAN DIMAS	LOS ANGELES	LOS ANGELES COUNTY DPW	131.00	1849.00	0.200	8.000	0.440	0.240
SAWPIT	LOS ANGELES	LOS ANGELES COUNTY DPW	150.00	914.00	0.160	8.000	0.320	0.240
SIERRA MADRE	LOS ANGELES	LOS ANGELES COUNTY DPW	69.00	64.00	0.160	8.000	0.320	0.240
THOMPSON CREEK	LOS ANGELES	LOS ANGELES COUNTY DPW	66.00	1042.00	0.200	8.000	0.360	0.240
PUDDINGSTONE DIV	LOS ANGELES	LOS ANGELES COUNTY DPW	34.00	514.00	0.200	8.000	0.360	0.240
COGSWELL	LOS ANGELES	LOS ANGELES COUNTY DPW	266.00	12234.00	0.200	8.000	0.440	0.240
MORRIS	LOS ANGELES	METROPOLITAN WATER DIST	245.00	34000.00	0.200	8.000	0.440	0.240
PERRIS	RIVERSIDE	STATE DEPT OF WATER RESOU	130.00	154852.00	0.200	8.000	0.360	0.240
MIRAMAR	SAN DIEGO	CITY OF SAN DIEGO	165.00	8250.00	0.200	8.000	0.360	0.240
VAN NUYS RESERV	LOS ANGELES	SAN GABRIEL COUNTY WD	23.00	0.00	0.160	8.000	0.280	0.240
MORGAN DEBRIS BN	LOS ANGELES	LOS ANGELES COUNTY DPW	37.00	36.00	0.200	8.000	0.360	0.240
PRADO DAM	RIVERSIDE	CESPL	106.00	295581.00	0.160	8.000	0.280	0.240
Devil Canyon Second Afterbay	San Bernardino	California Department of	40.00	800.00	0.200	8.000	0.440	0.240
OLIVE HILLS RES	ORANGE	CITY OF ANAHEIM	140.00	220.00	0.120	8.000	0.240	0.200
METZ ROAD DB	RIVERSIDE	RIVERSIDE COUNTY FCWCD	12.00	154.00	0.160	8.000	0.280	0.200
GREYSTONE RES	LOS ANGELES	CITY OF BEVERLY HILLS	75.00	61.00	0.120	8.000	0.240	0.200
RESERVOIR NO 4	LOS ANGELES	CITY OF BURBANK	38.00	38.00	0.160	8.000	0.240	0.200
SILVER LAKE	LOS ANGELES	CITY OF LOS ANGELES	43.00	2758.00	0.160	8.000	0.240	0.200
ANTELOPE	KERN	TEHACHAPI-CUMMINGS CO WD	57.00	996.00	0.120	8.000	0.240	0.200

JURUPA BASIN	RIVERSIDE	RIVERSIDE COUNTY FCWCD	22.00	291.00	0.160	8.000	0.360	0.200
LAKE HEMET	RIVERSIDE	LAKE HEMET MUN WATER DIST	135.00	19112.00	0.160	8.000	0.280	0.200
RANCHO CIELITO	SAN BERNARDINO	ROLLING RIDGE RANCH	9.00	160.00	0.160	8.000	0.280	0.200
CHINO RANCH NO 1	SAN BERNARDINO	CITY OF INDUSTRY URBAN DE	22.00	249.00	0.160	8.000	0.280	0.200
LITTLE DALTON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	71.00	360.00	0.160	8.000	0.320	0.200
SIERRA MADRE VI	LOS ANGELES	LOS ANGELES COUNTY DPW	50.00	200.00	0.160	8.000	0.280	0.200
BIG DALTON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	59.00	0.00	0.160	8.000	0.320	0.200
DUNN RANCH	RIVERSIDE	AGRI-EMPIRE,A CALIF CORP	44.00	126.00	0.160	8.000	0.280	0.200
30 MG CENTRAL RES	ORANGE	CITY OF BREA	30.00	94.00	0.160	8.000	0.280	0.200
MORRIS S JONES	LOS ANGELES	PASADENA DEPT WATER & POW	49.00	184.00	0.160	8.000	0.280	0.200
DIEMER RESERVOIR	ORANGE	METROPOLITAN WATER DIST	22.00	98.00	0.160	8.000	0.280	0.200
ORANGE CO RES	ORANGE	METROPOLITAN WATER DIST	103.00	240.00	0.160	8.000	0.280	0.200
PUDDINGSTONE	LOS ANGELES	LOS ANGELES COUNTY DPW	147.00	22232.00	0.160	8.000	0.280	0.200
EATON WASH DB	LOS ANGELES	LOS ANGELES COUNTY DPW	63.00	1501.00	0.160	8.000	0.280	0.200
DIEMER NO 8	ORANGE	METROPOLITAN WATER DIST	172.00	22.00	0.160	8.000	0.280	0.200
LAGUNA REG BASIN	LOS ANGELES	LOS ANGELES COUNTY DPW	43.00	568.00	0.160	8.000	0.240	0.200
RUBIO DB	LOS ANGELES	LOS ANGELES COUNTY DPW	64.00	345.00	0.160	8.000	0.280	0.200
ARUNDELL BARRANCA	VENTURA	VENTURA COUNTY FCD	57.00	0.00	0.120	8.000	0.200	0.200
BREA DAM	ORANGE	CESPL	87.00	7420.00	0.120	8.000	0.240	0.200
CARBON CANYON DAM	ORANGE	CESPL	99.00	12063.00	0.160	8.000	0.280	0.200
FULLERTON DAM	ORANGE	CESPL	46.00	1342.00	0.160	8.000	0.240	0.200
SEPULVEDA DAM	LOS ANGELES	CESPL	57.00	27563.00	0.160	8.000	0.240	0.200
WHITTIER NARROWS DAM	LOS ANGELES	CESPL	56.00	66702.00	0.160	8.000	0.240	0.200
L PETERS CAN RB	ORANGE	COUNTY OF ORANGE	52.00	280.00	0.120	4.000	0.200	0.160
LAS LLAJAS	VENTURA	VENTURA COUNTY FCD	96.00	1650.00	0.120	4.000	0.240	0.160
VILLA PARK	ORANGE	COUNTY OF ORANGE	118.00	24900.00	0.120	4.000	0.200	0.160
LOWER SUNSET DB	LOS ANGELES	LOS ANGELES COUNTY DPW	86.00	74.00	0.160	8.000	0.240	0.160
STOUGH DB	LOS ANGELES	LOS ANGELES COUNTY DPW	46.00	102.00	0.160	8.000	0.240	0.160
BLANCHARD DB	LOS ANGELES	LOS ANGELES COUNTY DPW	35.00	51.00	0.160	8.000	0.280	0.160
RESERVOIR NO 1	LOS ANGELES	CITY OF BURBANK	35.00	23.00	0.160	8.000	0.240	0.160
RESERVOIR NO 5	LOS ANGELES	CITY OF BURBANK	36.00	83.00	0.160	8.000	0.240	0.160
10TH AND WESTER	LOS ANGELES	CITY OF GLENDALE	28.00	49.00	0.120	8.000	0.240	0.160
MULHOLLAND	LOS ANGELES	CITY OF LOS ANGELES	195.00	7236.00	0.120	4.000	0.240	0.160
UPPER HOLLYWOOD	LOS ANGELES	CITY OF LOS ANGELES	87.00	243.00	0.120	4.000	0.240	0.160
EAGLE ROCK	LOS ANGELES	CITY OF LOS ANGELES	113.00	291.00	0.120	4.000	0.240	0.160
LAKEVIEW	RIVERSIDE	RIVERSIDE COUNTY FCWCD	37.00	990.00	0.160	4.000	0.280	0.160

HAINES CANYON DEBRIS DAM	LOS ANGELES	CESPL	70.00	15.00	0.120	4.000	0.240	0.160
MARY STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	40.00	570.00	0.160	4.000	0.280	0.160
SYCAMORE	RIVERSIDE	RIVERSIDE COUNTY FCWCD	63.00	1510.00	0.160	8.000	0.320	0.160
WOODCREST	RIVERSIDE	RIVERSIDE COUNTY FCWCD	44.00	0.00	0.160	4.000	0.280	0.160
WALNUT CANYON	ORANGE	CITY OF ANAHEIM	187.00	2796.00	0.120	8.000	0.240	0.160
PRENDA	RIVERSIDE	RIVERSIDE COUNTY FCWCD	44.00	291.00	0.160	4.000	0.280	0.160
WILSON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	54.00	0.00	0.160	8.000	0.320	0.160
OAK STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	36.00	400.00	0.120	8.000	0.240	0.160
MABEY CANYON	RIVERSIDE	RIVERSIDE COUNTY FCWCD	46.00	111.00	0.120	4.000	0.240	0.160
HENRY J MILLS RES	RIVERSIDE	METROPOLITAN WATER DIST	23.00	103.00	0.160	8.000	0.320	0.160
BIG SANTA ANITA	LOS ANGELES	LOS ANGELES COUNTY DPW	225.00	1028.00	0.160	4.000	0.280	0.160
EAST SIDE DETENTION DIKE NO. 2	RIVERSIDE	DOI BR	0.00	18000.00	0.120	4.000	0.200	0.160
BIG TUJUNGA NO	LOS ANGELES	LOS ANGELES COUNTY DPW	208.00	7023.00	0.160	8.000	0.320	0.160
PACOIMA	LOS ANGELES	LOS ANGELES COUNTY DPW	365.00	9251.00	0.160	8.000	0.320	0.160
HENRY J MILLS # 2	RIVERSIDE	METROPOLITAN WATER DIST	34.00	0.00	0.160	8.000	0.320	0.160
HJ MILLS RECLAM	RIVERSIDE	METROPOLITAN WATER DIST	48.00	0.00	0.160	8.000	0.320	0.160
RIVIERA RESERVOIR	LOS ANGELES	CITY OF SANTA MONICA	40.00	0.00	0.120	8.000	0.200	0.160
FERRO DEBRIS	VENTURA	VENTURA COUNTY FCD	45.00	63.00	0.120	4.000	0.200	0.160
AGUA CHINON	ORANGE	THE IRVINE COMPANY	41.00	525.00	0.120	4.000	0.200	0.160
EL TORO RES	ORANGE	EL TORO WATER DISTRICT	106.00	867.00	0.080	4.000	0.160	0.120
BORAX SOLAR EVAP	KERN	U S BORAX AND CHEMICAL CO	18.00	287.00	0.080	4.000	0.160	0.120
AGUA TIBIA	SAN DIEGO	ALBERT S BRADFORD	35.00	0.00	0.080	4.000	0.160	0.120
PETERS CANYON	ORANGE	COUNTY OF ORANGE	54.00	1460.00	0.120	4.000	0.200	0.120
WHITTIER RES NO	LOS ANGELES	CITY OF WHITTIER	55.00	34.00	0.080	4.000	0.160	0.120
ENCINO	LOS ANGELES	CITY OF LOS ANGELES	168.00	12100.00	0.120	4.000	0.200	0.120
GREEN VERDUGO	LOS ANGELES	CITY OF LOS ANGELES	118.00	116.00	0.120	4.000	0.240	0.120
Henshaw	San Diego	Vista Irrigation District	123.00	50000.00	0.080	4.000	0.160	0.120
AMARGOSA CREEK	LOS ANGELES	CITY OF PALMDALE	65.00	0.00	0.080	4.000	0.160	0.120
FAIRMOUNT PARK	RIVERSIDE	CITY OF RIVERSIDE	12.00	330.00	0.080	4.000	0.160	0.120
HARRISON STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	50.00	350.00	0.080	4.000	0.160	0.120
BOX SPRINGS	RIVERSIDE	RIVERSIDE COUNTY FCWCD	49.00	630.00	0.080	4.000	0.160	0.120
ALESSANDRO	RIVERSIDE	RIVERSIDE COUNTY FCWCD	66.00	530.00	0.080	4.000	0.160	0.120
QUAIL VALLEY	RIVERSIDE	KAUFFMAN & BOARD OF SO CA	37.00	178.00	0.120	4.000	0.200	0.120
RAILROAD CANYON	RIVERSIDE	ELSINORE VALLEY MUNICIPAL	94.00	19367.00	0.120	4.000	0.200	0.120
SENIOR CANYON	VENTURA	SENIOR CANYON MUTUAL WATE	76.00	98.00	0.080	4.000	0.160	0.120
CHEVY CHASE 1290	LOS ANGELES	CITY OF GLENDALE	90.00	21.00	0.120	4.000	0.200	0.120

DEVILS GATE	LOS ANGELES	LOS ANGELES COUNTY DPW	103.00	5858.00	0.120	4.000	0.240	0.120
TEJON STORAGE 2	KERN	TEJON RANCH COMPANY	67.00	1051.00	0.120	4.000	0.240	0.120
WOOD RANCH	VENTURA	CALLEGUAS MUN WATER DIST	146.00	12700.00	0.120	4.000	0.200	0.120
EAST GLORIETTA	LOS ANGELES	CITY OF GLENDALE	22.00	78.00	0.120	4.000	0.200	0.120
SUNNYMEAD RANCH	RIVERSIDE	SUNNYMEAD RANCH COMM ASSO	41.00	540.00	0.080	4.000	0.160	0.120
LEE LAKE	RIVERSIDE	ELSINORE VALLEY MUNICIPAL	47.00	2800.00	0.120	4.000	0.200	0.120
J C JACOBSEN	KERN	TEHACHAPI-CUMMINGS CO WD	56.00	2420.00	0.120	4.000	0.240	0.120
BRAND DB	LOS ANGELES	LOS ANGELES COUNTY DPW	45.00	86.00	0.120	4.000	0.200	0.120
IRRIGATION RES	KERN	CITY OF BAKERSFIELD	22.00	6505.00	0.080	4.000	0.160	0.120
BORON TAILS PD 6	KERN	U S BORAX AND CHEMICAL CO	39.00	0.00	0.080	4.000	0.160	0.120
BORON TAILS PD 5	KERN	U S BORAX AND CHEMICAL CO	55.00	4887.00	0.080	4.000	0.160	0.120
BORON TAILS PD	KERN	U S BORAX AND CHEMICAL CO	25.00	0.00	0.080	4.000	0.160	0.120
EL CENTRO WPP	IMPERIAL	CITY OF EL CENTRO	13.00	251.00	0.120	4.000	0.200	0.120
AERATED LAGOON	KERN	CITY OF BAKERSFIELD	12.00	0.00	0.080	4.000	0.160	0.120
SYCAMORE CANYON	VENTURA	VENTURA COUNTY FCD	40.00	0.00	0.120	4.000	0.200	0.120
BLACKBURN	KERN	TEHACHAPI-CUMMINGS CO WD	48.00	1128.00	0.120	4.000	0.240	0.120
NORTH DIKE	IMPERIAL	DOI BR	57.00	17766.00	0.120	4.000	0.160	0.120
SENATOR WASH	IMPERIAL	DOI BR	90.00	17766.00	0.120	4.000	0.160	0.120
SQUAW LAKE DIKE	IMPERIAL	DOI BR	74.00	17766.00	0.120	4.000	0.160	0.120
MATHEWS	RIVERSIDE	METROPOLITAN WATER DIST	264.00	222400.00	0.120	4.000	0.240	0.120
BRAND PARK	LOS ANGELES	CITY OF GLENDALE	99.00	35.00	0.120	4.000	0.200	0.120
CHEVY CHASE	LOS ANGELES	CITY OF GLENDALE	38.00	54.00	0.120	4.000	0.200	0.120
DIEDERICH RES	LOS ANGELES	CITY OF GLENDALE	60.00	203.00	0.120	4.000	0.200	0.120
GLENOAKS 968 RES	LOS ANGELES	CITY OF GLENDALE	62.00	29.00	0.120	4.000	0.200	0.120
EASTSIDE	RIVERSIDE	METROPOLITAN WATER DIST	284.00	0.00	0.120	4.000	0.200	0.120
LANG RANCH RETD BN	VENTURA	THE LANG RANCH COMPANY	51.00	0.00	0.120	4.000	0.200	0.120
Kern Diversion	Kern	Southern California Ediso	60.00	247.00	0.120	4.000	0.240	0.120
Pyramid	Los Angeles	California Department of	400.00	171000.00	0.120	4.000	0.240	0.120
VAIL	RIVERSIDE	RANCHO CALIF WATER DISTRI	152.00	62000.00	0.120	4.000	0.200	0.120
SYPHON CANYON	ORANGE	THE IRVINE COMPANY	59.00	0.00	0.080	4.000	0.160	0.120
MATILIJA	VENTURA	VENTURA COUNTY FCD	163.00	1800.00	0.120	4.000	0.160	0.120
10 MG WALTERIA	LOS ANGELES	CITY OF TORRANCE	40.00	31.00	0.080	4.000	0.160	0.120
SULPHUR CREEK	ORANGE	COUNTY OF ORANGE	42.00	1065.00	0.080	4.000	0.160	0.120
UPPER OSO	ORANGE	SANTA MARGARITA WATER DIS	142.00	4470.00	0.080	4.000	0.160	0.120
18 MG WALTERIA	LOS ANGELES	CITY OF TORRANCE	31.00	61.00	0.080	4.000	0.160	0.120
SAND CANYON	ORANGE	IRVINE RANCH WATER DISTRI	58.00	1290.00	0.080	4.000	0.160	0.120

SAN JOAQUIN RES	ORANGE	IRVINE RANCH WATER DISTRI	224.00	3336.00	0.080	4.000	0.160	0.120
PALISADES RES	ORANGE	TRI CITIES MUN WATER DIST	146.00	147.00	0.080	4.000	0.160	0.120
HARBOR VIEW	ORANGE	COUNTY OF ORANGE	65.00	118.00	0.080	4.000	0.160	0.120
LAGUNA	ORANGE	THE IRVINE COMPANY	40.00	460.00	0.080	4.000	0.160	0.120
BONITA CANYON	ORANGE	THE IRVINE COMPANY	51.00	483.00	0.080	4.000	0.160	0.120
LAMBERT	ORANGE	THE IRVINE COMPANY	17.00	278.00	0.080	4.000	0.160	0.120
POTRERO	LOS ANGELES	WESTLAKE LAKE MANAGEMENT	40.00	1491.00	0.080	4.000	0.160	0.120
LINDERO	LOS ANGELES	LAKE LINDERO HOMEOWNERS A	19.00	180.00	0.120	4.000	0.200	0.120
CENTURY	LOS ANGELES	STATE DEPT OF PARKS AND R	44.00	190.00	0.080	4.000	0.160	0.120
VEEH	ORANGE	LAKE HILLS COMMUNITY CHUR	37.00	346.00	0.080	4.000	0.160	0.120
ROSSMOOR NO 1	ORANGE	EL TORO WATER DISTRICT	36.00	53.00	0.120	4.000	0.160	0.120
MALIBOU LK CLUB	LOS ANGELES	MALIBU LAKE MOUNTAIN CLUB	44.00	775.00	0.080	4.000	0.160	0.120
STEWART CAN DB	VENTURA	VENTURA COUNTY FCD	34.00	0.00	0.080	4.000	0.160	0.120
BIG CANYON	ORANGE	CITY OF NEWPORT BEACH	65.00	721.00	0.080	4.000	0.160	0.120
WESTLAKE RES	LOS ANGELES	LAS VIRGENES MUN WATER DI	158.00	10375.00	0.080	4.000	0.160	0.120
PORTOLA	ORANGE	SANTA MARGARITA WATER DIS	53.00	2666.00	0.080	4.000	0.160	0.120
LAKE MISSION VIEJO	ORANGE	LAKE MISSION VIEJO ASSOC	123.00	5245.00	0.080	4.000	0.160	0.120
SKINNER CLEARWELL	RIVERSIDE	METROPOLITAN WATER DIST	44.00	410.00	0.120	4.000	0.200	0.120
RATTLESNAKE CAN	ORANGE	IRVINE RANCH WATER DISTRI	79.00	1770.00	0.120	4.000	0.160	0.120
CASITAS SADDLE DIKE	VENTURA	DOI BR	36.00	287000.00	0.080	4.000	0.160	0.120
ROBERT A SKINNER	RIVERSIDE	METROPOLITAN WATER DIST	109.00	62800.00	0.120	4.000	0.200	0.120
J W WISDA	LOS ANGELES	STATE DEPT OF PARKS AND R	50.00	55.00	0.120	4.000	0.160	0.120
STONE CANYON	LOS ANGELES	CITY OF LOS ANGELES	188.00	11792.00	0.120	4.000	0.200	0.120
UPPER STONE CANYON	LOS ANGELES	CITY OF LOS ANGELES	111.00	469.00	0.120	4.000	0.200	0.120
SANTA YNEZ CANYON	LOS ANGELES	CITY OF LOS ANGELES	157.00	403.00	0.080	4.000	0.160	0.120
HICKS CAN RETD BN	ORANGE	THE IRVINE COMPANY	60.00	207.00	0.120	4.000	0.160	0.120
ROUND CANYON RETD BN	ORANGE	COUNTY OF ORANGE	98.00	434.00	0.080	4.000	0.160	0.120
ORCHARD ESTATES	ORANGE	THE IRVINE COMPANY	21.00	0.00	0.120	4.000	0.160	0.120
EAST HICKS CN RTD BN	ORANGE	THE IRVINE COMPANY	49.00	150.00	0.120	4.000	0.160	0.120
GALIVAN RETD BASIN	ORANGE	COUNTY OF ORANGE	20.00	0.00	0.080	4.000	0.160	0.120
MARSHBURN RETD BN	ORANGE	COUNTY OF ORANGE	27.00	0.00	0.080	4.000	0.160	0.120
GOODHART CAN DTN BN	RIVERSIDE	METROPOLITAN WATER DIST	15.00	0.00	0.120	4.000	0.200	0.120
BEE CANYON RETD BN	ORANGE	COUNTY OF ORANGE	62.00	465.00	0.080	4.000	0.160	0.120
Quail	Los Angeles	California Department of	44.00	7770.00	0.120	4.000	0.160	0.120
TRABUCO RETARDING BN	ORANGE	COUNTY OF ORANGE	13.00	0.00	0.080	4.000	0.160	0.120
ROUND CANYON RETD BN	ORANGE	COUNTY OF ORANGE	98.00	434.00	0.080	4.000	0.160	0.120

EASTLAKE	SAN DIEGO	EASTLAKE I ASSOCIATION	35.00	0.00	0.060	4.000	0.080	0.080
KERN R CO PARK	KERN	KERN CO DEPT OF PARKS AND	18.00	1166.00	0.080	4.000	0.120	0.080
RUNKLE	VENTURA	VENTURA COUNTY FCD	41.00	165.00	0.080	4.000	0.160	0.080
BONITA LONG CAN	SAN DIEGO	CITY OF CHULA VISTA	29.00	0.00	0.060	4.000	0.080	0.080
SWEETWATER MAIN	SAN DIEGO	SOUTH BAY IRRIGATION DIST	112.00	51700.00	0.060	4.000	0.080	0.080
SAN DIEGUITO	SAN DIEGO	SANTA FE ID & SAN DIEGUIT	51.00	1384.00	0.080	4.000	0.080	0.080
TRAMPAS CANYON	ORANGE	OGLEBAY NORTON INDUSTRIAL	183.00	6070.00	0.080	4.000	0.120	0.080
CHOLLAS	SAN DIEGO	CITY OF SAN DIEGO	50.00	388.00	0.060	4.000	0.080	0.080
SAVAGE	SAN DIEGO	CITY OF SAN DIEGO	149.00	63180.00	0.060	4.000	0.080	0.080
SUTHERLAND	SAN DIEGO	CITY OF SAN DIEGO	162.00	29000.00	0.080	4.000	0.120	0.080
MOLYCORP TAILINGS	SAN BERNARDINO	MOLYCORP INCORPORATED	116.00	1140.00	0.060	4.000	0.080	0.080
BRESSI	SAN DIEGO	LENNAR HOMES	23.00	0.00	0.080	4.000	0.120	0.080
UPPER STEHLY	SAN DIEGO	NICHOLAS H STEHLY	35.00	0.00	0.080	4.000	0.120	0.080
LOWER STEHLEY	SAN DIEGO	NICHOLAS H STEHLY	60.00	0.00	0.080	4.000	0.120	0.080
SANTIAGO CREEK	ORANGE	SERRANO ID AND IRVINE RAN	136.00	38800.00	0.080	4.000	0.160	0.080
EL CASCO	RIVERSIDE	EL CASCO LAKE RANCH	19.00	188.00	0.080	4.000	0.120	0.080
DIXON	SAN DIEGO	CITY OF ESCONDIDO	116.00	0.00	0.080	4.000	0.120	0.080
LAKE SHERWOOD	VENTURA	LAKE SHERWOOD RANCH	45.00	2750.00	0.080	4.000	0.160	0.080
LAKE ELEANOR	VENTURA	CONEJO OPEN SPACE CONS AG	37.00	113.00	0.080	4.000	0.160	0.080
TURNER	SAN DIEGO	VALLEY CENTER MUN WATER D	111.00	2700.00	0.080	4.000	0.120	0.080
GENE WASH	SAN BERNARDINO	METROPOLITAN WATER DIST	140.00	8900.00	0.060	4.000	0.080	0.080
COPPER BASIN	SAN BERNARDINO	METROPOLITAN WATER DIST	184.00	26410.00	0.060	4.000	0.080	0.080
DOVE CANYON	ORANGE	DOVE CANYON COMPANY	88.00	575.00	0.080	4.000	0.160	0.080
MATTHEWS	SAN DIEGO	PETE PRESTININZI	47.00	122.00	0.080	4.000	0.120	0.080
L FRANKLIN NO 2	LOS ANGELES	CITY OF LOS ANGELES	49.00	285.00	0.080	4.000	0.160	0.080
TRABUCO	ORANGE	TRABUCO CANYON WATER DIST	108.00	175.00	0.080	4.000	0.160	0.080
MAERKLE	SAN DIEGO	CARLSBAD MUN WATER DIST	165.00	700.00	0.060	4.000	0.080	0.080
CALAVERA	SAN DIEGO	CARLSBAD MUN WATER DIST	67.00	800.00	0.060	4.000	0.080	0.080
FAIRBANKS	SAN DIEGO	FAIRBANKS RANCH ASSOCIATI	36.00	0.00	0.060	4.000	0.080	0.080
INCLINE	SAN DIEGO	CALMAT (INCI	30.00	210.00	0.060	4.000	0.080	0.080
RED MOUNTAIN RES	SAN DIEGO	FALLBROOK PU DISTRICT	120.00	1548.00	0.080	4.000	0.120	0.080
PALOS VERDES RES	LOS ANGELES	METROPOLITAN WATER DIST	82.00	1220.00	0.080	4.000	0.120	0.080
SAN VICENTE	SAN DIEGO	CITY OF SAN DIEGO	203.00	104480.00	0.060	4.000	0.080	0.080
LOWER FRANKLIN	LOS ANGELES	CITY OF LOS ANGELES	103.00	990.00	0.080	4.000	0.160	0.080
EASTSIDE FOREBAY			22.00	700.00	0.060	4.000	0.080	0.080
ROBINSON RANCH	ORANGE	WILLIAM LYON COMMUNITY IN	45.00	0.00	0.080	4.000	0.160	0.080

US SILICA FW PONDS	SAN DIEGO	CITY OF OCEANSIDE	76.00	0.00	0.080	4.000	0.120	0.080
PULGAS LAKE DAM	SAN DIEGO	DOD USMC	0.00	125.00	0.080	4.000	0.120	0.080
LAKE ONEILL DAM	SAN DIEGO	DOD USMC	0.00	1320.00	0.080	4.000	0.120	0.080
PILGRIM CREEK DAM	SAN DIEGO	DOD USMC	0.00	50.00	0.080	4.000	0.120	0.080
CASE SPRINGS DAM	SAN DIEGO	DOD USMC	0.00	67.00	0.080	4.000	0.120	0.080
WUEST	SAN DIEGO	WUEST ESTATE CO	50.00	700.00	0.060	4.000	0.080	0.060
HENRY JR	SAN DIEGO	MRS CHARLOTTE FRYE	33.00	262.00	0.060	4.000	0.080	0.060
CORTE MADERA	SAN DIEGO	RANCHO CORTE MADERA INC	16.00	1370.00	0.060	4.000	0.080	0.060
BARRETT	SAN DIEGO	CITY OF SAN DIEGO	161.00	61405.00	0.060	4.000	0.080	0.060
MORENA	SAN DIEGO	CITY OF SAN DIEGO	181.00	67406.00	0.060	4.000	0.080	0.060
SAN MARCOS	SAN DIEGO	CITIZENS DEVELOPMENT CORP	52.00	0.00	0.060	4.000	0.080	0.060
SAN MARCOS	SAN DIEGO	VALLECITOS WATER DIST	85.00	520.00	0.060	4.000	0.080	0.060
THOMPSON	LOS ANGELES	SOUTHERN CALIF EDISON CO	114.00	1760.00	0.060	2.000	0.080	0.060
WRIGLEY RESERVOIR	LOS ANGELES	SOUTHERN CALIF EDISON CO	42.00	0.00	0.060	2.000	0.080	0.060
MT WOODSON	SAN DIEGO	RAMONA MUN WATER DISTRICT	38.00	0.00	0.060	2.000	0.080	0.060
PALO VERDE	SAN DIEGO	PALO VERDE RANCH HOMEOWNE	67.00	1460.00	0.060	2.000	0.080	0.060
GREEN VALLEY	SAN DIEGO	CITY OF POWAY	162.00	3800.00	0.060	2.000	0.080	0.060
UPPER 4 S	SAN DIEGO	THOMAS RALPHS	28.00	83.00	0.060	4.000	0.080	0.060
LAKE LOVELAND	SAN DIEGO	SOUTH BAY IRRIGATION DIST	203.00	31000.00	0.060	2.000	0.080	0.060
BLOSSOM VY RES	SAN DIEGO	PADRE DAM MUNICIPAL WD	42.00	25.00	0.060	2.000	0.080	0.060
RAMONA	SAN DIEGO	RAMONA MUN WATER DISTRICT	228.00	14400.00	0.060	4.000	0.080	0.060
STANLEY A MAHR RES	SAN DIEGO	VALLECITOS WATER DIST	79.00	202.00	0.060	4.000	0.080	0.060
4S RANCH	SAN DIEGO	COUNTY OF SAN DIEGO	25.00	0.00	0.060	4.000	0.080	0.060
CHET HARRITT	SAN DIEGO	HELIX WATER DISTRICT	200.00	11290.00	0.060	2.000	0.080	0.060
BERNARDO RES	SAN DIEGO	CITY OF SAN DIEGO	54.00	30.00	0.060	4.000	0.080	0.060
LAKE HODGES	SAN DIEGO	CITY OF SAN DIEGO	131.00	64700.00	0.060	4.000	0.080	0.060
EL CAPITAN	SAN DIEGO	CITY OF SAN DIEGO	237.00	159300.00	0.060	2.000	0.080	0.060
UPPER OTAY	SAN DIEGO	CITY OF SAN DIEGO	78.00	3974.00	0.060	2.000	0.080	0.060
MURRAY	SAN DIEGO	CITY OF SAN DIEGO	110.00	7195.00	0.060	2.000	0.080	0.060
EARL THOMAS RES	SAN DIEGO	CITY OF SAN DIEGO	58.00	117.00	0.060	2.000	0.080	0.060
SANTA MARIA	SAN DIEGO	RAMONA MUN WATER DISTRICT	25.00	402.00	0.060	4.000	0.080	0.060
Wohlford Lake	San Diego	Escondido, City of	100.00	6500.00	0.060	4.000	0.080	0.060
MELROSE AVENUE	SAN DIEGO	DEVELOPMENT CONTINENTAL R	4.00	0.00	0.060	2.000	0.080	0.060
DIAMOND VALLEY LAKE FB	RIVERSIDE	METROPOLITAN WATER DIST	22.00	700.00	0.060	2.000	0.080	0.060

Direct Economic Losses For Buildings

May 26, 2009

All values are in thousands of dollars

	Capital Stock Losses					Income Losses				
	Cost Structural Damage	Cost Non-struct. Damage	Cost Contents Damage	Inventory Loss	Loss Ratio %	Relocation Loss	Capital Related Loss	Wages Losses	Rental Income Loss	Total Loss
California										
San Bernardino	886,328	3,569,779	1,301,861	45,277	3.9	19,057	261,249	338,600	272,774	6,694,924
Riverside	655,621	2,619,674	917,365	26,111	3.0	13,295	226,962	264,943	196,606	4,920,577
Imperial	4,614	22,101	9,150	277	0.4	85	656	981	1,014	38,879
San Luis Obispo	0	0	0	0	0.0	0	0	0	0	0
Santa Barbara	0	0	0	0	0.0	0	0	0	0	0
Ventura	10,880	99,149	53,473	1,998	0.2	124	3,901	4,541	2,485	176,550
Orange	53,247	457,926	249,330	10,925	0.2	680	22,602	26,804	14,776	836,289
Los Angeles	786,234	4,177,334	1,855,477	69,472	0.7	13,853	272,027	334,648	228,688	7,737,733
Kern	5,029	34,941	16,328	456	0.1	78	1,281	1,431	1,068	60,613
San Diego	743	29,023	18,321	685	0.0	3	114	136	168	49,193
Total	2,402,695	11,009,928	4,421,305	155,201	1.0	47,175	788,791	972,084	717,580	20,514,759

Study Region : S2 SAF southern

Scenario : S2 San Andreas Fault - southern scenario

	Capital Stock Losses					Income Losses				
	Cost Structural Damage	Cost Non-struct. Damage	Cost Contents Damage	Inventory Loss	Loss Ratio %	Relocation Loss	Capital Related Loss	Wages Losses	Rental Income Loss	Total Loss
Region Total	2,402,695	11,009,928	4,421,305	155,201	0.9	47,175	788,791	972,084	717,580	20,514,759

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

Study Region : S2 SAF southern

Scenario : S2 San Andreas Fault - southern scenario

Shelter Summary Report

May 26, 2009

	# of Displaced Households	# of People Needing Short Term Shelter
California		
San Luis Obispo	0	0
Riverside	2,481	2,380
San Bernardino	4,223	4,040
Imperial	4	7
Ventura	1	1
San Diego	0	0
Kern	2	1
Orange	4	3
Los Angeles	1,803	1,665
Santa Barbara	0	0
Total	**8,517**	**8,098**
Region Total	**8,517**	**8,098**

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

Study Region : S2 SAF southern

Scenario : S2 San Andreas Fault - southern scenario

Casualties Summary Report

May 26, 2009

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Imperial					
Casualties - 2am					
Commercial	0	0	0	0	0
Other-Residential	17	2	0	0	19
Educational	0	0	0	0	0
Single Family	2	0	0	0	2
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2am	**19**	**2**	**0**	**0**	**21**
Casualties - 2pm					
Educational	2	0	0	0	2
Industrial	0	0	0	0	0
Hotels	0	0	0	0	0
Other-Residential	5	1	0	0	6
Single Family	1	0	0	0	1
Commercial	3	0	0	0	4
Commuting	0	0	0	0	0
Total Casualties - 2pm	**12**	**1**	**0**	**0**	**13**
Casualties - 5pm					
Single Family	1	0	0	0	1
Other-Residential	6	1	0	0	7
Commuting	0	0	0	0	1
Commercial	3	0	0	0	3
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 5pm	**10**	**1**	**0**	**0**	**12**
Kern					
Casualties - 2am					
Commercial	0	0	0	0	0
Single Family	2	0	0	0	2
Other-Residential	13	2	0	0	15
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2am	**15**	**2**	**0**	**0**	**17**
Casualties - 2pm					
Educational	2	0	0	0	3
Commuting	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Kern					
Casualties - 2pm					
Single Family	0	0	0	0	0
Hotels	0	0	0	0	0
Other-Residential	3	0	0	0	3
Commercial	4	0	0	0	4
Industrial	1	0	0	0	1
Total Casualties - 2pm	**10**	**1**	**0**	**0**	**11**
Casualties - 5pm					
Single Family	1	0	0	0	1
Commuting	0	0	1	0	1
Commercial	3	0	0	0	4
Other-Residential	5	1	0	0	5
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 5pm	**10**	**1**	**1**	**0**	**12**
Los Angeles					
Casualties - 2am					
Hotels	10	2	0	1	13
Industrial	37	8	1	2	48
Educational	0	0	0	0	0
Other-Residential	836	169	17	31	1,052
Single Family	398	30	2	5	435
Commuting	0	0	1	0	1
Commercial	21	5	1	1	28
Total Casualties - 2am	**1,301**	**215**	**22**	**40**	**1,578**
Casualties - 2pm					
Industrial	273	60	8	15	356
Other-Residential	183	38	4	8	233
Commercial	1,488	353	53	104	1,998
Educational	726	193	31	61	1,012
Commuting	2	3	5	1	11
Single Family	78	6	0	1	85
Hotels	2	0	0	0	2
Total Casualties - 2pm	**2,751**	**654**	**102**	**190**	**3,698**
Casualties - 5pm					
Other-Residential	306	62	6	11	386
Industrial	171	37	5	10	223
Commuting	67	92	152	30	341
Single Family	147	12	1	2	161
Commercial	1,379	340	53	99	1,870
Hotels	3	1	0	0	4
Educational	72	18	3	5	97
Total Casualties - 5pm	**2,144**	**561**	**220**	**157**	**3,082**
Orange					

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Orange					
Casualties - 2am					
Commuting	0	0	0	0	0
Hotels	1	0	0	0	1
Educational	0	0	0	0	0
Industrial	4	0	0	0	5
Other-Residential	48	4	0	0	53
Commercial	1	0	0	0	1
Single Family	18	0	0	0	18
Total Casualties - 2am	**72**	**5**	**0**	**0**	**78**
Casualties - 2pm					
Other-Residential	9	1	0	0	10
Industrial	29	3	0	0	34
Single Family	3	0	0	0	3
Commuting	0	0	0	0	0
Commercial	63	6	0	0	70
Hotels	0	0	0	0	0
Educational	18	2	0	0	20
Total Casualties - 2pm	**123**	**12**	**1**	**1**	**137**
Casualties - 5pm					
Hotels	0	0	0	0	0
Educational	3	0	0	0	3
Commuting	3	4	6	1	14
Single Family	6	0	0	0	6
Commercial	45	4	0	0	50
Other-Residential	17	2	0	0	19
Industrial	18	2	0	0	21
Total Casualties - 5pm	**93**	**12**	**7**	**2**	**113**
Riverside					
Casualties - 2am					
Industrial	24	6	1	2	33
Commercial	17	4	1	1	23
Other-Residential	1,631	379	31	54	2,095
Educational	0	0	0	0	0
Commuting	0	0	1	0	1
Single Family	244	22	2	3	270
Hotels	29	8	1	2	40
Total Casualties - 2am	**1,945**	**420**	**36**	**63**	**2,463**
Casualties - 2pm					
Commercial	1,289	348	55	107	1,799
Other-Residential	435	101	8	14	559
Educational	382	106	17	34	539
Single Family	59	6	0	1	66
Commuting	2	3	5	1	11
Hotels	6	1	0	0	8
Industrial	174	46	7	13	240

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Riverside					
Total Casualties - 2pm	**2,346**	**611**	**93**	**171**	**3,221**
Casualties - 5pm					
Industrial	109	29	4	8	150
Other-Residential	588	137	11	20	757
Educational	30	8	1	3	42
Single Family	91	8	1	1	101
Hotels	9	2	0	1	12
Commercial	1,112	302	48	91	1,554
Commuting	104	130	230	44	507
Total Casualties - 5pm	**2,043**	**617**	**296**	**168**	**3,123**
San Bernardino					
Casualties - 2am					
Hotels	16	4	1	1	22
Single Family	468	43	3	5	519
Commercial	28	7	1	2	38
Commuting	0	1	1	0	2
Educational	0	0	0	0	0
Other-Residential	1,379	316	33	62	1,790
Industrial	28	7	1	2	38
Total Casualties - 2am	**1,918**	**377**	**40**	**73**	**2,408**
Casualties - 2pm					
Industrial	207	50	7	14	277
Hotels	3	1	0	0	4
Commuting	4	6	9	2	21
Educational	886	245	40	78	1,248
Other-Residential	307	71	8	14	400
Commercial	1,951	520	82	159	2,712
Single Family	95	9	1	1	106
Total Casualties - 2pm	**3,453**	**901**	**146**	**269**	**4,769**
Casualties - 5pm					
Other-Residential	507	117	13	23	659
Commercial	1,668	448	71	137	2,324
Single Family	174	16	1	2	194
Educational	102	29	5	9	144
Hotels	5	1	0	0	6
Commuting	60	93	141	28	322
Industrial	129	31	4	9	173
Total Casualties - 5pm	**2,645**	**735**	**235**	**209**	**3,822**
San Diego					
Casualties - 2am					
Other-Residential	1	0	0	0	1
Commercial	0	0	0	0	0
Single Family	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
San Diego					
Casualties - 2am					
Industrial	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 2am	**1**	**0**	**0**	**0**	**1**
Casualties - 2pm					
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Commuting	0	0	0	0	0
Commercial	1	0	0	0	1
Other-Residential	0	0	0	0	0
Single Family	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2pm	**1**	**0**	**0**	**0**	**1**
Casualties - 5pm					
Other-Residential	0	0	0	0	0
Commuting	0	0	0	0	0
Commercial	0	0	0	0	0
Single Family	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 5pm	**1**	**0**	**0**	**0**	**1**
San Luis Obispo					
Casualties - 2am					
Industrial	0	0	0	0	0
Commercial	0	0	0	0	0
Other-Residential	0	0	0	0	0
Single Family	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 2am	**0**	**0**	**0**	**0**	**0**
Casualties - 2pm					
Single Family	0	0	0	0	0
Other-Residential	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Commuting	0	0	0	0	0
Commercial	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2pm	**0**	**0**	**0**	**0**	**0**
Casualties - 5pm					
Industrial	0	0	0	0	0
Other-Residential	0	0	0	0	0
Commuting	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
San Luis Obispo					
Casualties - 5pm					
Commercial	0	0	0	0	0
Single Family	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 5pm	**0**	**0**	**0**	**0**	**0**
Santa Barbara					
Casualties - 2am					
Industrial	0	0	0	0	0
Commercial	0	0	0	0	0
Other-Residential	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Single Family	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 2am	**0**	**0**	**0**	**0**	**0**
Casualties - 2pm					
Commercial	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Single Family	0	0	0	0	0
Other-Residential	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2pm	**0**	**0**	**0**	**0**	**0**
Casualties - 5pm					
Other-Residential	0	0	0	0	0
Single Family	0	0	0	0	0
Commercial	0	0	0	0	0
Commuting	0	0	0	0	0
Industrial	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 5pm	**0**	**0**	**0**	**0**	**0**
Ventura					
Casualties - 2am					
Single Family	5	0	0	0	5
Educational	0	0	0	0	0
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Other-Residential	11	1	0	0	13
Commercial	0	0	0	0	0
Total Casualties - 2am	**17**	**1**	**0**	**0**	**18**
Casualties - 2pm					

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Ventura					
Casualties - 2pm					
Industrial	2	0	0	0	2
Hotels	0	0	0	0	0
Educational	5	1	0	0	6
Commuting	0	0	0	0	0
Other-Residential	2	0	0	0	2
Commercial	11	1	0	0	12
Single Family	1	0	0	0	1
Total Casualties - 2pm	**20**	**2**	**0**	**0**	**24**
Casualties - 5pm					
Commuting	1	1	1	0	3
Commercial	9	1	0	0	10
Other-Residential	4	0	0	0	5
Educational	1	0	0	0	1
Hotels	0	0	0	0	0
Single Family	2	0	0	0	2
Industrial	1	0	0	0	2
Total Casualties - 5pm	**17**	**3**	**2**	**1**	**22**
Region Total	NA	NA	NA	NA	NA

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

HAZUS-MH: Earthquake Event Report

Region Name: S2 SAF southern

Earthquake Scenario: S2 San Andreas Fault - southern scenario

Print Date: May 26, 2009

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:
The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, geotechnical, and observed ground motion data.

Table of Contents

Section	Page #
General Description of the Region	3
Building and Lifeline Inventory	4
Building Inventory	
Critical Facility Inventory	
Transportation and Utility Lifeline Inventory	
Earthquake Scenario Parameters	6
Direct Earthquake Damage	7
Buildings Damage	
Critical Facilities Damage	
Transportation and Utility Lifeline Damage	
Induced Earthquake Damage	11
Fire Following Earthquake	
Debris Generation	
Social Impact	12
Shelter Requirements	
Casualties	
Economic Loss	13
Building Losses	
Transportation and Utility Lifeline Losses	
Long-term Indirect Economic Impacts	
Appendix A: County Listing for the Region	
Appendix B: Regional Population and Building Value Data	

General Description of the Region

HAZUS is a regional earthquake loss estimation model that was developed by the Federal Emergency Management Agency and the National Institute of Building Sciences. The primary purpose of HAZUS is to provide a methodology and software application to develop earthquake losses at a regional scale. These loss estimates would be used primarily by local, state and regional officials to plan and stimulate efforts to reduce risks from earthquakes and to prepare for emergency response and recovery.

The earthquake loss estimates provided in this report was based on a region that includes 10 county(ies) from the following state(s):

California

Note:
Appendix A contains a complete listing of the counties contained in the region.

The geographical size of the region is 57,094.45 square miles and contains 4,277 census tracts. There are over 6,819 thousand households in the region and has a total population of 20,637,512 people (2000 Census Bureau data). The distribution of population by State and County is provided in Appendix B.

There are an estimated 5,224 thousand buildings in the region with a total building replacement value (excluding contents) of 1,545,838 (millions of dollars). Approximately 97.00 % of the buildings (and 0.00% of the building value) are associated with residential housing.

The replacement value of the transportation and utility lifeline systems is estimated to be 96,053 and 25,562 (millions of dollars) , respectively.

Building and Lifeline Inventory

Building Inventory

HAZUS estimates that there are 5,224 thousand buildings in the region which have an aggregate total replacement value of 1,545,838 (millions of dollars) . Appendix B provides a general distribution of the building value by State and County.

In terms of building construction types found in the region, wood frame construction makes up 90% of the building inventory. The remaining percentage is distributed between the other general building types.

Critical Facility Inventory

HAZUS breaks critical facilities into two (2) groups: essential facilities and high potential loss (HPL) facilities. Essential facilities include hospitals, medical clinics, schools, fire stations, police stations and emergency operations facilities. High potential loss facilities include dams, levees, military installations, nuclear power plants and hazardous material sites.

For essential facilities, there are 257 hospitals in the region with a total bed capacity of 54,260 beds. There are 6,689 schools, 281 fire stations, 474 police stations and 23 emergency operation facilities. With respect to HPL facilities, there are 362 dams identified within the region. Of these, 217 of the dams are classified as 'high hazard'. The inventory also includes 2,954 hazardous material sites, 0 military installations and 2 nuclear power plants.

Transportation and Utility Lifeline Inventory

Within HAZUS, the lifeline inventory is divided between transportation and utility lifeline systems. There are seven (7) transportation systems that include highways, railways, light rail, bus, ports, ferry and airports. There are six (6) utility systems that include potable water, wastewater, natural gas, crude & refined oil, electric power and communications. The lifeline inventory data are provided in Tables 2 and 3.

The total value of the lifeline inventory is over 121,615.00 (millions of dollars). This inventory includes over 13,384 kilometers of highways, 9,516 bridges, 459,254 kilometers of pipes.

Table 2: Transportation System Lifeline Inventory

System	Component	# locations/ # Segments	Replacement value (millions of dollars)
Highway	Bridges	9,516	24,623.70
	Segments	1,451	54,442.50
	Tunnels	21	38.00
		Subtotal	**79,104.20**
Railways	Bridges	263	48.20
	Facilities	155	398.70
	Segments	2,530	4,691.30
	Tunnels	0	0.00
		Subtotal	**5,138.20**
Light Rail	Bridges	51	13.30
	Facilities	0	0.00
	Segments	14	209.20
	Tunnels	0	0.00
		Subtotal	**222.50**
Bus	Facilities	123	158.20
		Subtotal	**158.20**
Ferry	Facilities	0	0.00
		Subtotal	**0.00**
Port	Facilities	235	604.50
		Subtotal	**604.50**
Airport	Facilities	212	1,363.40
	Runways	258	9,462.00
		Subtotal	**10,825.40**
		Total	**96,053.00**

Table 3: Utility System Lifeline Inventory

System	Component	# Locations / Segments	Replacement value (millions of dollars)
Potable Water	Distribution Lines	NA	4,592.50
	Facilities	52	2,043.30
	Pipelines	0	0.00
		Subtotal	**6,635.80**
Waste Water	Distribution Lines	NA	2,755.50
	Facilities	110	8,644.70
	Pipelines	0	0.00
		Subtotal	**11,400.20**
Natural Gas	Distribution Lines	NA	1,837.00
	Facilities	14	18.00
	Pipelines	0	0.00
		Subtotal	**1,855.00**
Oil Systems	Facilities	67	7.90
	Pipelines	0	0.00
		Subtotal	**7.90**
Electrical Power	Facilities	114	14,797.20
		Subtotal	**14,797.20**
Communication	Facilities	435	51.30
		Subtotal	**51.30**
		Total	**34,747.50**

Earthquake Scenario

HAZUS uses the following set of information to define the earthquake parameters used for the earthquake loss estimate provided in this report.

Scenario Name	S2 San Andreas Fault - southern scenario
Type of Earthquake	User-defined
Fault Name	NA
Historical Epicenter ID #	NA
Probabilistic Return Period	NA
Longitude of Epicenter	NA
Latitude of Epicenter	NA
Earthquake Magnitude	7.80
Depth (Km)	NA
Rupture Length (Km)	NA
Rupture Orientation (degrees)	NA
Attenuation Function	NA

Building Damage

HAZUS estimates that about 171,237 buildings will be at least moderately damaged. This is over 3.00 % of the total number of buildings in the region. There are an estimated 19,390 buildings that will be damaged beyond repair. The definition of the 'damage states' is provided in Volume 1: Chapter 5 of the HAZUS technical manual. Table 4 below summaries the expected damage by general occupancy for the buildings in the region. Table 5 summaries the expected damage by general building type.

Table 4: Expected Building Damage by Occupancy

	None		Slight		Moderate		Extensive		Complete	
	Count	(%)	Count	(%)	Count	(%)	Count	(%)	Count	(%)
Agriculture	3,954	0.09	314	0.07	166	0.14	68	0.20	32	0.17
Commercial	92,946	2.01	8,740	2.05	4,777	4.06	1,727	5.06	731	3.77
Education	4,049	0.09	293	0.07	125	0.11	40	0.12	18	0.09
Government	4,185	0.09	391	0.09	251	0.21	101	0.30	44	0.23
Industrial	24,045	0.52	2,773	0.65	1,723	1.46	608	1.78	219	1.13
Other Residential	443,973	9.59	57,164	13.41	46,527	39.53	29,075	85.15	18,056	93.12
Religion	6,968	0.15	620	0.15	331	0.28	132	0.39	61	0.31
Single Family	4,047,075	87.46	355,857	83.50	63,801	54.21	2,395	7.01	229	1.18
Total	**4,627,194**		**426,152**		**117,701**		**34,147**		**19,390**	

Table 5: Expected Building Damage by Building Type (All Design Levels)

	None		Slight		Moderate		Extensive		Complete	
	Count	(%)	Count	(%)	Count	(%)	Count	(%)	Count	(%)
Wood	4,240,647	91.65	368636	86.50	64,800	55.06	1,857	5.44	118	0.61
Steel	42,307	0.91	5075	1.19	3,724	3.16	1,498	4.39	517	2.67
Concrete	41,337	0.89	3769	0.88	1,830	1.55	684	2.00	344	1.77
Precast	25,761	0.56	2521	0.59	1,233	1.05	413	1.21	162	0.83
RM	91,263	1.97	4245	1.00	2,798	2.38	1,335	3.91	443	2.28
URM	12,879	0.28	1410	0.33	502	0.43	202	0.59	169	0.87
MH	173,000	3.74	40495	9.50	42,813	36.37	28,159	82.46	17,638	90.97
Total	**4,627,194**		**426,152**		**117,701**		**34,147**		**19,390**	

*Note:

RM Reinforced Masonry
URM Unreinforced Masonry
MH Manufactured Housing

Essential Facility Damage

Before the earthquake, the region had 54,260 hospital beds available for use. On the day of the earthquake, the model estimates that only 52,694 hospital beds (97.00%) are available for use by patients already in the hospital and those injured by the earthquake. After one week, 100.00% of the beds will be back in service. By 30 days, 100.00% will be operational.

Table 6: Expected Damage to Essential Facilities

Classification	Total	# Facilities		
		At Least Moderate Damage > 50%	Complete Damage > 50%	With Functionality > 50% on day 1
Hospitals	257	0	0	254
Schools	6,689	0	0	6,404
EOCs	23	1	0	21
PoliceStations	474	2	0	435
FireStations	281	4	0	258

Transportation and Utility Lifeline Damage

Table 7 provides damage estimates for the transportation system.

Table 7: Expected Damage to the Transportation Systems

System	Component		Number of Locations			
		Locations/ Segments	With at Least Mod. Damage	With Complete Damage	With Functionality > 50 % After Day 1	With Functionality > 50 % After Day 7
Highway	Segments	1,451	0	0	1,451	1,451
	Bridges	9,516	239	21	9,283	9,410
	Tunnels	21	0	0	21	21
Railways	Segments	2,530	0	0	2,530	2,530
	Bridges	263	4	0	259	262
	Tunnels	0	0	0	0	0
	Facilities	155	4	0	155	155
Light Rail	Segments	14	0	0	14	14
	Bridges	51	0	0	51	51
	Tunnels	0	0	0	0	0
	Facilities	0	0	0	0	0
Bus	Facilities	123	2	0	123	123
Ferry	Facilities	0	0	0	0	0
Port	Facilities	235	0	0	235	235
Airport	Facilities	212	3	0	212	212
	Runways	258	0	0	258	258

Note: Roadway segments, railroad tracks and light rail tracks are assumed to be damaged by ground failure only. If ground failure maps are not provided, damage estimates to these components will not be computed.

Tables 8-10 provide information on the damage to the utility lifeline systems. Table 8 provides damage to the utility system facilities. Table 9 provides estimates on the number of leaks and breaks by the pipelines of the utility systems. For electric power and potable water, HAZUS performs a simplified system performance analysis. Table 10 provides a summary of the system performance information.

Table 8 : Expected Utility System Facility Damage

System	# of Locations				
	Total #	With at Least Moderate Damage	With Complete Damage	with Functionality > 50 %	
				After Day 1	After Day 7
Potable Water	52	4	0	48	52
Waste Water	110	8	0	89	110
Natural Gas	14	0	0	14	14
Oil Systems	67	0	0	67	67
Electrical Power	114	3	0	104	114
Communication	435	47	0	423	435

Table 9 : Expected Utility System Pipeline Damage (Site Specific)

System	Total Pipelines Length (kms)	Number of Leaks	Number of Breaks
Potable Water	229,627	38277	9569
Waste Water	137,776	30273	7568
Natural Gas	91,851	32361	8090
Oil	0	0	0

Table 10: Expected Potable Water and Electric Power System Performance

	Total # of Households	Number of Households without Service				
		At Day 1	At Day 3	At Day 7	At Day 30	At Day 90
Potable Water	6,819,181	1,593,365	1,556,943	1,494,920	1,133,432	184,250
Electric Power		88,287	51,469	19,281	3,389	129

Fire Following Earthquake

Fires often occur after an earthquake. Because of the number of fires and the lack of water to fight the fires, they can often burn out of control. HAZUS uses a Monte Carlo simulation model to estimate the number of ignitions and the amount of burnt area. For this scenario, the model estimates that there will be 0 ignitions that will burn about 0.00 sq. mi 0.00 % of the region's total area.) The model also estimates that the fires will displace about 0 people and burn about 0 (millions of dollars) of building value.

Debris Generation

HAZUS estimates the amount of debris that will be generated by the earthquake. The model breaks the debris into two general categories: a) Brick/Wood and b) Reinforced Concrete/Steel. This distinction is made because of the different types of material handling equipment required to handle the debris.

The model estimates that a total of 0.00 million tons of debris will be generated. Of the total amount, Brick/Wood comprises 0.00% of the total, with the remainder being Reinforced Concrete/Steel. If the debris tonnage is converted to an estimated number of truckloads, it will require 0 truckloads (@25 tons/truck) to remove the debris generated by the earthquake.

Social Impact

Shelter Requirement

HAZUS estimates the number of households that are expected to be displaced from their homes due to the earthquake and the number of displaced people that will require accommodations in temporary public shelters. The model estimates 8,517 households to be displaced due to the earthquake. Of these, 8,098 people (out of a total population of 20,637,512) will seek temporary shelter in public shelters.

Casualties

HAZUS estimates the number of people that will be injured and killed by the earthquake. The casualties are broken down into four (4) severity levels that describe the extent of the injuries. The levels are described as follows;

- Severity Level 1: Injuries will require medical attention but hospitalization is not needed.
- Severity Level 2: Injuries will require hospitalization but are not considered life-threatening
- Severity Level 3: Injuries will require hospitalization and can become life threatening if not promptly treated.
- Severity Level 4: Victims are killed by the earthquake.

The casualty estimates are provided for three (3) times of day: 2:00 AM, 2:00 PM and 5:00 PM. These times represent the periods of the day that different sectors of the community are at their peak occupancy loads. The 2:00 AM estimate considers that the residential occupancy load is maximum, the 2:00 PM estimate considers that the educational, commercial and industrial sector loads are maximum and 5:00 PM represents peak commute time.

Table 11 provides a summary of the casualties estimated for this earthquake

Table 11: Casualty Estimates

		Level 1	Level 2	Level 3	Level 4
2 AM	Commercial	67	17	3	5
	Commuting	1	1	2	0
	Educational	0	0	0	0
	Hotels	55	14	2	4
	Industrial	93	22	3	6
	Other-Residential	3,936	873	81	148
	Single Family	1,136	96	7	13
	Total	**5,289**	**1,022**	**97**	**176**
2 PM	Commercial	4,808	1,229	190	371
	Commuting	9	12	20	4
	Educational	2,020	547	89	174
	Hotels	11	3	0	1
	Industrial	687	160	22	43
	Other-Residential	945	213	20	36
	Single Family	237	21	1	3
	Total	**8,716**	**2,184**	**343**	**632**
5 PM	Commercial	4,219	1,096	172	328
	Commuting	235	319	531	103
	Educational	207	55	9	17
	Hotels	17	4	1	1
	Industrial	429	100	14	27
	Other-Residential	1,433	319	30	55
	Single Family	422	36	3	5
	Total	**6,962**	**1,929**	**760**	**536**

Economic Loss

The total economic loss estimated for the earthquake is 22,506.71 (millions of dollars), which includes building and lifeline related losses based on the region's available inventory. The following three sections provide more detailed information about these losses.

Building-Related Losses

The building losses are broken into two categories: direct building losses and business interruption losses. The direct building losses are the estimated costs to repair or replace the damage caused to the building and its contents. The business interruption losses are the losses associated with inability to operate a business because of the damage sustained during the earthquake. Business interruption losses also include the temporary living expenses for those people displaced from their homes because of the earthquake.

The total building-related losses were 20,514.76 (millions of dollars); 12 % of the estimated losses were related to the business interruption of the region. By far, the largest loss was sustained by the residential occupancies which made up over 51 % of the total loss. Table 12 below provides a summary of the losses associated with the building damage.

Table 12: Building-Related Economic Loss Estimates

(Millions of dollars)

Category	Area	Single Family	Other Residential	Commercial	Industrial	Others	Total
Income Loses							
	Wage	0.00	51.70	834.54	45.33	40.50	972.08
	Capital-Related	0.00	22.14	729.56	27.73	9.37	788.79
	Rental	85.54	195.45	398.19	17.94	20.47	717.58
	Relocation	8.93	9.36	22.13	1.36	5.39	47.17
	Subtotal	**94.47**	**278.65**	**1,984.42**	**92.36**	**75.73**	**2,525.63**
Capital Stock Loses							
	Structural	638.37	535.47	827.99	238.10	162.76	2,402.69
	Non_Structural	4,113.91	2,622.02	2,895.70	850.46	527.84	11,009.93
	Content	1,592.62	628.77	1,404.05	539.49	256.37	4,421.30
	Inventory	0.00	0.00	42.57	108.65	3.98	155.20
	Subtotal	**6,344.91**	**3,786.26**	**5,170.31**	**1,736.70**	**950.95**	**17,989.13**
	Total	**6,439.38**	**4,064.91**	**7,154.73**	**1,829.06**	**1,026.68**	**20,514.76**

Transportation and Utility Lifeline Losses

For the transportation and utility lifeline systems, HAZUS computes the direct repair cost for each component only. There are no losses computed by HAZUS for business interruption due to lifeline outages. Tables 13 & 14 provide a detailed breakdown in the expected lifeline losses.

HAZUS estimates the long-term economic impacts to the region for 15 years after the earthquake. The model quantifies this information in terms of income and employment changes within the region. Table 15 presents the results of the region for the given earthquake.

Table 13: Transportation System Economic Losses
(Millions of dollars)

System	Component	Inventory Value	Economic Loss	Loss Ratio (%)
Highway	Segments	54,442.45	$0.00	0.00
	Bridges	24,623.70	$336.44	1.37
	Tunnels	38.02	$0.25	0.65
	Subtotal	**79104.20**	**336.70**	
Railways	Segments	4,691.34	$0.00	0.00
	Bridges	48.19	$0.48	0.99
	Tunnels	0.00	$0.00	0.00
	Facilities	398.72	$25.98	6.52
	Subtotal	**5138.20**	**26.50**	
Light Rail	Segments	209.22	$0.00	0.00
	Bridges	13.28	$0.01	0.09
	Tunnels	0.00	$0.00	0.00
	Facilities	0.00	$0.00	0.00
	Subtotal	**222.50**	**0.00**	
Bus	Facilities	158.20	$12.11	7.66
	Subtotal	**158.20**	**12.10**	
Ferry	Facilities	0.00	$0.00	0.00
	Subtotal	**0.00**	**0.00**	
Port	Facilities	604.51	$24.68	4.08
	Subtotal	**604.50**	**24.70**	
Airport	Facilities	1,363.37	$103.48	7.59
	Runways	9,462.00	$0.00	0.00
	Subtotal	**10825.40**	**103.50**	
	Total	**96053.00**	**503.40**	

Table 14: Utility System Economic Losses

(Millions of dollars)

System	Component	Inventory Value	Economic Loss	Loss Ratio (%)
Potable Water	Pipelines	0.00	$0.00	0.00
	Facilities	2,043.30	$113.09	5.53
	Distribution Lines	4,592.50	$172.25	3.75
	Subtotal	**6,635.84**	**$285.33**	
Waste Water	Pipelines	0.00	$0.00	0.00
	Facilities	8,644.70	$368.70	4.27
	Distribution Lines	2,755.50	$136.23	4.94
	Subtotal	**11,400.21**	**$504.93**	
Natural Gas	Pipelines	0.00	$0.00	0.00
	Facilities	18.00	$0.31	1.72
	Distribution Lines	1,837.00	$145.63	7.93
	Subtotal	**1,855.03**	**$145.94**	
Oil Systems	Pipelines	0.00	$0.00	0.00
	Facilities	7.90	$0.20	2.55
	Subtotal	**7.91**	**$0.20**	
Electrical Power	Facilities	14,797.20	$549.59	3.71
	Subtotal	**14,797.20**	**$549.59**	
Communication	Facilities	51.30	$2.54	4.94
	Subtotal	**51.33**	**$2.54**	
	Total	**34,747.51**	**$1,488.53**	

Table 15. Indirect Economic Impact with outside aid
(Employment as # of people and Income in millions of $)

	LOSS	Total	%
First Year			
	Employment Impact	(2,602,957)	-38.89
	Income Impact	(18,079)	-5.38
Second Year			
	Employment Impact	2,593,697	38.75
	Income Impact	13,635	4.06
Third Year			
	Employment Impact	394,042	5.89
	Income Impact	20,510	6.11
Fourth Year			
	Employment Impact	22,191	0.33
	Income Impact	560	0.17
Fifth Year			
	Employment Impact	1,251	0.02
	Income Impact	(564)	-0.17
Years 6 to 15			
	Employment Impact	72	0.00
	Income Impact	(627)	-0.19

Appendix A: County Listing for the Region

Imperial,CA

Kern,CA

Los Angeles,CA

Orange,CA

Riverside,CA

San Bernardino,CA

San Diego,CA

San Luis Obispo,CA

Santa Barbara,CA

Ventura,CA

Appendix B: Regional Population and Building Value Data

State	County Name	Population	Building Value (millions of dollars)		
			Residential	Non-Residential	Total
California					
	Imperial	142,361	5,037	1,548	6,586
	Kern	661,645	32,597	8,643	41,240
	Los Angeles	9,519,338	522,699	168,306	691,005
	Orange	2,846,289	183,299	57,530	240,830
	Riverside	1,545,387	88,621	21,255	109,876
	San Bernardino	1,709,434	92,383	22,452	114,835
	San Diego	2,813,833	179,289	45,457	224,747
	San Luis Obispo	246,681	17,021	4,544	21,566
	Santa Barbara	399,347	25,589	6,660	32,249
	Ventura	753,197	50,092	12,808	62,901
Total State		**20,637,512**	**1,196,627**	**349,203**	**1,545,835**
Total Region		**20,637,512**	**1,196,627**	**349,203**	**1,545,835**

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	6.70 - 26.80
	Building Contents	0.60 - 2.30
	Business Interruption	1.30 - 5.10
Infrastructure	Lifelines Damage	
	Total	10.30 - 41.00

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	300 - 1,000	6 - 30	2 - 10	300 - 1,100
Major	20 - 100	1 - 4	0 - 2	30 - 110
Total	300 - 1,100	8 - 30	3 - 13	300 - 1,200

Estimated Casualties : Night Time

Severity Level	Description	# Persons
Level 1	Medical Aid	3,000 - 11,000
Level 2	Hospital Care	500 - 2,000
Level 3	Life-threatening	50 - 190
Level 4	Fatalities	90 - 400

Estimated Shelter Needs

Type	Households	People
Displaced Households	4,000 - 17,000	
Public Shelter		

Comments :

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:

The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, goetechnical, and observed ground motion data.

Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 20,637,512

Building Exposure : ($ Millions)

Residential	1,196,632
Commerical	242,261
Other	106,944
Total	1,545,837

State: 4,000 - 16,000

Counties :

Major Metro Area :

Appendix: Counties

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	6.70 - 26.80
	Building Contents	0.60 - 2.30
	Business Interruption	1.30 - 5.10
Infrastructure	Lifelines Damage	
	Total	10.30 - 41.00

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	300 - 1,000	6 - 30	2 - 10	300 - 1,100
Major	20 - 100	1 - 4	0 - 2	30 - 110
Total	300 - 1,100	8 - 30	3 - 13	300 - 1,200

Estimated Casualties : Day Time

Severity Level	Description	# Persons
Level 1	Medical Aid	4,000 - 17,000
Level 2	Hospital Care	1,100 - 4,000
Level 3	Life-threatening	170 - 700
Level 4	Fatalities	300 - 1,300

Estimated Shelter Needs

Type	Households	People
Displaced Households	4,000 - 17,000	
Public Shelter		

Comments :

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:

The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, goetechnical, and observed ground motion data.

Appendix: Counties

Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 20,637,512

Building Exposure : ($ Millions)

Residential	1,196,632
Commerical	242,261
Other	106,944
Total	1,545,837

State: 4,000 - 16,000

Counties :

Major Metro Area :

Time of report: May 26, 2009 2:52 pm

S2 San Andreas Fault - Southern Scenario M 7.8

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	6.70 - 26.80
	Building Contents	0.60 - 2.30
	Business Interruption	1.30 - 5.10
Infrastructure	Lifelines Damage	
	Total	10.30 - 41.00

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	300 - 1,000	6 - 30	2 - 10	300 - 1,100
Major	20 - 100	1 - 4	0 - 2	30 - 110
Total	300 - 1,100	8 - 30	3 - 13	300 - 1,200

Estimated Casualties : Commute Time

Severity Level	Description	# Persons
Level 1	Medical Aid	3,000 - 14,000
Level 2	Hospital Care	1,000 - 4,000
Level 3	Life-threatening	400 - 1,500
Level 4	Fatalities	300 - 1,100

Estimated Shelter Needs

Type	Households	People
Displaced Households	4,000 - 17,000	
Public Shelter		

Comments :

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:

The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, goetechnical, and observed ground motion data.

Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 20,637,512

Building Exposure : ($ Millions)

Residential	1,196,632
Commerical	242,261
Other	106,944
Total	1,545,837

State: 4,000 - 16,000

Counties :

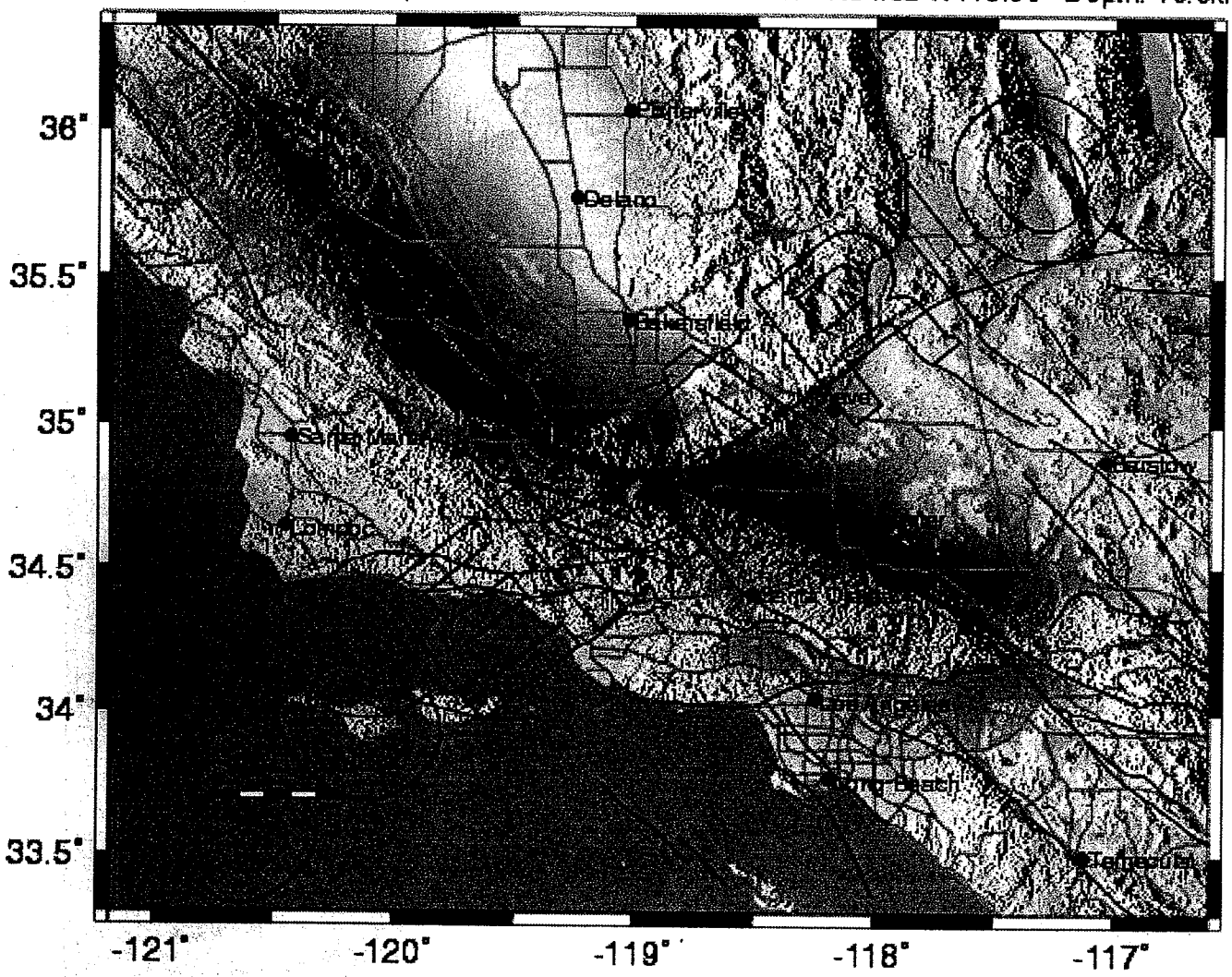
Major Metro Area :

Appendix: Counties

-- Earthquake Planning Scenario --

ShakeMap for San Andreas 1857 rupture Scenario

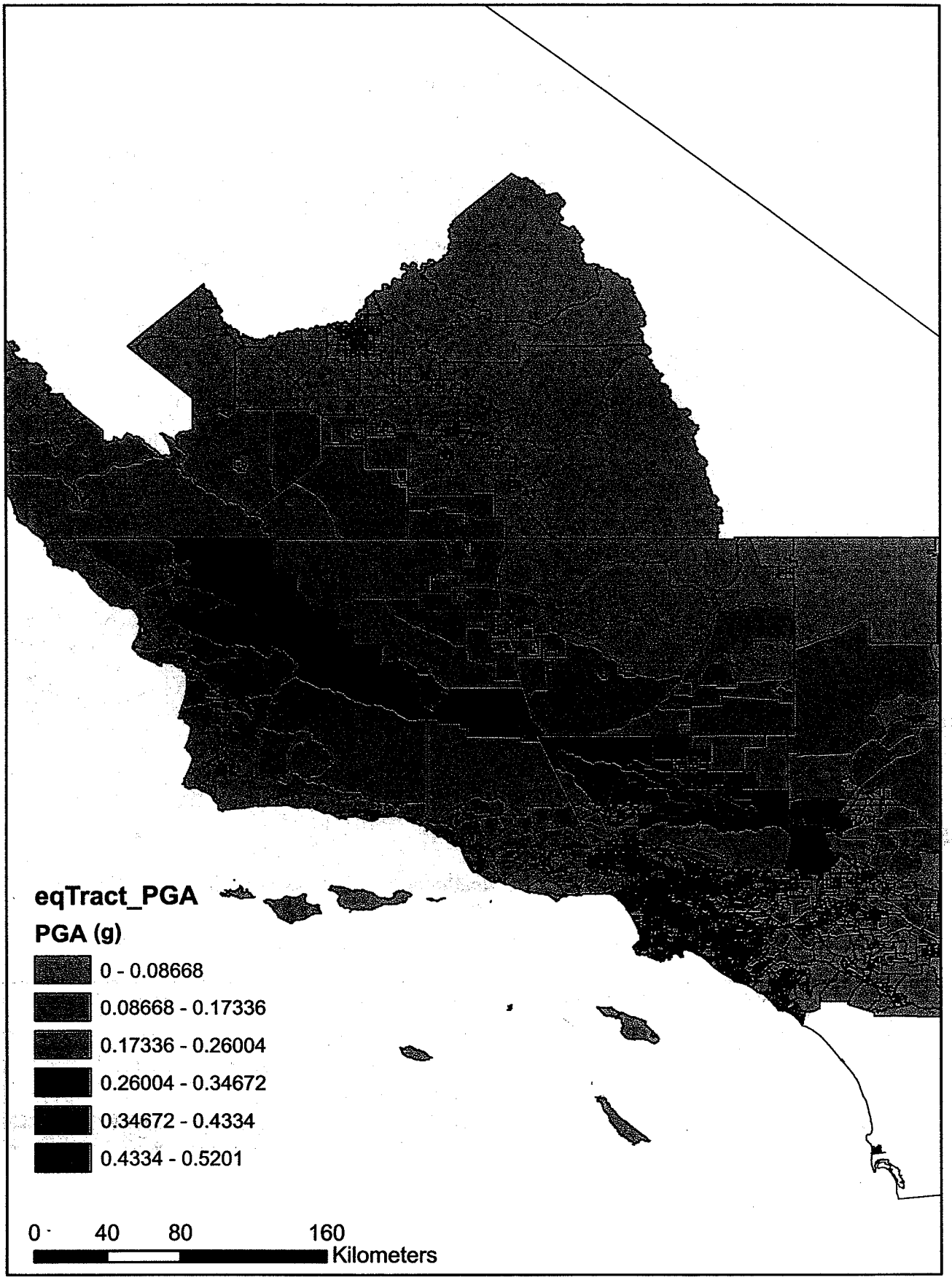
Scenario Date: Fri Feb 15, 2002 08:00:00 AM PST M 7.8 N34.82 W118.90 Depth: 10.0km



PLANNING SCENARIO ONLY -- Map Version 12 Processed Fri Aug 24, 2007 09:09:51 AM PDT

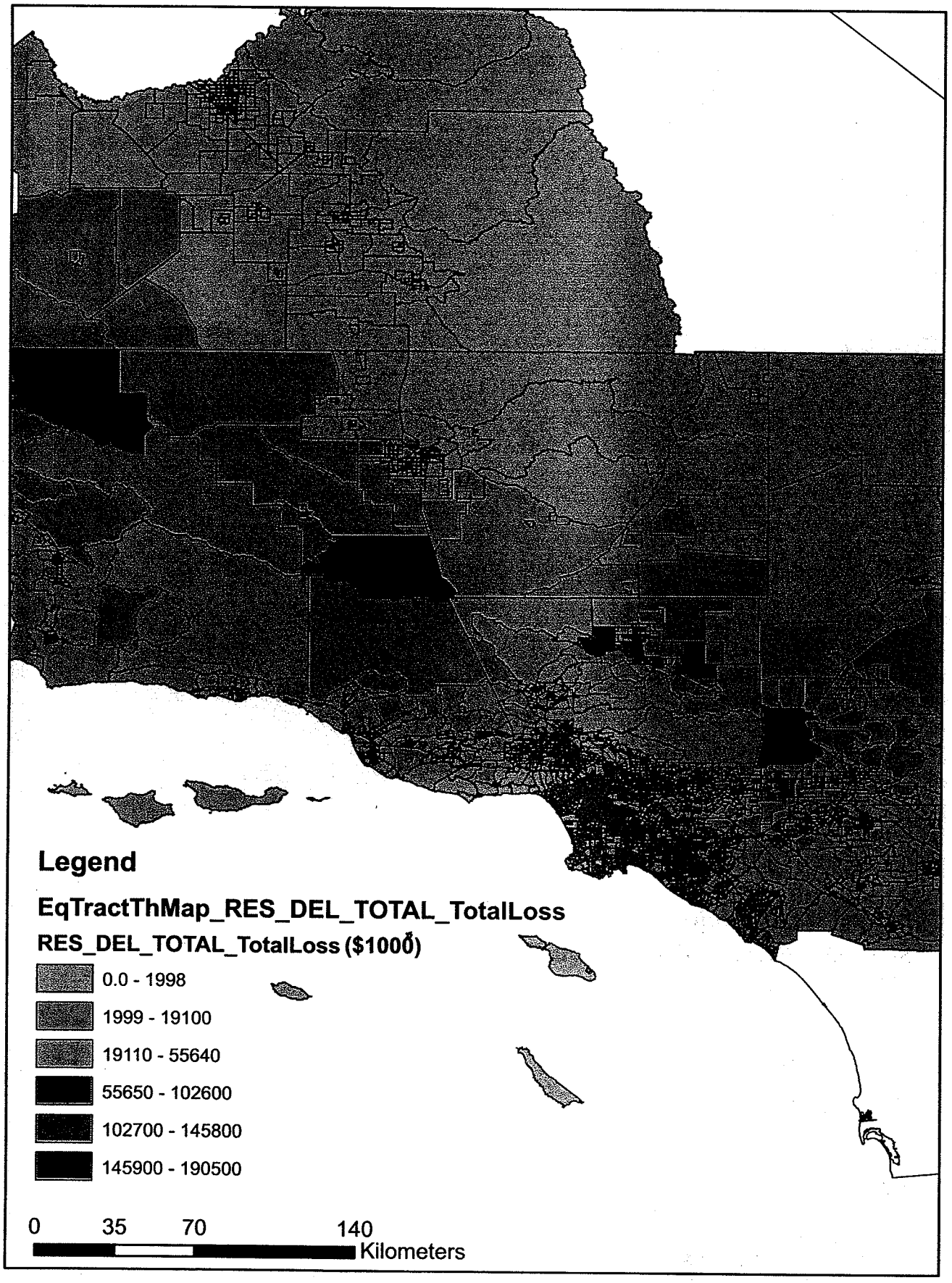
PERCEIVED SHAKING	Not felt	Weak	Light	Moderate	Strong	Very strong	Severe	Violent	Extreme
POTENTIAL DAMAGE	none	none	none	Very light	Light	Moderate	Moderate/Heavy	Heavy	Very Heavy
PEAK ACC.(%g)	<.17	.17-1.4	1.4-3.9	3.9-9.2	9.2-18	18-34	34-65	65-124	>124
PEAK VEL.(cm/s)	<0.1	0.1-1.1	1.1-3.4	3.4-8.1	8.1-16	16-31	31-60	60-116	>116
INSTRUMENTAL INTENSITY	I	II-III	IV	V	VI	VII	VIII		

Peak Ground Acceleration by Census Tract



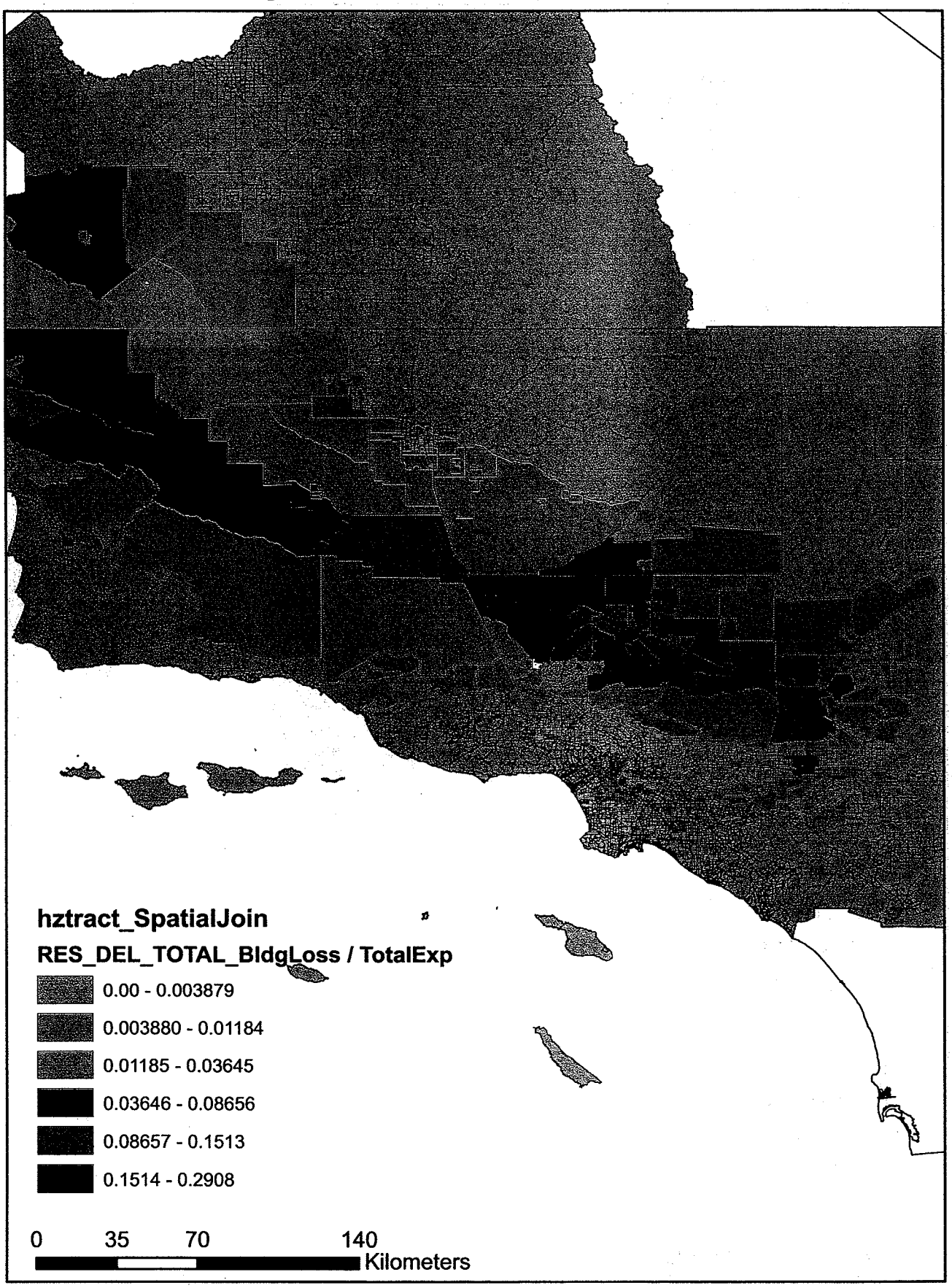
S21 San Andreas Fault - 1857 Scenario M 7.8

Total Building Loss by Census Tract



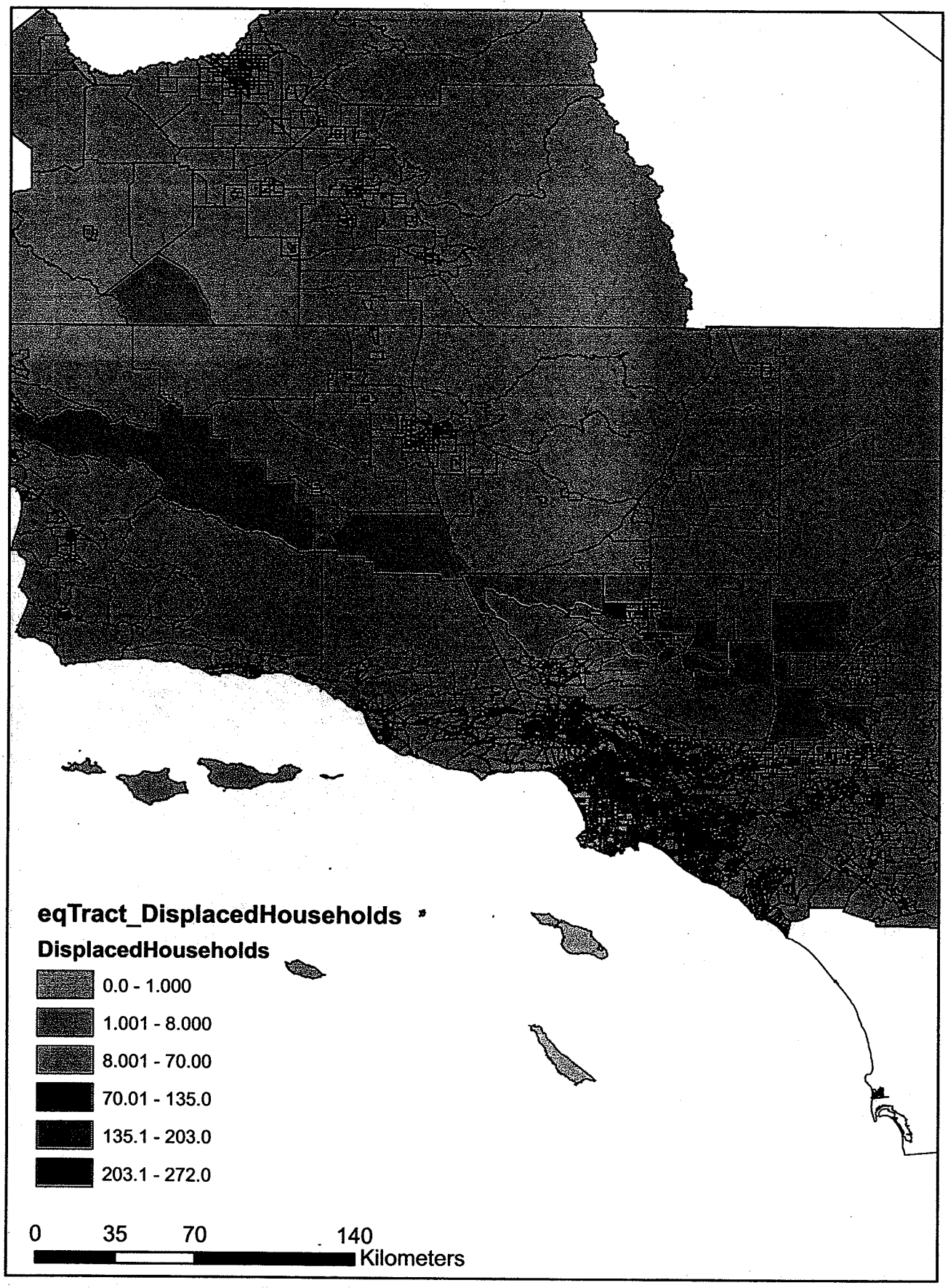
S21 San Andreas Fault - 1857 Scenario M 7.8

Building Loss Ratio by Census Tract



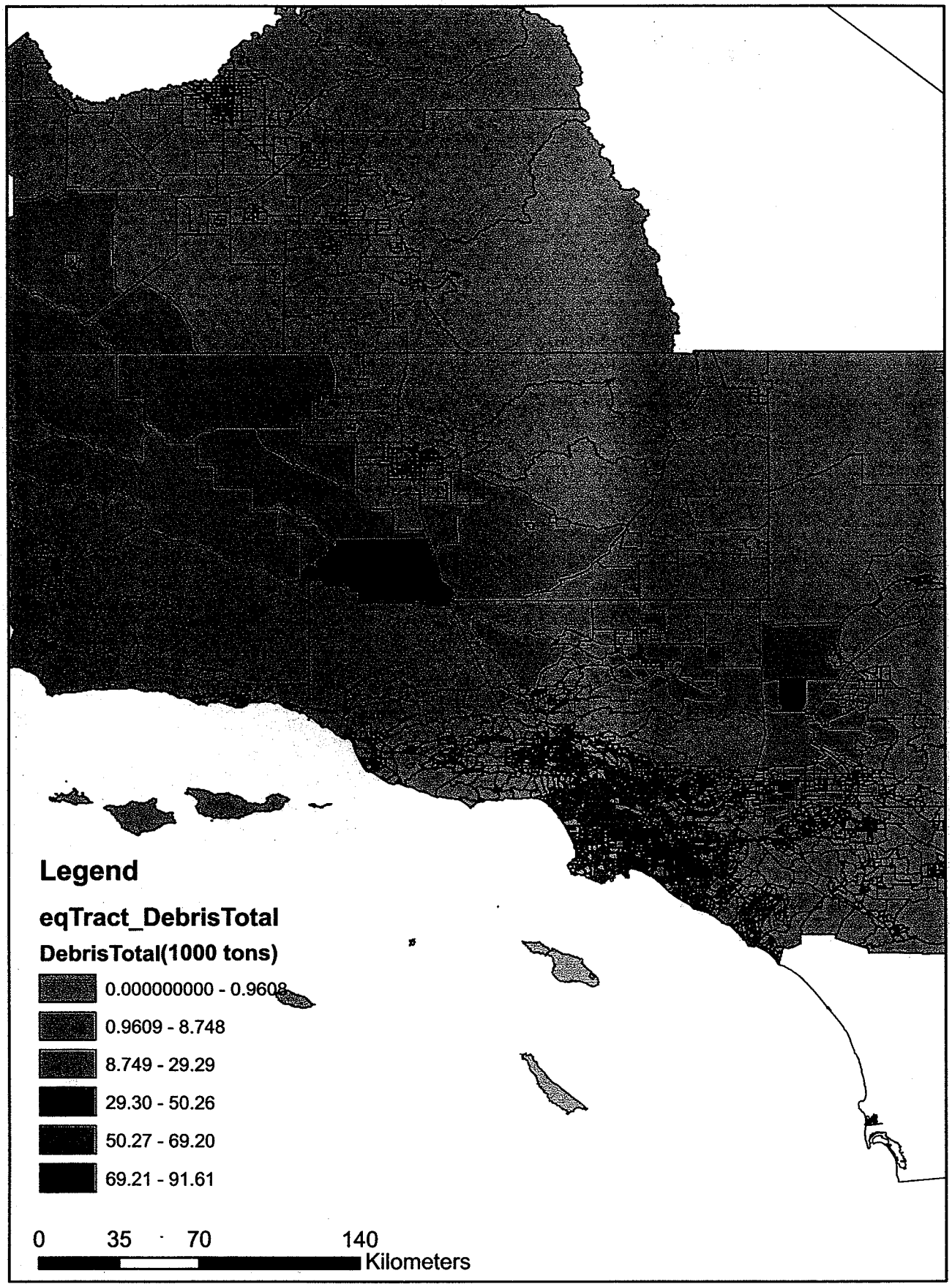
S21 San Andreas Fault - 1857 Scenario M 7.8

Displaced Households by Census Tract



S21 San Andreas Fault - 1857 Scenario M 7.8

Debris Generated by Census Tract



S21 San Andreas Fault - 1857 Scenario M 7.8

Name	CountyName	Owner	DamHeight	MaxStorage	PGA	PGV	Sa03	Sa10
HAROLD RESERVOIR	LOS ANGELES	PALMDALE WATER DISTRICT	30.00	7200.00	0.520	44.000	1.160	1.200
FAIRMONT	LOS ANGELES	CITY OF LOS ANGELES	121.00	9082.00	0.480	40.000	1.040	1.120
AMARGOSA CREEK	LOS ANGELES	CITY OF PALMDALE	65.00	1976.00	0.480	36.000	1.040	0.960
WEST SIDE TAILINGS AREA	KERN	EXCELL-MINERAL CO.	50.00	710.00	0.400	32.000	0.880	0.840
NORTH EAST TAILINGS AREA	KERN	EXCELL-MINERAL CO.	50.00	75.00	0.400	32.000	0.880	0.840
EAST SIDE TAILINGS AREA	INYO	EXCELL-MINERAL CO.	83.00	340.00	0.400	32.000	0.880	0.840
FAIRMONT NO 2	LOS ANGELES	CITY OF LOS ANGELES	24.00	0.00	0.480	32.000	1.040	0.800
PEARBLOSSOM SP BN	LOS ANGELES	STATE DEPT OF WATER RESOU	20.00	142.00	0.360	28.000	0.760	0.760
DAY CREEK DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	90.00	0.00	0.440	24.000	0.960	0.680
DEER CANYON DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	78.00	147.00	0.440	24.000	0.960	0.680
SAN ANTONIO DAM	LOS ANGELES	CESPL	160.00	11880.00	0.440	24.000	0.960	0.680
EAGLE RANCH	SAN LUIS OBISPO	HELEN M SMITH	55.00	215.00	0.320	20.000	0.600	0.520
SALINAS DAM	SAN LUIS OBISPO	CESPL	135.00	43200.00	0.320	20.000	0.600	0.520
DRY CANYON	LOS ANGELES	CITY OF LOS ANGELES	66.00	1660.00	0.320	16.000	0.600	0.480
DRINKWATER	LOS ANGELES	CITY OF LOS ANGELES	105.00	112.00	0.320	16.000	0.600	0.480
BOUQUET CANYON	LOS ANGELES	CITY OF LOS ANGELES	190.00	46405.00	0.320	20.000	0.640	0.480
ALTA LOMA BASIN 1	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	30.00	185.00	0.280	16.000	0.520	0.440
ALTA LOMA BASIN 2	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	22.00	85.00	0.280	16.000	0.520	0.440
DEMENS CR DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	35.00	133.00	0.280	16.000	0.520	0.440
CASTAIC	LOS ANGELES	STATE DEPT OF WATER RESOU	340.00	365000.00	0.360	16.000	0.720	0.440
Elderberry Forebay	Los Angeles	Los Angeles, City of	180.00	28200.00	0.360	16.000	0.720	0.440
Cedar Springs	Los Angeles	California Department of	203.00	75000.00	0.360	16.000	0.720	0.440
DESILTING BASIN 6	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	22.00	0.00	0.240	16.000	0.480	0.400
CUCAMONGA CR DB	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	60.00	1170.00	0.240	16.000	0.480	0.400
LITTLEROCK	LOS ANGELES	LITTLE ROCK CREEK ID	124.00	3700.00	0.280	16.000	0.600	0.400
JURUPA BASIN	SAN BERNARDINO	COUNTY OF SAN BERNARDINO	0.00	0.00	0.240	12.000	0.440	0.360
BUENA VISTA	KERN	KERN CO DEPT OF PARKS AND	14.00	0.00	0.240	12.000	0.480	0.360
BUENA VISTA	KERN	J G BOSWELL CO & TENNECO	20.00	0.00	0.240	12.000	0.480	0.360
AVENAL EFFL STO	KINGS	STATE DEPT OF CORRECTIONS	25.00	783.00	0.240	12.000	0.440	0.360
LITTLE MOUNTAIN	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	28.00	150.00	0.200	12.000	0.400	0.320
WIGGINS NO 2	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	19.00	284.00	0.240	12.000	0.440	0.320
BERRENDA MESA	KERN	BERRENDA MESA WATER DISTR	22.00	300.00	0.200	12.000	0.400	0.320
DEVILS CAN DYKE	SAN BERNARDINO	CITY OF SAN BERNARDINO	15.00	119.00	0.240	12.000	0.440	0.320
PERRIS HILL RES	SAN BERNARDINO	CITY OF SAN BERNARDINO	31.00	32.00	0.200	12.000	0.360	0.320
BIG DALTON	LOS ANGELES	LOS ANGELES COUNTY DPW	153.00	1331.00	0.240	12.000	0.520	0.320
WEYMOUTH MEM RES	LOS ANGELES	METROPOLITAN WATER DIST	18.00	184.00	0.200	12.000	0.400	0.320
SAN DIMAS	LOS ANGELES	LOS ANGELES COUNTY DPW	131.00	1849.00	0.240	12.000	0.520	0.320
COGSWELL	LOS ANGELES	LOS ANGELES COUNTY DPW	266.00	12234.00	0.240	12.000	0.520	0.320
MORRIS	LOS ANGELES	METROPOLITAN WATER DIST	245.00	34000.00	0.240	12.000	0.520	0.320
Devil Canyon Second Afterbay	San Bernardino	California Department of	40.00	800.00	0.240	12.000	0.520	0.320

MATILIJA	VENTURA	VENTURA COUNTY FCD	163.00	1800.00	0.240	12.000	0.440	0.320
Quail	Los Angeles	California Department of	44.00	7770.00	0.240	12.000	0.440	0.320
SAN ANTONIO	MONTEREY	MONTEREY COUNTY FCWCD	201.00	484500.00	0.200	12.000	0.360	0.280
LOWER STONEY VALLEY	MONTEREY	FORT HUNTER LIGGETT	30.00	150.00	0.200	12.000	0.360	0.280
EL PIOJO	MONTEREY	FORT HUNTER LIGGETT	0.00	50.00	0.200	12.000	0.360	0.280
HUGHES	MONTEREY	FORT HUNTER LIGGETT	50.00	300.00	0.200	12.000	0.360	0.280
OAT HILL RESERVOIR	MONTEREY	FORT HUNTER LIGGETT	15.00	50.00	0.200	12.000	0.360	0.280
ENGINEER	MONTEREY	FORT HUNTER LIGGETT	0.00	50.00	0.200	12.000	0.360	0.280
LOPEZ DAM	LOS ANGELES	CESPL	50.00	209.00	0.160	8.000	0.320	0.280
LIVE OAK RES	LOS ANGELES	METROPOLITAN WATER DIST	105.00	0.00	0.200	8.000	0.400	0.280
PUDDINGSTONE	LOS ANGELES	LOS ANGELES COUNTY DPW	147.00	22232.00	0.200	8.000	0.320	0.280
PUDDINGSTONE DIV	LOS ANGELES	LOS ANGELES COUNTY DPW	34.00	514.00	0.200	8.000	0.400	0.280
MORGAN DEBRIS BN	LOS ANGELES	LOS ANGELES COUNTY DPW	37.00	36.00	0.200	12.000	0.400	0.280
SINALOA	VENTURA	SINALOA LAKE OWNERS ASSOC	30.00	0.00	0.160	8.000	0.320	0.240
LOS ANGELES RES	LOS ANGELES	CITY OF LOS ANGELES	130.00	11800.00	0.160	8.000	0.280	0.240
SCHOOLHOUSE DB	LOS ANGELES	LOS ANGELES COUNTY DPW	38.00	0.00	0.160	8.000	0.320	0.240
BLANCHARD DB	LOS ANGELES	LOS ANGELES COUNTY DPW	35.00	51.00	0.160	8.000	0.320	0.240
CHATSWORTH	LOS ANGELES	CITY OF LOS ANGELES	45.00	18486.00	0.160	8.000	0.280	0.240
LOWER SAN FERNANDO	LOS ANGELES	CITY OF LOS ANGELES	125.00	12000.00	0.160	8.000	0.280	0.240
UPPER SAN FERNANDO	LOS ANGELES	CITY OF LOS ANGELES	82.00	2388.00	0.160	8.000	0.280	0.240
CHANNEL DIV DIKE	LOS ANGELES	CITY OF LOS ANGELES	42.00	662.00	0.160	8.000	0.280	0.240
YARNELL DEBR BN	LOS ANGELES	CITY OF LOS ANGELES	42.00	216.00	0.160	8.000	0.280	0.240
L VAN NORMAN BYPASS	LOS ANGELES	CITY OF LOS ANGELES	78.00	280.00	0.160	8.000	0.280	0.240
HANSEN DAM	LOS ANGELES	CESPL	97.00	44990.00	0.160	8.000	0.320	0.240
SANTA FE DAM	LOS ANGELES	CESPL	92.00	45409.00	0.160	8.000	0.320	0.240
ANTELOPE	KERN	TEHACHAPI-CUMMINGS CO WD	57.00	996.00	0.160	8.000	0.280	0.240
DECLEZ DETENTION	RIVERSIDE	SAN BERNARDINO CO FC DIST	30.00	480.00	0.200	8.000	0.360	0.240
PIGEON PASS	RIVERSIDE	RIVERSIDE COUNTY FCWCD	36.00	1400.00	0.160	8.000	0.280	0.240
RANCHO CIELITO	SAN BERNARDINO	ROLLING RIDGE RANCH	9.00	160.00	0.160	8.000	0.280	0.240
CHINO RANCH NO 1	SAN BERNARDINO	CITY OF INDUSTRY URBAN DE	22.00	249.00	0.160	8.000	0.280	0.240
SAWPIT DB	LOS ANGELES	LOS ANGELES COUNTY DPW	82.00	273.00	0.160	8.000	0.320	0.240
SANTA ANITA DB	LOS ANGELES	LOS ANGELES COUNTY DPW	56.00	386.00	0.160	8.000	0.320	0.240
LA TUNA DB	LOS ANGELES	LOS ANGELES COUNTY DPW	47.00	384.00	0.160	8.000	0.320	0.240
BAILEY DB	LOS ANGELES	LOS ANGELES COUNTY DPW	43.00	65.00	0.160	8.000	0.320	0.240
30 MG CENTRAL RES	ORANGE	CITY OF BREA	30.00	94.00	0.160	8.000	0.280	0.240
LAKE GREGORY	SAN BERNARDINO	SAN BERNARDINO CO REG PK	90.00	3360.00	0.200	8.000	0.360	0.240
LIVE OAK	LOS ANGELES	LOS ANGELES COUNTY DPW	76.00	330.00	0.200	8.000	0.360	0.240
SAWPIT	LOS ANGELES	LOS ANGELES COUNTY DPW	150.00	914.00	0.160	8.000	0.320	0.240
SIERRA MADRE	LOS ANGELES	LOS ANGELES COUNTY DPW	69.00	64.00	0.160	8.000	0.320	0.240
THOMPSON CREEK	LOS ANGELES	LOS ANGELES COUNTY DPW	66.00	1042.00	0.200	8.000	0.400	0.240
DIEMER NO 8	ORANGE	METROPOLITAN WATER DIST	172.00	22.00	0.160	8.000	0.280	0.240

RUBIO DB	LOS ANGELES	LOS ANGELES COUNTY DPW	64.00	345.00	0.160	8.000	0.320	0.240
VAN NUYS RESERV	LOS ANGELES	SAN GABRIEL COUNTY WD	23.00	0.00	0.160	8.000	0.280	0.240
Santa Felicia	Ventura	United Water Conservation	213.00	88000.00	0.200	8.000	0.360	0.240
LAS LLAJAS	VENTURA	VENTURA COUNTY FCD	96.00	1650.00	0.160	8.000	0.280	0.200
SMALL CANYON	SAN BERNARDINO	SAN BERNARDINO CO FC DIST	68.00	36.00	0.160	8.000	0.280	0.200
METZ ROAD DB	RIVERSIDE	RIVERSIDE COUNTY FCWCD	12.00	154.00	0.120	8.000	0.200	0.200
PORTER ESTATE	LOS ANGELES	PORTER RANCH DEVELOPMENT	41.00	240.00	0.160	8.000	0.240	0.200
LOWER SUNSET DB	LOS ANGELES	LOS ANGELES COUNTY DPW	86.00	74.00	0.160	8.000	0.280	0.200
STOUGH DB	LOS ANGELES	LOS ANGELES COUNTY DPW	46.00	102.00	0.160	8.000	0.280	0.200
RESERVOIR NO 1	LOS ANGELES	CITY OF BURBANK	35.00	23.00	0.160	8.000	0.280	0.200
RESERVOIR NO 4	LOS ANGELES	CITY OF BURBANK	38.00	38.00	0.160	8.000	0.280	0.200
RESERVOIR NO 5	LOS ANGELES	CITY OF BURBANK	36.00	83.00	0.160	8.000	0.280	0.200
10TH AND WESTER	LOS ANGELES	CITY OF GLENDALE	28.00	49.00	0.160	8.000	0.280	0.200
ELYSIAN	LOS ANGELES	CITY OF LOS ANGELES	71.00	187.00	0.160	8.000	0.240	0.200
MULHOLLAND	LOS ANGELES	CITY OF LOS ANGELES	195.00	7236.00	0.160	8.000	0.240	0.200
SILVER LAKE	LOS ANGELES	CITY OF LOS ANGELES	43.00	2758.00	0.120	8.000	0.240	0.200
UPPER HOLLYWOOD	LOS ANGELES	CITY OF LOS ANGELES	87.00	243.00	0.160	8.000	0.240	0.200
GREEN VERDUGO	LOS ANGELES	CITY OF LOS ANGELES	118.00	116.00	0.160	8.000	0.280	0.200
HAINES CANYON DEBRIS DAM	LOS ANGELES	CESPL	70.00	15.00	0.160	8.000	0.280	0.200
MARSHBURN RETD BN	ORANGE	COUNTY OF ORANGE	27.00	0.00	0.160	8.000	0.240	0.200
GALIVAN RETD BASIN	ORANGE	COUNTY OF ORANGE	20.00	0.00	0.160	8.000	0.240	0.200
ORCHARD ESTATES RETD BN	ORANGE	COUNTY OF ORANGE	21.00	0.00	0.160	8.000	0.240	0.200
HANSEN RECREATIONAL LAKE	LOS ANGELES	CITY OF LOS ANGELES	50.00	0.00	0.160	8.000	0.240	0.200
JURUPA BASIN	RIVERSIDE	RIVERSIDE COUNTY FCWCD	22.00	291.00	0.160	8.000	0.280	0.200
MOCKINGBIRD CAN	RIVERSIDE	CITY OF RIVERSIDE	74.00	2905.00	0.160	8.000	0.280	0.200
EMPIRE WEIR NO 2	KINGS	TULARE L BASIN WAT STOR D	15.00	0.00	0.160	8.000	0.240	0.200
MIN HOT SPRINGS L	SAN BERNARDINO	CAMPUS CRUSADE FOR CHRIST	54.00	45.00	0.160	8.000	0.320	0.200
SENIOR CANYON	VENTURA	SENIOR CANYON MUTUAL WATE	76.00	98.00	0.160	8.000	0.280	0.200
GRASS VALLEY	SAN BERNARDINO	ARROWHEAD LAKE ASSOCIATIO	35.00	505.00	0.160	8.000	0.320	0.200
LAKE ARROWHEAD	SAN BERNARDINO	ARROWHEAD LAKE ASSOCIATIO	190.00	56400.00	0.160	8.000	0.320	0.200
TEJON STORAGE 2	KERN	TEJON RANCH COMPANY	67.00	1051.00	0.160	8.000	0.320	0.200
LITTLE DALTON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	71.00	360.00	0.200	8.000	0.320	0.200
YORBA	ORANGE	COUNTY OF ORANGE	45.00	1722.00	0.120	8.000	0.240	0.200
J C JACOBSEN	KERN	TEHACHAPI-CUMMINGS CO WD	56.00	2420.00	0.160	8.000	0.320	0.200
WILSON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	54.00	0.00	0.200	8.000	0.360	0.200
SIERRA MADRE VI	LOS ANGELES	LOS ANGELES COUNTY DPW	50.00	200.00	0.160	8.000	0.280	0.200
BIG DALTON DB	LOS ANGELES	LOS ANGELES COUNTY DPW	59.00	0.00	0.200	8.000	0.320	0.200
IRRIGATION RES	KERN	CITY OF BAKERSFIELD	22.00	6505.00	0.160	8.000	0.240	0.200
OAK STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	36.00	400.00	0.120	8.000	0.240	0.200
MABEY CANYON	RIVERSIDE	RIVERSIDE COUNTY FCWCD	46.00	111.00	0.160	8.000	0.240	0.200
NEW L ARROWHEAD	SAN BERNARDINO	COUNTY OF SAN BERNARDINO	225.00	2270.00	0.160	8.000	0.320	0.200

AERATED LAGOON	KERN	CITY OF BAKERSFIELD	12.00	0.00	0.160	8.000	0.240	0.200
BLACKBURN	KERN	TEHACHAPI-CUMMINGS CO WD	48.00	1128.00	0.160	8.000	0.320	0.200
BIG SANTA ANITA	LOS ANGELES	LOS ANGELES COUNTY DPW	225.00	1028.00	0.160	8.000	0.320	0.200
MORRIS S JONES	LOS ANGELES	PASADENA DEPT WATER & POW	49.00	184.00	0.160	8.000	0.280	0.200
DIEMER RESERVOIR	ORANGE	METROPOLITAN WATER DIST	22.00	98.00	0.160	8.000	0.240	0.200
ORANGE CO RES	ORANGE	METROPOLITAN WATER DIST	103.00	240.00	0.160	8.000	0.240	0.200
GARVEY RES	LOS ANGELES	METROPOLITAN WATER DIST	160.00	1850.00	0.160	8.000	0.240	0.200
BIG TUJUNGA NO	LOS ANGELES	LOS ANGELES COUNTY DPW	208.00	7023.00	0.200	8.000	0.360	0.200
PACOIMA	LOS ANGELES	LOS ANGELES COUNTY DPW	365.00	9251.00	0.200	8.000	0.360	0.200
EATON WASH DB	LOS ANGELES	LOS ANGELES COUNTY DPW	63.00	1501.00	0.160	8.000	0.280	0.200
LAGUNA REG BASIN	LOS ANGELES	LOS ANGELES COUNTY DPW	43.00	568.00	0.160	8.000	0.240	0.200
BREA DAM	ORANGE	CESPL	87.00	7420.00	0.120	8.000	0.240	0.200
CARBON CANYON DAM	ORANGE	CESPL	99.00	12063.00	0.160	8.000	0.240	0.200
FULLERTON DAM	ORANGE	CESPL	46.00	1342.00	0.120	8.000	0.240	0.200
PRADO DAM	RIVERSIDE	CESPL	106.00	295581.00	0.160	8.000	0.280	0.200
SEPULVEDA DAM	LOS ANGELES	CESPL	57.00	27563.00	0.160	8.000	0.240	0.200
WHITTIER NARROWS DAM	LOS ANGELES	CESPL	56.00	66702.00	0.160	8.000	0.240	0.200
Kern Diversion	Kern	Southern California Ediso	60.00	247.00	0.160	8.000	0.320	0.200
Pyramid	Los Angeles	California Department of	400.00	171000.00	0.160	8.000	0.320	0.200
CHORRO CREEK	SAN LUIS OBISPO	STATE DEPT OF CORRECTIONS	77.00	477.00	0.120	8.000	0.240	0.200
LINDERO	LOS ANGELES	LAKE LINDERO HOMEOWNERS A	19.00	180.00	0.120	8.000	0.200	0.200
SAN MARCOS	SAN LUIS OBISPO	HARRY E BLYTHE JR	42.00	785.00	0.160	8.000	0.280	0.200
RIGHETTI	SAN LUIS OBISPO	ERNEST R RIGHETTI	75.00	783.00	0.120	8.000	0.240	0.200
LAS TABLAS CR	SAN LUIS OBISPO	SECURITY PAC NATIONAL BAN	37.00	275.00	0.160	8.000	0.280	0.200
ATASCADERO PARK	SAN LUIS OBISPO	CITY OF ATASCADERO DPW	18.00	416.00	0.160	8.000	0.280	0.200
STEWART CAN DB	VENTURA	VENTURA COUNTY FCD	34.00	0.00	0.160	8.000	0.280	0.200
TERMINAL	SAN LUIS OBISPO	SAN LUIS OBISPO CO FCWCD	53.00	1094.00	0.160	8.000	0.280	0.200
LOPEZ	SAN LUIS OBISPO	SAN LUIS OBISPO CO FCWCD	166.00	77000.00	0.120	8.000	0.240	0.200
CASITAS SADDLE DIKE	VENTURA	DOI BR	36.00	287000.00	0.120	8.000	0.240	0.200
TWITCHELL	SAN LUIS OBISPO, SANTA BARBARA	DOI BR	216.00	398120.00	0.160	8.000	0.280	0.200
Nacimiento	San Luis Obispo	Monterey County Water Res	215.00	470000.00	0.160	8.000	0.280	0.200
KERN R CO PARK	KERN	KERN CO DEPT OF PARKS AND	18.00	1166.00	0.120	4.000	0.200	0.160
OLIVE HILLS RES	ORANGE	CITY OF ANAHEIM	140.00	220.00	0.120	8.000	0.200	0.160
BORAX SOLAR EVAP	KERN	U S BORAX AND CHEMICAL CO	18.00	287.00	0.120	4.000	0.160	0.160
VILLA PARK	ORANGE	COUNTY OF ORANGE	118.00	24900.00	0.120	8.000	0.200	0.160
PETERS CANYON	ORANGE	COUNTY OF ORANGE	54.00	1460.00	0.120	4.000	0.200	0.160
BIG FOUR RANCH	KERN	KERN-TULARE WATER DISTRIC	38.00	377.00	0.120	4.000	0.200	0.160
ELK BAYOU	TULARE	KAWEAH DELTA WC DISTRICT	16.00	0.00	0.080	4.000	0.160	0.160
GREYSTONE RES	LOS ANGELES	CITY OF BEVERLY HILLS	75.00	61.00	0.120	8.000	0.200	0.160
YUCAIPA NO 3	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	35.00	47.00	0.120	4.000	0.200	0.160

YUCAIPA NO 2	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	49.00	170.00	0.120	4.000	0.200	0.160
YUCAIPA NO 1	SAN BERNARDINO	SAN BERNARDINO VALLEY MWD	42.00	152.00	0.120	4.000	0.200	0.160
SHEFFIELD	SANTA BARBARA	CITY OF SANTA BARBARA	28.00	163.00	0.120	4.000	0.200	0.160
LAURO	SANTA BARBARA	DOI BR	117.00	870.00	0.120	4.000	0.200	0.160
WHITTIER RES NO	LOS ANGELES	CITY OF WHITTIER	55.00	34.00	0.120	4.000	0.160	0.160
ENCINO	LOS ANGELES	CITY OF LOS ANGELES	168.00	12100.00	0.120	8.000	0.200	0.160
EAGLE ROCK	LOS ANGELES	CITY OF LOS ANGELES	113.00	291.00	0.120	8.000	0.240	0.160
AMARGOSA CREEK	LOS ANGELES	CITY OF PALMDALE	65.00	0.00	0.120	4.000	0.160	0.160
FAIRMOUNT PARK	RIVERSIDE	CITY OF RIVERSIDE	12.00	330.00	0.120	4.000	0.160	0.160
HARRISON STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	50.00	350.00	0.120	4.000	0.160	0.160
BOX SPRINGS	RIVERSIDE	RIVERSIDE COUNTY FCWCD	49.00	630.00	0.120	4.000	0.160	0.160
SYCAMORE	RIVERSIDE	RIVERSIDE COUNTY FCWCD	63.00	1510.00	0.120	8.000	0.240	0.160
ALESSANDRO	RIVERSIDE	RIVERSIDE COUNTY FCWCD	66.00	530.00	0.120	4.000	0.160	0.160
EMPIRE WEIR NO 1	KINGS	EMPIRE WEST SIDE IRR DIST	18.00	0.00	0.120	8.000	0.200	0.160
ISLAND WEIR	KINGS	LAGUNA IRRIGATION DISTRIC	13.00	230.00	0.120	8.000	0.200	0.160
CRESCENT WEIR	KINGS	CRESENT CANAL COMPANY	16.00	50.00	0.120	8.000	0.200	0.160
CHEVY CHASE 1290	LOS ANGELES	CITY OF GLENDALE	90.00	21.00	0.120	4.000	0.240	0.160
GREEN VAL LAKE	SAN BERNARDINO	GREEN VALLEY MUTUAL WATER	56.00	316.00	0.120	4.000	0.240	0.160
WALNUT CANYON	ORANGE	CITY OF ANAHEIM	187.00	2796.00	0.120	8.000	0.240	0.160
DEVILS GATE	LOS ANGELES	LOS ANGELES COUNTY DPW	103.00	5858.00	0.160	8.000	0.240	0.160
EAST GLORIETTA	LOS ANGELES	CITY OF GLENDALE	22.00	78.00	0.120	4.000	0.240	0.160
SUNNYMEAD RANCH	RIVERSIDE	SUNNYMEAD RANCH COMM ASSO	41.00	540.00	0.120	4.000	0.160	0.160
BRAND DB	LOS ANGELES	LOS ANGELES COUNTY DPW	45.00	86.00	0.120	4.000	0.240	0.160
BORON TAILS PD 6	KERN	U S BORAX AND CHEMICAL CO	39.00	0.00	0.120	8.000	0.200	0.160
BORON TAILS PD 5	KERN	U S BORAX AND CHEMICAL CO	55.00	4887.00	0.120	8.000	0.200	0.160
BORON TAILS PD	KERN	U S BORAX AND CHEMICAL CO	25.00	0.00	0.120	8.000	0.200	0.160
BRAND PARK	LOS ANGELES	CITY OF GLENDALE	99.00	35.00	0.120	4.000	0.240	0.160
CHEVY CHASE	LOS ANGELES	CITY OF GLENDALE	38.00	54.00	0.120	4.000	0.240	0.160
DIEDERICH RES	LOS ANGELES	CITY OF GLENDALE	60.00	203.00	0.120	4.000	0.240	0.160
GLENOAKS 968 RES	LOS ANGELES	CITY OF GLENDALE	62.00	29.00	0.120	4.000	0.240	0.160
ARUNDELL BARRANCA	VENTURA	VENTURA COUNTY FCD	57.00	0.00	0.120	8.000	0.200	0.160
SAN VICENTE STO POND	SAN DIEGO	RAMONA MUN WATER DISTRICT	30.00	161.00	0.120	4.000	0.200	0.160
MILPITAS	MONTEREY	FORT HUNTER LIGGETT	20.00	50.00	0.120	8.000	0.200	0.160
MOJAVE DAM	SAN BERNARDINO	CESPL	200.00	179400.00	0.120	4.000	0.240	0.160
RUNOFF CONT FACILITY	SANTA BARBARA	CASMALIA RESOURCES	21.00	0.00	0.120	4.000	0.160	0.160
SYPHON CANYON	ORANGE	THE IRVINE COMPANY	59.00	0.00	0.120	4.000	0.200	0.160
RIVIERA RESERVOIR	LOS ANGELES	CITY OF SANTA MONICA	40.00	0.00	0.120	4.000	0.200	0.160
WOOD RANCH	VENTURA	CALLEGUAS MUN WATER DIST	146.00	12700.00	0.120	8.000	0.200	0.160
UPPER OSO	ORANGE	SANTA MARGARITA WATER DIS	142.00	4470.00	0.120	4.000	0.160	0.160
LAMBERT	ORANGE	THE IRVINE COMPANY	17.00	278.00	0.120	4.000	0.200	0.160
POTRERO	LOS ANGELES	WESTLAKE LAKE MANAGEMENT	40.00	1491.00	0.120	8.000	0.200	0.160

CENTURY	LOS ANGELES	STATE DEPT OF PARKS AND R	44.00	190.00	0.120	4.000	0.200	0.160
ALISAL CREEK	SANTA BARBARA	THE ALISAL RANCH	93.00	0.00	0.120	4.000	0.200	0.160
LAKE LOS CARNEROS	SANTA BARBARA	COUNTY OF SANTA BARBARA	31.00	532.00	0.120	8.000	0.200	0.160
MALIBOU LK CLUB	LOS ANGELES	MALIBU LAKE MOUNTAIN CLUB	44.00	775.00	0.120	4.000	0.200	0.160
FERRO DEBRIS	VENTURA	VENTURA COUNTY FCD	45.00	63.00	0.120	8.000	0.200	0.160
SANTA MONICA DB	SANTA BARBARA	SANTA BARBARA COUNTY FCWC	102.00	164.00	0.120	8.000	0.200	0.160
SYCAMORE CANYON	VENTURA	VENTURA COUNTY FCD	40.00	0.00	0.120	8.000	0.200	0.160
RATTLESNAKE CAN	ORANGE	IRVINE RANCH WATER DISTRI	79.00	1770.00	0.120	4.000	0.200	0.160
BRADBURY	SANTA BARBARA	DOI BR	190.00	239200.00	0.120	4.000	0.200	0.160
CARPINTERIA	SANTA BARBARA	DOI BR	27.00	40.00	0.120	8.000	0.200	0.160
CASITAS	VENTURA	DOI BR	267.00	287000.00	0.120	4.000	0.200	0.160
ORTEGA	SANTA BARBARA	DOI BR	86.00	72.00	0.120	8.000	0.200	0.160
JUNCAL	SANTA BARBARA	MONTECITO WATER DISTRICT	160.00	6950.00	0.160	8.000	0.280	0.160
J W WISDA	LOS ANGELES	STATE DEPT OF PARKS AND R	50.00	55.00	0.120	4.000	0.200	0.160
STONE CANYON	LOS ANGELES	CITY OF LOS ANGELES	188.00	11792.00	0.120	8.000	0.200	0.160
UPPER STONE CANYON	LOS ANGELES	CITY OF LOS ANGELES	111.00	469.00	0.120	8.000	0.200	0.160
SANTA YNEZ CANYON	LOS ANGELES	CITY OF LOS ANGELES	157.00	403.00	0.120	4.000	0.200	0.160
HICKS CAN RETD BN	ORANGE	THE IRVINE COMPANY	60.00	207.00	0.120	4.000	0.200	0.160
ROUND CANYON RETD BN	ORANGE	COUNTY OF ORANGE	98.00	434.00	0.120	4.000	0.200	0.160
ORCHARD ESTATES	ORANGE	THE IRVINE COMPANY	21.00	0.00	0.120	4.000	0.200	0.160
EAST HICKS CN RTD BN	ORANGE	THE IRVINE COMPANY	49.00	150.00	0.120	4.000	0.200	0.160
MARSHBURN RETD BN	ORANGE	COUNTY OF ORANGE	27.00	0.00	0.120	4.000	0.200	0.160
LANG RANCH RETD BN	VENTURA	THE LANG RANCH COMPANY	51.00	0.00	0.120	4.000	0.200	0.160
AGUA CHINON	ORANGE	THE IRVINE COMPANY	41.00	525.00	0.120	8.000	0.200	0.160
BEE CANYON RETD BN	ORANGE	COUNTY OF ORANGE	62.00	465.00	0.120	4.000	0.200	0.160
Gibraltar	Santa Barbara	Santa Barbara, City of	178.00	8410.00	0.160	8.000	0.280	0.160
TRABUCO RETARDING BN	ORANGE	COUNTY OF ORANGE	13.00	0.00	0.120	4.000	0.200	0.160
ROUND CANYON RETD BN	ORANGE	COUNTY OF ORANGE	98.00	434.00	0.120	4.000	0.200	0.160
L PETERS CAN RB	ORANGE	COUNTY OF ORANGE	52.00	280.00	0.120	4.000	0.200	0.120
RUNKLE	VENTURA	VENTURA COUNTY FCD	41.00	165.00	0.120	4.000	0.200	0.120
EL TORO RES	ORANGE	EL TORO WATER DISTRICT	106.00	867.00	0.120	4.000	0.160	0.120
RANCHO DEL CIERVO	SANTA BARBARA	CAVALLETTO RANCHES	65.00	546.00	0.120	4.000	0.200	0.120
BAP PONDS 1, 2,3	KERN	U S BORAX AND CHEMICAL CO	30.00	0.00	0.080	4.000	0.120	0.120
MARY STREET	RIVERSIDE	RIVERSIDE COUNTY FCWCD	40.00	570.00	0.120	4.000	0.200	0.120
SANTIAGO CREEK	ORANGE	SERRANO ID AND IRVINE RAN	136.00	38800.00	0.120	4.000	0.200	0.120
WOODCREST	RIVERSIDE	RIVERSIDE COUNTY FCWCD	44.00	0.00	0.120	4.000	0.200	0.120
EL CASCO	RIVERSIDE	EL CASCO LAKE RANCH	19.00	188.00	0.080	4.000	0.160	0.120
RAILROAD CANYON	RIVERSIDE	ELSINORE VALLEY MUNICIPAL	94.00	19367.00	0.120	4.000	0.160	0.120
LAKE HEMET	RIVERSIDE	LAKE HEMET MUN WATER DIST	135.00	19112.00	0.080	4.000	0.120	0.120
BEAR VALLEY	SAN BERNARDINO	BIG BEAR MUNICIPAL WD	80.00	74000.00	0.080	4.000	0.160	0.120
CEDAR LAKE	SAN BERNARDINO	FIRST CONGR CHURCH OF LA	28.00	37.00	0.080	4.000	0.160	0.120

GLEN MARTIN	SAN BERNARDINO	GLEN MARTIN PROPERTIES CO	55.00	46.00	0.080	4.000	0.160	0.120
PRENDA	RIVERSIDE	RIVERSIDE COUNTY FCWCD	44.00	291.00	0.120	4.000	0.200	0.120
LAKE SHERWOOD	VENTURA	LAKE SHERWOOD RANCH	45.00	2750.00	0.080	4.000	0.160	0.120
LAKE ELEANOR	VENTURA	CONEJO OPEN SPACE CONS AG	37.00	113.00	0.080	4.000	0.160	0.120
LEE LAKE	RIVERSIDE	ELSINORE VALLEY MUNICIPAL	47.00	2800.00	0.080	4.000	0.160	0.120
DUNN RANCH	RIVERSIDE	AGRI-EMPIRE,A CALIF CORP	44.00	126.00	0.080	4.000	0.120	0.120
HENRY J MILLS RES	RIVERSIDE	METROPOLITAN WATER DIST	23.00	103.00	0.120	4.000	0.200	0.120
MATHEWS	RIVERSIDE	METROPOLITAN WATER DIST	264.00	222400.00	0.120	4.000	0.200	0.120
PERRIS	RIVERSIDE	STATE DEPT OF WATER RESOU	130.00	154852.00	0.120	4.000	0.160	0.120
MIRAMAR	SAN DIEGO	CITY OF SAN DIEGO	165.00	8250.00	0.120	4.000	0.160	0.120
EASTSIDE	RIVERSIDE	METROPOLITAN WATER DIST	284.00	0.00	0.080	4.000	0.120	0.120
HENRY J MILLS # 2	RIVERSIDE	METROPOLITAN WATER DIST	34.00	0.00	0.120	4.000	0.200	0.120
HJ MILLS RECLAM	RIVERSIDE	METROPOLITAN WATER DIST	48.00	0.00	0.120	4.000	0.200	0.120
SEVEN OAKS DAM	SAN BERNARDINO	CESPL	550.00	145600.00	0.080	4.000	0.160	0.120
Bear Creek Diversion	San Bernardino	Southern California Ediso	7.80	103.00	0.080	4.000	0.160	0.120
San Gabriel	Los Angeles	San Gabriel Hydroelectric	320.00	44600.00	0.080	4.000	0.160	0.120
DIAMOND VALLEY LAKE	RIVERSIDE	METROPOLITAN WATER DIST	284.00	0.00	0.120	4.000	0.160	0.120
GOODHART CAN DTN BN	RIVERSIDE	METROPOLITAN WATER DIST	15.00	0.00	0.120	4.000	0.160	0.120
DOVE CANYON	ORANGE	DOVE CANYON COMPANY	88.00	575.00	0.080	4.000	0.160	0.120
10 MG WALTERIA	LOS ANGELES	CITY OF TORRANCE	40.00	31.00	0.080	4.000	0.160	0.120
SULPHUR CREEK	ORANGE	COUNTY OF ORANGE	42.00	1065.00	0.080	4.000	0.160	0.120
18 MG WALTERIA	LOS ANGELES	CITY OF TORRANCE	31.00	61.00	0.080	4.000	0.160	0.120
L FRANKLIN NO 2	LOS ANGELES	CITY OF LOS ANGELES	49.00	285.00	0.120	4.000	0.200	0.120
SAND CANYON	ORANGE	IRVINE RANCH WATER DISTRI	58.00	1290.00	0.080	4.000	0.160	0.120
SAN JOAQUIN RES	ORANGE	IRVINE RANCH WATER DISTRI	224.00	3336.00	0.080	4.000	0.160	0.120
TRABUCO	ORANGE	TRABUCO CANYON WATER DIST	108.00	175.00	0.080	4.000	0.160	0.120
PALISADES RES	ORANGE	TRI CITIES MUN WATER DIST	146.00	147.00	0.080	4.000	0.160	0.120
HARBOR VIEW	ORANGE	COUNTY OF ORANGE	65.00	118.00	0.080	4.000	0.160	0.120
LAGUNA	ORANGE	THE IRVINE COMPANY	40.00	460.00	0.080	4.000	0.160	0.120
BONITA CANYON	ORANGE	THE IRVINE COMPANY	51.00	483.00	0.080	4.000	0.160	0.120
VEEH	ORANGE	LAKE HILLS COMMUNITY CHUR	37.00	346.00	0.080	4.000	0.160	0.120
ROSSMOOR NO 1	ORANGE	EL TORO WATER DISTRICT	36.00	53.00	0.080	4.000	0.160	0.120
HARTZELL	SAN LUIS OBISPO	W W HARTZELL ET AL	50.00	515.00	0.120	4.000	0.200	0.120
BIG CANYON	ORANGE	CITY OF NEWPORT BEACH	65.00	721.00	0.080	4.000	0.160	0.120
WESTLAKE RES	LOS ANGELES	LAS VIRGENES MUN WATER DI	158.00	10375.00	0.120	4.000	0.160	0.120
PORTOLA	ORANGE	SANTA MARGARITA WATER DIS	53.00	2666.00	0.080	4.000	0.160	0.120
LAKE MISSION VIEJO	ORANGE	LAKE MISSION VIEJO ASSOC	123.00	5245.00	0.120	4.000	0.160	0.120
PALOS VERDES RES	LOS ANGELES	METROPOLITAN WATER DIST	82.00	1220.00	0.080	4.000	0.160	0.120
WHALE ROCK	SAN LUIS OBISPO	STATE DEPT OF WATER RESOU	193.00	51407.00	0.080	4.000	0.160	0.120
LOWER FRANKLIN	LOS ANGELES	CITY OF LOS ANGELES	103.00	990.00	0.120	4.000	0.200	0.120
GALIVAN RETD BASIN	ORANGE	COUNTY OF ORANGE	20.00	0.00	0.080	4.000	0.160	0.120

ROBINSON RANCH	ORANGE	WILLIAM LYON COMMUNITY IN	45.00	0.00	0.080	4.000	0.160	0.120
KUNKLE	BUTTE	PAC GAS AND ELECTRIC CO	54.00	463.00	0.060	4.000	0.080	0.080
TRAMPAS CANYON	ORANGE	OGLEBAY NORTON INDUSTRIAL	183.00	6070.00	0.080	4.000	0.120	0.080
LAKEVIEW	RIVERSIDE	RIVERSIDE COUNTY FCWCD	37.00	990.00	0.080	4.000	0.160	0.080
ISABELLA DAM	KERN	CESPK	98.00	568000.00	0.080	4.000	0.120	0.080
SUCCESS DAM	TULARE	CESPK	98.00	82300.00	0.060	4.000	0.080	0.080
Rio Bravo Diversion	Kern	Olcese Water District	25.00	63.00	0.080	4.000	0.120	0.080
QUAIL VALLEY	RIVERSIDE	KAUFFMAN & BOARD OF SO CA	37.00	178.00	0.080	4.000	0.160	0.080
FOSTER	RIVERSIDE	IDYLLWILD CO WATER DIST	38.00	0.00	0.080	4.000	0.120	0.080
VAIL	RIVERSIDE	RANCHO CALIF WATER DISTRI	152.00	62000.00	0.080	4.000	0.120	0.080
EDWARDS RES	SANTA BARBARA	TIMOTHY M DOHENY	120.00	1321.00	0.080	4.000	0.120	0.080
DOS PUEBLOS	SANTA BARBARA	RUDOLF R SCHULTE	78.00	3842.00	0.080	4.000	0.120	0.080
SKINNER CLEARWELL	RIVERSIDE	METROPOLITAN WATER DIST	44.00	410.00	0.080	4.000	0.120	0.080
GLEN ANNE	SANTA BARBARA	DOI BR	103.00	660.00	0.080	4.000	0.120	0.080
ROBERT A SKINNER	RIVERSIDE	METROPOLITAN WATER DIST	109.00	62800.00	0.080	4.000	0.120	0.080
GOODHART CAN DTN BN	RIVERSIDE	METROPOLITAN WATER DIST	15.00	0.00	0.080	4.000	0.120	0.080
TEJON STORAGE 1	KERN	TEJON RANCH COMPANY	32.00	0.00	0.060	2.000	0.080	0.060
LARSON	TULARE	S TULE RV INDEPENDENT DIT	54.00	410.00	0.060	2.000	0.080	0.060
Middle Fork Diversion	Tulare	Southern California Ediso	7.00	1700.00	0.060	2.000	0.080	0.060

Direct Economic Losses For Buildings

June 23, 2009

All values are in thousands of dollars

	Capital Stock Losses					Income Losses				
	Cost Structural Damage	Cost Non-struct. Damage	Cost Contents Damage	Inventory Loss	Loss Ratio %	Relocation Loss	Capital Related Loss	Wages Losses	Rental Income Loss	Total Loss
California										
San Bernardino	326,323	1,331,694	559,537	24,894	1.4	6,226	105,295	134,964	98,097	2,587,029
Riverside	37,998	234,523	116,764	5,207	0.2	583	11,869	14,792	10,676	432,412
Fresno	5,788	21,080	7,732	209	0.1	116	2,012	2,812	1,614	41,363
San Luis Obispo	24,408	109,508	49,721	2,604	0.6	359	5,702	6,636	5,077	204,015
Kings	2,043	13,842	6,423	172	0.2	28	407	529	515	23,959
Tulare	484	7,273	4,291	186	0.0	4	86	103	89	12,516
Santa Barbara	5,286	52,787	28,068	835	0.2	61	2,426	2,765	1,432	93,660
Ventura	16,572	136,728	72,152	2,674	0.2	186	5,864	6,766	3,848	244,790
Orange	40,470	392,587	216,263	9,049	0.2	486	16,730	19,678	11,458	706,721
Los Angeles	801,312	4,215,584	1,820,742	62,499	0.7	14,510	276,825	339,062	235,804	7,766,337
Kern	54,017	255,552	106,065	2,852	0.8	1,043	14,925	18,410	13,059	465,924
Monterey	889	3,932	1,602	54	0.0	13	159	173	159	6,981

Study Region : S21 SAF 1857 scenario 1

Scenario : S21 San Andreas Fault 1857 repeat M7.8

	Capital Stock Losses					Income Losses				
	Cost Structural Damage	Cost Non-struct. Damage	Cost Contents Damage	Inventory Loss	Loss Ratio %	Relocation Loss	Capital Related Loss	Wages Losses	Rental Income Loss	Total Loss
Total	1,315,588	6,775,091	2,989,360	111,234	1.0	23,616	442,299	546,690	381,829	12,585,707
Region Total	1,315,588	6,775,091	2,989,360	111,234	0.6	23,616	442,299	546,690	381,829	12,585,707

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

Study Region : S21 SAF 1857 scenario 1

Scenario : S21 San Andreas Fault 1857 repeat M7.8

Shelter Summary Report

June 23, 2009

	# of Displaced Households	# of People Needing Short Term Shelter
California		
Fresno	14	13
Kings	3	8
Tulare	0	0
San Luis Obispo	6	4
Riverside	10	9
San Bernardino	621	577
Ventura	1	1
Monterey	0	0
Kern	48	37
Orange	3	2
Los Angeles	2,191	1,978
Santa Barbara	0	0
Total	**2,896**	**2,629**
Region Total	**2,896**	**2,629**

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

Study Region : S21 SAF 1857 scenario 1

Scenario : S21 San Andreas Fault 1857 repeat M7.8

Casualties Summary Report

June 23, 2009

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Fresno					
Casualties - 2am					
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Industrial	0	0	0	0	0
Commercial	0	0	0	0	0
Single Family	2	0	0	0	2
Other-Residential	12	2	0	0	14
Commuting	0	0	0	0	0
Total Casualties - 2am	**14**	**2**	**0**	**0**	**16**
Casualties - 2pm					
Commercial	5	1	0	0	6
Industrial	0	0	0	0	0
Other-Residential	2	0	0	0	3
Single Family	0	0	0	0	0
Hotels	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	3	1	0	0	4
Total Casualties - 2pm	**11**	**2**	**0**	**0**	**14**
Casualties - 5pm					
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Commuting	0	0	0	0	1
Industrial	0	0	0	0	0
Single Family	1	0	0	0	1
Other-Residential	4	1	0	0	5
Commercial	5	1	0	0	6
Total Casualties - 5pm	**10**	**2**	**0**	**0**	**13**
Kern					
Casualties - 2am					
Commercial	1	0	0	0	2
Commuting	0	0	0	0	0
Single Family	22	1	0	0	24
Other-Residential	104	19	1	2	126
Educational	0	0	0	0	0
Hotels	1	0	0	0	2
Industrial	1	0	0	0	2
Total Casualties - 2am	**130**	**21**	**1**	**2**	**155**
Casualties - 2pm					
Commuting	0	0	1	0	1
Single Family	5	0	0	0	6

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Kern					
Casualties - 2pm					
Educational	36	9	1	3	48
Hotels	0	0	0	0	0
Industrial	10	2	0	0	13
Other-Residential	26	5	0	1	31
Commercial	93	23	4	7	127
Total Casualties - 2pm	**170**	**39**	**6**	**11**	**227**
Casualties - 5pm					
Single Family	8	0	0	0	9
Commuting	14	17	30	6	66
Other-Residential	37	7	0	1	45
Commercial	75	19	3	5	102
Hotels	0	0	0	0	0
Educational	3	1	0	0	4
Industrial	6	1	0	0	8
Total Casualties - 5pm	**143**	**45**	**34**	**13**	**234**
Kings					
Casualties - 2am					
Industrial	0	0	0	0	0
Other-Residential	6	1	0	0	7
Educational	0	0	0	0	0
Commercial	0	0	0	0	0
Single Family	1	0	0	0	1
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 2am	**7**	**1**	**0**	**0**	**9**
Casualties - 2pm					
Commercial	2	0	0	0	3
Single Family	0	0	0	0	0
Other-Residential	2	0	0	0	2
Educational	2	0	0	0	2
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2pm	**6**	**1**	**0**	**0**	**8**
Casualties - 5pm					
Commercial	2	0	0	0	2
Other-Residential	2	0	0	0	3
Single Family	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 5pm	**5**	**1**	**0**	**0**	**6**
Los Angeles					

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Los Angeles					
Casualties - 2am					
Hotels	12	3	0	1	16
Educational	0	0	0	0	0
Industrial	39	9	1	3	52
Single Family	423	38	3	7	471
Other-Residential	976	214	22	41	1,252
Commuting	0	0	1	0	1
Commercial	24	6	1	2	33
Total Casualties - 2am	**1,474**	**270**	**28**	**53**	**1,826**
Casualties - 2pm					
Industrial	288	68	9	18	384
Other-Residential	217	49	5	10	282
Commercial	1,730	445	70	137	2,381
Educational	856	245	41	81	1,223
Commuting	2	3	6	1	13
Single Family	83	8	1	1	93
Hotels	2	1	0	0	3
Total Casualties - 2pm	**3,179**	**819**	**132**	**248**	**4,378**
Casualties - 5pm					
Other-Residential	358	79	8	15	460
Industrial	180	42	6	11	240
Single Family	157	15	1	2	175
Commercial	1,635	433	70	131	2,269
Commuting	92	123	207	40	461
Hotels	3	1	0	0	5
Educational	83	22	4	7	115
Total Casualties - 5pm	**2,507**	**714**	**296**	**207**	**3,725**
Monterey					
Casualties - 2am					
Other-Residential	3	0	0	0	3
Commuting	0	0	0	0	0
Single Family	0	0	0	0	0
Commercial	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Industrial	0	0	0	0	0
Total Casualties - 2am	**3**	**0**	**0**	**0**	**3**
Casualties - 2pm					
Single Family	0	0	0	0	0
Commercial	1	0	0	0	1
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Other-Residential	1	0	0	0	1
Industrial	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Monterey					
Total Casualties - 2pm	**2**	**0**	**0**	**0**	**2**
Casualties - 5pm					
Commercial	1	0	0	0	1
Other-Residential	1	0	0	0	1
Industrial	0	0	0	0	0
Hotels	0	0	0	0	0
Commuting	0	0	1	0	2
Single Family	0	0	0	0	0
Educational	0	0	0	0	0
Total Casualties - 5pm	**2**	**1**	**1**	**0**	**3**
Orange					
Casualties - 2am					
Hotels	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Industrial	3	0	0	0	3
Other-Residential	34	3	0	0	36
Single Family	15	0	0	0	15
Commercial	1	0	0	0	1
Total Casualties - 2am	**53**	**3**	**0**	**0**	**56**
Casualties - 2pm					
Other-Residential	6	1	0	0	7
Industrial	20	2	0	0	22
Single Family	2	0	0	0	2
Commercial	45	3	0	0	49
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	12	1	0	0	13
Total Casualties - 2pm	**86**	**7**	**0**	**0**	**94**
Casualties - 5pm					
Hotels	0	0	0	0	0
Commuting	2	3	4	1	10
Single Family	5	0	0	0	5
Educational	2	0	0	0	2
Commercial	32	2	0	0	35
Other-Residential	12	1	0	0	13
Industrial	13	1	0	0	14
Total Casualties - 5pm	**66**	**7**	**5**	**1**	**79**
Riverside					
Casualties - 2am					
Industrial	2	0	0	0	2
Commercial	1	0	0	0	1
Other-Residential	36	3	0	0	40
Educational	0	0	0	0	0
Commuting	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Riverside					
Casualties - 2am					
Single Family	16	0	0	0	16
Hotels	0	0	0	0	0
Total Casualties - 2am	**54**	**4**	**0**	**0**	**58**
Casualties - 2pm					
Commercial	35	4	0	0	40
Other-Residential	9	1	0	0	9
Commuting	0	0	0	0	0
Educational	14	2	0	0	16
Single Family	3	0	0	0	3
Hotels	0	0	0	0	0
Industrial	11	1	0	0	13
Total Casualties - 2pm	**72**	**8**	**1**	**1**	**81**
Casualties - 5pm					
Industrial	7	1	0	0	8
Educational	2	0	0	0	2
Other-Residential	13	1	0	0	14
Single Family	6	0	0	0	6
Hotels	0	0	0	0	0
Commercial	28	3	0	0	31
Commuting	2	3	5	1	11
Total Casualties - 5pm	**57**	**8**	**5**	**1**	**72**
San Bernardino					
Casualties - 2am					
Hotels	5	1	0	0	6
Commercial	6	1	0	0	8
Single Family	131	4	0	0	135
Commuting	0	0	0	0	1
Educational	0	0	0	0	0
Other-Residential	393	65	4	7	469
Industrial	14	3	0	1	18
Total Casualties - 2am	**549**	**74**	**5**	**8**	**637**
Casualties - 2pm					
Industrial	104	21	3	5	133
Hotels	1	0	0	0	1
Commuting	1	1	2	0	5
Other-Residential	88	15	1	2	105
Educational	221	46	6	12	285
Single Family	26	1	0	0	27
Commercial	437	82	10	20	549
Total Casualties - 2pm	**878**	**166**	**22**	**39**	**1,105**
Casualties - 5pm					
Other-Residential	141	23	1	3	169
Commercial	371	71	9	17	467
Educational	23	5	1	1	29

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
San Bernardino					
Casualties - 5pm					
Hotels	1	0	0	0	2
Single Family	47	2	0	0	49
Commuting	18	27	42	8	95
Industrial	65	13	2	3	83
Total Casualties - 5pm	**667**	**140**	**54**	**32**	**894**
San Luis Obispo					
Casualties - 2am					
Industrial	1	0	0	0	1
Commercial	0	0	0	0	0
Other-Residential	32	5	0	0	38
Single Family	7	0	0	0	8
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Total Casualties - 2am	**41**	**6**	**0**	**1**	**48**
Casualties - 2pm					
Educational	11	3	0	1	15
Single Family	1	0	0	0	1
Other-Residential	6	1	0	0	7
Hotels	0	0	0	0	0
Commercial	18	4	0	1	23
Commuting	0	0	0	0	0
Industrial	8	2	0	0	11
Total Casualties - 2pm	**45**	**9**	**1**	**2**	**58**
Casualties - 5pm					
Industrial	5	1	0	0	7
Other-Residential	12	2	0	0	14
Commuting	2	2	4	1	8
Single Family	3	0	0	0	3
Commercial	19	4	1	1	25
Educational	1	0	0	0	2
Hotels	0	0	0	0	0
Total Casualties - 5pm	**42**	**10**	**4**	**2**	**58**
Santa Barbara					
Casualties - 2am					
Industrial	0	0	0	0	0
Commercial	0	0	0	0	0
Other-Residential	6	0	0	0	6
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Single Family	2	0	0	0	2
Hotels	0	0	0	0	0
Total Casualties - 2am	**8**	**0**	**0**	**0**	**9**
Casualties - 2pm					

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Santa Barbara					
Casualties - 2pm					
Commercial	5	0	0	0	6
Educational	1	0	0	0	2
Other-Residential	1	0	0	0	1
Commuting	0	0	0	0	0
Single Family	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	1	0	0	0	1
Total Casualties - 2pm	**9**	**1**	**0**	**0**	**10**
Casualties - 5pm					
Other-Residential	2	0	0	0	2
Single Family	1	0	0	0	1
Commercial	4	0	0	0	4
Commuting	0	0	0	0	1
Educational	0	0	0	0	0
Industrial	1	0	0	0	1
Hotels	0	0	0	0	0
Total Casualties - 5pm	**8**	**1**	**0**	**0**	**9**
Tulare					
Casualties - 2am					
Commercial	0	0	0	0	0
Single Family	0	0	0	0	0
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	0	0	0	0	0
Other-Residential	1	0	0	0	1
Total Casualties - 2am	**1**	**0**	**0**	**0**	**1**
Casualties - 2pm					
Industrial	0	0	0	0	0
Hotels	0	0	0	0	0
Other-Residential	0	0	0	0	0
Commercial	0	0	0	0	0
Single Family	0	0	0	0	0
Educational	0	0	0	0	0
Commuting	0	0	0	0	0
Total Casualties - 2pm	**1**	**0**	**0**	**0**	**1**
Casualties - 5pm					
Other-Residential	0	0	0	0	0
Single Family	0	0	0	0	0
Commercial	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	0	0	0	0	0
Commuting	0	0	0	0	0
Industrial	0	0	0	0	0

	Injury Severity Level				
	Severity 1	Severity 2	Severity 3	Severity 4	Total
California					
Tulare					
Total Casualties - 5pm	**1**	**0**	**0**	**0**	**1**
Ventura					
Casualties - 2am					
Single Family	7	0	0	0	7
Commuting	0	0	0	0	0
Educational	0	0	0	0	0
Hotels	0	0	0	0	0
Industrial	1	0	0	0	1
Other-Residential	15	1	0	0	16
Commercial	0	0	0	0	0
Total Casualties - 2am	**23**	**1**	**0**	**0**	**24**
Casualties - 2pm					
Industrial	4	0	0	0	4
Commuting	0	0	0	0	0
Hotels	0	0	0	0	0
Educational	5	1	0	0	6
Other-Residential	3	0	0	0	3
Single Family	1	0	0	0	1
Commercial	14	1	0	0	15
Total Casualties - 2pm	**27**	**2**	**0**	**0**	**29**
Casualties - 5pm					
Commuting	1	1	2	0	4
Other-Residential	5	0	0	0	6
Commercial	11	1	0	0	12
Hotels	0	0	0	0	0
Educational	1	0	0	0	1
Single Family	3	0	0	0	3
Industrial	2	0	0	0	3
Total Casualties - 5pm	**23**	**3**	**2**	**0**	**28**
Region Total	NA	NA	NA	NA	NA

Totals only reflect data for those census tracts/blocks included in the user's study region and will reflect the entire county/state only if all of the census blocks for that county/states were selected at the time of study region creation.

HAZUS-MH: Earthquake Event Report

Region Name: S21 SAF 1857 scenario 1

Earthquake Scenario: S21 San Andreas Fault 1857 repeat M7.8

Print Date: June 23, 2009

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:
The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, geotechnical, and observed ground motion data.

Table of Contents

Section	Page #
General Description of the Region	3
Building and Lifeline Inventory	4
Building Inventory	
Critical Facility Inventory	
Transportation and Utility Lifeline Inventory	
Earthquake Scenario Parameters	6
Direct Earthquake Damage	7
Buildings Damage	
Critical Facilities Damage	
Transportation and Utility Lifeline Damage	
Induced Earthquake Damage	11
Fire Following Earthquake	
Debris Generation	
Social Impact	12
Shelter Requirements	
Casualties	
Economic Loss	13
Building Losses	
Transportation and Utility Lifeline Losses	
Long-term Indirect Economic Impacts	
Appendix A: County Listing for the Region	
Appendix B: Regional Population and Building Value Data	

General Description of the Region

HAZUS is a regional earthquake loss estimation model that was developed by the Federal Emergency Management Agency and the National Institute of Building Sciences. The primary purpose of HAZUS is to provide a methodology and software application to develop earthquake losses at a regional scale. These loss estimates would be used primarily by local, state and regional officials to plan and stimulate efforts to reduce risks from earthquakes and to prepare for emergency response and recovery.

The earthquake loss estimates provided in this report was based on a region that includes 12 county(ies) from the following state(s):

California

Note:
Appendix A contains a complete listing of the counties contained in the region.

The geographical size of the region is 63,929.50 square miles and contains 3,987 census tracts. There are over 6,304 thousand households in the region and has a total population of 19,379,969 people (2000 Census Bureau data). The distribution of population by State and County is provided in Appendix B.

There are an estimated 4,912 thousand buildings in the region with a total building replacement value (excluding contents) of 1,426,940 (millions of dollars). Approximately 97.00 % of the buildings (and 0.00% of the building value) are associated with residential housing.

The replacement value of the transportation and utility lifeline systems is estimated to be 94,938 and 23,686 (millions of dollars) , respectively.

Building and Lifeline Inventory

Building Inventory

HAZUS estimates that there are 4,912 thousand buildings in the region which have an aggregate total replacement value of 1,426,940 (millions of dollars) . Appendix B provides a general distribution of the building value by State and County.

In terms of building construction types found in the region, wood frame construction makes up 90% of the building inventory. The remaining percentage is distributed between the other general building types.

Critical Facility Inventory

HAZUS breaks critical facilities into two (2) groups: essential facilities and high potential loss (HPL) facilities. Essential facilities include hospitals, medical clinics, schools, fire stations, police stations and emergency operations facilities. High potential loss facilities include dams, levees, military installations, nuclear power plants and hazardous material sites.

For essential facilities, there are 255 hospitals in the region with a total bed capacity of 51,524 beds. There are 6,443 schools, 293 fire stations, 462 police stations and 25 emergency operation facilities. With respect to HPL facilities, there are 374 dams identified within the region. Of these, 218 of the dams are classified as 'high hazard'. The inventory also includes 2,867 hazardous material sites, 0 military installations and 1 nuclear power plants.

Transportation and Utility Lifeline Inventory

Within HAZUS, the lifeline inventory is divided between transportation and utility lifeline systems. There are seven (7) transportation systems that include highways, railways, light rail, bus, ports, ferry and airports. There are six (6) utility systems that include potable water, wastewater, natural gas, crude & refined oil, electric power and communications. The lifeline inventory data are provided in Tables 2 and 3.

The total value of the lifeline inventory is over 118,624.00 (millions of dollars). This inventory includes over 14,118 kilometers of highways, 9,682 bridges, 498,435 kilometers of pipes.

Table 2: Transportation System Lifeline Inventory

System	Component	# locations/ # Segments	Replacement value (millions of dollars)
Highway	Bridges	9,682	22,084.70
	Segments	1,468	54,945.50
	Tunnels	21	38.00
		Subtotal	**77,068.30**
Railways	Bridges	279	49.80
	Facilities	161	414.20
	Segments	2,701	4,911.20
	Tunnels	0	0.00
		Subtotal	**5,375.20**
Light Rail	Bridges	28	6.20
	Facilities	0	0.00
	Segments	6	128.50
	Tunnels	0	0.00
		Subtotal	**134.70**
Bus	Facilities	117	150.50
		Subtotal	**150.50**
Ferry	Facilities	0	0.00
		Subtotal	**0.00**
Port	Facilities	167	429.60
		Subtotal	**429.60**
Airport	Facilities	235	1,511.30
	Runways	280	10,268.80
		Subtotal	**11,780.10**
		Total	**94,938.40**

Table 3: Utility System Lifeline Inventory

System	Component	# Locations / Segments	Replacement value (millions of dollars)
Potable Water	Distribution Lines	NA	4,984.40
	Facilities	49	1,925.40
	Pipelines	0	0.00
		Subtotal	**6,909.80**
Waste Water	Distribution Lines	NA	2,990.60
	Facilities	109	8,566.10
	Pipelines	0	0.00
		Subtotal	**11,556.70**
Natural Gas	Distribution Lines	NA	1,993.70
	Facilities	14	18.00
	Pipelines	0	0.00
		Subtotal	**2,011.70**
Oil Systems	Facilities	68	8.00
	Pipelines	0	0.00
		Subtotal	**8.00**
Electrical Power	Facilities	101	13,109.80
		Subtotal	**13,109.80**
Communication	Facilities	499	58.90
		Subtotal	**58.90**
		Total	**33,654.90**

Earthquake Scenario

HAZUS uses the following set of information to define the earthquake parameters used for the earthquake loss estimate provided in this report.

Scenario Name	S21 San Andreas Fault 1857 repeat M7.8
Type of Earthquake	User-defined
Fault Name	NA
Historical Epicenter ID #	NA
Probabilistic Return Period	NA
Longitude of Epicenter	NA
Latitude of Epicenter	NA
Earthquake Magnitude	7.80
Depth (Km)	NA
Rupture Length (Km)	NA
Rupture Orientation (degrees)	NA
Attenuation Function	NA

Building Damage

HAZUS estimates that about 82,943 buildings will be at least moderately damaged. This is over 2.00 % of the total number of buildings in the region. There are an estimated 5,506 buildings that will be damaged beyond repair. The definition of the 'damage states' is provided in Volume 1: Chapter 5 of the HAZUS technical manual. Table 4 below summaries the expected damage by general occupancy for the buildings in the region. Table 5 summaries the expected damage by general building type.

Table 4: Expected Building Damage by Occupancy

	None		Slight		Moderate		Extensive		Complete	
	Count	(%)	Count	(%)	Count	(%)	Count	(%)	Count	(%)
Agriculture	4,216	0.09	285	0.10	133	0.21	44	0.30	18	0.33
Commercial	88,903	1.96	7,778	2.66	3,393	5.40	858	5.86	338	6.15
Education	3,825	0.08	241	0.08	82	0.13	19	0.13	10	0.18
Government	4,193	0.09	347	0.12	179	0.28	50	0.34	16	0.29
Industrial	22,751	0.50	2,579	0.88	1,403	2.23	375	2.56	114	2.07
Other Residential	450,381	9.93	51,072	17.44	32,865	52.33	12,292	84.00	4,830	87.71
Religion	6,691	0.15	533	0.18	231	0.37	67	0.45	29	0.52
Single Family	3,956,240	87.20	229,931	78.54	24,519	39.04	929	6.35	152	2.75
Total	**4,537,200**		**292,766**		**62,804**		**14,633**		**5,506**	

Table 5: Expected Building Damage by Building Type (All Design Levels)

	None		Slight		Moderate		Extensive		Complete	
	Count	(%)	Count	(%)	Count	(%)	Count	(%)	Count	(%)
Wood	4,138,217	91.21	238297	81.40	24,802	39.49	762	5.21	56	1.02
Steel	40,315	0.89	4953	1.69	2,991	4.76	792	5.41	237	4.31
Concrete	39,241	0.86	3239	1.11	1,290	2.05	352	2.41	132	2.41
Precast	24,743	0.55	2276	0.78	846	1.35	186	1.27	73	1.32
RM	88,196	1.94	3160	1.08	1,295	2.06	471	3.22	238	4.33
URM	12,335	0.27	1328	0.45	305	0.49	54	0.37	54	0.98
MH	194,152	4.28	39512	13.50	31,275	49.80	12,016	82.11	4,715	85.63
Total	**4,537,200**		**292,766**		**62,804**		**14,633**		**5,506**	

*Note:

RM Reinforced Masonry
URM Unreinforced Masonry
MH Manufactured Housing

Essential Facility Damage

Before the earthquake, the region had 51,524 hospital beds available for use. On the day of the earthquake, the model estimates that only 50,896 hospital beds (99.00%) are available for use by patients already in the hospital and those injured by the earthquake. After one week, 100.00% of the beds will be back in service. By 30 days, 100.00% will be operational.

Table 6: Expected Damage to Essential Facilities

Classification	Total	# Facilities		
		At Least Moderate Damage > 50%	Complete Damage > 50%	With Functionality > 50% on day 1
Hospitals	255	0	0	255
Schools	6,443	0	0	6,321
EOCs	25	1	0	24
PoliceStations	462	2	0	451
FireStations	293	2	0	290

Transportation and Utility Lifeline Damage

Table 7 provides damage estimates for the transportation system.

Table 7: Expected Damage to the Transportation Systems

System	Component		Number of Locations			
		Locations/ Segments	With at Least Mod. Damage	With Complete Damage	With Functionality > 50 % After Day 1	After Day 7
Highway	Segments	1,468	0	0	1,468	1,468
	Bridges	9,682	123	23	9,556	9,610
	Tunnels	21	0	0	21	21
Railways	Segments	2,701	0	0	2,701	2,701
	Bridges	279	4	0	275	276
	Tunnels	0	0	0	0	0
	Facilities	161	1	0	160	161
Light Rail	Segments	6	0	0	6	6
	Bridges	28	0	0	28	28
	Tunnels	0	0	0	0	0
	Facilities	0	0	0	0	0
Bus	Facilities	117	1	0	117	117
Ferry	Facilities	0	0	0	0	0
Port	Facilities	167	0	0	167	167
Airport	Facilities	235	3	0	234	235
	Runways	280	0	0	280	280

Note: Roadway segments, railroad tracks and light rail tracks are assumed to be damaged by ground failure only. If ground failure maps are not provided, damage estimates to these components will not be computed.

Tables 8-10 provide information on the damage to the utility lifeline systems. Table 8 provides damage to the utility system facilities. Table 9 provides estimates on the number of leaks and breaks by the pipelines of the utility systems. For electric power and potable water, HAZUS performs a simplified system performance analysis. Table 10 provides a summary of the system performance information.

Table 8 : Expected Utility System Facility Damage

System	# of Locations				
	Total #	With at Least Moderate Damage	With Complete Damage	with Functionality > 50 %	
				After Day 1	After Day 7
Potable Water	49	1	0	48	49
Waste Water	109	2	0	97	109
Natural Gas	14	0	0	14	14
Oil Systems	68	0	0	68	68
Electrical Power	101	2	0	97	101
Communication	499	7	0	498	499

Table 9 : Expected Utility System Pipeline Damage (Site Specific)

System	Total Pipelines Length (kms)	Number of Leaks	Number of Breaks
Potable Water	249,218	41651	10413
Waste Water	149,531	32943	8236
Natural Gas	99,687	35214	8804
Oil	0	0	0

Table 10: Expected Potable Water and Electric Power System Performance

	Total # of Households	Number of Households without Service				
		At Day 1	At Day 3	At Day 7	At Day 30	At Day 90
Potable Water	6,304,099	1,770,567	1,733,906	1,678,816	1,395,267	698,325
Electric Power		35,080	20,958	8,140	1,470	50

Induced Earthquake Damage

Fire Following Earthquake

Fires often occur after an earthquake. Because of the number of fires and the lack of water to fight the fires, they can often burn out of control. HAZUS uses a Monte Carlo simulation model to estimate the number of ignitions and the amount of burnt area. For this scenario, the model estimates that there will be 0 ignitions that will burn about 0.00 sq. mi 0.00 % of the region's total area.) The model also estimates that the fires will displace about 0 people and burn about 0 (millions of dollars) of building value.

Debris Generation

HAZUS estimates the amount of debris that will be generated by the earthquake. The model breaks the debris into two general categories: a) Brick/Wood and b) Reinforced Concrete/Steel. This distinction is made because of the different types of material handling equipment required to handle the debris.

The model estimates that a total of 3.00 million tons of debris will be generated. Of the total amount, Brick/Wood comprises 35.00% of the total, with the remainder being Reinforced Concrete/Steel. If the debris tonnage is converted to an estimated number of truckloads, it will require 120,000 truckloads (@25 tons/truck) to remove the debris generated by the earthquake.

Social Impact

Shelter Requirement

HAZUS estimates the number of households that are expected to be displaced from their homes due to the earthquake and the number of displaced people that will require accommodations in temporary public shelters. The model estimates 2,896 households to be displaced due to the earthquake. Of these, 2,629 people (out of a total population of 19,379,969) will seek temporary shelter in public shelters.

Casualties

HAZUS estimates the number of people that will be injured and killed by the earthquake. The casualties are broken down into four (4) severity levels that describe the extent of the injuries. The levels are described as follows;

- Severity Level 1: Injuries will require medical attention but hospitalization is not needed.
- Severity Level 2: Injuries will require hospitalization but are not considered life-threatening
- Severity Level 3: Injuries will require hospitalization and can become life threatening if not promptly treated.
- Severity Level 4: Victims are killed by the earthquake.

The casualty estimates are provided for three (3) times of day: 2:00 AM, 2:00 PM and 5:00 PM. These times represent the periods of the day that different sectors of the community are at their peak occupancy loads. The 2:00 AM estimate considers that the residential occupancy load is maximum, the 2:00 PM estimate considers that the educational, commercial and industrial sector loads are maximum and 5:00 PM represents peak commute time.

Table 11 provides a summary of the casualties estimated for this earthquake

Table 11: Casualty Estimates

		Level 1	Level 2	Level 3	Level 4
2 AM	Commercial	33	8	1	2
	Commuting	0	1	1	0
	Educational	0	0	0	0
	Hotels	18	4	1	1
	Industrial	61	13	2	3
	Other-Residential	1,617	314	27	51
	Single Family	627	44	4	7
	Total	**2,357**	**383**	**36**	**65**
2 PM	Commercial	2,385	564	85	165
	Commuting	4	6	9	2
	Educational	1,161	306	49	97
	Hotels	4	1	0	0
	Industrial	448	96	13	25
	Other-Residential	360	72	7	12
	Single Family	124	9	1	1
	Total	**4,486**	**1,054**	**163**	**302**
5 PM	Commercial	2,182	534	83	155
	Commuting	131	175	295	57
	Educational	115	28	4	9
	Hotels	6	1	0	0
	Industrial	280	60	8	15
	Other-Residential	587	115	10	19
	Single Family	230	17	1	3
	Total	**3,531**	**931**	**402**	**258**

Economic Loss

The total economic loss estimated for the earthquake is 14,209.55 (millions of dollars), which includes building and lifeline related losses based on the region's available inventory. The following three sections provide more detailed information about these losses.

Building-Related Losses

The building losses are broken into two categories: direct building losses and business interruption losses. The direct building losses are the estimated costs to repair or replace the damage caused to the building and its contents. The business interruption losses are the losses associated with inability to operate a business because of the damage sustained during the earthquake. Business interruption losses also include the temporary living expenses for those people displaced from their homes because of the earthquake.

The total building-related losses were 12,585.71 (millions of dollars); 11 % of the estimated losses were related to the business interruption of the region. By far, the largest loss was sustained by the residential occupancies which made up over 49 % of the total loss. Table 12 below provides a summary of the losses associated with the building damage.

Table 12: Building-Related Economic Loss Estimates

(Millions of dollars)

Category	Area	Single Family	Other Residential	Commercial	Industrial	Others	Total
Income Loses							
	Wage	0.00	19.34	473.29	30.86	23.20	546.69
	Capital-Related	0.00	8.29	409.41	19.03	5.57	442.30
	Rental	37.92	82.57	237.09	13.16	11.10	381.83
	Relocation	3.57	3.74	12.40	0.99	2.92	23.62
	Subtotal	**41.48**	**113.94**	**1,132.19**	**64.04**	**42.79**	**1,394.43**
Capital Stock Loses							
	Structural	352.41	233.06	475.03	161.83	93.26	1,315.59
	Non_Structural	2,581.59	1,387.23	1,860.59	614.78	330.91	6,775.09
	Content	1,072.83	373.55	971.87	397.53	173.57	2,989.36
	Inventory	0.00	0.00	29.78	78.63	2.83	111.23
	Subtotal	**4,006.83**	**1,993.85**	**3,337.26**	**1,252.77**	**600.57**	**11,191.27**
	Total	**4,048.31**	**2,107.79**	**4,469.45**	**1,316.80**	**643.36**	**12,585.71**

Transportation and Utility Lifeline Losses

For the transportation and utility lifeline systems, HAZUS computes the direct repair cost for each component only. There are no losses computed by HAZUS for business interruption due to lifeline outages. Tables 13 & 14 provide a detailed breakdown in the expected lifeline losses.

HAZUS estimates the long-term economic impacts to the region for 15 years after the earthquake. The model quantifies this information in terms of income and employment changes within the region. Table 15 presents the results of the region for the given earthquake.

Table 13: Transportation System Economic Losses
(Millions of dollars)

System	Component	Inventory Value	Economic Loss	Loss Ratio (%)
Highway	Segments	54,945.53	$0.00	0.00
	Bridges	22,084.73	$184.17	0.83
	Tunnels	38.02	$0.33	0.87
	Subtotal	**77068.30**	**184.50**	
Railways	Segments	4,911.24	$0.00	0.00
	Bridges	49.79	$0.44	0.88
	Tunnels	0.00	$0.00	0.00
	Facilities	414.16	$23.95	5.78
	Subtotal	**5375.20**	**24.40**	
Light Rail	Segments	128.53	$0.00	0.00
	Bridges	6.17	$0.01	0.12
	Tunnels	0.00	$0.00	0.00
	Facilities	0.00	$0.00	0.00
	Subtotal	**134.70**	**0.00**	
Bus	Facilities	150.49	$11.78	7.83
	Subtotal	**150.50**	**11.80**	
Ferry	Facilities	0.00	$0.00	0.00
	Subtotal	**0.00**	**0.00**	
Port	Facilities	429.59	$20.94	4.87
	Subtotal	**429.60**	**20.90**	
Airport	Facilities	1,511.29	$124.86	8.26
	Runways	10,268.83	$0.00	0.00
	Subtotal	**11780.10**	**124.90**	
	Total	**94938.40**	**366.50**	

Table 14: Utility System Economic Losses

(Millions of dollars)

System	Component	Inventory Value	Economic Loss	Loss Ratio (%)
Potable Water	Pipelines	0.00	$0.00	0.00
	Facilities	1,925.40	$70.41	3.66
	Distribution Lines	4,984.40	$187.43	3.76
	Subtotal	**6,909.76**	**$257.84**	
Waste Water	Pipelines	0.00	$0.00	0.00
	Facilities	8,566.10	$260.64	3.04
	Distribution Lines	2,990.60	$148.24	4.96
	Subtotal	**11,556.70**	**$408.88**	
Natural Gas	Pipelines	0.00	$0.00	0.00
	Facilities	18.00	$0.49	2.75
	Distribution Lines	1,993.70	$158.47	7.95
	Subtotal	**2,011.75**	**$158.96**	
Oil Systems	Pipelines	0.00	$0.00	0.00
	Facilities	8.00	$0.21	2.63
	Subtotal	**8.02**	**$0.21**	
Electrical Power	Facilities	13,109.80	$429.95	3.28
	Subtotal	**13,109.80**	**$429.95**	
Communication	Facilities	58.90	$1.51	2.57
	Subtotal	**58.88**	**$1.51**	
	Total	**33,654.91**	**$1,257.35**	

Table 15. Indirect Economic Impact with outside aid
(Employment as # of people and Income in millions of $)

	LOSS	Total	%
First Year			
	Employment Impact	13,607,318	226.15
	Income Impact	39,427	13.19
Second Year			
	Employment Impact	7,194,423	119.57
	Income Impact	32,012	10.71
Third Year			
	Employment Impact	194,549	3.23
	Income Impact	10,028	3.35
Fourth Year			
	Employment Impact	10,957	0.18
	Income Impact	206	0.07
Fifth Year			
	Employment Impact	618	0.01
	Income Impact	(348)	-0.12
Years 6 to 15			
	Employment Impact	32	0.00
	Income Impact	(379)	-0.13

Appendix A: County Listing for the Region

Fresno,CA

Kern,CA

Kings,CA

Los Angeles,CA

Monterey,CA

Orange,CA

Riverside,CA

San Bernardino,CA

San Luis Obispo,CA

Santa Barbara,CA

Tulare,CA

Ventura,CA

Appendix B: Regional Population and Building Value Data

State	County Name	Population	Building Value (millions of dollars)		
			Residential	Non-Residential	Total
California					
	Fresno	799,407	40,837	11,740	52,577
	Kern	661,645	32,597	8,643	41,240
	Kings	129,461	5,678	1,246	6,924
	Los Angeles	9,519,338	522,699	168,306	691,005
	Monterey	401,762	24,315	6,506	30,822
	Orange	2,846,289	183,299	57,530	240,830
	Riverside	1,545,387	88,621	21,255	109,876
	San Bernardino	1,709,434	92,383	22,452	114,835
	San Luis Obispo	246,681	17,021	4,544	21,566
	Santa Barbara	399,347	25,589	6,660	32,249
	Tulare	368,021	17,134	4,976	22,110
	Ventura	753,197	50,092	12,808	62,901
Total State		**19,379,969**	**1,100,265**	**326,666**	**1,426,935**
Total Region		**19,379,969**	**1,100,265**	**326,666**	**1,426,935**

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	4.00 - 16.20
	Building Contents	0.40 - 1.60
	Business Interruption	0.70 - 2.80
Infrastructure	Lifelines Damage	
	Total	6.30 - 25.20

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	170 - 700	5 - 20	2 - 9	180 - 700
Major	9 - 40	0 - 2	0 - 1	10 - 40
Total	180 - 700	6 - 20	2 - 10	190 - 800

Estimated Casualties : Night Time

Severity Level	Description	# Persons
Level 1	Medical Aid	1,200 - 5,000
Level 2	Hospital Care	190 - 800
Level 3	Life-threatening	20 - 70
Level 4	Fatalities	30 - 130

Estimated Shelter Needs

Type	Households	People
Displaced Households	1,400 - 6,000	
Public Shelter		

Comments :

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:

The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, goetechnical, and observed ground motion data.

Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 19,379,969

Building Exposure : ($ Millions)

Residential	1,100,269
Commerical	224,569
Other	102,101
Total	1,426,939

State: 1,300 - 5,000

Counties : See Appendix

Major Metro Area :

Time of report: June 23, 2009 8:48 am
S21 San Andreas Fault - 1857 Scenario M 7.8

Appendix: Counties

Fresno,CA

Kern,CA

Kings,CA

Los Angeles,CA

Monterey,CA

Orange,CA

Riverside,CA

San Bernardino,CA

San Luis Obispo,CA

Santa Barbara,CA

Tulare,CA

Ventura,CA

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	4.00 - 16.20
	Building Contents	0.40 - 1.60
	Business Interruption	0.70 - 2.80
Infrastructure	Lifelines Damage	
	Total	6.30 - 25.20

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	170 - 700	5 - 20	2 - 9	180 - 700
Major	9 - 40	0 - 2	0 - 1	10 - 40
Total	180 - 700	6 - 20	2 - 10	190 - 800

Estimated Casualties : Day Time

Severity Level	Description	# Persons
Level 1	Medical Aid	2,000 - 9,000
Level 2	Hospital Care	500 - 2,000
Level 3	Life-threatening	80 - 300
Level 4	Fatalities	150 - 600

Estimated Shelter Needs

Type	Households	People
Displaced Households	1,400 - 6,000	
Public Shelter		

Comments :

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Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 19,379,969

Building Exposure : ($ Millions)

Residential	1,100,269
Commerical	224,569
Other	102,101
Total	1,426,939

State: 1,300 - 5,000

Counties : See Appendix

Major Metro Area :

Time of report: June 23, 2009 9:10 am
S21 San Andreas Fault - 1857 Scenario M 7.8

Appendix: Counties

Fresno,CA

Kern,CA

Kings,CA

Los Angeles,CA

Monterey,CA

Orange,CA

Riverside,CA

San Bernardino,CA

San Luis Obispo,CA

Santa Barbara,CA

Tulare,CA

Ventura,CA

HAZUS-MH Loss Estimation

Estimated Economic Loss ($ Billions)

Category	Description	Range
General Building Stock	Building Damage	4.00 - 16.20
	Building Contents	0.40 - 1.60
	Business Interruption	0.70 - 2.80
Infrastructure	Lifelines Damage	
	Total	6.30 - 25.20

Estimated Building Damage(Thousands of Buildings)

Description	Residential	Commercial	Other	Total
Minor	170 - 700	5 - 20	2 - 9	180 - 700
Major	9 - 40	0 - 2	0 - 1	10 - 40
Total	180 - 700	6 - 20	2 - 10	190 - 800

Estimated Casualties : Commute Time

Severity Level	Description	# Persons
Level 1	Medical Aid	1,800 - 7,000
Level 2	Hospital Care	500 - 1,900
Level 3	Life-threatening	200 - 800
Level 4	Fatalities	130 - 500

Estimated Shelter Needs

Type	Households	People
Displaced Households	1,400 - 6,000	
Public Shelter		

Comments :

Totals only reflect data for those census tracts/blocks included in the user's study region.

Disclaimer:

The estimates of social and economic impacts contained in this report were produced using HAZUS loss estimation methodology software which is based on current scientific and engineering knowledge. There are uncertainties inherent in any loss estimation technique. Therefore, there may be significant differences between the modeled results contained in this report and the actual social and economic losses following a specific earthquake. These results can be improved by using enhanced inventory, goetechnical, and observed ground motion data.

Earthquake Information

Location :

Origin Time:

Magnitude : 7.80

Epicenter Latitude/Longitude :
/

Depth & Type :/U

Fault Name :
NA

Maximum PGA : 1.00

Ground Motion /Attenuation :

Information Sources:

Comments :

Population and Building Exposure (2002 D&B) (2000 Census)

Population: 19,379,969

Building Exposure : ($ Millions)

Residential	1,100,269
Commerical	224,569
Other	102,101
Total	1,426,939

State: 1,300 - 5,000

Counties : See Appendix

Major Metro Area :

Time of report: June 23, 2009 9:41 am
S21 San Andreas Fault - 1857 Scenario M 7.8

Appendix: Counties

Fresno,CA

Kern,CA

Kings,CA

Los Angeles,CA

Monterey,CA

Orange,CA

Riverside,CA

San Bernardino,CA

San Luis Obispo,CA

Santa Barbara,CA

Tulare,CA

Ventura,CA

(3)

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

May 16, 2011

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California

MAY 18 2011

Re: Valley Vineyards (TR 066952)
Leona Valley, California

Dear Mr. Sackett:

After completing a thorough investigation of County of Los Angeles Codes and requirements, we have determined that the advanced waste treatment system proposed for the above referenced case not only requires an environmental impact report as dictated by the Antelope Valley Area Wide plan, it also requires a conditional use permit as part of the application process.
The requirements as per County code are as follows:

> **Sewage Treatment Plants as Accessory Uses**
> **Reference:** None. See CUP provisions under Zones R, A and C.
> Q: **Does a sewage treatment plant, as an accessory use, require a Conditional Use Permit?**
> A: The County Counsel has advised this Department that a sewage treatment plant which is accessory to and serves only the property on which it is located does not require a conditional use permit. Therefore, the only time a conditional use permit would be required to establish a sewage treatment plant would be for a facility that is to serve property other than that on which it is located or is to be deeded to the County for operation and maintenance.

The proposal includes waste treatment (evapotranspiration beds, dousing tanks, feeder lines, etc) in a variety of collective areas, located away from the individual residential sites. Therefore, a Conditional Use Permit is required for the proposed On Site Waste Treatment Plant.

Best regards,

William J Elliott

Bill Elliott
President, Leona Valley Town Council
(661) 270-9017

CC: Michael D. Antonovich

(4)

May 4, 2011

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

Jodie Sackett, AICP
County of Los Angeles Department of Regional Planning
320 West Temple Street
Room 1382
Los Angeles, California 90012

Re: Valley Vineyards
Tentative Tract Map 066952
Bouquet Canyon Road, Leona Valley

Dear Mr. Sackett:

Enclosed herein is the Leona Valley Town Council Subdivision Committee's preliminary review of the Proposed Onsite Waste Treatment System for Tentative Tract Map 066952, also known as Valley Vineyards. In advance of your reading, we wish to direct you to review the Consent of Use clause located on the introduction page of this document.

For your edification, additional copies were provided to the following individuals:

Sorin Alexanian
Paul McCarthy
Michelle Bush
Alfonso Medina
Patrick Nejadian

Should you have any questions, you may contact Peggy Fuller, Chair of the Leona Valley Town Council Land Use Committee or William Elliott, President of the Leona Valley Town Council.

Respectfully,

The Leona Valley Town Council Land Use Committee

Review of Proposed Onsite Wastewater Treatment System

Valley Vineyards Tentative Tract Map 66952, Bouquet Canyon Road, Leona Valley

Prepared By the Leona Valley Town Council Development Committee: May 2011

Introduction

The Leona Valley Town Council's Development Committee is responsible for due diligence relative to proposed projects within the boundaries of the Community Standards District. Part of our due diligence is to review plans and studies and provide information that may support or refute information already provided to the County of Los Angeles. This is necessary in order to give a clear understanding of the proposal and ascertain the benefit as well as potential harm that could result. The Committee is comprised of community members of varying expertise from legal, to engineering, real estate, environmental, business and construction.

Consent of Use

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Research, Studies and Interviews

Because we may or may not have expertise specific to onsite wastewater treatment systems, we have relied upon the expertise of others. This includes first person interviews with Alfonso Medina, County of Los Angeles Director of Environmental Protection Bureau; Cindi Mitton, Senior Engineer with California Waterworks Board; John Steude, Engineering Geologist Lahontan Water Control Board; Mark Watton, General Manager of the Otay Water District (San Diego) and Colorado River Programs Ad Hoc Committee Chair, City of Calabasas Department of Public Health and many others.

Additionally, we have relied upon primary and secondary reports. Our primary reports include but are not limited to the following:

- United States Environmental Protection Agency Risk Management Research (EPA 625/R-00/008) Onsite Water Treatment Systems Technology Fact Sheet 6
- United States Environmental Protection Agency, Office of Water Program Operations & Office of Research & Development, Design Manual for Onsite Wastewater Treatment & Disposal Systems (EPA 625/1-80-012)
- City of Calabasas: OWTS Inspection Program Status Update, August 11, 2010
- The Nature Conservancy: Alternative On Site Sewage Treatment Systems: Watershed Implications, White Paper, January 2007

- Update of the Advanced On-site Wastewater Treatment and Management Market Study, State Reports, 2009
- County of San Diego Opinion on OTW systems
- State of California Water Resources Control Board Guidelines for Evapotranspiration System
- Environmental Technology Initiative: Project Funded by the U.S. Environmental Protection Agency under Assistance Agreement No. CX824652

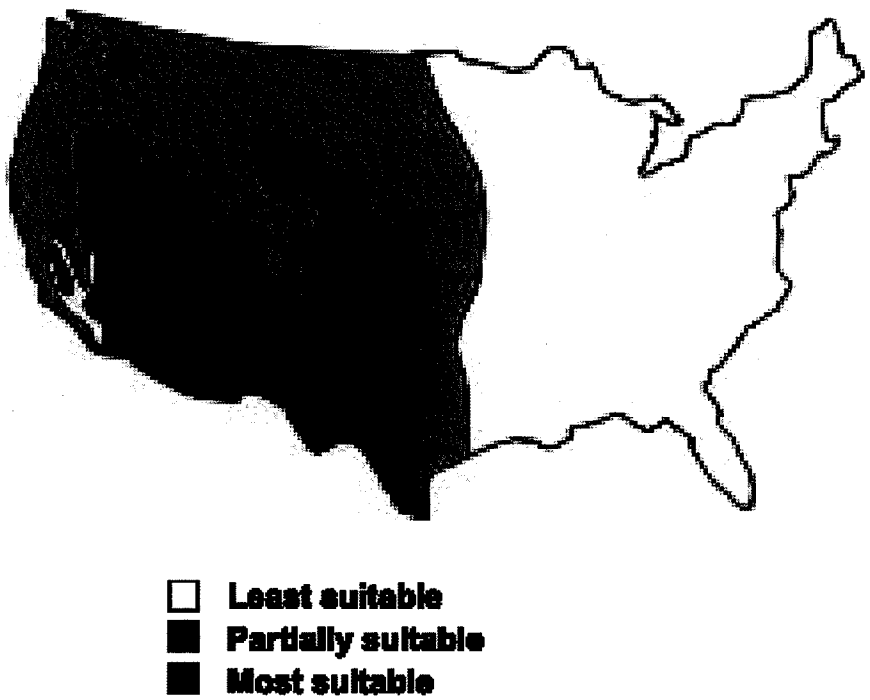
We will address the proposed system as it relates to the climate, soil conditions, drainage and unique biotic resources of Leona Valley and the subject site.

Climate

According to the United States Environmental Protection Agency, these systems do not function when their surfaces freeze. Leona Valley has a climate that is dissimilar from most of Los Angeles County. It is a transitional desert to woodland environment and freezing temperatures between December and April occur with regularity. It is one of the only regions in the County of Los Angeles that can support cherry trees, which require 700+ hours of freezing temperatures per year. Snow fall is a common occurrence between the months of December and March.

Leona Valley Snow Storm, January 3, 2011

While evapotranspiration systems are successful in some portions of the United States, there are areas that are considered "least suitable" by the EPA. These systems are best suited for arid climates where evaporation exceeds precipitation. Soil percolation is also an important consideration. The following is an EPA map depicting the relative suitability of evapotranspiration systems in the United States. As indicated by the map, the areas immediately east and west of the Mojave Desert are considered least suitable for such a system. The community of Leona Valley, a semi-arid climate, is situated directly west of the Mojave Desert, an area considered "least suitable" by the United States Environmental Protection Agency.



Source: EPA 625/R-00/008, Risk Management Research

The United States Environmental Protection Agency considers the most significant constraint on the use of ET Systems, such as the system proposed on the subject site, is climatic conditions. The evaporation rate is controlled primarily by climatic factors such as precipitation, wind speed, humidity, solar radiation and temperature. Studies have indicated that essentially all of the precipitation that falls on an ET bed infiltrates the bed and becomes part of the hydraulic load that requires evaporation. Provisions for the proposed system do not address storage of effluent and precipitation in ET systems during long periods of negative net evaporation, and for subsequent evaporation during periods of positive net evaporation. Thus

the year-round use of non-discharging ET systems is only feasible in the arid and semi-arid portions of the United States where evaporation exceeds precipitation during every month of operation, so that long-term storage capacity is not required. While Leona Valley has a semi-arid to arid climate during the months of June to October, the remainder of the year has an extraordinary amount of rainfall when compared to the County or the desert to the east and has several months of freezing temperatures.

The Nature Conservancy issued a White Paper in January 2007 on alternative on-site sewage treatment systems and watershed implications. "Decisions as to location, appropriate technology and performance standards for advanced treatment system should be based on site specific soil and hydrological conditions as well as environmental objectives for watershed as a whole. A "one size fits all" approach should be avoided."

There are a variety of microclimates within Leona Valley. Properties that are as little as one-quarter mile apart can have entirely different climate conditions. This is because Leona Valley is a long narrow valley spanning several miles. It is encapsulated by two mountain ranges. The southern mountain range is located north of the Angeles Forest; the northern mountain range is south of the Mojave Desert (Palmdale/Antelope Acres). In the center between the two mountain ranges are hills, caused by the pushing or crushing of the northern and southern tectonic plates as part of the San Andreas Rift zone. Because of the variety of hills and mountains along with changes in wind speed and flow throughout Leona Valley, there are clear climate differences in this area. Generally speaking, those properties situated north of Elizabeth Lake Road are closer to the desert and have a slightly more arid environment. Those properties that are closest to the Angeles National Forest (foothills) and are south of Elizabeth Lake Road, generally experience greater rainfall, colder temperatures and larger snow fall amounts. The exception is an area referred to by local cherry growers as the banana belt of Leona Valley, on and around 95th Street West, south of Leona Avenue. However, the difference in this location from the remaining Southern Leona Valley is barely perceptible.

During the January 2011 snowfall, the northern section of Leona Valley received a few inches of snow. Sections of the southern portion of Leona Valley received over a foot of snowfall and some residents reported that the snow had not melted up to two weeks following the January 3, 2011 snow event. During the 2005 El Niño year, portions of Southern Leona Valley received up to 50 inches of rainfall while Northern Leona Valley documented substantially less (10 to 15 inches less).

For the last two decades, amateur weather persons in Leona Valley have documented temperature changes, precipitation and snowfall. This documentation is available in the Community Archives. In all likelihood, the Developer probably obtained weather data for Leona Valley from the only government weather station in this area, which is located north of Elizabeth Lake Road at the "t" of Bouquet Canyon Road. While it is in close proximity to the subject property, it is situated north of Elizabeth Lake Road, in a different climate area. Changes between Northern and Southern climates within Leona Valley are quite substantial and would likely result in an error when completing evaporation calculations. Furthermore, if the Developer utilized precipitation records for Zip Code 93551, which is shared with the City of Palmdale (in the Mojave Desert) then the precipitation reporting for design purposes will be woefully inaccurate. According to the EPA, failure of onsite wastewater treatment systems is typically related to poor design assumptions. One such poor assumption is under-estimating the rate of annual rainfall, which in Leona Valley, has varied widely from year to year over the past two decades. The State of California has suggested that such systems be restricted to locations where the minimum winter pan rate (annual design evapotranspiration rate) exceeds rainfall for every month for the previous ten years of record. This would include the 2005 rain season where Southern Leona Valley received more than 50 inches of rainfall. The system must be designed to accept 50 inches of rain in one year, which is a technological improbability.

As previously stated, evapotranspiration systems are governed by climatic conditions. These systems are not suitable where the surface is irregular, there may be limited storage capacity or the site is unable to store the winter wastewater for evaporation in the summer. There is no indication that storage for winter wastewater is planned. There is a potential for overloading from infiltration of precipitation. Transpiration and evaporation can be reduced when vegetation is dormant (i.e.: winter months). Although most precipitation will be absorbed into the ET bed, hydraulic overloading can occur if more water enters the system than is evaporated. Therefore, for ET systems, the evaporation rate must exceed the precipitation rate, which makes the ET system suitable for areas of relatively low rainfall.[1] Therefore, Leona Valley, as indicated by the U.S. Environmental Protection Agency, is not suitable for such a system.

Soil, Discharge and the Eco-system

It is our understanding that the subject site had poor percolation results when tested to accommodate conventional septic tank systems. The site can only support ±35 homes under

[1] Evapotranspiration Systems: Project Funded by the U.S. Environmental Protection Agency under Assistance Agreement No. CX824652

the requirements of a private (septic) disposal system. Therefore, in order to achieve a higher residential density, the Developer was forced to seek alternative systems, such as an evapotranspiration system. A collective evapotranspiration system has never been utilized in the County of Los Angeles for a residential subdivision. It has been utilized in Malibu and Catalina Island for the treatment of storm water. Onsite systems utilizing the ET disposal are primarily used where geological limitations prevent the use of subsurface disposal, and where discharge to surface water is not permitted or possible. The conditions that tend to favor the use of an ET system include those properties with a very low soil mantle, high groundwater, relatively impermeable soils or fractured bedrock. ETA systems are generally used where slowly permeable soils are encountered. While ET systems may be used where the application of subsurface disposal is limited, it is not without limitations. Such a system is limited by land availability as well as topographical characteristics (addressed under land requirements).

The system as proposed is to be contained by an impermeable liner in order to prevent intrusion into the sensitive subsurface waters (streams). However, impermeable liners, even when double lined, are subject to failure due to natural forces such as general wear and tear or degradation as well as outside factors such as the digging and destruction by ground squirrels, weasels and gophers, all of which have been observed on the subject site. While poisoning of the intruding species could be proposed, some of the squirrels are endangered (Mojave ground squirrels) and the carcasses would likely be eaten by birds of prey and other wildlife, harming the sensitive eco-system known as the San Andreas Rift Zone. The potential to fence the bed area may limit some animal intrusion; however, most of these species create elaborate tunnel systems that go beneath fencing, making this an unreliable solution. Additionally, the tunnel systems from these creatures will lead to the inevitable collapse of any bed.

Because the subject site cannot support more than 35 homes with conventional septic systems, it is imperative that the exact evapotranspiration system, including all of the schematics, and technical testing (sizing per home, weather, slope, storage, set-backs, etc) be identified and studied for its suitability prior to the approval of the density for this project. The system as proposed appears to be subject to failure, particularly given the area specific constraints. The Developer has described a hybrid of an ET as well as an ETA system before Leona Valley Town Council meetings. The fact is, we are uncertain as to the true specifications of the waste treatment system because the full characteristics, dynamics and testing have yet to be submitted. Without full knowledge of the system type, it is impossible to ascertain whether this system is suitable for the property or if it can support the amount of homes proposed for this project. Therefore, an actual system plan with all of its specifications and studies must be

included and approved by the County of Los Angeles prior to determining the dwelling unit density for this property.

It is our understanding that the property did not percolate sufficiently to accommodate a subdivision, which is why a conventional septic system will not work. The Developer has indicated that they will be dispersing effluents around the project site, on individual lots. If the site cannot adequately percolate, then it is unlikely that the dispersal of effluents through this advanced treatment system can occur safely.

Land Requirements and Site Constraints 4,000 to 6,000-square feet of land area per dwelling unit is recommended by the EPA. Topography shall not exceed 15% grade; In addition, a 100% expansion area should be provided in the event of failure. Assuming 5,000-square feet of land area per dwelling unit plus a 100% expansion area for failure provision, this equates to 26.85-acres, excluding the storage requirement during negative evaporation periods. This land area cannot be located within the watershed. According to the State of California Department of Water Resources, the density criteria are two equivalent dwelling units (septic tanks) per 2 houses on one acre. While the entire site may have been utilized for the calculation, the fact is only a small portion is going to be utilized for waste treatment and the entire site (such as open dedicated open space or areas that cannot percolate) should not be included in the calculation. As proposed, multiple portions are situated in or contiguous to the watershed (including a blue line creek). Furthermore, the waste treatment facility (ET system) cannot be situated on a grade of more than 15%. Buffer zones are normally required, yet a buffer zone has not been established for this project. The Environmental Protection Agency indicates that buffer zones typically range from 100 to 300 feet around the circumference of the bed. Because of toxicity and pathogen factors that can harm humans and wildlife, it is recommended that the plan include fencing that is five or six feet high.

On the actual data as depicted on the plat map submitted by the Developer (see following page), only 6.8 acres of the site is dedicated to evapotranspiration/infiltration areas. Of this land area, only 4.9 acres is net of water resources (riparian/watershed/drainage), which is in violation of EPA and State of California Standards. Furthermore, the proposed plot plan indicates an equestrian trail traverses the et bed. According to the United States Environmental Protection Agency, such beds should be fenced and must not have contact with animals or children. Those individuals with compromised immune systems or who have regular contact with the et bed may also be at risk.

EVAPOTRANSPIRATION / INFILTRATION AREAS:

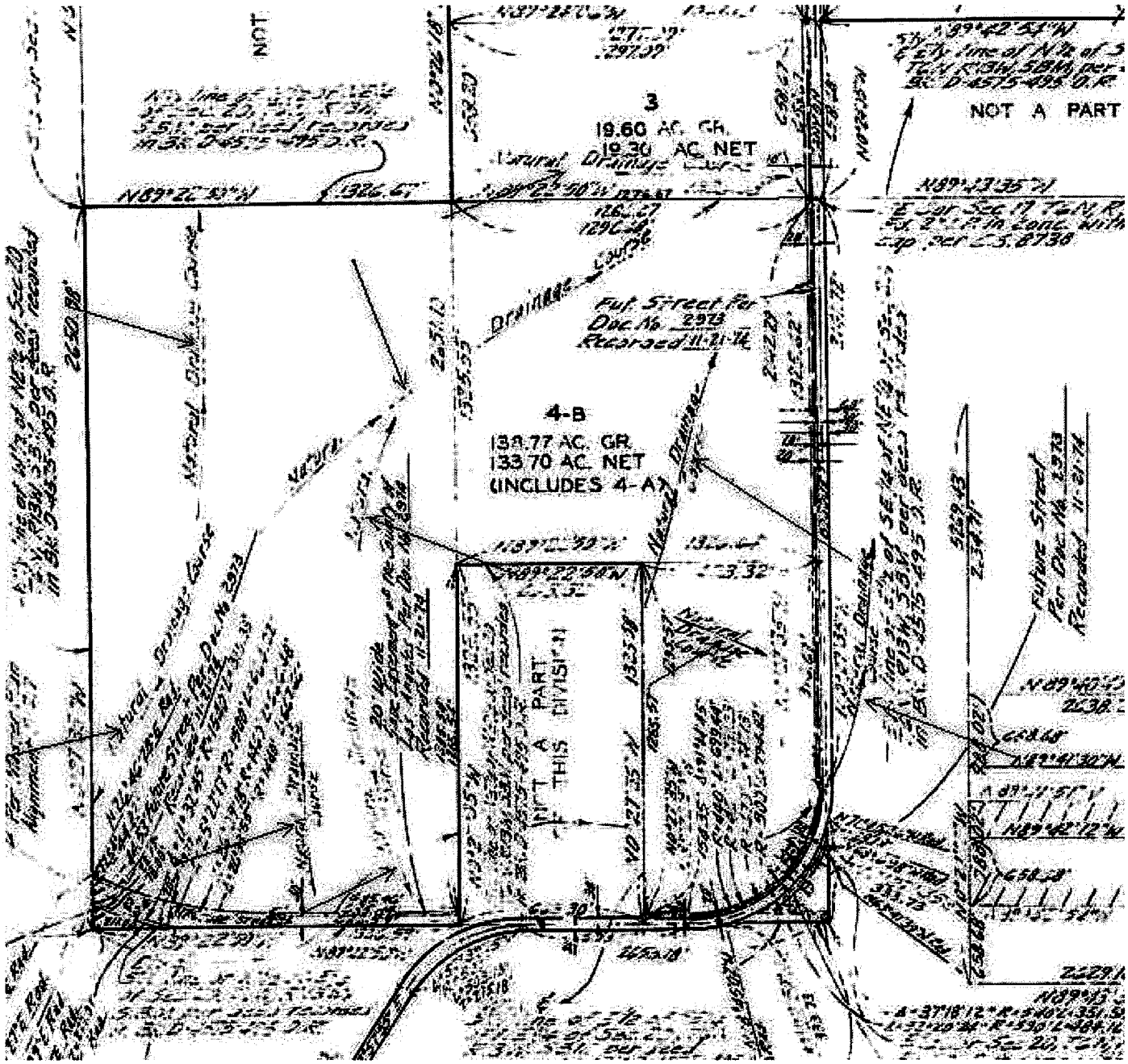
AREA "A" PORTION OF LOT 120 : 2.3 AC GROSS / 1.9 AC NET* (52 LOTS)
AREA "B" PORTION OF LOT 120 : 3.5 AC GROSS / 2.0 AC NET* (40 LOTS)
AREA "C" PORTION OF LOT 120 : 0.5 AC GROSS / 0.5 AC NET* (15 LOTS)
AREA "D" PORTION OF LOT 119 : 0.5 AC GROSS / 0.3 AC NET* (10 LOTS)
* NET = GROSS AREA MINUS AREA WITHIN 100' OF WATERCOURSE.

LEGEND

Source: Valley Vineyard Plot Plan

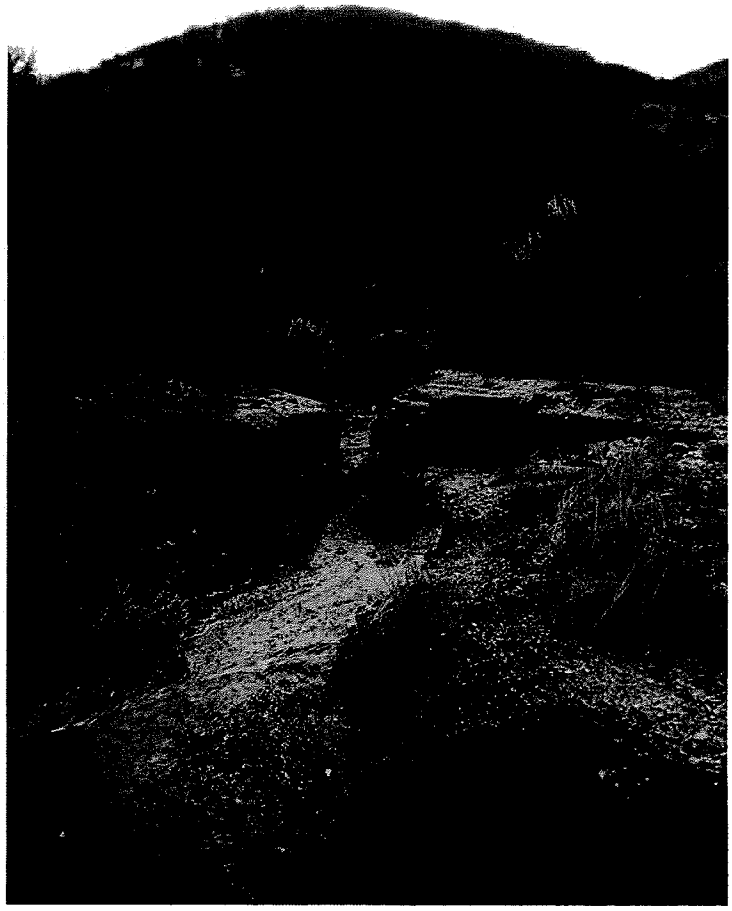
Impact on Watershed

In 1974, a parcel map was submitted to the County of Los Angeles and included the eastern most parcel known as Valley Vineyards. On the parcel map are several mapped waterways that are situated on the property. While the new Developer has referenced two waterways in their submission to the County, it has long been established that there are several more known watercourses as depicted in the Los Angeles County recorded map shown on the following page.



The arrows throughout the parcel map illustration indicate the large amount of natural watercourses, and exclude upper Bouquet Creek and the full extension of the Lost Valley Ranch Road Creek. The Lost Valley Road Creek crosses the site and actually feeds the area known as Black Bull Bog at the southwest corner of Bouquet Canyon Road and Elizabeth Lake Road, which eventually joins the Amargosa. The Department of Fish and Game has recently cited a property owner for interrupting the waterway in the bog area, because the site is inhabited by the threatened California Red Legged Frog and the Foothill Yellow Legged Frog, a species of Special

Concern. One of the evapotranspiration beds is situated on top of or within the right of way of the drainage of the Lost Valley Ranch Road Creek and there is no evidence of a setback from this sensitive location. A second proposed evapotranspiration bed is actually on top of a watershed area, as indicated by Valley Vineyard's own maps. It is highly imprudent to place evapotranspiration beds on top of or within 200 feet of watershed and/or blue line creeks. Further, it is in violation of County of Los Angeles code. According to the County of Los Angles Onsite Wastewater Treatment System Guidelines dated September 1, 2009, "The installation of OWTS within flood plain/hazard area shall be avoided."



Lost Valley Ranch Road Vicinity, in the Area of a Proposed ET Bed
Steam, 2005 File Photo

The watershed in Leona Valley is home to many sensitive species including half the Southern California population of tricolored blackbirds, whose status is pending a change from a Species

of Concern to Endangered (Meese, 2011). Therefore, significant setbacks from these water resources are necessary.

According to older regional maps, the subject site is improved with multiple abandoned wells, which could be a potential source of drinking water or an indication of a subsurface stream or spring location. It is recommended that as per best management practice a setback from said wells be minimally 200 feet from the dispersal systems and ET beds.

The Developer proposes watering the dedicated open space area (vineyards) with treated effluent water. While it may (or may not) be permissible to utilize treated water on row crops, it is problematic to place treated water within all of the mapped drainage channels on the property. There appears to be no allowance or indication as to setbacks from these channels or if these channels are to be removed with or without the approval of the State of California Department of Water Resources. If these water courses are to stay, some actually lead to the drainage of the Amargosa, which flows to the City of Palmdale and will be utilized for a recharge program. It is not known if the City of Palmdale has accepted such a plan by Valley Vineyard or if the City has been apprised of the waste treatment plans, which will impact their own watershed. Therefore, besides obtaining advanced approvals from the State of California Department of Water Resources, it is also critical for the County of Los Angeles to ascertain whether the City of Palmdale is willing to accept such a risk as well.

Salt Accumulation, Nitrates and Contamination

According to Susan Rask, environmental health specialist with Barnstable, Massachusetts County Department of Health and Environment, the main problem with current package technology is variable performance. "Even the systems that generally perform have periods of nonperformance." Alternative systems may not be appropriate in situations where design flow, siting or sensitivity of the receiving environment to a particular contaminant requires that the system meet performance standards on a consistent basis.

Leona Valley's domestic water service is comprised of hard water. The use of water softeners will contribute to the salt build-up, as has occurred in the City of Santa Clarita.

The Environmental Protection Agency indicates salt accumulation does occur as waste water is evaporated. This is even more pronounced in a line system such as the one that is proposed for the subject site. Salt accumulation is particularly pronounced during dry periods, although it is potentially redistributed throughout the bed during rainfall. For ET systems with surface

vegetation, salt accumulation may adversely affect performance after a long period of use. In order to minimize the potential for future problems associated with salt accumulation, the ET piping system should be designed to permit flushing of the bed. This process should be monitored by an established governmental agency with taxing authority, such as the County of Los Angeles. Because the locations of the ET beds traverse or are within a setback of blue line streams and riparian areas, a supplemental monitor should be the State of California Department of Water Resources or their designated assignee. In the event of failure, a performance plan and protocol must be established in advance for the removal and replacement of the toxic waste soil and plant cuttings.

Sodicity

Soil sodicity occurs with long-term use of an evapotranspiration system. While it is an obscure problem in Los Angeles County, it is relatively widespread in Australia where evapotranspiration systems are commonly used. In sodic soils, much of the chlorine has been washed away, leaving behind sodium ions attached to tiny particles in the soil. As a result, these particles tend to lose their tendency to stick together when wet, leaving unstable soils which may erode or become impermeable to both water and roots. Sodic soils can occur in the top 30 centimeters of soil, or it may occur lower down, but it is the top five centimeters where the real difficulties are encountered. In areas where plants are necessary (such as in ET beds) the most important fertile topsoil is lost. Effectively, the soil has been pulverized into a sand-like condition, making it unsuitable for plant growth. Sodic topsoil's in arid and semi-arid regions are subject to dust storms, which create major environmental and human problems. Sodicity can be concentrated in a lined ET bed system, as proposed, and will require constant removal of soil in order to ensure that the evapotranspiration process can occur.

Aside from soil removal and replacement, there are ways to treat sodic soil, but the ET system lends itself to cause such a condition. Most commonly, calcium containing substances like gypsum are applied to the affected soil in order to help alleviate the condition. However, such an additive may not resolve sodicity in the long-term. Removal of the damaged soil and plants will be costly and are considered hazardous waste as per the State of California.

Dosing Tanks

The project as proposed indicates the use of dosing tanks with the ET system. Typically, a dosing tank is placed between the tank and the mound to accumulate effluent to be periodically dosed to the mound or bed. Once the accumulated effluent reaches a predetermined volume, the effluent is pumped to the laterals in the mound by an electrical

control system. Proper dosing tank construction, placement and sizing must be considered to ensure reliable system operation.

Ensuring that the dosing tank is watertight is critical. In areas with a high seasonal or permanent water table such as Leona Valley, groundwater may leak into the dosing tank and overload the system. The seals around the pipes that enter and exit the dosing tank are especially vulnerable to leaks. If the pump is running more than the few minutes a day it takes to pump out the accumulated effluent, groundwater may be leaking into the tank or dosing tank. If groundwater infiltration is suspected, an event counter can document the number of times the pump comes on.

There is no indication as to the size of the proposed dosing tank. The minimum size of the tank is the sum of the dosing volume, the volume of the delivery pipes, volume needed to keep the pump submerged and emergency storage in the case of pump failure. The dose volume equals the deliver pipes plus five times the volume that will drain through the holes. A minimum of one-day emergency storage above the high water alarm should be provided. Because of the likely event of power outages and pump failures, a redundancy system must be established in order to protect the public, property and eco system.

The dosing tank construction requirements are the same as for septic tanks. The tank must be durable and watertight and must withstand the soil loads, which tend to push in on the walls. Since the environment in the tanks is very corrosive, no metal parts or fittings should be used. The major difference between a septic tank and a dosing tank is that the dosing tank volume will be lowered on a daily basis. Therefore, anchoring it against floatation is critical in areas with a high seasonal or permanent water table, which is where mound systems are often used.

In the event of power failures, which are a regular occurrence in Leona Valley, the effluents will not be pumped and dispersed into the ET tank beds, causing a potential for effluent build-up and leakage into the blue line streams as well as un-mapped subsurface streams. The proposed location of the dosing tanks is not at a high elevation. It is recommended that these tanks be placed at a higher elevation in the subdivision to ensure that the effluents leak on the subdivision property to allow containment before it flows downhill and downstream to at risk watersheds. This will also allow failure to be readily observed prior to breaching streams and riparian areas.

Considerations for Small Multi-Home Housing Clusters

The ET Systems addressed by the EPA are generally for single residential dwellings and not for multi-home developments. The EPA indicates that ET Systems may be applicable to small housing clusters, but large (land) area requirements may limit their practicality. Adjustments to the type of pretreatment may be required depending on the wastewater characteristics.[2]

Operations and Maintenance: Homeowners Associations and System Failures

According to the supplement provided by the Developer, the maintenance Hierarchy is proposed as follows:

1.) First, the homeowner
2.) Second, the homeowner's association
3.) Third, a Special Assessment District with taxing Authority

John Steude, Engineering Geologist for the Lahontan Water Control Board, expressed concern over who will be responsible for the maintenance and operation of the project, particularly those who will be responsible for implementing the mitigation measures should there be a failure to properly treat or dispose of wastes.

Someone must be responsible to monitor the advanced treatment system and its operations. There is no discussion in the documents regarding who will implement and maintain a treatment process. It is not possible for the homeowner or even a homeowners association to conduct day-to-day maintenance, determine if there is a problem with the system nor are they licensed to conduct monitoring and maintenance functions. Therefore, the monitoring and maintenance functions will fall on the shoulders of the taxing authority, the County of Los Angeles.

When a package sewage treatment system is in use for a subdivision, someone needs to be the responsible party when it comes to maintenance and monitoring. This is generally a group or organization that has demonstrated an ability to do this function professionally. For example, in the County of San Diego, it is the water district or a County sewer district that has the ultimate responsibility, not a private party.[3]

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[2] EPA 625/1-80-012, Page 309

[3] Interview with Mark Watton, Otay Water District Manager, February 1, 2011

There are several examples of the potential problems with these systems. What had occurred in Otay Water District involved a planned development of 200 homes with a package treatment plant. The Developer wanted to pipe the recycled water across the urban limit line and circumvent the rural standard for sewage treatment in that area. The State of California Department of Health wanted someone to be the responsible party for the package treatment plant. Otay Water District was not interested, because they would end up with the project and the Developer would run off with the profits. Ultimately, the project failed because no one would sponsor the over-sight of the package treatment plant upon completion.

In Campo, California, a new housing subdivision was constructed in a rural area of San Diego County. Homes in the area are typically custom construction on multi-acre lots. The subdivision in question featured ±500 dwellings single-family homes on standard tract size lots. Effectively, it was a remote subdivision without services such as sewer and water. The project was ultimately serviced by an orphan well-water and package treatment system and the maintenance to these remote facilities became exorbitant to the homeowners, resulting in a very high rate of foreclosure and tremendous tract specific maintenance fees to the property owners. The County of San Diego is now "stuck" with this service district and shares in the burden of costs while the Developer has left with the profits.

The City of Calabasas had permitted the construction of Onsite Waste Treatment Systems for individual single-family residences. In an August 11, 2010 meeting before the Calabasas City Council it was reported out of the 70 systems inspected, 47% had major failures; 30% had minor failures or were under review; 4.2% were connecting to the sewer system; and 13 had full or conditional operating permits issued. Without the City monitoring these systems, it would not have been possible for a typical homeowner to realize their system was at risk or causing environmental damage.

It is entirely inappropriate for a homeowner or the homeowner's association to monitor an advanced waste treatment system, particularly when this site impacts subsurface and jurisdictional waterways. The subject site is in a "draft" significant ecological area, which under the terms of the current Antelope Valley Area Wide Plan, must be treated as if it were a Significant Ecological Area. This type of system is already pre-disposed to failure because the freezing/climate conditions of Leona Valley and the lack of direct over-sight of the system upon the completion of the project will result in environmental calamity. Past experience has demonstrated that once the Developer has left the project, it is the homeowners and the

jurisdictional authority that can be left holding the proverbial bag. Therefore, the primary responsibility should be the Special Assessment District (Waste Treatment District) with taxing authority, most appropriately, the County of Los Angeles.

Setback Requirements for Waste-systems from Crops for Harvest

The development as proposed indicates the dedicated open space area, which is to be kept natural in accordance with the Antelope Valley Area Wide Plan, is to be developed with a vineyard. There is no indication as to the rules and regulations relative to watering food crops with treated effluent water. The State of California has a series of rules and treatment levels that have yet to be addressed in any submission to the County of Los Angeles or the State of California. There is also no indication as to how often this treated water will be tested for contamination and pathogens in order to protect the public from an adversely impacted crop.

Those that are familiar with the grape growing process also know that wine will develop the flavor of the land on which the grapes grew. And while treated wastewater may be acceptable for watering native species and hillside plants, it might not be suitable when developing this fledgling wine region. In agricultural terms, special characteristics such as site, geology, soil and climate contribute to a wine growing region. This is known as "terroir". In terms of wine, when the soil is watered with treated effluent water it will assume the basic taste of the soil that has been dosed or treated with said water. Presently, the Viticultural area known as Leona Valley is unique to the County and the State of California and has a stellar reputation for producing premium wines. It is therefore recommended that the Developer obtain concurrent approval from the wine growers of Leona Valley as the reputation of this wine growing region is at risk.

Viewshed

The proposed location of the ET beds is near the four corners of the subject site, in plain view of the public and critical scenic view-sheds. Two locations are visible from Bouquet Canyon Road, which is and has long been established as a Scenic Roadway (City of Palmdale and County of Los Angeles). The two other bed locations are directly visible by those who traverse the scenic trails inside and outside of the project. The ET beds must not compromise the scenic integrity of the community and the surrounding area. Nor should the neighboring properties be adversely impacted by the site or smell of the ET beds. In order to allow for the best concealment of the subdivision's infrastructure, the ET beds must be relocated and concealed within the core (center) of the project. In hillside areas this can be accomplished through terracing of the bed so that the grade does not exceed 15% as per EPA requirements. Setbacks are mandatory and fencing must be required.

California Regional Water Quality Control Board, Lahontan Region Review of Project

On September 13, 2010, the California Regional Water Control Board submitted preliminary comments on the project as proposed. The agency was particularly critical of the proposed advanced treatment system for domestic waste. Based on the information contained in the initial study, the Water Board Staff found the project to have potentially significant impacts to natural resources. Specific comments and questions relative to the proposed on site waste water treatment system included, but are not limited to the following:

1.) No determination of jurisdictional waters is presented or referenced.
2.) Depth to groundwater in disposal areas were not presented or referenced.
3.) Potential impacts to state and federal jurisdictional waters due to construction activities are not described nor are (there) proposed controls and project specific mitigation measures.
4.) Wastewater effluent characteristics were not presented or referenced.
5.) Basic wastewater treatment and disposal for a unique alternative system was not presented or referenced.
6.) Plants to be irrigated with wastewater are not identified
7.) Too little information in the Initial Study to evaluate potential impacts
8.) There are potential long-term impacts to groundwater due to the project that need to be evaluated at a project-specific level.
9.) The long term build-up of nitrates and other contaminants in the soil and groundwater down-gradient of the waste disposal areas is a potential long term impact not addressed in the study.
10.) The anticipated total nitrogen discharge is not discussed. If the total nitrogen discharged in wastewater effluent will be greater than 10 mg/L, then treatment and other mitigation measures must be discussed to ensure the water quality is protected.
11.) Major components of the alternative waste treatment system were not provided.
12.) Additional details on the treatment system (specific type of biological treatment) and waste effluent characteristics (e.g. total dissolved solids, total nitrogen, nitrate levels) are not provided.
13.) State who will be responsible for implementing the mitigation measures should there be a failure to properly treat or dispose wastes. State which entity (specifically) will be accepting responsibility for operation and maintenance of the entire waste treatment and disposal system.

14.) Information on the criteria to require additional treatment or disinfection of the potential means of achieving additional treatment or disinfection are not provided. If the project proponents will not be providing the additional treatment, please describe how the additional treatment and disposal will be implemented and maintained?

15.) Provide data and other supporting information on the water quality of the effluent to be disposed to the ground. Identify proposed means for achieving additional treatment and/or disinfection as a mitigation measure.

16.) The project description states that treated effluent conveyed to the 4 disposal areas will be spread via shallow underground pressurized lines which are designed to disperse the effluent into the root area of plants which cover the disposal areas. The project description states: "This process is designed so that the roots absorb the effluent where it then evapotranspirates into the atmosphere rather than percolates into the ground water." This statement is not supported by facts, data, or other information.

17.) Provide information supporting this statement. Provide a water balance evaluation that addresses the rate and volume of discharge, evapotranspiration and infiltration that will occur.

18.) Provide an evaluation of potential groundwater mounding to be expected at the disposal areas.

19.) Provide an evaluation of the agronomic rates of nutrient loading that can be supported by the plants that will be specified. Identify whether plants are expected to transpire more than just water (i.e., waste constituents) to the atmosphere.

20.) Identify which specific waste constituents will be taken up by the plants if uptake is being considered as part of the project evaluation. Describe the fate and transport of waste constituents that are not taken up by plant roots (e.g., nutrients above agronomic rates).

21.) Describe the fate of wastewater constituents that are absorbed and accumulated by plants (e.g., metals).

22.) State how plants used in the treatment and disposal process will be managed (e.g., periodically harvested and disposed in a landfill).

23.) State how using plants as part the treatment process will work when plants have reduced evapotranspiration during the winter season and during the night, considering that wastewater will be generated 24 hours per day, every day of the year.

24.) State how the depth of waste discharge will be controlled to match the depth of the plant root zones.

25.) The Initial Study does not address potential waste generation and discharges during vineyard operations or the potential water quality impacts due to vineyard operations (e.g., pesticides, herbicides, & fertilizers).

26.) The initial study is silent on whether or not vineyard plants will be used for the evapotranspiration treatment processes. Clearly state whether or not the Project proponents propose to irrigate vineyard plants with wastewater, initially or in the future.

27.) Describe the area and location of the disposal areas.

28.) Describe the depth of ground water before and after any potential groundwater mounding that may occur as a result of waste discharges.

29.) Describe the soil thickness.

30.) Provide any percolation test reports or other geotechnical information describing the subsurface characteristics for waste disposal.

31.) The proximity of the disposal areas to off-site public or private supply wells is not addressed. Provide information identifying whether there are groundwater supply wells within ½ mile of the project boundaries that may be impacted by waste discharges from the project.

32.) Provide an estimate of the down-gradient distance that wastewater is expected to migrate, with and without the evapotranspiration effects of plants.

33.) State what additional treatment may be done at the disposal areas and who will implement and maintain the treatment process.

34.) Describe the fate and transport of effluent waste constituents in the ground?

35.) Describe how underground effluent emitters will be monitored for clogging and proper flow.

36.) State definitively whether or not the project site is located in an area known for having septic tank limitations due to high groundwater or other geotechnical limitations.

37.) State the depth of groundwater and describe the geologic materials (soil, fractured rock, etc)

38.) State definitively whether or not the project proposing on site systems is located in close proximity to a drainage course. Clearly show on a map where drainage courses in the vicinity of the project site are located and where the disposal areas are located.

In the conclusion of the State document, it was found that the potential impacts to water quality are not adequately identified and delineated, and therefore, mitigation measures cannot be properly evaluated until all of the potential impacts are adequately described.

Suggestions and Potential Conditions as Recommended by the LVTC Land Use Committee

1.) All of the questions and concerns posed by the State of California Department of Water Resources must be answered and accepted prior to going on calendar for a hearing before the County of Los Angeles Planning Commission.

2.) The proposed system is in a location identified by the United States Environmental Protection Agency as "least suitable" and is an experimental system that is subject to failure under conditions that exist in Leona Valley. Therefore, the site density must not be greater than what can be supported by conventional on site septic systems, or ±35 single-family dwellings.

3.) Provide a water discharge report as the property currently exists and as proposed.

4.) Establish a buffer zone around ET beds at a minimum of 300 feet.

5.) ET beds must be set back from watershed, blue creeks, streams, wells (active and abandoned) and all drainage courses by a distance of at least 300 feet.

6.) In order to allow for the best concealment of the subdivision's infrastructure, the ET beds must be relocated and concealed within the core (center) of the project. In hillside areas this can be accomplished through terracing of the bed so that the grade does not exceed 15% as per EPA requirements. Setbacks are mandatory and fencing must be required.

7.) The system must be designed to accommodate a minimum of 50 inches of rain during the winter season and must have adequate storage to accommodate the project during winter freezing and heavy rain conditions. Please provide appropriate associated studies and calculations to determine storage capacity.

8.) The taxing authority (County of Los Angeles) must maintain the sewage treatment system.

9.) Testing for pathogens and contaminates for the treated water for the crops (vineyard) must be completed quarterly by the Los Angeles County Health Department.

10.) The size of the ET beds should be doubled to allow for 100% expansion in failure and allow for rotation when sodicity occurs.

11.) Create a process for the responsible party (maintenance) for soil removal and disposal of contaminated plant cuttings within the ET beds.

12.) Approval of the waste treatment design must be obtained by the County of Los Angeles Health Department and the State of California Department of Water Resources (with permit issuance) prior to the approval of this subdivision by the County of Los Angeles Planning Department.

13.) Because such a system will have a major impact to the environment (per State of California) as well as a planning impact on all rural areas of the County of Los Angeles,

there must be a full Environmental Impact Report. Further, this is a standing requirement according to the Antelope Valley Area Wide Plan which requires an environmental impact report for waste treatment facilities.

14.) Because the property is situated within or proximate to the San Andreas Rift Zone, the system needs to be designed to accommodate at least 10-days without power (like septic systems). All et systems need to have backup generators as all of the homes in this tract will have sludge tanks and pumps.

15.) The ET system needs to be treated as if a standard effluent field and have adequate clearance above the high ground water mark.

16.) Potential mounding of water is a concern and nitrates can build-up. Therefore, nitrate levels may not exceed those of a drinking water standard. The system must be tested quarterly for nitrate levels. When exceeding the standards, the system must be shut-down and another system must be established.

17.) Establish monthly non-toxic mosquito (vector) controls for the ET beds.

18.) No trail (equine/hiking) trails may traverse the et-beds.

19.) As per the State of California Density Criteria, there shall be 2 edu's (equivalent dwelling unit for septic tanks) per 2 houses on one acre. The calculation may not include the land area that is unsuitable for percolation, is traversed by drainage, streams, riparian or other watershed. Dedicated open space area must be excluded from the calculation.

20.) Because this is a small developer that lacks substantial capitalization, we require a reclamation bond (reclaim to nature in the event of failure) be placed on this project. This has been done with larger developers in other areas of Southern California. Reclaim shall occur within 1-year of the last major period of work (small modifications/work will not be consider a sustaining economic or physical factor).

21.) Because this is a new technology for a commercial grade system in the County of Los Angeles, a public hearing sponsored by the County of Los Angeles Health Department with the State of California Department of Water Resources needs to be conducted prior to the approval of the advanced treatment system design and implementation.

(5)

Traffic Report Deficiencies
Valley Vineyard Development
West of Bouquet Canyon Road
@ 87th Street West & Lost Valley Ranch Road
Reviewed August 20, 2008

The Report submitted by Valley Vineyard, does not base its findings on the anticipated completion date of the project; therefore, the actual trends are not adequately addressed or realistically analyzed. The Report needs to be corrected, utilizing the planned completion date to the proposed subdivision and the relevant data for that period of performance.

Note for County: These traffic reports should have an expiration date so that out dated reports are not used or relied upon for new projects, which are often delayed for many years due to economic conditions. A good example of an out dated report is the Ritter Ranch study utilized to support the conclusions of the Vineyard study. The Ritter study was found to be severely flawed when it was conducted several years ago.[1] *The County should insist a project timetable schedule be part of this study and all future reports.*

The report does not adequately address the County's request to include the Ritter Ranch counts. The calculated traffic counts should include the estimated traffic counts from Ritter Ranch *and* Valley Vineyard projects, and not use a percentage of increase. The report does not indicate the true traffic counts that will be realized with the Ritter Ranch, Valley Vineyards, and projected North County growth rates. Table 6 indicates 94,501 trips for the Ritter project, but not its effects on Bouquet Canyon Road. The LVTC insists that the report be updated to reflect the actual projected numbers and not percentages of increase so that the true impact can be ascertained.

The report provides no history of accidents along Bouquet Canyon Road. Bouquet Canyon Road is known to have one of the highest death rates in the State of California.[2] The report is not complete without indicating the increase in the number of accidents as a result of the added traffic, increased ingress/egress, horse crossing and the addition of an intersection on Bouquet Canyon Road. The safety of this roadway and the shortfalls in its design cannot be determined or resolved without knowing where and how accidents occur on the north section of Bouquet Canyon Road.

The Traffic Count Work Sheets indicate the City of Palmdale as the location. The report needs to be updated with the correct location. The Traffic Count Work Sheets should indicate Leona Valley as the studied area. This inaccuracy suggests a lack of familiarity of the area or a deficit of knowledge for this location.

Traffic Count Work Sheets start at 7:00 AM, near the <u>conclusion</u> of the commuting time for this area. Leona Valley is a commuter community, and most of the residents commute

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[1] Leona Valley Town Council v Ritter Park Associates, et al
[2] California Highway Patrol, Resident Deputy Study

to the South. The reports must to be updated with the traffic count starting at 4:30 in the morning.

The Traffic Count Work Sheets indicate the date of study as July 18, 2007. This summer season date is not indicative of typical work day traffic on Leona Valley roads, as this represents summer vacation time. The counting effort should have taken place during normal traffic conditions and must exclude summer and winter breaks (preferably a weekday in September, after school is in session). The traffic count needs to be accomplished during the time of year that there is known high traffic periods.

The report does not mention or take into account Leona Valley School, which is located at the northwest corner of Leona Avenue and 90th Street West. An appropriate analysis must consider the traffic impact, including the direct access to the school, which is a kindergarten through 8th grade institution. The County and the company generating the report must also consider the pending population expansion at the Leona Valley School. The expansion will include the Anaverde subdivision in southwest Palmdale. The student population is expected to triple this year. The report must be updated to address the school, its expansion and the additional traffic that will be generated by the subdivision.

The report indicates all the counts were done on the same day. Unless multiple people did the counts, the actual work sheets are suspect. The work sheet should indicate who took the counts and should be signed by the person performing the task to be officially recognized; there is also no indication as to if there is quality control on the work sheets. Since the proposed project will affect the community over a much longer time span, the counts should be accomplished with automated counting equipment, traceable to a calibration standard. The count should take place over a 7 day period with data recorded over (7) 24 hours periods. The raw data should also be included in the addenda of the report. The traffic count topic has come up several times in the community. No one has come forward to collaborate that actual traffic counting was ever done, because no equipment was observed or noticed by the public. The LVTC requests that the test be performed again by the County or with County oversight utilizing calibrated counting equipment. The report should include the calibration sheet for the equipment and a signed affidavit by the person or persons performing the traffic count. Once the report is updated and resubmitted, the LVTC expects the County validate the data once it is resubmitted by performing spot checks with County traffic counting equipment. The traffic study must include Bouquet Canyon Road, 87th Street West, Elizabeth Lake Road, Leona Avenue and 90th Street West.

6. A traffic signal is projected to be warranted at the following study intersection for Year 2009 without project traffic conditions (see Appendix D):

   Bouquet Canyon Road (NS) at:
   Elizabeth Lake Road (EW)

   The unsignalized intersections have been evaluated for traffic signals using the California Department of Transportation Warrant 3 Peak Hour traffic signal warrant analysis, as specified in the Manual of Uniform Traffic Control Devises 2003 California Supplement, dated May 20, 2004.

The report indicates that a red light will be needed at Bouquet Canyon and Elizabeth Lake Road by 2009, even without the project. The LVTC does not believe the conclusion of the report. The intersection of Bouquet Canyon and Elizabeth Lake Road does not show any signs of needing a traffic signal, therefore the LVTC insists the County perform a traffic study for this intersection to ensure the safety of the citizens of Leona Valley and validate the analysis and the conclusion of the report.

The method sited to calculate the need for a traffic signal seems to be the incorrect process for a rural environment and needs to be adjusted for the traffic and accident rate for this intersection. The traffic flow at this intersection is not known to be a problem and the Leona Valley Town Council has received zero complaints from citizens regarding this intersection in the last ten years. If a traffic signal is required at the Bouquet Canyon and Elizabeth Lake Road intersection, then the project should be put off until the traffic light is installed by the County, or is required to be installed by the Subdivision Developer.

Bouquet Canyon Road, along the referenced subdivision project, is a high-speed section of roadway. The proposed subdivision will be incorporating a new intersection in the middle of this high-speed thoroughfare (55-70 mph/typical), therefore, the County needs to monitor the speed in front of the proposed entrance (A Court) to the project to better understand the design requirements and to ensure that the new intersection is designed to best maximize safety.

The same high-speed section of Bouquet Canyon Road is also noted for unsafe passing. Traffic just south of the subject property is slowed due to the numerous curvatures of the roadway when traveling north; Bouquet Canyon Road, in front of the proposed project, is the first and most common place that cars are able to pass slower moving vehicles. The unsafe passing will take place in the middle of the proposed intersection. The report does not address this safety issue. For safety reasons, the County should require the report address this issue so that the County can ensure a design that best maximizes safety.

> 90th Street West: This north-south roadway currently is two lanes undivided in the study area. 90th Street West is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 1,100 to 1,500 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Bouquet Canyon Road: This north-south roadway currently is two lanes undivided in the study area. Bouquet Canyon Road is classified as a Secondary Highway (80 foot right-of-way) on the County of Los Angeles Highway Plan. It currently carries approximately 2,900 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Godde Hill Road: This north-south roadway currently is two lanes undivided in the study area. Godde Hill Road is classified as a Major Highway (100 foot right-of-way) on the County of Los Angeles Highway Plan. It currently carries approximately 3,300 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Elizabeth Lake Road: This east-west roadway currently is two lanes undivided in the study area. Elizabeth Lake Road is classified as a Major Highway (100 foot right-of way) on the County of Los Angeles Highway Plan. It currently carries approximately 3,000 to 6,800 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session. The estimated traffic count indicates a very large variation. The traffic on Elizabeth Lake Road is pretty consistent.

> Lost Valley Ranch Road: This east-west roadway currently is two lanes undivided in the study area. Lost Valley Ranch road is not classified on the County of Los Angeles Highway Plan.

Dirt road needs to be added to the description of the road. Lost Valley Ranch Road is also a natural watercourse, which has failed and relocated multiple times in the last two decades.

The project traffic distribution is incorrect. It assumes that most of the traffic will go to the East and not the South. This error appears to be due to the lack of familiarity of this location. Most of the residents in the Antelope Valley commute to the South as this is a bedroom community. Valley Vineyards needs to perform a traffic survey of the local residents to see where they commute to and apply that percentage to the traffic count for the project. Major studies for the Antelope Valley have already been done in recent years, which indicate the majority of residents commute outside of the Valley for employment. The majority of the traffic does not go to Palmdale; most of the citizens commute to the southern work centers in the Santa Clarita Valley, San Fernando Valley, Los Angeles, and points further south. The traffic distribution also does not take into account the traffic to Leona Valley School and the commercial core of this town, to and from the project. The Traffic Distribution uses percentages of increase. This methodology is misleading. Actual counts should be use. The report should be using the calculated counts that include the Ritter Ranch project counts.

A. Method of Projection

For Existing Plus Ambient Growth traffic conditions, an areawide growth rate has been utilized to account for areawide growth on study area roadways. Existing Plus Ambient Growth traffic volumes have been calculated based on a 3.8 percent annual growth rate of existing traffic volumes over a two (2) year period. The areawide growth rate has been obtained from the Los Angeles County Department of Transportation.

Areawide growth has been added to daily and peak hour traffic volumes on surrounding roadways.

With the building limits taking place in the South County, Developers are looking to the north in smaller unincorporated towns to build their medium size subdivisions. Therefore, the growth rate needs to be updated based on this latest trend. The report fails to include the growth rates for the Antelope Valley, taking into to account the population and commuter increases for the cities of Lancaster and Palmdale. Elizabeth Lake Road and Godde Hill Road are utilized by residents of Lancaster, Palmdale and Quartz Hill to commute to Santa Clarita/San Fernando and Los Angeles basin areas. The increased traffic flow should be accounted for based upon the actual growth rates of this region. The report draws conclusions based on old data and growth rates that have not been updated per today's environments. The report needs to be corrected, based on the changing growth rates and demographic patterns.

Table 6

Other Development Traffic Generation

				Peak Hour						
				Morning			Evening			
Project	Land Use	Quantity	Units[1]	Inbound	Outbound	Total	Inbound	Outbound	Total	Daily
PM 062789	Single-Family Detached Residential	3	DU	1	2	3	2	1	3	29
PM 066871	Single-Family Detached Residential	3	DU	1	2	3	2	1	3	29
PM 068295	Single-Family Detached Residential	4	DU	1	2	3	3	1	4	38
TR 062622	Single-Family Detached Residential	11	DU	2	6	8	7	4	11	105
Ritter Ranch TTM 51508[2]	Single-Family Detached Residential	6,305	DU	1,260	3,470	4,730	3,970	2,330	6,300	63,430
	Multi-Family Attached Residential	895	DU	60	330	390	340	160	500	5,350
	Commercial Retail	63	AC	260	110	370	750	780	1,530	17,335
	School	1,800	ST	470	250	720	20	50	70	2,340
	Park	198	AC	110	--	110	--	70	70	725
	Subtotal			2,160	4,160	6,320	5,080	3,390	8,470	89,180
Joshua Ranch TTM 52200[3]	Single-Family Detached Residential	535	DU	102	300	402	342	198	540	5,120
Total				2,267	4,472	6,739	5,436	3,595	9,031	94,501

The numbers used to update this report for Ritter Ranch are not correct. Ritter Ranch no longer includes multi family residential units except for a senior housing project. The Table does not account for the traffic to the Ritter Ranch golf course, the planned equestrian center and shopping centers. The report needs to be updated per the latest proposed design changes made by Sun Cal. The Traffic report developed by Sun Cal should be seen by the County before any action is taken on approving this report or subdivision.

Evaluation of the Road Design

The design does not take into consideration that Bouquet Canyon Road is a scenic byway. More information is required to ensure that the road design enhances the scenic byway. The County needs to require additional design packages to ensure the design meets the Scenic byway requirements.

The proposed road design does not include a deceleration lane on Bouquet Canyon Road for south bound traffic turning into A Court. This section of Bouquet Canyon Road is a high-speed area, with the southbound traffic turning west into the subdivision, A Court, requires a right hand turning lane for safe deceleration and to keep from impeding the flow of southbound traffic. Without the decelerating right had turn lane, southbound traffic will perform unsafe passing to avoid the right-hand turning vehicles. The County needs to ensure the safety of motorists and the residents of Leona Valley by requiring the road design to include a right-hand deceleration lane. The deceleration lane needs to be adequately long enough to maintain the flow of traffic and provide for the safety of the commuters and the residents of the proposed project. As an additional safety precaution, the Developer must be responsible for an additional turn out on the southbound side, between Elizabeth Lake Road and the project site, to allow traffic to pull over before entering the subdivision.

Turning South out of "A" Court, the project design includes an acceleration lane. The Acceleration Lane requires the cars to merge into one south bound lane right in the middle of the turn, defined by segment DD and CC in the provided project drawings. The merge should be carried around the corner with the merge taking place in the straightaway identified as segment BB. The County needs to extend the end of the merge lane to the straightaway between the curves.

The northbound left turning lane into "A' Court needs to be longer to allow for high-speed traffic on Bouquet Canyon Road. After the corner, just before A Court, is the first place north bound backed-up traffic obtains a chance to pass. Provisions need to be made for a passing lane or a longer turning lane so traffic can maneuver around the cars turning left on to "A court".

If the County were to investigate the number and cause of the accidents along this stretch of Bouquet Canyon Road, they will find a high number of accidents are caused by cattle and wildlife deer. on the road. With the increase of traffic from this project, the County should mandate the Developer upgrade the existing fence to a highway fence, built to County or State specification, while still in compliance with the Leona Valley Community Standards District.

During a Town Council meeting earlier this year, the Developer indicated that that he planned on adding an equestrian crossing at the high speed segment (55-70 mph) of Bouquet Canyon Road. The location is approximately ½ to one mile north of the curve (Cowart's curve). Adding a horse crossing at this location (to connect to the trail system) will put the drivers and the riding community at an unacceptable elevated risk of injury or

death. Therefore, it is recommended that any crossing occur subsurfacely, so that equestrian travelers traversing this area do not interfere with the flow of traffic.

Residents have voiced a large volume of concerns over ingress/egress at the terminus of Lost Valley Ranch Road and 87th Street West, a narrow rural roadway. As per our previous recommendations, we believe this access should be removed in favor of dual access points on Bouquet Canyon Road.

Supplemental Commentary
August 23, 2008

It appears the Developer has traffic counting equipment situated at Lost Valley Ranch Road at 87th Street West on August 23, 2008, a Saturday morning and the week of the Antelope Valley Fair. Leona Valley is a rural community with strong participation in fair events. Most families with children camp out at the Fairgrounds, taking care of livestock and displays, until competitions are over. Therefore, much of the community is absent from August 21 through September 1st. We had previously stated that a traffic study during summer is inappropriate as true traffic counts will not be reflected. This is further exacerbated during fair week and any study done the week of August 22, 2008 to September 1, 2008 should be disregarded.

August 5, 2008

Leona Valley Town Council
Leona Valley, CA 93551

Subject: "Valley Vineyard" Development

PLEASE FORWARD TO THE APPROPRIATE L.A. COUNTY AGENCY

In 1988, a proposal to build a housing development on the same site that "Valley Vineyard" now proposes, was soundly rejected by the community and the County, and was never adopted. Subsequently, that proposed development became the impetus to establish the Leona Valley community standards district, and form a town council, giving unequivocal evidence of this community's commitment to maintaining the rural characteristics and opportunities, as well as the rather unique design pattern of Leona Valley.

Now, 20 years later, a new owner of the property is asking to do the same – build a gated urban housing tract in Leona Valley. Not surprising, after 20 years, nothing has changed; not the environment, topography, infrastructure, impacts - or the community's desire for compatible growth which enhances our quality of life, not changes it.

The Leona Valley town council has done a superb job of analyzing this project and identifying the impacts on the environment and community. I concur with their findings and applaud their effort.

Therefore, please add my voice to those who find this project inappropriate and oversized for this area.

I would be anxious to see what more suitable alternatives the developer can propose and would encourage him to do so.

Mary Ann Floyd

Mary Ann Floyd,

LVIA Land Use Committee Chairman
CSD Formation Chairman
Town Council Co-Founder and Member
ARTC Founder

LEONA VALLEY TOWN COUNCIL

The proposed housing tract "The Valley Vineyard Project:" consisting of 121 homes and a commercial vineyard are not an asset to our valley for numerous reasons. There is a restricted traffic entrance to our valleys on both the north and south slopes and more difficult as the influx of families with children has increased. Lake Elizabeth Road has increased traffic from the east and the west with many accidents monthly reported in the Mountain Yodeler. With the added traffic from the proposed homes will be added traffic from the south on 87th Street West which will require turning onto Leona Avenue , a curve that has seen many past misses and near misses on the curve and of the residents leaving their home driveways. This also will increase the accidents that are presently occurring on 87th Street West. Most of the traffic violations are not sited or recorded due to lack of Sheriff Patrol assigned to this area.

The safety of this rural lifestyle lived here will endanger the children who we see walking to and from school, riding on their skateboards, bikes, scooters, riding or walking their horses dogs or other animals. Also the area has many joggers who use the streets to go into the hills to hike.

I have seen an increase in traffic in delivery , Waste Management, Propane trucks and U.S. Postal trucks in the thirty plus years that I have lived here . There are also the Fire Emergency and ambulance responses that are frequent. During the fires that have occurred there is limited entrances to the areas that are burning and often with evacuation and fire responders there is conflicts. With the projected 100 cars a day increase the hazards will implode to disasters becoming unmanageable.

I am very concerned for those who also will be having the water table drained and left with no water except that which is controlled by water commodity sellers, The California Water District has agreed to selling the developer some water, but there already is a restricted amount of water available, with the global warming more drought conditions are and will occur, meaning less water from the aqueduct There is limited water for fire fighting as it was experienced in past fires.

We need not add to hazards with the addition of this development.

Marcella E. Mahan

DUARTE RANCH

August 5, 2008

To: The Leona Valley Town Council

Our family resides at an 8 acre ranch located at 40203 107th St. West in Leona Valley. It is our understanding that there is currently a proposal to develop a subdivision of 121 residential units with clustering to 1.5 acres between 87th Street West and Bouquet Canyon Road. This is of great concern to our family. Please advise the Los Angeles County that we are strenuously opposed to any such development in Leona Valley.

We have lived here for two years and plan to raise our children here. The environment we have chosen to raise our children in is of the utmost importance to our family. We have made and will continue to make significant sacrifices toward this effort. We carefully researched and specifically chose to live in Leona Valley when we moved here from New York State in 2006. We will have three children in the Leona Valley Elementary School this year. We also have horses, a llama, and many other animals. We plan to have even more farm animals in the future. Our family participates in many community activities and we are also members of the Leona Valley Improvement Association and the Leona Valley 4-H Racketeers. We are active in the Leona Valley Elementary School Parent/Teacher Organization. We ride our horses throughout the community and use Leona Avenue and 90th Street regularly while on horseback. One of our children regularly rides her horse unsupervised to the Jackie's Restaurant to eat with her friends. When our children walk or walk their dogs throughout the community we enjoy an increased margin of safety due to the current level of traffic as well as the nature of a small community where most everyone knows each other. Most of the current traffic consists of the folks who live here and they know they need to drive carefully to protect their neighbors as well as their own reputation in the community!

We are very, very concerned about the significant danger caused by the increased traffic that a subdivision would bring and given that coupled with the very limited egress and ingress to this community it would pose not only a danger but an extreme nuisance. Certainly traffic lights would be needed and we do not want those here. It would also no longer be safe to ride the horses and allow children to walk on Leona Avenue and 90th St. due to the increased traffic. The effect of the increased traffic on Elizabeth Lake Road is another very significant problem. There is already a huge increase in the number of serious accidents on Elizabeth Lake Road since 2003 and many of these occur in the Leona Valley area.

Please consider how the increased traffic and limited ingress and egress would also create an impossible situation should a disaster strike. In Leona Valley the fire and earthquake danger is a very real and daily concern. The problems associated with evacuating the school, located on Leona Avenue and 90th St., and the current student populace of 150 children and their families are of enormous concern to this community even without the significant added problem of an additional 121 residential units and increased student body.

PHONE (661) 270-9367
E-MAIL mtjduarte@aol.com

The smaller size of the lots and the essential "mass production" of tract homes, albeit "custom type" or expensive tract homes, is not in keeping with the style and nature of this community in any way and we are concerned that these future residents could not possibly integrate as a whole into the existing community and would, in fact, become an adversarial community within the same. In addition, there currently exists approximately 500 single family homes in Leona Valley and the effect of such a subdivision would create an oversupply of housing in this area with a detrimental effect on the economy vis a vis the extended absorption rate. The current elementary school would likely double in size. The effect of this would significantly and rapidly create chaos in this school which currently enjoys some of the highest test scores for the entire school district.

The crime rate would likely be increased since the current residents of the community, for the most part, know who lives here and they work well together to keep watch over each other and the children of the community. We are concerned because statistics show that in subdivisions the likelihood that investors would buy many of these tract homes and potentially (and we assume, unwittingly) lease them to sexual predators is significantly increased. The ratio in Leona Valley of homeowners to leaseholders is much different than in Palmdale and Lancaster and it is well demonstrated that the vested interest of homeowners adds to increased safety in the community.

We are additionally concerned about the environment and resources in Leona Valley. Building a subdivision here would have a significant detrimental effect on the land. It could potentially create additional flooding problems on the Lost Valley Ranch Road which is a natural waterway. A subdivision of this size would require an on site sewage treatment plant. More importantly, there is already very limited water resources to sustain the existing community let alone supply sufficient water for this many new homes.

The ultimate effect of a subdivision, of any type, in Leona Valley would essentially put it right "on the road" to make it very similar or otherwise homogenous to the environment down in Palmdale and Lancaster. While this is not meant in any way to make a derogatory statement about those communities; we chose to live in Leona Valley and not Palmdale or Lancaster. Leona Valley is a small, rural community, it is intentionally and historically a small, rural community and those of us who live here have chosen and sacrificed to do so because we want to live this specific, particular, and wonderful lifestyle. If someone wants to buy a home and become a member of this community, then they should do so. However, our family would be terribly upset to see it happen via a subdivision of any type. A subdivision is a subdivision is a subdivision. Please do all you can to keep subdivisions out of our town. Thank you for all of your work and consideration.

Sincerely,

Terri Valentine-Duarte, Manny Duarte, Nikki Valentine, Lauren Valentine, Joey Duarte, and Tony Duarte

40203 107th St. W.
Leona Valley, CA
93551
P.O. Box 900167
Palmdale, CA 93590

JOEY
TONY

August 3, 2008

Lana & John Seymour
39909 86th St. West &
Vacant lot on 87th St. West
Leona Valley, CA 93551-7418
(661) 270-0339

Leona Valley Town Council,

We are writing this letter in protest to the "Valley Vineyard" proposed housing tract and commercial vineyard, one of our issues is the increase in vehicle traffic. We were informed at one of the past meetings by Mr. Allday that there will be a minimum increase of a 100 cars a day traveling along Lost Valley Ranch Road where one of the their main entrances will be located on either side of the roadway.

This will cause a significant impact on 87th St. W which curves on to Leona Ave. especially to the Leona Valley School. School buses picking up and dropping off on 90th St. W and Elizabeth Lake Road morning and afternoons for students attending other elementary, middle schools and high schools not located in this area. Then there will be the "normal" traffic to and from the market, feed store, restaurants and other business etc.

This causes us many safety concerns such as entering or exiting Vientos, this will affect the residents of 86th St. W. We have seen several bad accidents at the corner of Vientos at 87th St. W.

Many of our friends and neighbors walk or run along 87th St. W, as does many of the children in our area who ride their horses, walk their animals, ride their bikes, scooters, skateboards etc. We have witnessed a number of close calls or seen someone speeding past a person riding a horse with no consideration to the rider or animal. In some instinct spooking the horse and nearly throwing the rider. 87th St. is a narrow road not a lot of room for two vehicles passing by one another in many areas, lot alone the adults and/or children and their animals sharing this same roadway.

Plus during the winter rains at times water drainage becomes a significant problem because of the amount of water traveling down the side of 87th St. W that overwhelms the culverts and causes drivers to drive down the middle of the roadway.

When we have had fires in the past and/or emergencies of one nature or another requiring emergency equipment, or various types of delivery trucks getting stuck or breaking down on 87th St. W the road has become blocked for long durations of time. The residents can neither leave nor enter their residents. When the delivery trucks have blocked the roadway you either set there and wait for who knows how long, park your vehicle and

walk or should I say hike up the hill to get home on 86th St. or go some where else and try later.

We can't imagine in the event of an evacuation due to another fire or earthquake or even worse both! What kayos and havoc the existing residents of the South side of Leona Valley could face if this housing project is approved as planned.

To try and evacuate that many more residents out and down 87th St. W while trying to set up emergency equipment, (fire hydrant located at Vientos & 87th St. W). It would be impossible. Once the equipment sets up at this corner traffic comes to a halt. Now what??

The last big fire that swept through Leona Valley's East end via Bouquet Canyon in a fire storm, didn't give the residents of Lost Valley Ranch Road, 86 or 87th St W much time with the winds blowing like they were to get their animals and get out. Do to the narrow roads once the emergency equipment was in place there wasn't enough room to get horse trailers or vehicles by.

We are asking that you please consider our deep concerns for the safety and well being of our neighbor and just how much this project would impact Leona Valley residents.

Sincerely,

Lana & John Seymour

Lana & John Seymour

August 9, 2008

Dear Leona Valley Town Council:

Thank you for taking the time to inform the residents of Leona Valley about the impending housing tract. I would like to go on record as opposing this large a group of homes in an area where evacuation in case of fire would be very difficult.

The corner where 87th St. dead ends into Leona Valley is already dangerous without adding the number of cars that will come with the 121 homes. I think the estimated 100 additional cars on our roads is rather low considering that most households have more than one car per home.

The traffic that will be added to 87th St. W. will be traveling on Leona Ave., 90th St. W., and Elizabeth Lake Rd. Why 121 homes? 21 would sound more reasonable.

Who is going to supply water to those homes? How many school age children will come with the additional homes?

Unfortunately, one small housing tract could ultimately lead to one more, a little bigger, and so on. If things don't go well with this project will Leona Valley be stuck with a mess like Elizabeth Lake Rd. near The Lazy T Ranch.

Can the traffic from those homes be directed out onto Bouquet Canyon Rd?

Thank you so much for your efforts on behalf of the community to keep building of new homes to sensible standards.

Thank you,

Ruth Perkins

Ruth Perkins
(661) 270-1720

Dear Leona Valley Town Counsil:
Re: Subdivision Valley Vineyards

Our concerns regarding this project are:

1. The Lot sizes Do Not Conform with the wishes of the Leona Valley people.
Our town people want to keep the lot sizes to 2 1/2 acres
Why reduce the lot size? That would make it crowded here and we like the open feeling...

2. Environmental/degradation of resources: This will affect:
A. Present water resources
B. Traffic IN Leona Valley and going OUT of Leona Valley
That means more hazards and there will be a need for more Stop signs and even Traffic lights will have to be added for safety. We Don't want that! Soon we will be living in the City NOT the Country.

We Are not against any new developments, but we are against the fact that the developers are not considering the towns peoples needs, they just want to make a fast buck and move on to the next development WE are the ones who LIVE here! Listen to the town people and come up with something that will be a good choice for everyone.

3. What about fire issues? Escape routes? Fire hydrants and enough water to fight the fire?

4. Lighting, streets, another school, waste management? We are concerned about all theses issues.

We always get promises but look what happens, for instance the NEW ROAD..we get left with an uncompleted project, a blighted area not to mention a Great Safety Hazard!

Were just not ready to start another project when there are so many unanswered questions.

Sincerely,
Terry & Aleta Dupuis

To who it may Concern

In regards to the 100+ homes being built and going in to 87th St west which is a two (2) lane Street. There is no Safe way to put that much traffic on 87th St. There is a blind Corner at Leona Valley Ave and 87th St. That is very dangerous now and as fast as people drive add another 200+ Cars and that would be a safty problem. It would not be safe for Kids walking to School are the Store And how people riding horses get to the riding trails

In case of a Forest Fire The Fire Dept. is tring to get equipment to the Fire and people are tring to get there horses on trailes and Cars out. The Street gets blocked Very fast now in the last Two (2) Fires. If the traffic from 100+ homes goes into 87th St and we have another Forest Fire May God Help us because we will Need it. And we will have another Forest Fire

Thank you

Leon & Mary Thompson
40047 87th St W.
Leona Valley, CA 93551

April 5, 2008

Alice Wallman - LUTA

I am a resident on 87th ST. West in Leona Valley. I am on the Corner of 87th & Leona Avenue, where Cars make the turn from Leona Ave on to 87th St West.

I have already had my fence hit twice by Cars not making the turn. Most recently, a Car took out the fence and hit my parked Horse Trailer. It was $ 4,000 in Damage

I Cannot emerge anymore Cars on 87th St. West. All the residents on 86th Street have to go down 87th to get on a Connecting Street to their homes. All the Cars on Lost Valley go down 87th St. West to get on their road.

It won't just be a 100 more Cars, they at least 200 more! All families today have at least two Cars. It will be Bumper to Bumper on 87th W

I do not want 87th St. West, used by the residents of the Leona Valley Vineyard Project.

Sincerely,

Janet Sartain

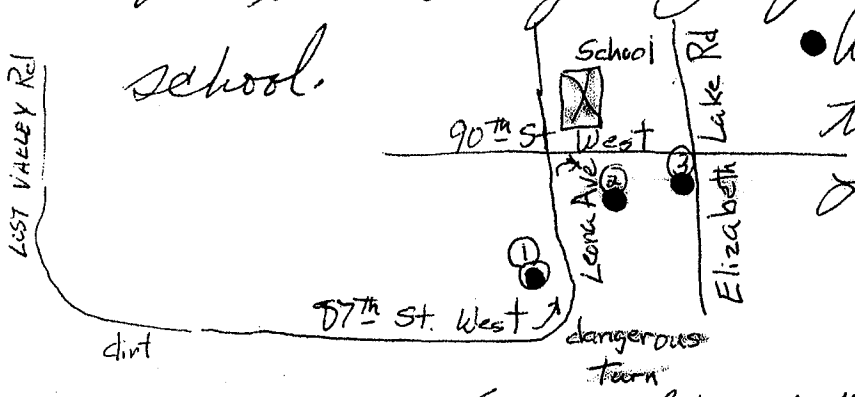
40114 - 87th ST. W, Leona Valley

April 5, 2008

Dear Los Angeles County Planning Commission,

I have lived on 87th Street West in Leon Valley for more than twenty years. It is a narrow, two lane country road with limited traffic; because at the moment, the road pass my home is dirt and stops back in a canyon. The developers of the L.V. Vineyard Project are planning to put over one homes next to Bouquet Canyon and they want to use 87th Street West as a secondary exit. The problem I see is the danger of make a turn onto Leona Avenue from 87th Street West and the extra traffic that will be going by our local elementary school.

• Also three turns will need to be make to get to Elizabeth Lake Road



Even with limited traffic, there have been numerous accidents at this corner

Why can't the new project have its secondary exit on Bouquet Canyon? (one on each side of the developement)

Sincerely, Linda Blackburn
40014 87th Street West
Leona Valley CA 93551

To whom It May Concern
3-28-08

We live on the corner of 89th & Leona Ave. & we can't believe anyone would consider putting 100 more cars on these small 2 car roads. Its bearly comfortable passing a car & tight when passing a delivery truck, trash truck & even a large pick-up

We live in clean air here but that wouldn't last putting 100 more cars on these small roads then comes all that dust & pollution My husband cannot take the pollution because of lung damage

Our corner is very sharp & we have heard lots of tires screeching, cars that didn't make the corner & ended in the field and the corner is a blind spot to who is coming people walking children going to school on their bikes people riding horses

The last evacuation was tough between fire trucks horse trailers people

moving out of their homes, it was a nightmare & 1 little extra outlet is not much help with 100 more homes & we all have 2 cars & vacation vihicles, horse trailers & trucks

We have 4 great grandchildren 2 of which are walking & playing outside what if God forbide one got out to the street & 1 of those 100 cars hit one of our babies It would be unbearable. It would be a constant fear with so many cars traveling these streets & passing our home.

These roads were not meant to accomodate that many cars.

Because no house hold has just one car to it. It would be 200 cars on that road not 100.

Our answer is No way. a vote of NO.

Ray & Lynne Moody
8718 Leona Ave.

August 20, 2008

Regarding Valley Vineyard:

We moved here for a reason. We came from a land of traffic, planned communities, gated communities, yards the size of postage stamps, people living like rats in a cage and, more importantly, a land where people don't take the time to know their neighbors.

We moved here to give ourselves, and our animals, room to live, to enjoy and explore our surroundings, to breathe without ingesting toxic fumes, to not have to fear being shot, stabbed or robbed in our own neighborhood.

We moved here because we grew up without the fears that today's children have. We wanted to see kids living the life that we knew. Leona Valley kids ride their horses and their bikes to the local market, the local restaurants or to their friend's houses without fear. Their parents know that everyone watches out for them and the kids know that they are being watched.

Now, the Valley Vineyard developers want to take that away from us. They look at our rolling hills and see dollar signs. They spout their fancy rhetoric about the positive aspects of their project. There are no positive aspects of it. We are not the country bumpkins that we are being taken for. We know that a large, gated community will not only increase light pollution, place a big draw on our already stretched resources, add traffic that we don't need or want, and ruin what this community is all about and has always been about. This is not progress. Any development of that property is of detriment to the community that already exists.

There are thousands of empty properties in the immediate area already. Instead of building more, why not do something positive like installing wind generators or large solar panels on that property? Make it a wildlife area. There's plenty of it there. Even better, why not just leave it alone? Go away Valley Vineyard. We don't want you!!!

Janice and Dave Gantenbein

August 1, 2008

To Whom It May Concern

Regarding the Valley Vineyard Project in Leona Valley

As residents of Lost Valley Ranch Road, immediately west of the project, we will be negatively impacted by the traffic the project produces. Since Leona Valley has no bus service for the elementary or middle school children and the high school bus comes to 90th St West and Elizabeth Lake Road, that will necessitate at least 1 or possibly 3 trips in the morning and the same in the afternoon for each home with a school aged child residing within.

Let's say 75% of the homes have children attending school, that would mean that each household collectively, for school alone, not counting work and town trips, would add between 90 and 540 additional daily trips on each of the affected roads. That is an inconceivable number on residential roads. What's worse is the fire hazards and the lack of alternatives for mass exodus. Having lived here over 30 years thru at least 6 or 7 major fires, we can not handle that additional traffic.

Respectfully,

Richard M Clayton
Guyla J Clayton

To Whom It May Concern
Re: Proposal of a One Way Gated Community at the top of 87th St. West, Leona Valley

My wife and I have lived in Leona Valley for over 5 years. Our house is located at the bottom of 87th Street West where it intersects Leona Avenue in a blind 90 degree turn. Our location gives us a unique understanding of the dangers and safety concerns of adding additional vehicle traffic on 87th Street. Over the past several years we have seen the traffic utilizing our street increase substantially. It has become a problem even getting out of our driveway during peak hours. Within the past two months we have observed several accidents and near misses at the intersection with Leona Avenue. The latest incident resulted in a car losing control in the turn, crashing through my neighbors fence and slamming into a horse trailer and corral. The paramedics were needed to attend to the woman's injuries. The turn is very sharp and blind to cars going either direction.

We also have several horses and riders in the area that travel up and down both Leona & 87th streets daily. Most of us in the neighborhood know to slow down and give them as much room as possible on these narrow streets, however, not all. We have seen incidents of horses getting spooked and putting their riders in real danger. We've seen one rider running frantically trying to catch a spooked horse that had thrown her. Adding more traffic to these streets that weren't designed to carry this volume of traffic, will significantly increase the risk of serious accidents and the safety of all the residents who live on and use Leona Avenue and 87th Street.

Our main concern is for the people currently living on the south side of Leona Valley, there is only one evacuation exit to Elizabeth Lake Avenue, this is 90th Street West. Over the last five years there have been significant fires and floods that have affected our neighbors and ourselves. During the fire scare, several residents needed to evacuate horses and other livestock in trailers. This was difficult due to fire fighting equipment leaving little room to maneuver. (This is not a criticism of the Fire Department, it is the reality we face in the event we need to evacuate the area.). In addition, with all the evacuating residents heading East & West on Leona Avenue and North down 90th Street, the intersection of 90th Street and Leona Avenue will become a grid lock and a disaster area in case of a serious evacuation need. Before allowing additional traffic volume that will exacerbate the situation, an impact study should be completed on the issues facing existing residents in case a major disaster hits the south side of Leona Valley and what impact allowing additional traffic down 87th St. would have. All of us that live on or off 87th Street have only one way out in case of an emergency. Allowing people that live behind a one-way gate to use 87th Street during any kind of adverse situation will put the lives and wellbeing of my neighbors and ourselves in great danger. This is a bad idea!

Thank you for consideration of these views,
Mike & Patti Groninga
40115 87th Street West,
Leona Valley, CA 93551

To Whom It May Concern:

RE: Traffic concerns on 87th Street - Leona Vineyard Housing Project

We have resided on 87th Street in Leona Valley for the past 16 years.

We would like to voice our concerns regarding the proposed gate entrance/exit on 87th Street for the Leona Vineyard Housing project. At the Town council meeting on March 10, the developer shared his 'traffic study' report. In their report they state that an additional 100 cars can, at any time of the day, be traveling up and down 87th Street after the completion of this project if the access gate is allowed on 87th Street. Our street already has more traffic than any other street in Leona Valley due to the fact that 86th Street, Vientos, and Lost Valley Ranch Road residents do not have any other way in or out but up and down 87th Street.

I cannot tell you what hazards this will cause in adding an additional 100 cars to our road. This street was built when there were only a few houses on the street many years ago. This street is barely wide enough for two cars to pass, carefully. There are no sidewalks; we like it that way because we are rural. There are many kids that walk or ride their bikes to and from the local elementary school each day. We also have equestrians on horseback and pedestrians walking up and down our streets at different times of the day and evening. This will cause a great issue to their safety due to the narrowness of the road. With that many more cars traveling up and down the street it will become dangerous to enter and exit our driveways, especially at the top of the street where you cannot see around the curve, and the rise in the street just past the middle where the view is blocked.

There are already two entrances/exits planned on Bouquet Canyon Road which is more than adequate for this project. Also, where is the fairness in them being able to take a short cut down our street but we can't take a short cut through their streets to get to Bouquet Canyon? The developer states he will open the gates to all of us in an emergency which will mean the residents from the development will be coming down our street and we will not be able to get out ourselves.

This is just wrong. Please only allow the access to and from Bouquet Canyon for this project.

Respectfully,

Robert and Valerie Harpham

Alice Wollman

Hello,

I am writing to inform you of the affect the new Leona Valley Vineyard Project will have on my community and my home as a homeowner living in Leona Valley near 87 Street West and Leona Avenue.

I have not written a letter in over 60 years, my last letter was to my mother and I was in the service in Korea, informing her of my discharge from naval service. My daughter is assisting me with this letter because I do not like to write letters and cannot spell very well.

Concerning the intersection of 87th Street and Leona Avenue, I was a lead person in the City of Monterey Park – in charge of traffic control for approximately 22 years, I would suggest to the traffic committee this intersection is a blind intersection with trees and bushes on each corner. In the past 22 years of living in Leona Valley we have had roughly 10-15 cars drive through fences from 87th Street coming toward Leona Avenue. Two ran my through fence, destroying an old corral built by the Ritter family, with very little left of this antique monument of Leona Valley history. My wife and I replaced the old wooden fence with chain link fence installed around our front yard and where the old corral once stood. The next person hit our chain link fence costing over $500 which I did recoup in court but could have been avoided. The property next to mine intersecting 87th Street and Leona Avenue has been destroyed by careless drivers speeding down 87th, ending up running through the fence at this intersection and then fleeing the scene. Numerous times I have called the owners, because this resulted in the cattle being let loose into the road; a few of the individuals caught have been illegal aliens attempting to flee the scene and had no drivers license or insurance. Another person coming from Leona Avenue to 87th Street was speeding so fast they jumped the asphalt berm and hit a fence and a trailer situated on that property, there excuse was the sun was in their eyes, which leads me to thin k she should have been travelling at a safer speed. With my past experience in traffic control I believe there should be a stop sign on both streets - 87th Avenue and Leona Avenue where they intersect, including a speed reduction. They currently drive this section of road at various speeds up to 50-60 miles per hour, which results in the accidents at this intersection.

If you would like further information or have any questions about the information contain in this letter please contact me.

Harry Charles Schay

8719 Leona Ave

Leona Valley, CA

(6)

January 6, 2008

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

Reference: Valley Vineyard, LLC; TT 066950; TT 066952

Dear Mr. Allday:

Thank you for providing our Council with an electronic copy of the documents relative to the above case. As indicated during the December 10, 2007 Leona Valley Town Council meeting, these documents are proprietary and therefore, the electronic files have printing restrictions.

Because of the pre-existing proprietary agreements, we cannot place your documents on the Council website until we receive a release of rights to use, publish and print from the authors of said documents. Please provide the appropriate releases from your experts, and we will be happy to post your documents on our Leona Valley Town Council website, provided there is sufficient website space to do so.

Very truly yours,

Richard Thomas
President
Leona Valley Town Council

Cc: Norman Hickling, Deputy to Supervisor Antonovich
Jodie Sackett
Daniel Fierros
File

7

January 6, 2008

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

Daniel Fierros
Impact analysis Section
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Fierros:

The Leona Valley Town Council (LVTC) is in receipt of a copy of Lauren Development / Valley Vineyard's letter to you dated September 7, 2007 regarding TR066952/Renvt200700035, Response to Comments from LVTC to Draft Initial Study. To respond to each item in the letter's attachment would be a duplication of effort, as our original Response / Comment to the development proposal thoroughly discusses the community's concerns with this project, as well as viable mitigation measures and adjustments.

We do, however, feel it necessary to respond generally to the charges and statements made in the cover letter.

At the invitation of the Town Council, the Developer has presented his project to the community on multiple occasions as documented in LVTC meeting minutes. The Town Council is committed to thoroughly reviewing the impacts and/or benefits of this project and reflect the direction of the community to the decision makers. There has been no attempt to obfuscate the process. As of this month, the Leona Valley Town Council has made available our public meetings as a forum for the Developer to make a presentation to the community on a monthly basis.

The letter infers that LVTC has failed to respond to nine (9) site-specific reports and documents prepared for the project by the Developer. These cited reports were not provided to the LVTC by the Developer for review. As of our last regular meeting, the Council was provided with a "proprietary" copy of the reports, which we are unable to print out or even post on our website, without a release from the authors. The Council would have been happy to include these reports in their evaluation of the project, had the Developer been forthright in making them available sooner without proprietary restrictions.

The "General Assumptions and Limiting Conditions" included in the LVTC comment package is not, as the Developer infers, an admission of incompetence, but a standard statement often used by individuals to ensure that their right to participate in governmental processes is not threatened, silenced, chilled, or in any way thwarted by threats of litigious action, commonly known as Strategic Lawsuits Against Public Participation (SLAPP).

January 6, 2008

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

The letter states that "minor changes" have been made to the project; however, the Developer has failed to provide knowledge of, or documentation of these changes to the LVTC. Therefore, it is not possible to comment about changes we have not been made aware of nor have received copies of.

We look forward to continued productive discussions regarding this project.

Very truly yours,

Richard Thomas, President
Leona Valley Town Council

Cc: Supervisor Michael D. Antonovich
Bruce McClendon, Director, Department of Regional Planning
Norman Hickling, Deputy to Supervisor Antonovich
Jodie Sackett
Lauren Development, Inc.

8

October 27, 2007

LEONA VALLEY TOWN COUNCIL

P.O. BOX 795 • LEONA VALLEY • CA 93551

Reference: Valley Vineyards, LLC; TT 066950; TT 066952

Mr. Bill Ford:

We missed you at the last Town Council meeting; we were prepared to discuss your letter in public during the scheduled agenda item on your proposed subdivision. Thank you for offering John Allday's expertise to support the CSD committee. The CSD Committee considered the offer; however, because the CSDs are almost done we decided to respectfully decline your offer of support.

I would like to remind you and notify your distribution list that John Allday did attend the first few meetings when the CSD committee was open to anyone that was interested. Subsequently, to speed up the CSD generation process, due to the limited time, the size of the Committee was reduced and limited to seven Leona Valley Citizens.

Shortly, the proposed updated CSDs will be made available to the public; this should support your subdivision development schedule. Once they are public you should have enough information to begin conforming to the proposed CSDs prior to the County's approval process. If you have questions or require clarification on the proposed CSDs the CSD committee will support any discussions required to help you design your subdivision so that it conforms to the intent of the proposed CSDs and, if required, provide this clarification to the County for possible incorporation into the proposed CSD's.

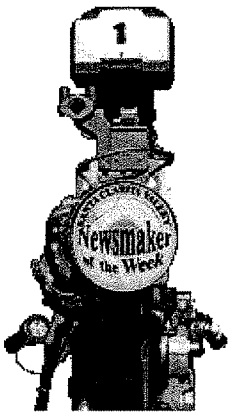
After the CSDs are made public all homeowners, landowners or their representatives are encouraged to provide inputs, suggestions, or raise concerns or issues with the CSDs at the CSD Committee's planned public meeting. Once the CSDs are approved by the Leona Valley Citizens (expected to be part of the February elections) there will be a public hearing by the County where again homeowners, landowners or their representatives will be allowed to provide public comments. If you would like to voice your concerns beforehand, then I suggest requesting to be on the Town Council's agenda or you may speak during the Town Council's Public Comment agenda item.

William S Elliott

Respectfully
Bill Elliott
CSD Committee Chair

cc: All LVTC Members
Norm Hickling, asst to Supv. Antonovich
Jodie Sackett, County Planning
Daniel Fierros, County Planning
Mitch Glazer, County Planning

9



SCV NEWSMAKER OF THE WEEK:
John Valenzuela, Tribal Chairman

Interview by Leon Worden
Signal City Editor

Sunday, July 11, 2004
(Television interview conducted May 27, 2004)

Newsmaker Home

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Local Television for Santa Clarita

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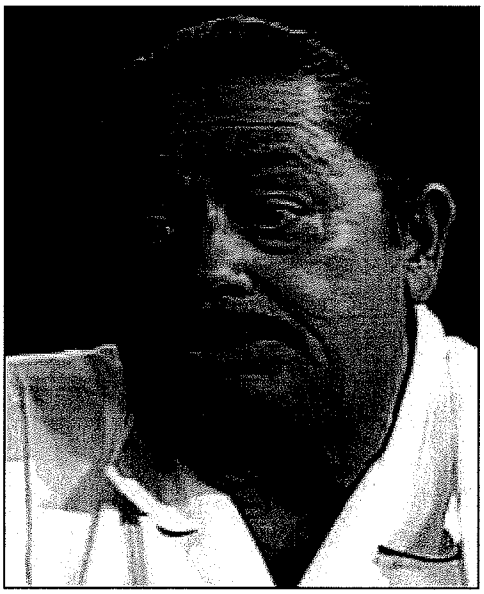

"Newsmaker of the Week" is presented by the SCV Press Club and Comcast, and hosted by Signal City Editor Leon Worden. The half-hour program premieres every Wednesday at 9:30 p.m. on SCVTV Channel 20, repeating Sundays at 8:30 a.m.

This week's newsmaker is John Valenzuela, chairman of the San Fernando Band of Mission Indians, which represents native Americans in the Santa Clarita Valley. The following interview was conducted May 27. Questions are paraphrased and answers may be abbreviated for length.

What's Your Tribe?
Flemish? Navajo? Zulu? Discover your genetic ancestry.
www.dnatribes.com

Powwow Ringtones
Send Complimentary Ringtones to your cell.
BestTones4U.com

Santa Clarita California
Photos, Customer Ratings & Reviews. Save on Trips to Santa Clarita, CA
www.Expedia.com

Indians
Free to Join. 1000's of pictures & video's of Beautiful Indian Singles
www.indiamatch.com

Signal: Your group has the name "San Fernando" in it, but whom do you represent?

Valenzuela: Well, I represent three groups — Fernandeños, which is the San Fernando Valley; I represent Tataviam, which is the Upper Santa Clara River; and the Vanyume, which is the northern desert, clear up to Victorville.

Signal: So your organization has a geographic boundary?

Valenzuela: Yes.

TR066952
9-10-07
Correspondence from LVTC regarding cultural resources

Signal: How does somebody become a member?

Valenzuela: There is a lot of documentation that goes into it. You have to have what they call a BIA number through the Bureau of Indian Affairs.

Signal: Individuals do?

Valenzuela: Yes. ... In 1928 there were the rolls through the BIA, and also in 1948 and '68. During those rolls, they gave you a number, and you end up with a BIA number.

Signal: So each individual has a number?

Valenzuela: Yes. (As to) myself, my son has it, because he was in that period there. But anybody below his sons, to show where they're from ... would have to show proof that I am his dad, and that I had the documentation, and it goes from that point on.

Signal: You must be a real expert in genealogy.

Valenzuela: You know, it's a really complicated issue. When we started this recognition process it was mind-boggling — I mean, all the laws that we have to meet through the BIA, through the membership, the genealogy and all the criteria that we have to meet.

Right now we have a moratorium on the membership. We are still working on the membership. We have hired a certified genealogist; she gets into our rolls to make sure that we have all the necessary documents from (the members).

Signal: Why would there be a moratorium on membership?

Valenzuela: Well, the members, which consist of 600 or more, had a vote in one of our meetings to hold a moratorium until we finish the documentation. We wanted to finish what we had in there now and get it certified. It doesn't mean that later on we can't allow anybody else to go in; we can. It's up to the members to decide.

Signal: When you refer to documentation — you're seeking federal recognition.

Valenzuela: Yes. In 1995 we put in a letter of intent with the Bureau of Indian Affairs that we were going to try to form a tribe. We had some legal advice from the California Indian Legal Services, which helped us to (write) our

constitution and other requirements that we needed in order to proceed with this petition.

We don't have them anymore; we have an attorney now, and he is a native, and he is familiar (with the process). I believe he was the chairman of the Cahuilla tribe for a small period of time. He's familiar as to what we need, working along with Dr. John Johnson, ethnohistorian with the Santa Barbara Museum of Natural History. John Johnson has gathered a lot of information about the Mission Indians here in California, and also (about) our families locally. He has put some documents together to show that our ancestors lived a long time ago here in this area.

Signal: So your group is functioning as a nonprofit organization.

Valenzuela: Yes. We go under Seven Feathers (Inc.), which is the nonprofit corporation that we have now. In order to try to put our petition together, we applied for an ANA grant, the Administration for Native Americans, and we were very fortunate to get this grant, a large amount of money. With this grant, we hired John Johnson and our attorney and a CPA to help us with the process. Also, we bought all of our equipment, all the computers, all the desks, all the equipment that we needed to open an office. That really helped us out because normally, we would have to go out and raise the money to do this.

Signal: Is having an office a requirement for recognition?

Valenzuela: Yes.

Signal: What does federal recognition do for you?

Valenzuela: Well, federal recognition gives us federal funds and benefits. It gives us a right to (make) some kind of (property) investment through the government. Of course if we do that, they have to buy the property and it goes into trust and we have to deal with them.

What we really want is medical (coverage) for our elders; we want benefits to cover some of our children, our grandsons, other family members, too; to get an education. So that's where some of these funds come in. Of course the biggest item is to get medical for the people in the tribe. That's why it comes under the federal recognition process.

Signal: Many people automatically think "casino" when they hear about an Indian tribe in California. Is that on your horizon?

Valenzuela: We're putting this petition together, and that's the first thing that people think: "Well, they're going to put (in) a petition; they're going to get recognized; 'casino.'" But there are other areas that we can invest in, other than a casino.

I think a casino, right now, is a little bit out of the picture, even though we have been approached by investors. I think that we need to concentrate more (on) trying to put all the documentation together to get federally recognized. We don't want to get (sidetracked) thinking that investors are going to help support us to get set up.

We've got the work that we have to do with John Johnson. The other stuff can come later. I'm not saying no, maybe, yes; I don't know. We need, I think, to concentrate on what is more important to us right now.

Signal: Although you represent a much wider area, you've talked in the past about wanting to establish a cultural center here in Santa Clarita. Is that still in your plans?

Valenzuela: Definitely. We are looking for property.

We have a lot of artifacts and material at the Antelope Valley Indian Museum. It's just sitting in there and it's put away in storage. I would just love to put a cultural center here in the valley for the school kids — teach them a little bit about what our culture was, show them the artifacts and the materials (people) used, to live on. I think it's very important that you get it into the school systems, maybe bus them into a cultural center and (teach) them the program.

Signal: Turning back the clock, how many people lived in the Santa Clarita Valley at the time of Spanish conquest, when the missionaries built the outpost at Castaic Junction in 1804?

Valenzuela: I really don't have the count. I believe there were quite a few. One time I heard about 5,000 (or) 6,000. I don't know if that's a true fact or not. A lot of this information was lost as far as our cultural resources and the language and so forth that we had.

Signal: The people here at the time were the Tataviam.

Valenzuela: Yes. Here in the valley we have the Chacanacas; they were here for many years —

Signal: That's a family name?

Valenzuela: Yes, a family name. We had the Wards here,

and then we had the Cookes.

Signal: The Cookes in Castaic?

Valenzuela: Yes. So, a lot of them lived here in this area. Our part of the family, the Valenzuela family, was on the coast, the Ventura and Oxnard area. Some of them were in Piru and the Santa Paula area. ... You had a large amount of people here in the Santa Clarita Valley.

Signal: What's your personal bloodline? You're not full-blooded Tataviam —

Valenzuela: I don't think there is anybody that's really full-blooded...

Signal: During the Spanish period, tribal groups across Southern California were taken to the missions —

Valenzuela: They were driven to the missions to work in the missions, to build the missions, and a lot of them in the San Fernando area lived around the mission. I think at that time, there were probably four or five tribes like the Chumash; the Tongva; Gabrieleño; us, the Fernandeño — there were different groups there at one time. Then later on they kind of split it off, after they were forcing the people to go into the missions.

We go back as far as Victorville in the high desert. Topipabit is a village there now, and it goes back to about 1750, I believe. We have some ancestors who come out of that village, and that was way prior to the mission period.

Signal: Why do you call your group a "band"? Is there a difference between a band and a tribe?

Valenzuela: Not really. It's just a name. It's a band of people put together. Somebody might just call it a tribe.

Signal: So your organization isn't really about representing people because they're Tataviam or Fernandeño or Vanyume; it's really about representing individual families?

Valenzuela: Representing the people that we have — yes. And of course, there are probably a lot of (other) people out there, but it's a big task to get all these people and get all that documentation together. There probably are other people that would be connected, but they've never registered with us, so we just work with the people that we have now in our membership.

Signal: When you talk about some of your own people coming from Oxnard, they would be Chumash — so where did you have ancestors who link you to your tribe?

Valenzuela: It would be in San Fernando, the Fernandeño. As a matter of fact, growing up as a young man on the coast — my mother and my dad would tell me that, yeah, we're natives, but during that time, things were not allowed to be said about — that we were Indian or whatever. We were led to believe that we were part Chumash.

But as we went along and worked in the archives with John Johnson and got all of the documentation, we were not. As a matter of fact, we still have people who live in Oxnard, members of ours; it's hard for them to believe that we were not Chumash. The only Chumash that we have in our genealogy comes from Calleguas Creek over in the Santa Rosa Valley. Jimmy Addington came out of a village there. But it was a very small line.

Signal: Some of your members claim local heritage but don't live here?

Valenzuela: Right. A lot of them moved. A lot of them used to work here at the Van Nuys auto plant. A lot of them live in Oregon; we have some in South Carolina; we have some in Idaho. They're pretty much spread out. Up in Portland (and) Washington...

Signal: You dip down into the San Fernando Valley where there's a separate tribe, the Fernandeño-Tataviam.

Valenzuela: Yes. We have met with that group. As you know, there's a lot of things that we have to do before we (can) put that petition in, and we didn't want any red flags raised. One of the things was that this other group has another group of people. They do fall in line within our history, but a very small part of it. We had to meet with

these people because we wanted to find out if they had some of our people signed, or we had some of theirs signed. You couldn't participate in one tribe and the other tribe. So we did this with a letter from the chairman and myself — we put a letter to all the members, stating, where are you at? This is how we established that we didn't want anybody to say, "Hey, wait a minute, you didn't enroll me in your records." We didn't want to have any problems with it.

Signal: There's not a problem of geographic overlap?

Valenzuela: No.

Signal: Individuals can decide what tribe they want to join?

Valenzuela: Yes, if they have the genealogy. We have probably about 650 members now. We're still doing some paperwork and we'll probably get up to about 700.

Signal: It's only been a few years since your organization has been going.

Valenzuela: Yes.

Signal: If there was already a group in the San Fernando Valley, what prompted you to start this?

Valenzuela: It was our people. We gathered in Thousand Oaks and we thought about the idea of getting our people together and having meetings and putting a constitution together and working on our membership.

Signal: It's only been the last couple of years that you've been active locally. You've shown up at City Council meetings now; what are you out to accomplish?

Valenzuela: Right now we're trying to get involved in native American monitoring. Since this is our historical area and our genealogy comes from this area, we felt that we should get involved in the government issues, the city issues here, and also in construction jobs, because we find that there is a lot of destruction of cultural resources.

Also, we want to be involved because we have ancestors who came out of these villages. For example, we have a project in the Leona Valley, the widening of Elizabeth Lake Road. We just got a contract on that, and I have a person doing some monitoring out there. There are some (culturally significant) sites involved, and that's why we

want to get involved, because we don't want to see any more destruction of cultural resources or sites.

A while back, I did another job for the city of Palmdale, which was the same part of Elizabeth Lake Road — they widened the road, and we happened to hit some sites that we didn't think were there. We found a site towards the end of the project, close to Bouquet Canyon. After consulting with (city officials), they actually moved the city property line over so we could miss that site. But a bad thing happened: A couple of years later we drove by there, and apparently somebody had bought the property where we had moved (the cultural materials) to not be destroyed, and the guy took 15 feet of soil off the top of that site.

Signal: What was there?

Valenzuela: We had remains, human remains; we had artifacts; we had two parts of remains. We interred them, right close by the site. It was devastating to me to see that there was something there (that) we didn't want it to be disturbed and for some reason along the line because of the building permits, the county — it was an individual home that the guy was going to build there. Some way or another, there was not an investigation done through the informational center where we gathered all of the (information about) sites that we had. So the guy went ahead and built on it. That was devastating to me.

Signal: What do you do if somebody owns property where you believe there to be remains or artifacts? Do you work with the owner?

Valenzuela: (In the Leona Valley case), it's a very gray area as far as CEQA (the California Environmental Quality Act) is concerned. I worked very hard with the heritage commission in Sacramento, and it was just a gray area. I complained to (Supervisor Michael D.) Antonovich's office in the county, but nothing was done with it.

Signal: In general, do you want to see things preserved on-site and stop people from developing their property, or are you willing to see artifacts be moved?

Valenzuela: There are two different (issues). In some cases, it depends (on) what we really feel. If there are human remains on it, of course we're going to leave it up to our elders to decide if they want to move them out. We have set a policy with this now, and I think that we need to consult with them.

Under the requirements, with the county or (city), there are some requirements through the environmental impact

report that comes out. ... Some of the counties are pretty good about that. But of course there are gray areas like the Leona Valley, a lot of individual homes, and there are probably sites all over the valley there.

Signal: Where have you found that there are artifacts and remains in the SCV? Are they concentrated in one area, or are they all over?

Valenzuela: They're really all over. A while back we did a burial site at Highway 126 with Caltrans. It was a big site with human remains, and there were different time periods because of the way they were buried. We reinterred them in the same place that we had found them, with whatever artifacts they had with them, to make sure that nobody gets into it.

Signal: You've shown up at Planing Commission hearings on Newhall Land's Riverpark project, where about 1,100 homes are planned near the Santa Clara River.

Valenzuela: Right. As a matter of fact, I attended the Planning Commission (meeting) and I raised my concerns over it — that under the report, which I got later, there was a site that was going to be destroyed.

Signal: What is there?

Valenzuela: Well, initially, when they do a Phase 1 (archaeological survey), they go in and they look at the surface. They can usually tell at the surface if there are artifacts of some kind there. It kind of tells you a little bit about the soil. You really have to look at the surface to know if there's anything there. Usually you can see something on top.

Signal: What kind of artifacts are on the Riverpark property?

Valenzuela: That's one thing about it, it's pretty hard to tell. (People lived) all along the Santa Clara River. They were close to water, they were real close to nice places. Probably during that time there were nice places along the Santa Clara River, and they used to pick some sites along the Santa Clara River. So you really don't know if there is anything there or not. We have to do some kind of inspection or do some little excavation to find out if there are any materials there.

Signal: Have they done that?

Valenzuela: No they haven't. All they did is a surface inspection. They have not done that.

Signal: What did they surface inspection indicate?

Valenzuela: That they found material, but not enough to say (whether) we should leave it alone or (not).

Signal: What do you want to see happen?

Valenzuela: I don't want to see anything destroyed. A lot of times, a lot of this material will wash over. You have to use common sense. If there was a village on top and you're working down on the bottom, you usually see what time. It has been years and years since these villages were there, so it's pretty hard to tell. There could even be material that went down the river. In this case over in the Leona Valley, what they are going to do — we are going to do — we're going to have excavations to find what is really (contained) on the sites.

Signal: What's the next step for your organization? Will we see you become more active with development projects?

Valenzuela: Yes, I think so. As a matter of fact, we put a letter in to the Newhall Land Co. that we want to get involved in their project up there. ... We want to preserve as much as we can, especially here in this valley, (which) is very rich in cultural resources. No matter where you dig, if it's a private home or whatever it is, near the river or on top of the hill, we have to treat it very sensitively.

Signal: What is the value in saving the artifacts, and the culture?

Valenzuela: Just like anything else, I think there is a lot of value. I think it's stuff that shouldn't be disturbed. There are human remains that are there for a purpose; we shouldn't disturb them. It's just like, if we go to Eternal Valley (Cemetery) up here and we got a bulldozer and he just went through there, that's the same way we would feel — getting a bulldozer and destroying all that we have there.

We should preserve our cultural resources as much as possible. It's hard because of all the construction that's going here, but we're going to stay active here. We do have an office at the Santa Clarita Valley Historical Society (Heritage Junction). ... Eventually we're probably going to get an office someplace big enough where we can hold our meetings with our members. We are working on a lot of

projects right now.

See this interview in its entirety today at 8:30 a.m., and watch for another "Newsmaker of the Week" on Wednesday at 9:30 p.m. on SCVTV Channel 20, available to Comcast and Time Warner Cable subscribers throughout the Santa Clarita Valley.

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(10)

A CULTURAL RESOURCES INVESTIGATION OF TENTATIVE TRACT MAP #48722 LOCATED IN LEONA VALLEY, LOS ANGELES COUNTY, CALIFORNIA

Submitted to:

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Respectfully Submitted:

R. W. Robinson

December 11 1989
date

TR066952
9-10-07
Correspondence From LVTC regarding cultural resources

CONTENTS

INTRODUCTION 1

PROJECT DESCRIPTION . . 1

PERSONNEL 2

LITERATURE AND RECORDS SEARCH . 2

ETHNOARCHAEOLOGICAL BACKGROUND . 3

FIELD INVESTIGATION . . 4

SITE DESCRIPTIONS . . 5

DISCUSSION . . . 6

CONCLUSIONS AND RECOMMENDATIONS 7

MAP 1 8

MAP 2 9

REFERENCES 10

A CULTUI RESOURCES INVESTIGATION OF TENTATIVE TRACT MAP #48722 LOCATED IN LEONA VALLEY, LOS ANGELES COUNTY, CALIFORNIA

INTRODUCTION:

During the month of December, 1989, a cultural resources investigation was carried out on behalf of TUCAN DEVELOPMENT COMPANY, INC. of Sepulveda, California concerning property located in the Leona Valley area of Los Angeles County, California. The purpose of this cultural resources investigation was to locate and identify any and all cultural resources of either historic or prehistoric significance which might be found to exist on the property, and to assess the relative significance of such resources. Furthermore, the investigation was to attempt to identify any and all impacts to such resources which might be expected to result from the proposed further development of the property, and to suggest reasonable mitigation measures designed to preserve and protect such resources insofar as might be possible. This report presents the results of the complete investigation.

PROJECT DESCRIPTION:

The project site consists of a irregularly shaped parcel of approximately three hundred acres located near the eastern end of Leona Valley. Elizabeth Lake Road forms the southern margin of the property. The project site includes the entire northwest quarter of Section 15, portions of the southwest quarter of Section 15 lying north of Elizabeth Lake Road, that portion of the northeast quarter of Section 22 lying north of Elizabeth Lake Road, and a part of the southeast quarter of Section 16 lying between Elizabeth Lake Road and Godde Hill Road; all in Township 6N, Range 13W, SBBM. Map 1 shows the location of the project site with respect to the eastern end of Leona Valley.

Portions of the west end of the project site have been heavily grazed in the past, but the majority of the property remains in a relatively natural state. Vegetation cover consists of several common species of grasses and shrubs common to desert/foothill environments. Typical species occurring over much of the property include sage, juniper, and various species of Yucca and Opuntia including Joshua. A very interesting cluster of Joshua combined with Beavertail Cactus, California Juniper, Century Plant, and Manzanita occurs along a low ridge dominating the eastern portion of the project site in Section 22. The property is crossed by many dirt roads, trails, and old fence lines. Along the southern portion of the project site long narrow surface scrapes cut by a road grader or bulldozer have been placed running in a north/south direction at intervals of a few hundred meters. These surface scrapes have disturbed the natural surface of the property and removed the normal vegetation.

The southern portion of the project site, immediately adjacent to Elizabeth Lake Road, consists of low hills, flats, and ridges bordering the Amargosa Drainage. This drainage represents the major drainage and natural water source on the property. The portion of the project site lying north of Godde Hill Road is characterized by a mush more rugged terrain with steep slopes, high sharp ridges, and small but deep drainages. Soils in the higher elevations are sandy and rocky. In the lower areas and flats the soils are better developed and consist largely of sandy alluvial deposits. No other particularly unusual features were noted.

PERSONNEL:

Principle Investigator: R. W. Robinson, B.A. Anthropology, 1964, California State University, Sacramento. M.A. Anthropology, 1967, California State University, Sacramento. Experience includes over 25 years involvement in California archaeology. Currently Professor of Anthropology at Antelope Valley College, Lancaster, California.

Field Assistant: Kerrie Kirkbride, Undergraduate student at California State University, Northridge. Four years experience assisting with archaeological survey, excavation, and analysis.

Field Assistant: Burt Pfeiffer, Undergraduate student at Antelope Valley College, Lancaster, California. Four years experience assisting with archaeological survey, excavation, and analysis.

Field Assistant: Depak Dhillonn, Undergraduate student at Antelope Valley College, Lancaster, California. Two years experience assisting with archaeological survey and excavation.

LITERATURE AND RECORDS SEARCH:

A literature and records search was conducted for the investigation. All pertinent literature dealing with the property and the general area of the project site was reviewed. The Department of Anthropology at Antelope Valley College provided information on the history and prehistory of the local area. A formal records search was conducted through the Archaeological Survey of the University of California at Los Angeles.

Significant cultural resources have long been known to exist Leona Valley and the general area of the project site. Leona Valley offers more water than most of the rest of the Antelope Valley as well as a greater variety and concentration of food resources. Cultural resources should be expected to occur in greater concentration in this area.

The records search confirms these general impressions. Archaeological site CA-LAn-951 is located immediately east of the eastern-most end of the project site. This site is described as a surface scatter of artifacts including projectile points, chipping "waste", milling tools, burned bone, and at least one soapstone ornament. No "midden" or

subsurface cultural deposit is noted. Further away, but of much greater significance, is archaeological site CA-LAn-767. This site, recorded in 1976 some two miles east of the project site along Elizabeth Lake Road, contained several human burials. The site consisted entirely of a buried cemetery with no surface indications. The site was found quite by accident. Two cultural resource investigations have been conducted immediately adjacent to the project site without significant archaeological resources being found or recorded. One additional survey associated with a AVEK Water Project feeder line actually crossed part of the project site following Godde Hill Road. This survey was also without significant results.

Within a three to four mile radius of the project site, many dozens of cultural resource investigations have taken place over the past few years and many dozens of significant archaeological sites have been recorded. This record search clearly indicates that the area of the project site is culturally sensitive, and that archaeological resources are very likely to occur on the property.

ETHNOARCHAEOLOGICAL BACKGROUND:

The Antelope Valley has long been known to possess a rich and varied prehistory and archaeological record. Over 250 archaeological sites of significance are currently recorded for the area in general. Antelope Valley College, with the assistance of various other institutions, has been conducting research in the Antelope Valley since 1968. This effort has resulted in the preparation of several professional papers and publications dealing with this prehistory, (Robinson, 1987; Sutton, 1988). The Kern-Antelope Historical Society and the Antelope Valley Archaeological Society have also contributed to the record. Chester King and others conducted an extensive investigation of the Vasquez Rocks area in the early 1970's, (King, et. al., 1974). On a somewhat broader scale, the Northridge Archaeological Research Center and the California State University at Northridge have generated several additional studies in the general area. Many smaller environmental impact studies have providing additional archaeological information have been conducted in various parts of the region since the early 1970's. The overall result of this work has been the gradual piecing together of a rich and diversified pattern of human history and prehistory covering several thousand years.

Historically, the native inhabitants of the northern and western portions of the Antelope Valley were known by the name "Kitanemuk". The people of the southern part of the Antelope Valley and the Santa Clara drainage were known as the "Tataviam". Rather than proper names for these cultures, these terms actually refer to dialects of the much broader "Shoshone" language family which was spoken over vast portions of southern California and the Great Basin. The cultures of these people were largely destroyed in the last century. The only ethnographic information available on these people comes from the works of such early 20th century anthropologists as Alfred Kroeber and John P. Harrington. This information is far from complete, or exhaustive, but it does present a very general image of a sophisticated and colorful way of life.

How long the Kitanemuk and Tataviam occupied the Antelope Valley and Santa Clara Drainage is not known with any certainty. It is known, however, that a fairly stable cultural system of the same general form existed in the area for approximately 2500 years. This cultural system, taking advantage of a relatively rich and varied natural environment as well as a very favorable trade location in relation to other native Californians, grew rich and prospered over the years. At the time of historic contact these cultures were equivalent in complexity and sophistication to most other cultural groups throughout the Greater Southwest.

At the present time there is very little evidence for an occupation in the Antelope Valley prior to approximately 3000 years ago. What little evidence does exist, however, is exciting and encouraging. Who these very early people were is not presently known, nor is it understood where they came from, when they first arrived, or how long they stayed. Future archaeological research is sure to shed much needed light on this remote past, and efforts in this direction are already underway.

For a more extensive treatment of both ethnographical and archaeological background information on the Antelope Valley and Santa Clara Drainage, see Kroeber, 1954; Blackburn and Bean, 1978; King and Blackburn, 1978, Robinson, 1987; and Sutton, 1988.

FIELD INVESTIGATION:

An intensive walkover survey of the project site was made. This method essentially consists of walking over the entire surface of the project site in a systematic manner at closely spaced intervals while examining the surface for any and all traces of potential cultural resources. This approach assures that no area of the project site of any appreciable size will go unexamined. Transects of approximately fifty meters were covered in a generally north-south direction. Due to the complex topography of the project site and the unusual shape, the size and direction of these transects changed from time to time in the course of the investigation. Vegetation cover was a minor problem at most, and with relatively few exceptions, the entire surface of the property was adequately examined in this manner. Approximately one hundred man-hours were spent in this walkover survey.

Four prehistoric archaeological sites were located and recorded on the project site in the course of this investigation. These sites have been recorded at the Department of Anthropology, Antelope Valley College, under the temporary designations AVC-260, AVC-261, AVC-262, and AVC-263. Records have also been submitted to the Archaeological Survey at the University of California at Los Angeles where they will eventually be given official site designations. Individual site descriptions are provided below. Map 2 shows the locations and approximate extent of the four sites.

AVC-260:

This site is located in the western most portion of the project site in Section 16. The site consists of a scatter of stone flakes and fragmentary milling stones, most of which were exposed by one of the surface scrapes mentioned above. A portion of this area is characterized by a dark colored soil, although none of the normal components of "midden", or cultural deposit, could be identified. Artifacts recorded for this site include the following:

4 rhyolite flakes
1 jasper flake
3 fragmentary schist "metates" (grinding slabs)
1 fragmentary andesite "mano" (grinding stone)
1 complete granite mano

AVC-261:

Located immediately east of AVC-260 near the eastern section line of Section 16, this site consists of a small surface scatter of artifacts rather densely distributed over an east facing hill slope. No midden was in evidence. A dirt road cuts across this site. Artifacts recorded for this site include the following:

9 rhyolite flakes
1 chalcedony flake
2 quartz flakes
2 colored silicate flakes
3 obsidian flakes
1 granite mano
1 obsidian projectile point or drilling implement

AVC-262:

This site is located to the east of AVC-261 in Section 15. The site is considerably larger than AVC-261 with a surface artifact scatter of lesser density. Again, no evidence of midden, or subsurface deposit, was immediately apparent. One of the above mentioned surface scrapes crosses this site. Artifacts recorded for this site include:

10 rhyolite flakes
2 colored silicate flakes
1 large rhyolite core
1 schist metate fragment
1 schist mano fragment
1 piece of possibly modified soapstone

AVC-263:

East of all of the previously discussed sites is a area of small sandy hills and juniper bushes extending across the southeast quarter of Section 15 immediately north of the Amargosa Drainage. Surface artifacts occur thinly scattered over this area. The site is extremely difficult to define in terms of its margins due to the thinness of the scatter.

Again as in all other cases, no distinct midden concentrations could be identified. Artifacts recorded for this site include the following:

2 small rhyolite cores
9 rhyolite flakes
5 quartz flakes
4 chalcedony flakes
1 chert flake
1 obsidian flake

Historic Resources:

One windmill of some appreciable but undetermined age stands in the grazed flat in the extreme western end of the project site. The age and significance of this historic structure cannot be determined. this windmill represents the only representative of the "historic" period found in the course of the investigation which might be considered to be of significance.

General Discussion:

The above mentioned windmill represents the only item worthy of mention for the historic period. Its age and significance cannot be determined at this time. No further comment is possible at this time.

The four prehistoric sites described above must be considered significant cultural resources. All four sites lie in close proximity to the Amargosa Drainage. Stone materials such as obsidian, jasper, and rhyolite are represented in significant frequency at all sites. These materials do not occur naturally in the immediate area and must have been imported. In the case of obsidian, the nearest source is approximately one hundred miles distant. Milling implements (manos and metates) are fairly common occurrences at these sites and are made from locally available materials.

Although "middens" could not be clearly identified, it must be remembered that this investigation did not attempt to deal with the question of subsurface deposits. No test excavations were included in this first phase of investigation, and the possibility of subsurface material must be considered high.

The relatively close proximity of a known subsurface site (CA-LAn-767) containing human remains and exhibiting no surface indications must also be carefully considered in regard to this project site. Prehistoric human burials may well occur almost anywhere along the Amargosa Drainage. It is of considerable importance to consider this possibility in planning development of the Drainage. The presence of four prehistoric sites on the current project sites certainly underscores this importance.

All four of the prehistoric sites are difficult to define with precision due to the light density of the scatters. A much more intensive examination of these sites will be necessary before accurate margins can become identifiable.

CONCLUSIONS AND RECOMMENDATIONS:

The four prehistoric archaeological sites described above are considered significant cultural resources. Subsequent development of this property must carefully consider the impacts that such development will undoubtedly have on these important resources.

The following recommendations are made as suggestions for adequate and appropriate mitigation of such expected impacts:

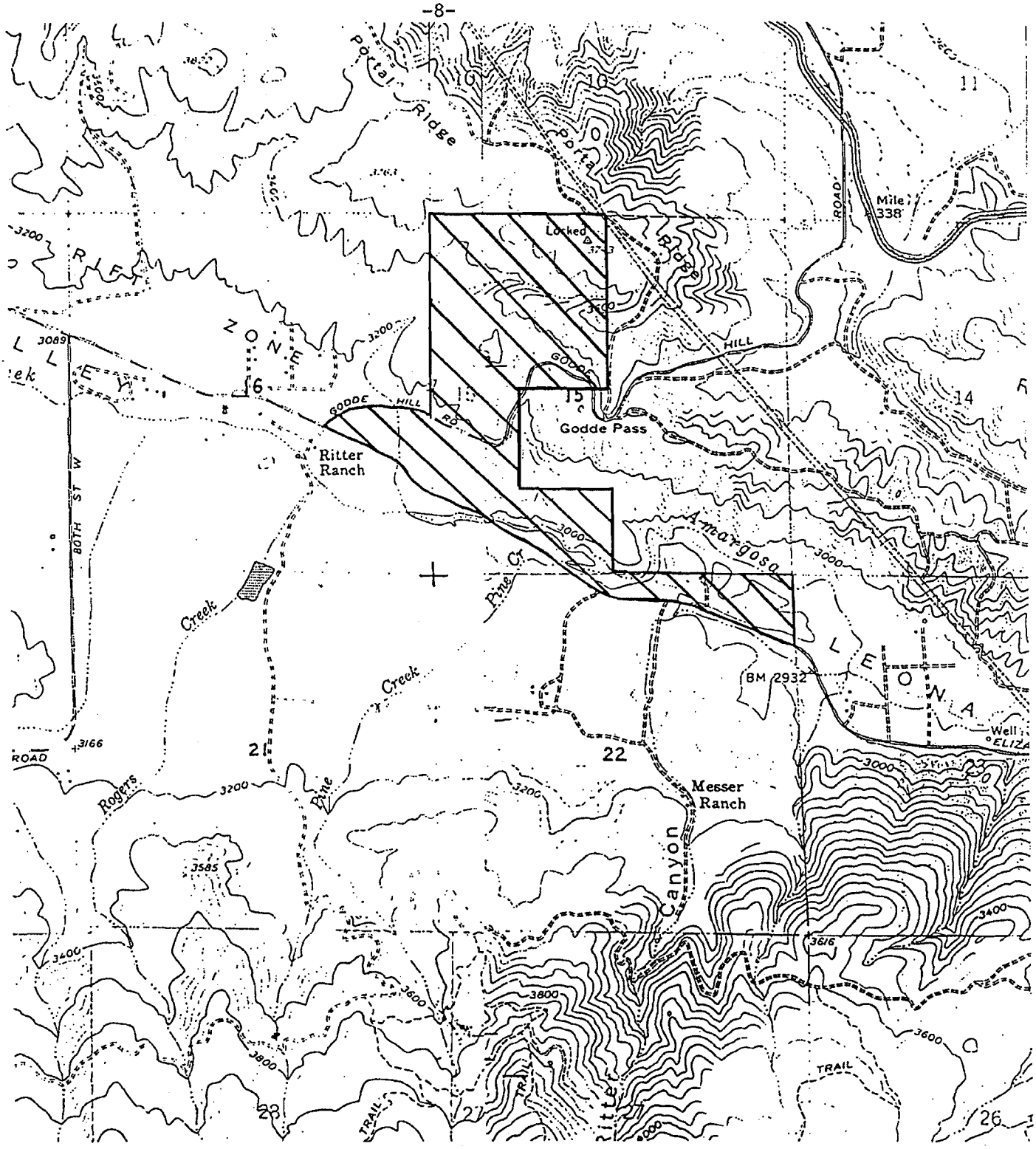
1. A more intensive study of each of the four site areas should be made in an attempt to more accurately define the limits and margins of the site areas. Such studies should also discover and record more artifacts in each of the areas thereby filling out the rather scanty descriptions contained in this report. Adequate future planning will depend on more complete and accurate definitions of site integrity and cultural content in each of the four areas. Such a study will also help to identify the research potential of these cultural resources.

2. Based largely on the result of the intensive studies outlined above, it may be desireable to conduct subsurface tests for buried cultural resources. Such subsurface tests might consist of a combination of auguring and test excavation. Such an effort will help to accurately define the vertical structure of the sites in the same way that intensive surface examination will define the horizontal limits.

3. Ideally, subsequent development plans should make a concerted effort to avoid these archaeological sites. Rearranging areas of building and open space may achieve this result.

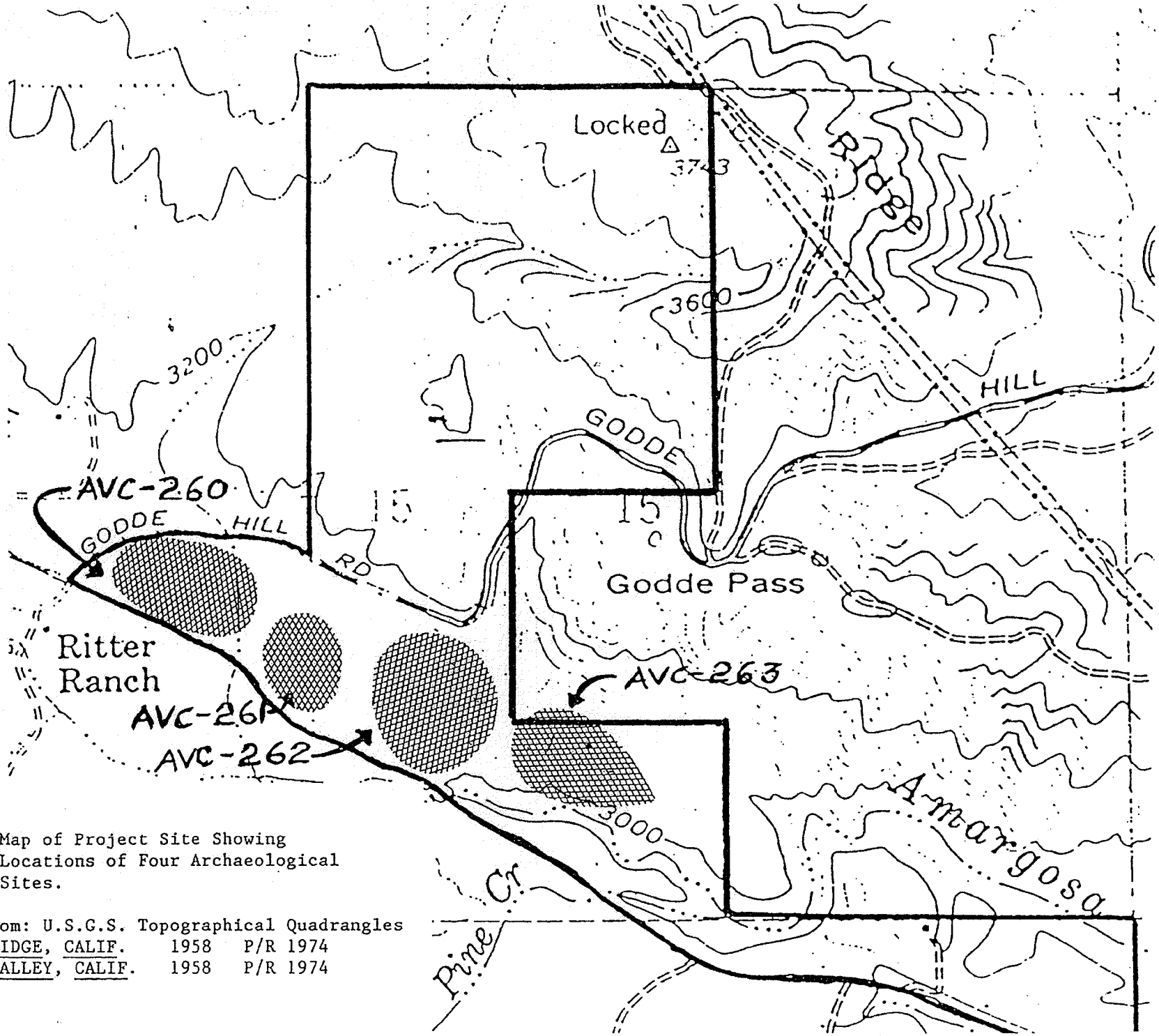
4. If this approach is not possible, additional efforts involving surface collection, accurate mapping, and more extensive test excavation will undoubtedly become necessary. The specific nature of this work would, of course, depend on the results of the efforts suggested above.

5. Due to the existence of four prehistoric archaeological sites on the project site, and the relatively close proximity of subsurface archaeological remains including human burials, it will be imperative that close monitoring by qualified archaeologists take place in all cases where ground is to be disturbed within 300 meters of the Amargosa Drainage.



MAP 1: Map of Area Surveyed. Project Site Shown Cross-hatched

Taken From: U.S.G.S. Topographical Quadrangles
RITTER RIDGE, CALIF. 1958, P/R 1974.
SLEEPY VALLEY, CALIF. 1958, P/R 1974



MAP 2: Map of Project Site Showing Locations of Four Archaeological Sites.

Taken From: U.S.G.S. Topographical Quadrangles
RITTER RIDGE, CALIF. 1958 P/R 1974
SLEEPY VALLEY, CALIF. 1958 P/R 1974

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(11)

August 6, 2007

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

General Information

Description of Project: The proposed project is a request for a tentative tract map to subdivide three parcels, 292.49 acres into 121 lots – 1.5 acres minimum to 17 acres maximum for single-family residential purposes. Home sites graded on each lot will range from approximately 10,000 square feet to 31,000 square feet. All streets will be private with the exception of the connection between 87th Street West and Lost Valley Ranch Road (currently a dirt road used by residents of Lost Valley Ranch Road), will be dedicated as a public street. The current property use is vacant and undeveloped. The project applicant is requesting a CUP (RCUP 20070038). Single-family units will consist of one and two stories. The project will use domestic water and septic sewer disposal systems. A total of 1,033,350 cubic yards of dirt will be graded and balanced on site.

Gross Area: 292.49

Zoning: A-2-2; *Leona Valley Community Standards District.*

Environmental Setting: ***Leona Valley Town Council Comment****: There is a correction to this portion of the document. The project is located on Bouquet Canyon Road. It is not three miles from the Antelope Valley Freeway. The site is located eight miles from the Antelope Valley Freeway. Surrounding land uses also include vacant land and grazing land. Leona Valley is a "designated rural community".*

General Plan: N-1, Non-Urban; Leona Valley Town Council Comment: The County of Los Angeles Planning Department document incorrectly states 0.5 du/acre. According to page IV-6 of the Antelope Valley Areawide General Plan, the entire community is designated Non-Urban 1 permitting a minimum lot size of 2-acres. According to the Antelope Valley Areawide General Plan, those properties in N-1, Non Urban use areas that are also subject to hillside management requirements, have greater restrictions. Furthermore, the development is bound by the Leona Valley Community Standards District, which permits one single-family dwelling per 2½ acres. Based upon the "clustering rule" lot sizes may be reduced to one and one-half acres in Hillside Management Areas, provided that 70% of the entire development is dedicated to natural or conservation area. The Antelope Valley Areawide General Plan has specific provisions for Non-Urban Residential Developments exceeding one dwelling unit per five acres. As identified on page V1-25 of said plan, the project can be approved to substantial compliance subject to conditions, which have not been satisfied. We believe there has been a misapplication of the clustering rule. The plan for the development in its present format does not conform to these requirements.

The following is the preliminary response by the Leona Valley Town Council to the Initial Study and Impact Analysis Matrix by the County of Los Angeles Department of Regional Planning on the above referenced project. The Council reserves the right to additional commentary upon receipt of further information or changes in the project design and execution.

This is the first proposed tract home subdivision for Leona Valley, as such, the impact is anticipated to be substantial because of the following reasons:

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

According to Dataquick, as of July 2007 there are 520 single-family homes in Leona Valley, all of custom construction. There are no subdivisions within the bounds of this Valley. The estimated population of this rural community is over 1,800 residents. With an average household containing 3.18 residents, the proposed project will result in a population increase of over 20% to our Valley.

The community is serviced by one school, which educates kindergarten through eighth grade students. According to the Westside Union School District, Leona Valley School provides education for approximately 161 students and is at full capacity unless significant capital improvements are made. Leona Valley Elementary is already bound by a pre-existing settlement agreement to accept students from the Ritter Ranch/SunCal development in the Palmdale City limits, up until the construction of the 500th residence. In addition, our elementary school will be accepting students on a mandatory basis from the new Ana Verde development in the City of Palmdale. Therefore, our elementary school is beyond full capacity.

Members of the community voiced serious objections over this project. Primary concerns included, but were not limited to the following:

- *Higher density/incompatible land use*
- *Adverse Impact on Leona Valley School*
- *Inadequate ingress/egress & traffic*
- *Fire Safety/Fire Department Volunteer Only*
- *Water service/pre-existing lack of water resources*
- *Incompatible with the character of Leona Valley*
- *Community opposes gated developments*
- *Impact on natural resources*
- *Septic system/contamination of ground water/waste treatment*
- *Disruption of fire access*
- *Excessive population increase*
- *Wetlands protection*
- *Bouquet Canyon is not an "all weather" road. Subject to failure in 10-year capital storm*

The following pages will address the citizens' concerns based on information that is fully verified. Supporting documentation is provided for your review in order to make an informed decision regarding all aspects of this project.

Hazards - 1. Geotechnical

a. Is the project located in an active or potentially active fault zone, Seismic Hazards Zone, or Alquist-Priolo Earthquake Fault Zone?

   Planning's Response – No, *project is located approximately 1 mile from the San Andreas Fault zones. (Seismic Hazard Zones Map - Sleepy Valley Quad).*

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

LVTC's Comments

The Leona Valley/Bouquet region is bisected by the San Andreas Fault, a seismically active fault-line.

The unusual geotechnical aspects of Leona Valley were featured in the book California Fault by Thurston Clarke. The USGS Geologists have not fully studied Leona Valley and for decades have been in a quandary over seismic and water patterns for this community.

"Mysterious springs have been erupting along the fault (San Andreas). They had started last year when ponds dry for decades suddenly filled with water and attracted families of mallards. Torrents swept through horse barns, a spring erupted in a living room, a pond swarming with tadpoles appeared overnight at the community center, and rivulets flowed down driveways, collecting in puddles that refuse to shrink. USGS geologists took photographs and water samples, but lacked funds to map the springs and determine their source. They speculated the eruptions might be part of the natural recharge pattern caused by a sudden shift from drought to heavy rainfall, or somehow connected to the Landers earthquake or movement of plates along the fault." (California Fault, page 323; © 1996).

These events have occurred up to three miles from the San Andreas fault including areas proximate to the subject site. While we have not had an opportunity to inspect the subject site for these conditions (nor do we have the necessary expertise), similar water features have been observed on a frequent basis for properties contiguous to the subject sites. New springs have appeared in Leona Valley as recent as three weeks ago.

Leona Valley is part of what is referred to as a Rift Zone. A Rift Zone is a large area of the earth in which plates of the earth's crust are moving away from each other, forming an extensive system of fractures and faults. As such, there are fractures and fault lines dispersed throughout Leona Valley. In addition, according to Geotechnical reports obtained by residents who have constructed homes in the Lost Valley Ranch Road vicinity, there is a fault line that runs through Lost Valley Ranch Road, adjacent to the subject site.

According to Evidence of Steep Faults in the Central Transverse Ranges From Seismic Refraction Data Abstract, "The recent LARSE II seismic experiment crossed the Central Transverse Ranges at a point north of the San Fernando Valley, CA. This experiment had both a dense receiver line (more than 1000 receivers with spacing of 100m to 500m) and a dense set of shots (approximately 100 shots with a spacing of 1km). In the Transverse Ranges, first arrival times, correlated over many shots, reveal the presence of 6 steeply dipping faults. The most prominent one of these is the Bouquet Canyon fault, which separates the younger Vasquez formation on the south, from the Pelona Schist on the north. The seismic data indicates this is a south dipping fault, which when coupled with the observation that the motion is down to the south, indicates that the region was under extension in the recent past. A full waveform modeling method was used to predict the effect of faults on the first arrivals. This was then used to locate the faults, as well as to determine their dips. The San Francisquito fault, the Clearwater fault,

and the San Andreas Fault, as well as two buried faults in the Mojave Desert were detected with this method. The seismic signatures of these faults are relatively small features and are only detectable by correlating over many shot points." The site is proximate to the Bouquet Canyon Fault.

SunCal (Ritter Ranch) has recently completed an intensive study of the western section of their development, which is directly east of the subject site. Recent studies (within the last five years) have revealed newly discovered fault-lines which had previously been unknown and not mapped by the USGS. The Developer's mitigation measures fail to reduce the adverse factors to less than significant. Based on the proximity of numerous fault lines to the subject site and the frequency and volume of sudden springs in the vicinity, a more intensive geotechnical study of the site must be completed for the protection of the residents that will inhabit this seismically active location. This must include a site-specific study for earthquake fault lines.

b. Is the project site located in an area containing a major landslide(s)?

Planning's Response – Yes

LVTC's Comments

"Yes", the Leona Valley Town Council agrees with this response. The site is mapped for liquefaction conditions as well as landslides.

According to the Seismic Hazard Zone Report for the Sleepy Valley 7.5-Minute Quadrangle prepared by the Department of Conservation, California Geological Survey 2003, "Landslides are most abundant along the steep north and south facing slopes of the Sierra Pelona in the central part of the Sleepy Valley Quadrangle…Landslides in the area range from small surficial failures along road-cuts and stream cuts to very large translational and rotational landslides."

c. Is the project site located in an area having high slope instability?

Planning's Response – Yes, the site is located within a liquefaction area.

LVTC's Comments

The Leona Valley Town Council agrees with this response.

d. Is the project site subject to high subsidence, high groundwater level, liquefaction, or hydrocompaction?

Planning's Response – Yes, *Liquefaction (Seismic Hazard Zones Map - Sleepy Valley Quad)*

LVTC's Comments:

The Leona Valley Town Council agrees with this response. Considering the high water table, the random occurrence of streams/ponds and the fact that the USGS has not fully studied these conditions for this community, special considerations must be taken in the development of this site.

According to the Seismic Hazard Zone Report for the Sleepy Valley 7.5-Minute Quadrangle prepared by the Department of Conservation, California Geological Survey 2003, "In Leona Valley & Pelona Valley, ground-water levels have been measured at less than 10 feet. In narrow canyons ground water depth is assumed to be less than 10 feet during wet periods." Liquefaction conditions are more abundant and likely under these conditions.

e. Is the proposed project considered a sensitive use (school, hospital, public assembly site) located in close proximity to a significant geotechnical hazard?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council agrees with this response. The site is not a school or hospital and will not be utilized for public assembly.

f. Will the project entail substantial grading and/or alteration of topography including slopes of over 25%?

Planning's Response – No

LVTC's Comments

According to the plans supplied by the Developer, approximately 50% of the land area is subject to grading.

g. Would the project be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code (1994), creating substantial risks to life or property?

Planning's Response – No

LVTC's Comments

A soil study has not been provided for review. There are conditions pertaining to this site that could create risks to life and property, therefore, the LVTC wishes to review the soils report in order to ascertain the conditions of this site.

h. Other factors?

Planning's Response – No input

LVTC's Comments

The protected Bouquet Canyon Creek appears to traverse this site. The proposed ingress/egress location at Bouquet Canyon Road has historically flooded and closed during heavy winter rains and snow. The Bouquet Canyon Creek traverses the subject site, crosses Bouquet Canyon Road and drains onto the Ritter Ranch/Sun Cal property. This drainage channel then rejoins the Amargosa Creek.

A secondary creek runs from Lost Valley Ranch Road drains off of the subject site and bisects properties between 86th and 87th Street West. A controlled drainage system needs to be installed. The drainage system must be unlined as to protect existing sub-surface, often dormant, endangered habitat that occupies these areas.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

The site and improvements are specifically bound by State and Federal requirements. Quoting CEQA guidelines on the State of California website:

> *"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habit of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."*

We believe this requirement would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered unarmored threespine stickleback fish.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

STANDARD CODE REQUIRMENTS

☐ Building Ordnance No. 2225 – Section 308B, 309, 310, and 311 and chapters 29 and 70

☒**MITIGATION MEASURES**
☐Lot Size ☐Project Design

☐**OTHER CONSIDERATIONS**
☐Approval of Geotechnical Report by DPW

Consultation with DPW – Geotechnical and Materials Engineering Division

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **geotechnical** factors?

Planning's Response:

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Based on the above LVTC comments, we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on geotechnical factors and should be further examined or disapproved until these factors are resolved to the satisfaction of the community and to prudent safety standards as required by local, State and Federal law.

There are no plans to control drainage onto Bouquet Canyon Road, Feeney Road, 87th Street West, 86th Street West and Lost Valley Ranch Road. The elevation of Lost Valley Ranch Road has changed by four feet in the last thirty years due to debris build-up and flow onto and off of the subject site. No evidence has been provided as to mitigation measures for this site-specific problem.

End of Planning's Page 5

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

HAZARDS - 2 Flood

a. Is the major drainage course, as identified on USGS quad sheets by a dashed line, located on the project site?

Planning's Response – Yes, *unknown creek runs through this site.*

LVTC's Comments

The "unknown:" creek as identified in the Planning Document is the Bouquet Canyon blue-line creek. It connects directly with the Amargosa Creek, which was created by the San Andreas Fault. The Bouquet Canyon Creek is protected by State and Federal agencies. During the heavy winter rains of 2004/2005 many sites along Bouquet Canyon were inaccessible due to over-flooding and extension of Bouquet Canyon creek into the roadway and onto driveways. Water and debris drain from the subject site onto the roadway, at times making it impassable. The Department of Fish & Game prevented grading and removal of the mudflow from these locations because of the protected species within this sometimes dry waterway.

The plan, as submitted, and based on the analysis by the County of Los Angeles, makes no provision to protect this stream with known protected species. Section 1601 of the California Fish and Game Code protects the natural flow, bed, channel, and bank of any river, stream or lake designed by the California Department of Fish and Game (CDFG) in which there is at any time an existing fish or wildlife resources or benefit for the resources. As required by law, project plans must be submitted to CDFG that are sufficient to indicate the nature of the project for construction if the project will do the following:

- *Divert, obstruct, or change a streambed*
- *Use materials from the streambeds*
- *Result in disposal; or deposition of debris, waste or other material containing crumbed, flaked or ground pavement where it can flow into a stream.*

Because of the variances in rainwater fall and water table in this area, the size, width and depth of the stream changes regularly. Nevertheless, the California Department of Fish and Game has taken active measures to protect this natural resource.

As previously stated: The protected Bouquet Canyon Creek traverses this site. A creek that runs from Lost Valley Ranch Road also traverses the site. The proposed ingress/egress location at Bouquet Canyon Road has historically flooded and closed during heavy winter rains and snow. The project may cut and grade near this protected waterway. The Bouquet Canyon Creek traverses the subject site, and crosses Bouquet Canyon Road, draining to the Ritter Ranch/Sun Cal project and rejoining Amargosa Creek.

The site and improvements are specifically bound by State and Federal requirements that have not yet been abided to in this process. Again, quoting CEQA guidelines on the State of California website:

> *"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."*

We believe this requirement would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered unarmored threespine stickleback fish.

b. Is the project site located within or does it contain a floodway, floodplain, or designated flood hazard zone?

Planning's Response – No.

LVTC's Comments

LVTC disagrees with this response. The Bouquet Canyon creek traverses this site. This is a blue line waterway. There is also local flooding of the Bouquet Canyon Roadway. Because of numerous serious capital storm events the County of Los Angeles Department of Public Works has recently determined that Bouquet Canyon Road cannot sustain a ten-year capital storm.

There has been regular flooding events on Lost Valley Ranch Road, 86th Street West, 87th Street West and Vientos Drive. Water drains from the subject site and Lost Valley Ranch Road. This creek is not identified on a map. This active stream floods from Lost Valley at the terminus of 87th Street West and flows north, making this roadway impassable and flooding private property during heavy winter rains. Leona Valley has had repeated documented rainfall in the range of 34 to 50 inches in one year, which is much greater than the County average. Therefore, greater efforts must be made to accommodate the unusually high rainfall in this foothill location.

When private property has flooded in the area of 86th and 87th Street West, the State of California Department of Fish and Game has prohibited residents from clearing their sites of debris or redirecting the stream in any fashion. Therefore, we are of the belief that this is an undocumented blue line stream (with the County) but is protected by the State of California Department of Fish and Game. Furthermore, the original location of Lost Valley Ranch Road was lost four times in the last thirty years, because the roadway turned into a major stream. Access to homes at times requires the use of a four-wheel drive vehicle and at times, could not be accessed at all. Because of the regular flooding events on Bouquet Canyon Road (cannot sustain a 10-year capital storm), 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road, we believe the response by the County of Los Angeles Planning Department is incorrect.

c. Is the project site located in or subject to high mudflow conditions?

Planning's Response – No

LVTC's Comments

The LVTC disagrees with the Counties' disposition of "No" this should be a "Yes". As previously stated, the site has been subject to flooding and adjacent roadways have been impassable. (See photos)

d. Could the project contribute or be subject to high erosion and debris deposition from run-off?

Planning's Response – No

LVTC's Comments. *Unless significant improvements are made to the areas around the two streams and roadways (which are already subject to failure) the Leona Valley Town Council must disagree with this response.*

It is assumed that the State of California Department and Fish & Game as well as the associated environmental protection agencies will approve the alterations to the existing streams and corrective measures to improve 87th Street West, 86th Street West, Lost Valley Ranch Road, Vientos Drive and Bouquet Canyon Road in order to insure the roadways and adjacent properties are protected from debris disposition, erosion and water flow (assuming such improvements are desired by the homeowners). The property owner has failed to protect adjacent properties from mudflow and adverse drainage over the years, because these are natural streams. Therefore, in order to protect nearby properties, significant alterations must be made to control drainage and protect the streams. These improvements must be approved by the impacted property owners who live on 87th Street West, 86th Street West, Lost Valley Ranch Road and Vientos Drive; as well as the 38700 to 39000 block of Bouquet Canyon Road, Leona Valley. Protective measures must maintain the rural rolled curb of said roadways. The improvements must comply with the rural standards of the Leona Valley Community Standards District and the Antelope Valley Areawide General Plan.

e. Would the project substantially alter the existing drainage pattern of the site or area?

Planning's Response – No

LVTC's Comments

In order to make the contiguous and adjacent roadways safe for the increased population demands, significant alterations must be made to the existing streams and drainage that emanates from this site. The property owner has failed to protect adjacent properties from mudflow and adverse drainage over the years, because these are natural streams. Therefore, in order to protect nearby properties, significant alterations must be made to control drainage and protect the streams.

The newly developed sites will be fully compacted in accordance with modern building standards. As such, these sites will not be able to support the same drainage that has historically occurred. As such, there will be an increase in runoff to the existing drainage streams, which are already subject to flooding and contribute to hazardous area conditions.

f. Other factors (e.g., dam failure)?

Planning's Response – Maybe

LVTC's Comments

Information pertaining to the specific biota/environmental resources of Bouquet Canyon are available in the attached exhibits:

- *USGS Parasite Analysis of Native and Non-native Fish in the Angeles National Forest, 2001 Final Report*
- *Biological Resources Assessment for the Newhall County Water District Vasquez Water Main Project, Santa Clarita, California*
- *University of California Santa Barbara, Prioritizing Sites along the Santa Clara River for Conservation of Threatened and Endangered Species, June 2000*
- *State of California, The Resources Agency, Department of Fish & Game: Distribution, Reproduction Success and Impact of Nest Parasitism of Brown-Headed Cowbirds on the Least Bell's Vireo's.*
- *West Mojave Habitat*
- *Vermillion Flycatcher*
- *The Antelope Valley Areawide General Plan*
- *San Andreas Rift Zone*

STANDARD CODE REQUIRMENTS

☐ Building Ordinance No. 2225 – Section 308A ☐ Ordinance No. 12,114 (Floodways)
☐ Approval of Drainage concept by DPW

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

☒**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**
☐Lot Size ☐Project Design ☐Approval of Geotechnical Report by DPW

Planning's Response *Consultation with DPW – Drainage and Grading.*

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by **flood (hydrological)** factors?

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on or will be impacted by flood (hydrological) factors. Therefore, the LVTC recommends significant corrections and interface with the State of California Department of Fish & Game and impacted property owners on Lost Valley Ranch Road, 86th Street West, 87th Street West, Vientos Drive and the 38700 to 39000 block of Bouquet Canyon Road, Leona Valley.

Due to the fact that these roads can be impassable during storm events, that mud flow has occurred on nearby properties, and that a protected blue line stream traverses the site, we believe the hydrological factors are potentially significant and must be resolved prior to the approval of this subdivision.

End of Planning's Page 6

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

HAZARDS - 3. Fire

a. Is the project site located in a Very High Fire Hazard Severity Zone (Fire Zone 4)?
Planning's Response – Yes, *Very High Fire Hazard Severity Zone*

LVTC's Comments

The LVTC concurs with the County's assessment of this item. This location is at least 20 minutes from a fully staffed fire station. Green Valley's and Leona Valley's Fire Stations are call (volunteer) stations and presently having staffing problems. The nearest responding fire stations are in Quartz Hill and Lake Hughes.

b. Is the project site in a high fire hazard area and served by inadequate access due to lengths, width, surface materials, turnarounds or grade?

Planning's Response – No

LVTC's Comments

The LVTC disagrees with Planning's disposition of this item. The site does not presently have adequate access due to lengths, width, surface materials, turnarounds or grade. 87th Street West was impassable during the last firestorm.

The County of Los Angeles Planning Department in conjunction with the Leona Valley Town Council completed a study of the housing patterns in Leona Valley in the early 1990s. It was determined at that time that 90% of the population of Leona Valley is located south of Elizabeth Lake Road. During a firestorm event, the majority of the occupants of this Valley will exit from the corner of Leona Avenue and 90th Street West. Because this is an equestrian and agricultural oriented community, evacuations also include hundreds of head of livestock/horses. The ingress/egress for the subject site is at 87th Street West with a secondary access at Bouquet Canyon Road. While the developer has indicated that the main exit area is Bouquet Canyon Road, this is contrary to the direction and formation of the roadways, which better supports an exit at 87th Street West. 87th Street West has better access to the elementary school and the commercial district/restaurants in town, making this the most likely exit point. The topography of the existing road, 87th Street West, is comprised of level and sloping terrain. This means those who travel at the north end of 87th Street West and drive south on 87th Street West cannot see over the grade and are blind to on coming traffic. The same holds true for those driving north on 87th Street West.

During the 2004/2005 winter rains, Bouquet Canyon Road was closed for several months. There was significant mud and debris flow emanating from the subject site onto the roadway. According to the County of Los Angeles Department of Public Works, Bouquet Canyon Road cannot withstand a ten-year capital storm.

87th Street West is a dedicated forty-foot wide residential street, however, is improved to a narrower width in most locations. The improved width is 24 to 30 feet. According to the Antelope Valley Areawide General Plan, future local street improvements should be limited to a maximum paved width of twenty-four feet. Area homeowners should not be required to make widening improvements to the roadway to accommodate this project. When vehicles are parked on one to two sides of the street, the passageway between vehicles is only 14-20 feet.

Ingress/egress is clearly inadequate in this location during firestorms. The turn around for fire trucks and equipment is often difficult when multiple engines are on the scene. It is our understanding that some improvements will be made to Lost Valley Ranch Road (where it connects to the project), which is an unpaved road. 87th Street West and Leona Avenue have not been planned nor is it wide enough to handle the additional traffic for evacuation purposes. Lost Valley Ranch Road has washed out and was relocated four times in the last thirty years.

c. Does the project site have more than 75 dwelling units on a single access in a high fire hazard area?

Planning's Response – Yes

LVTC's Comments

The LVTC has no comments at this time.

d. Is the project site located in an area having inadequate water and pressure to meet fire flow standards?

Planning's Response – No.

LVTC's Comments

The Leona Valley Town Council strongly disagrees with this comment. In 1994, there was a fire at the location of 107th Street West at the western end of Leona Valley. Shortly after the fire started, the fire hydrants went "dry" and air support was necessary to battle this devastating blaze. This is not because of inadequate water pressure alone, but because the water wells in Leona Valley went dry. The water service in this community is inadequate to support the existing population base. This is substantiated in the meeting minutes for the August 2004 Leona Valley Town Council Meeting. Officials with California Water Service specifically stated that the wells in Leona Valley produce only 80 acre feet of water per year, while the community uses approximately 365 acre feet per year. The shortfall is obtained from AVEK (Antelope Valley East Kern Water Agency), which is an interruptible secondary agricultural water source and has been shut off for days to weeks at a time. It is also interruptible if an inadequate allotment is made to our area by authorities or in the event of an earthquake or unforeseen shutdown or repairs.

A will-serve letter created by California Water Service failed to acknowledge or factor in the pre-existing dire conditions that impact the limited resources of Leona Valley – conditions that the Company itself has cited.

According to California Water Service, the water supply in Leona Valley is inadequate to sustain the current community. How then, with no infrastructure improvements, can the water company claim to be able to provide water for an additional 21% increase in housing units? California Water Service must clarify this discrepancy with sound substantiated documentation before this aspect of the project can be approved.

e. Is the project located in close proximity to potential dangerous fire hazard conditions/uses (such as refineries, flammables, explosives manufacturing)?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this response. There is no natural gas service to this site. The project calls for the installation of at least 121 propane tanks, which can pose a potentially dangerous fire hazard with so many pressurized propane tanks in such a confined area.

f. Does the proposed use constitute a potentially dangerous fire hazard?

Planning's Response – No

LVTC's Comments

The LVTC disagrees with Planning's disposition of "No" and it should be "Yes". This is because the existing water supply in Leona Valley is insufficient to support further development. The development of 121-additional homes will put an undue strain on the water resources to fight fires in this hazardous area. The addition of 121 propane tanks in a high fire severity area will further increase the potential for fire devastation. The ingress/egress to the site is inadequate and will pose further congestion on a narrow road (87th Street West). The water company states that the community has inadequate water storage and lacks a reliable water source. The community only has a volunteer fire department. The nearest staffed fire station is in Quartz Hill, approximately 20 minutes from Leona Valley.

g. Other factors?

Planning's Response – None

LVTC's Comments: *The Leona Valley Town Council specifically requests when the water availability study and fire hydrant tests are done for this site, they must be completed without the supplement of AVEK water into the Leona Valley waterlines. This will represent the true and correct water flow based upon the actual water resources of the community. This must be done to assure the study is completed under the interruptible and unreliable conditions that currently exist in this town. If such a shut down does occur, water tenders and Los Angeles County Fire Department Staff must be located in the Valley, which has been the procedure when AVEK has shut down in the past. The community must be provided with advance notice of the test.*

STANDARD CODE REQUIREMENTS

Water Ordinance No. 7834 Fire Ordinance No. 2947 Fire Regulation No.8
Fuel Modification / Landscape Plan

☐ **MITIGATION MEASURES/OTHER CONSIDERATIONS**

Project Design Compatible Use

Planning's Response – Comply with Subdivision requirements from fire department.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by **fire hazard** factors?

☐Potentially significant ☒ Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on fire hazard factors and should be disapproved until the community has adequate water to sustain the population, based upon the actual water usage for the metered users of Leona Valley. This property is located in a high fire severity hazard area that has been subject to several evacuations in recent years. There is no official evacuation plan. The property is serviced by Leona Valley Fire Station 140, a call fire department (volunteer). There are no employees and the staffing from this facility is intermittent depending on the work schedules of the volunteers. The secondary fire station that services this site is located in Quartz Hill, twenty minutes drive time, or longer, to the subject site. The paved roadway on 87th Street West is too narrow (as per the Antelope Valley Areawide General Plan, a paved width of 24-feet) to accommodate the increase in traffic safely, particularly during an emergency situation.

End of Planning's Page 7

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

HAZARDS - 4. Noise

a. Is the project site located near a high noise source (airports, railroads, freeways, industry)?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

b. Is the proposed use considered sensitive (school, hospital, senior citizen facility) or are there other sensitive uses in close proximity?

Planning's Response – No

LVTC Comments

No LVTC comment at this time.

c. Could the project substantially increase ambient noise levels including those associated with special equipment (such as amplified sound systems) or parking areas associated with the project?

Planning's Response – No

LVTC's Comments

No LVTC comment at this time.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project?

Planning's Response – Yes, during construction.

LVTC's Comments

There will be an increase in general noise upon the development of this site, because of the 20% increase in population. There will be noise from increased traffic, people and equipment.

e. Other factors?

Planning's Response – No input

LVTC's Comments

No LVTC comment at this time.

STANDARD CODE REQUIREMENTS

Noise Control (Title 12 - Chapter 8) Uniform Building Code (Title 26 - Chapter 35)

☐**MITIGATION MEASURES**

☐ Lot Size ☐ Project Design ☐ Compatible Use

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be adversely impacted by noise?

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

LVTC's Comments

No LVTC comment at this time.

End of Planning's Page 8

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 1 Water Quality

a. Is the project site located in an area having known water quality problems and proposing the use of individual water wells?

Planning's Response – No

LVTC's Comments

The LVTC disagrees with the Planning's disposition of "No" this should be "Yes". During an August 2004 Water Meeting hosted by the Leona Valley Town Council, California Water Service and the Antelope Valley East Kern Water Agency reported that there are water quality and quantity issues in Leona Valley. There are three water wells that service the metered portions of the community. Of the three wells, one is dry and one has high fluoride levels and has been determined to be unfit for human consumption. This is the well located closest to the subject site, east of 90th Street West, north of Leona Avenue. (Please refer to meeting minutes exhibit).

Several properties adjacent to the subject site are serviced by private water wells. Well water studies indicate that some locally pumped water is also contaminated with arsenic and excessive nitrates.

Homeowners who presently have metered water through California Water Service have reported drops in water pressure during draught conditions for those who are located at the end of a line or are situated at higher elevations.

When the developer's representative made a presentation to the Leona Valley Town Council, he indicated that they were considering the addition of new wells, which may or may not be located in the community in order to allow construction on this site. If a well is improved and constructed outside the boundaries of Leona Valley, it will not serve Leona Valley and will not meet the immediate needs of what is considered a dire situation. Some local wells are contaminated. California Water Service is obtaining the shortfall of water from AVEK. This water is interruptible and is considered a secondary source. Based on these facts, we believe the Planning Department's response is inaccurate.

b. Will the proposed project require the use of a private sewage disposal system?

Planning's Response – Yes, *septic tank is proposed.*

LVTC's Comments

The current location of the site is inappropriate for 121 individual septic systems. A presentation made before the Town Council by the developer indicated that the septic systems would likely be eliminated in favor of an on-site sewage treatment plant. Based on this assertion, a complete study of the site should be made in order to ascertain if the property can support such a project. The Leona Valley Town Council needs to be informed of the proposed location of this treatment plant. The neighbors to this facility and site need to be informed of such a project. We request that Planning fully determines the exact system of sewage disposal before the project can be moved forward.

An earlier failed development project proposed for the same general area as the subject site required installation of a sewage treatment plant specifically because of the adverse conditions stated herein.

According to the National Pollutant Discharge Elimination System, an NPDWS permit is required whenever a facility discharges pollutants into a body of water. This includes surface waters such as streams, creeks, lakes and wetlands. Untreated effluent materials leaching into the ground water applies to this standard. In addition, discharge from the vehicles that drive over the stream will cause discharge into the streambed. Two "creeks" (one is Bouquet Canyon creek) traverse the subject site. The water table in Leona Valley is very high and has been confirmed to be at a depth of ten feet, or less.

If the answer is yes, is the project site located in an area having known septic tank proposing on-site systems located in close proximity to a drainage course?

Planning's Response – No.

LVTC's Comments

This should not be "No" it should be "Yes". The Bouquet Creek runs through the property. The unnamed creek on Lost Valley Ranch Road is proximate to the site. Therefore, the property is located in close proximity to a drainage course.

c. Could the project's associated construction activities significantly impact the quality of groundwater and/or storm water runoff to the storm water conveyance system and/or receiving water bodies?

Planning's Response – No.

LVTC's Comments

The Leona Valley Town Council disagrees with this response. According to the USGS Study of the Sleepy Valley Quadrangle, the water table in Leona Valley is ten feet deep or less. This is further documented in the book California Fault. The construction activities of this project will impact the quality of the groundwater and/or storm water run-off. According to the National Pollutant Discharge Elimination System, an NPDWS permit is required whenever a facility discharges pollutants into a body of water. This includes surface waters such as streams, creeks, lakes and wetlands. Untreated effluent materials leaching into the ground water applies to this standard.

d. Could the project's post-development activities potentially degrade the quality of storm water runoff and/or could post-development non-storm water discharges contribute potential pollutants to the storm water conveyance system and/or receiving bodies?

Planning's Response – No.

LVTC's Comments

Unless the Septic Systems are completely redesigned LVTC believes Planning's response needs to be "Yes" not "No". The USGS has determined that Leona Valley has a high water table and two blue line streams traverse this site. The proposed 121 septic tanks and leach fields will degrade and place pollutants in the environment.

e. Other factors?

Planning's Response – No

LVTC's Comments

It is unacceptable to allow discharge sewage in the area of this site with a high water table. In addition, State and Federal law requires a significant setback from the water way and from a waterway that discharges directly into the drinking water supply for the County of Los Angeles. Failure to install an onsite sewage treatment plant will put the existing protected creek and very high water table at risk.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

STANDARD CODE REQUIREMENTS

☐Industrial Waste Permit ☐Health Code – Ordinance No. 7583, Chapter 5
☐Plumbing Code – Ordinance No. 2269 ☒NPDES Permit Compliance (DPW)

LVTC's Comments

An on site sewage treatment plant should be installed in order to prevent damage to the fragile eco system, nearby creeks and high water table and to prevent contamination of the local water wells.

☒**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design ☐Compatible Use

Planning's Response – *Consultation with RWQCB, Health Services, DPW – Land Development (NPDES review) and Environmental Programs*

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be adversely impacted by, **water quality** problems?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments

Based on the above LVTC comments, we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on or will be adversely impacted by water quality and quantity. The excessive number of septic tank systems in an area with small building pads and a high water table will result in contamination of the subsurface water, which is utilized for drinking and agricultural purposes. Therefore, the installation of an on-site sewage treatment plant is necessary.

Sufficient water resources must be obtained, including improvements of water pipes to service this site, without an adverse impact to the community via water rate increases. California Water Service has historically charged the community for upgrades in service. Leona Valley has the second highest water rate in the State of California. The current water resources are insufficient to service the community and an additional 121 water meters to be serviced by the same system can result in dire consequences.

End of Planning's Page 9

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 2. Air Quality

a. Will the proposed project exceed the State's criteria for regional significance (generally (a) 500 dwelling units for residential users or (b) 40 gross acres, 650,000 square feet of floor area or 1,000 employees for non-residential uses)?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

b. Is the proposal considered a sensitive use (schools, hospitals, parks) and located near a freeway or heavy industrial use?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

c. Will the project increase local emissions to a significant extent due to increased traffic congestion or use of a parking structure or exceed AQMD thresholds of potential significance per Screening Tables of the CEQA Air Quality Handbook?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

d. Will the project generate or is the site in close proximity to sources that create obnoxious odors, dust, and/or hazardous emissions?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time

e. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

f. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

g. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standard (including releasing emission which exceed quantitative thresholds for ozone precursors)?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

h. Other factors?

Planning's Response – No input

LVTC's Comments

No LVTC comments at this time.

STANDARD CODE REQUIREMENTS

☐Health and Safety Code – Section 40506

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Project Design ☐Air Quality Report

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be adversely impacted by, **air quality**?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

End of Planning's Page 10

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 3. Biota

a. Is the project site located within Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resource (ESHA, etc.), or is the site relatively undisturbed and natural?

Planning's Response – No

LVTC's Comments

The site is relatively undisturbed and natural. Therefore, the Leona Valley Town Council disagrees with the Planning Department's response of "no".

According to the Antelope Valley Areawide General Plan, the Portal Ridge area (foothills) is identified as S.E.A. #58. This position, at the intersection of three major geographical regions has produced the most diverse and unique flora found in the County. The area contains ten distinct plant communities, representing the transition between desert foothill and mountain environments. The diversity of the area is further enhanced by the presence of northern species, some of which are rare in the County, reaching their southern limit here. This area is very valuable because it possesses such a concentrated variety of vegetation types.[1]

The boundaries of the Portal Ridge area are large. The subject property is located in the Portal Ridge region, as is all of Leona Valley and the western edge of the Ritter Ranch Development project. The property is adjacent to the Ritter Ridge area (SEA #56), which has ninety-seven resident vertebrate species, recorded. These include twenty-five small mammals, fifty-three birds and nineteen reptiles. The area is also known as an important refuge for migratory birds.

The Draft of the County of Los Angeles General Plan proposes large portions of Portal Ridge, Leona Valley and Ritter Ridge as part of the San Andreas Rift Significant Ecological Area. This covers the north facing slopes of the Angeles National Forest and surrounds Amargosa Creek and a large portion of its watershed located in Leona Valley. A study completed by UCLA already identifies this region as a Significant Ecological Area.

Based on information specifically contained in the Antelope Valley Areawide General Plan, the pre-existing Ritter Ridge SEA, the Portal Ridge (foothills) Significant Ecological Area, UCLA determination of a Leona Valley Significant Ecological Area and the proposed San Andreas Rift Significant Ecological Area, it is our belief that the subject property is located within a Significant Ecologically area, or minimally, is an SEA buffer.

b. Will grading, fire clearance, or flood related improvements remove substantial natural habitat areas?

Planning's Response – Yes, 50% of the site will be graded

[1] Antelope Valley Areawide General Plan

LVTC's Comments

A majority of the natural vegetation will be removed from the site. The developer is planning on the infill of grape vines on the slope areas of this property. While this type of improvement supports the agricultural intent of the community, it could degrade the natural habitat that currently exists. The developer reported that there would be an installation of a small bridge. If flooding is to be controlled on an off site, there will be a further change of the natural habitat of this location.

There is a conflict with State law and the proposed wine grapes that are to be grown on the site. State of California Law requires all homeowners association to be non-profit entities. Therefore, the homeowner's association may not engage in wine-producing activities through the growing of grapes.

c. Is a major drainage course, as identified on USGS quad sheets by a dashed line, located on the project site?

Planning's Response – Yes, *the project site supports two unnamed drainages.*

LVTC's Comments

The Bouquet Canyon Creek traverses the subject site. This is a tributary fed by the Amargosa creek. The Lost Valley Ranch Road Creek also traverses the site.

d. Does the project site contain a major riparian or other sensitive habitat (e.g. coastal sage scrub, oak woodland, sycamore riparian, woodland, wetland, etc.)?

Planning's Response – Yes, *two riparian corridors will be largely untouched. The existing wetlands area near the southern.*

LVTC's Comments

Yes, numerous species of locally unusual or rare plants are located in the vicinity. Additional sensitive habitat includes: the Hoary Bowlesia; Schott's Sedge; Utah Miner's lettuce; Kellogg's tarplant; Weston's Barestem Buckwheat; Fluffweed; California Sunflower; Woodland Star; Parish's Broad-leaved Lupine; Snakeheads; Antelope Bush; Sierra Mint; Checker Bloom; Horned Pondweed (known to be located in the shaded Riparian Woodland in Bouquet Canyon).

e. Does the project site contain oak or other unique native trees (specify kinds of trees)?

Planning's Response – No.

LVTC's Comments

No LVTC comments at this time.

f. Is the project site habitat for any known sensitive species (federal or state listed endangered, etc.)?

Planning's Response – Yes. Site has potential to support both raptor and songbird nest.

LVTC's Comments

Yes. The Bouquet Canyon location is known for specific endangered species such as the unarmored three-spine stickleback fish, the red-legged frog, the San Diego Horned Lizard, the highly imperiled Long Billed Curlew, the Tri-Colored Blackbird (California Species of Interest), the endangered Southwest Willow Flycatcher, the Mountain Plover (Species of Concern), the endangered Amargosa Vole, the threatened burrowing owl, the endangered Kangaroo Rat, the endangered Mojave ground squirrel as well as numerous plant species. Property owners on Bouquet Canyon Road have been restricted from grading/moving soil even during flood conditions and access loss because of the protected species located in this area.

The site and improvements are specifically bound by State and Federal requirements that have not been involved in this process at this time. CEQA guidelines address this on the State of California website:

"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habit of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."

We believe this requirement would apply to the critical habitat location of the "red-legged frog", which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered "unarmored threespine stickleback fish". The Bouquet Canyon creek crosses the subject site.

g. Other factors (e.g., wildlife corridor, adjacent open space linkage)?

Planning's Response – No.

LVTC's Comments

The Leona Valley Town Council disagrees with this response. Years of observation support the fact that this is a wildlife corridor with access to the Angeles National Forest, streams and ponds. Species including indigenous coyotes, egrets, red foxes, great blue heron, roadrunners, red tailed-hawks, eagles (nesting area), bobcats, mountain lions, great horned owls, ducks, squirrels, deer, grizzly bears and many other species have been observed traversing this site. Leona Valley School has had lockdowns in the past specifically because bears have been in the vicinity.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

☒**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**
☐Lot Size ☐Project Design ☐ERB/SEATAC Review ☐Oak Tree Permit
Planning's Response –*Breeding bird survey, biological monitor, native landscaping, night lighting conditions required, remove all Eucalyptus trees*

LVTC Comments: *"Dark skies" are a desired non-urban feature of the character of Leona Valley. So much so, the Community included restrictions on lighting in its community standards district (CSD). Leona Valley currently has only 3 streetlights (required by L.A. County Public Works) and has no desire to alter this characteristic with urban lighting standards. This Project would undoubtedly increase the number of streetlights and exterior lighting to create nighttime light pollution and the end of "dark skies" in Leona Valley.*

There are no Eucalyptus trees in the vicinity.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, **biotic** resources?

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on biotic resources. This is based upon the riparian location, numerous endangered species in this ecologically sensitive location as well as being located in the foothills of Significant Ecological Area #58, contiguous to the Ritter Ridge Significant Ecological Area and is in the area of the proposed San Andreas Rift Zone Significant Ecological Area.

End of Planning's Page 11

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 4. Archaeological/Historical/Paleontological

a. Is the project site in or near an area containing known archaeological resources or containing features (drainage course, spring, knoll, rock outcroppings, or oak trees) that indicate potential archaeological sensitivity?

Planning's Response – Yes, *The project site supports two unnamed drainages. The drainage systems are comprised of natural, unlined channels with earthen banks and sandy streambeds.*

LVTC's Comments

The project is in an area known for significant archaeological resources. Numerous burial grounds and early implements have been found in and around this Valley. 107th Street West is the location of a blue line street and there are several ponds throughout the community. The area has "major" drainage and natural water sources, making this an ideal location for archaeological resources.

b. Does the project site contain rock formations indicating potential paleontological resources?

Planning's Response – No

LVTC's Comments

The subject site does not contain rock formations, however, there are rock formations in the surrounding area.

c. Does the project site contain known historic structures or sites?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

d. Would the project cause a substantial adverse change in the significance of a historical or archaeological resource as defined in 15064.5?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council firmly disagrees with the County of Los Angeles Planning Department response of "no".

On December 11, 1989, R.W. Robinson, a licensed Archaeologist, completed a Cultural Resource Investigation for another tentative tract map (subdivision never came into fruition) of three hundred acres with Elizabeth Lake Road forming the southern margin. The project site included the entire northwest quarter of Section 15, lying north of Elizabeth Lake Road, a portion of the northeast quarter of Section 22, and a part of the southeast quarter of Section 16, lying between Elizabeth Lake Road and Godde Hill Road. A copy of this report is provided for your review.

R.W. Robinson stated, "Significant cultural resources have long been known to exist (in) Leona Valley and the general area of the project site. Leona Valley offers more water than most of the rest of the Antelope Valley as well as a greater variety and concentration of food resources. Cultural resources should be expected to occur in greater concentration in this area."

Several archaeological sites were discussed in the report. CA-Lan-951 is located eastern of the 300-acre site that was the study of this report. The site had a surface scatter of artifacts including projectile points, chipping "west", milling tools, burned bone and at lease one soapstone ornament. Of greater significance is site CA-Lan-767. The site, recorded in 1976 (two miles east on Elizabeth Lake Road) contained several human burials. The site consisted entirely of a buried cemetery. Within a three to four mile radius of the project site, many dozens of cultural resource investigations have taken place and many dozens of archaeological sites have been recorded. "This record search clearly indicates that the area of the project site is culturally sensitive, and that archaeological resources are very likely to occur on the property."

During the survey, four archaeological sites were located and recorded on the project site. These sites were given the temporary designation as AVC-260, AVC-261, AVC-262, AVC-263. Artifacts found are identified as follows:

<u>AVC 260</u> The site consists of a scatter of stone flakes and fragmentary milling stones;

- *4 rhyolite flakes*
- *1 jasper flake*
- *3 fragmentary schist "metates" (grinding slabs)*
- *1 fragmentary andesite "mano" (grinding stone)*
- *1 complete granite mano*

<u>AVC 261:</u>Small surface scatter of artifacts

- *9 rhyolite flakes*
- *1 chalcedony flake*
- *2 quartz flakes*
- *2 colored silicate flakes*
- *3 Obsidian flakes*
- *1 granite mano*
- *1 obsidian projectile point or drilling implement*

<u>AVC 262:</u> Surface scatter of lesser density

- *10 rhyolite flakes*
- *2 colored silicate flakes*
- *1 large thyolite core*
- *1 schist metate fragment*

- *1 schist mano fragment*
- *1 piece of possibly modified soapstone*

AVC 263: Surface artifacts thinly scattered

- *2 small rhyolite cores*
- *9 rhyolite flakes*
- *5 quartz flakes*
- *4 chalcedony flakes*
- *1 chert flake*
- *1 obsidian flake*

The exploration did not include any subsurface investigations and the likelihood of subsurface material was considered high.

One of the recommendations in the report states, "Due to the existence of four prehistoric archaeological sites on this project site, and the relatively close proximity to subsurface archaeological remains including human burials, it will be imperative that close monitoring by qualified archaeologists take place in all cases where ground is to be disturbed within 300 meters of the Amargosa Drainage."

A tributary of the Amargosa Drainage crosses the subject site and Lost Valley Ranch Road, which is also contiguous to the site, is a blue line stream. Therefore, it is highly likely that the conditions found at Godde Hill Road and Elizabeth Lake Road exist at the subject site. Additionally, the Ritter Ranch property, located east of Bouquet Canyon Road, has already revealed hundreds of prehistoric remains and implements, particularly during the re-alignment of Elizabeth Lake Road.

Every archeological survey of this area has produced artifacts and/or burial grounds indicating the likelihood of a strong presence of Shoshone-speaking Native American and early man habitation.

Under the California Environmental Quality Act, Title 14, Chapter 3, Article 5, Section 15064.5 indicates that a project may not have a substantial adverse change (such as grading for a subdivision) in the significance of an historical resource. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The CEQA process applies to archeological sites.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

When an initial study identifies the existence of, or the probably likelihood of early man or Native American human remains within the project, a lead agency shall work with the appropriate native Americans as identified by the Native American Heritage Commission.

e. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Planning's Response – No

LVTC's Comments

The site is comprised of a small knoll. It is unknown if there could be a unique paleontological resource.

f. Other factors?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council would like to address the relocation of any potential archeological finds for this site. We wish for the items to be placed in the care of the West Antelope Valley Historical Society, to be utilized in the future Leona Heritage Park.

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design ☐Phase 1 Archaeology Report

Planning's Response - *None*

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **archaeological, historical**, or **paleontological** resources?

☐Potentially significant ☒Less than significant with project mitigation ☐ Less than significant/No impact

LVTC Comments: *The Leona Valley Town Council disagrees with the assessment by the County that the project has a less than significant impact on archaeological, historical or paleontological resources. Artifacts found in Leona Valley suggest that the area has a rich history in Native American and early man culture that could potentially be destroyed upon grading of this site. This is a "Potentially significant" cultural resource. According to the Cultural Resources Investigation completed by R.W. Robinson on December 11, 1989:*

> *"Significant cultural resources have long been known to exist (in) Leona Valley and the general area of the project site. Leona Valley offers more water than most of the rest of the Antelope Valley as well as a greater variety and concentration of food resources. Cultural resources should be expected to occur in greater concentration in this area."*

A Phase 1 Archaeology Report must be completed. Furthermore, we request that any artifacts remain in the possession of the West Antelope Valley Historical Society for future permanent display in Leona Valley.

End of Planning's Page 12

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 5. Mineral Resources

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Planning's Response – No

LVTC's Comments

We do not believe a mineral resource study has been completed.

b. Would the project result in the loss of availability of a locally important mineral resource discovery site delineated on a local general plan, specific plan or other land use plan?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

c. Other factors?

Planning's Response – No input

LVTC's Comments

No LVTC comments at this time.

☐**MITIGATION MEASURES** **OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **mineral** resources?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

End of Planning's Page 12

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 6. Agriculture Resources

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?

Planning's Response – Yes

LVTC's Comments

The Leona Valley Town Council agrees with this response. This site has historically been utilized for grazing land, although not in recent years. The Leona Valley/Bouquet Canyon region has had a moderate expansion of farmland/agricultural uses over the last decade with the addition of multiple vineyards and orchards.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Planning's Response – No

LVTC's Comments

The potential growing of grape vines for profit by the homeowners association appears to be in conflict with California State law which indicates homeowners associations are to be non-profit entities and cannot engage in profitable operations (including contracting the operation).

c. Would the project involve other changes in the existing environment that due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Planning's Response – Yes. Site within a grazing land designation

LVTC's Comments

The Leona Valley Town Council agrees with this response.

d. Other factors?

Planning's Response – No

LVTC's Comments

No LVTC comments at this time.

LVTC Response to Project Number TR0066952; RENVT200700035
West of & Abutting Bouquet Canyon Road;
Assessor's Parcel Numbers 3206-003-007, & 001 & 008

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design

CONCLUSION
Considering the above information, could the project leave a significant impact (individually or cumulatively) on **agriculture** resources?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

End of Planning's Page 14

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

RESOURCES – 7. Visual Qualities

a. Is the project site substantially visible from or will it obstruct views along a scenic highway (as shown on the Scenic Highway Element), or is it located within a scenic corridor or will it otherwise impact the viewshed?

Planning's Response – No

LVTC's Comments

In another report for a project on Bouquet Canyon Road, the County of Los Angeles identified Bouquet Canyon Road as a second priority site. According to Norman Hickling, Deputy to Supervisor Michael D. Antonovich, the County of Los Angeles has proposed making Bouquet Canyon Road a Scenic Highway.

The January 25, 1993 General Plan for the City of Palmdale, Environmental Resources section indicates that Elizabeth Lake Road, Godde Hill Road and Bouquet Canyon Road are all designated scenic streets or highways. While the west side of Bouquet Canyon is not the jurisdiction of the city of Palmdale, it is our assertion that Bouquet Canyon Road is in fact, a scenic corridor and is now proposed to have this permanent designation by the County of Los Angeles. The city of Palmdale identifies Bouquet Canyon Road specifically as a road "well known for its tree-lined canyon and winding stream."

In a pre-1920 map of the region, the Automobile Club of Southern California provided travelers with a guide map for the area and specifically featured Bouquet Canyon Road as a scenic route. Today, weekend cyclists, runners, and motorcyclists continue to utilize Bouquet Canyon as a primary recreation and scenic route, which has direct access to the Angeles National Forest. Therefore, it is our firm assertion that Bouquet Canyon Road is in fact, a scenic roadway and has been considered for nearly one hundred years as a scenic corridor.

b. Is the project substantially visible from or will it obstruct views from a regional riding or hiking trail?

Planning's Response – Yes

LVTC's Comments

The Leona Valley Town Council agrees with this assessment.

c. Is the project site located in an undeveloped or undisturbed area that contains unique aesthetic features?

Planning's Response – No

LVTC's Comments

The project is located in an undeveloped section of Leona Valley. According to the Los Angeles County Assessor, within parcel area 3206 (subject parcel area) there are very few improved residential properties within the bounds of Leona Valley. Parcel area 3206 contains 51 single-family homes with a Leona Valley address. The balance are dedicated primarily to pasture, open space, orchards and forestry land. Therefore, the site is located in a largely undeveloped area.

d. Is the proposed use out-of-character in comparison to adjacent uses because of height, bulk, or other features?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this response. The development is not of like character or density when compared to the surrounding area. There are no urban subdivisions in Leona Valley and construction of new homes has historically been infill in nature, in accordance with the Antelope Valley Areawide General Plan.

In order to be in character with the community, the project should be of a lesser density. Within Assessor's Parcel Area 3206 (subject parcel area) for those homes within the bounds of Leona Valley, the median lot size is 5.25-acres. The highest residential density area in Leona Valley contains one home per 4.68-acres. There are no tract homes in Leona Valley. Therefore, we believe that the development is out of character for the community.

Residential building sites within the development are to have building pads in the range of 10,000 to 31,000-square feet. This is also out of character for the community. Generally, sites in Leona Valley have level land area greater than 50% of the gross lot size.

e. Is the project likely to create substantial sun shadow, light or glare problems?

Planning's Response – No

LVTC's Comments

The property is subject to rural lighting standards.

f. Other factors (e.g., grading or landform alteration)?

Planning's Response – No

LVTC's Comments

The plan for the subdivision calls for 50% grading which results in an alteration of the topographical features of the property. Therefore, this response should have been "yes".

☐ **MITIGATION MEASURES** ☒ **OTHER CONSIDERATIONS**

☐ Lot Size ☐ Project Design ☐ Visual Report ☐ Compatible Use

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **scenic** qualities?

☐ Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

LVTC's Comments:
A full analysis of the degradation of visual qualities cannot be determined at this time. The plan calls for the installation of underground utilities, which will assist in the protection of the view-scape.

End of Planning's Page 15

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

SERVICES – 1. Traffic/Access

a. Does the project contain 25 dwelling units, or more and is it located in an area with known congestion problems (roadway or intersections)?

Planning's Response – No

LVTC's Comments

Normal daily traffic patterns on 87th Street West currently experience no congestion problems. However, during events that require emergency response, 87th Street can become congested with fire, police, forestry, and animal control vehicles and personnel, plus evacuees and livestock. These past events have been successfully managed with the current population of the south side and the projected infill / lower density growth as stated in the Antelope Valley Areawide General Plan. Increased traffic from the Project's population, particularly in the event of an emergency situation, needs to be studied to create a safe and expedient route.

Based on the last 6 years of data, Bouquet Canyon Road has a mileage death rate of 13.4 deaths per 100 million miles in the 6.4 miles between Elizabeth Lake and Spunky Canyon as compared with the 1.25 statewide mileage death rate in California in 2005. While congestion problems are not apparent, the road has a higher than typical death rate due to events not related specifically to congestion.

Bouquet Canyon Road cannot sustain a ten-year capital storm according to the County of Los Angeles.

According to Chapter 21.24.400, Division of Land Adjacent to Existing Roads: If the advisory agency finds that the proposed division of land abuts an existing road which has improvements insufficient for the general use of the lot owners in the division of land and local neighborhood and drainage needs, it may disapprove the design of the division unless the subdivider provides improvements or agrees to improve such road in the same standards required of roads within all divisions of land by Chapter 21.32.

b. Will the project result in any hazardous traffic conditions?

Planning's Response – No

LVTC's Comments

It is the opinion of the LVTC that the County's response of "No" is incorrect; this should be a "Yes" disposition.

a. *Bouquet Canyon Road is a winding, scenic rural roadway that is used by daily commuters and weekend pleasure drivers. The proposed Project entrance site on Bouquet Canyon Road is at the two-lane straightaway that currently experiences high rates of speed and dangerous passing. Project residents stopped on Bouquet Canyon Road to turn into the Project, or entering Bouquet Canyon Road from the Project, can create serious hazards for themselves and other motorists. For the safety and welfare of residents and commuters, a comprehensive traffic flow and roadway condition study needs to be done before plot plan can be approved.*

b. *Also, Bouquet Canyon is not considered an "all-weather" roadway and can – and has been closed to traffic for months during repairs after storm events. Preventative measures for debris, water, and mud runoff from the site onto Bouquet Canyon Road need to be provided.*

c. *The Project has only two routes into and out of the site: Bouquet Canyon Road and 87th St West. The 87th Street entrance will be gated and keyed for Project residents only. 87th Street is a 24' street that winds through Leona Valley exiting at 90th and Elizabeth Lake Road. It is the only roadway to service Lost Valley Ranch Road, 87th Street, 86th Street, Vientos, and East Leona Avenue. 90th and Elizabeth Lake Road is the only point at which the entire south side of Leona Valley can exit or enter.*

d. *87th Street West and the eastern section of Leona Avenue are dedicated forty-foot wide streets, however, are improved to a narrower width of 24 to 30 feet in most locations. The Antelope Valley Areawide General Plan allows for paving of 87th Street West to a width of twenty-four feet. Area homeowners should not be required to make widening improvements to the roadway to accommodate this project. Furthermore, topographical features of the right of way may prevent further road improvements. Ingress/egress is clearly inadequate in this location during firestorms. The turn around for fire trucks and equipment is often difficult when multiple engines are on the scene, particularly when residents are evacuating livestock/equine. It is our understanding that the developer has considered some improvements to a small portion of the unpaved Lost Valley Ranch Road. 87th Street West and Leona Avenue have not been planned nor have they been studied for roadway safety, Public Works and Antelope Valley Areawide General Plan compliance, particularly in emergency situations.*

c. Will the project result in parking problems with a subsequent impact on traffic conditions?

Planning's Response – Maybe

LVTC's Comments

Because of the narrow width of the roadway, it is unlikely that parking will be available along 87th Street West.

d. Will inadequate access during an emergency (other than fire hazards) result in problems for emergency vehicles or residents/employees in the area?

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this response. Properties located on 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road have experienced wash outs, large boulders in the roadway, and difficulty negotiating evacuation of family and livestock during firestorm or flooding conditions. Bouquet Canyon Road has a history of failure and cannot withstand a ten-year capital storm. The majority of the residents in Leona Valley exit from 90th Street West at Leona Avenue. Secondary roadways such as these have delayed removal in mudflow and snow conditions. Therefore, traffic increase causing further congestion can result in less than safe conditions. It is recommended that the exit in the area of 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road be removed and relocated.

e. Will the congestion management program (CMP) Transportation Impact Analysis thresholds of 50 peak hour vehicles added by project traffic to a CMP highway system intersection or 150 peak hour trips added by project traffic to a mainline freeway link be exceeded?

Planning's Response – Maybe

LVTC's Comments

Since there will be 121 homes in this project, it is likely that there will be an increase in traffic with the potential of more than 150 peak hour trips.

f. Would the project conflict with adopted policies, plans, or program supporting alternative transportation (e.g., bus, turnouts, bicycle racks)?

Planning's Response – No

LVTC's Comments

None

g. Other factors?

Planning's Response – No input

LVTC's Comments: *Currently under construction and abutting Bouquet Canyon Road, is the City of Palmdale's 7,200-unit housing development, which has ingress/egress access off and onto said roadway via Elizabeth Lake Road. The first release of homes is scheduled for next year. Traffic studies fail to address the change in traffic patterns on Bouquet Canyon Road that these 7,200-units can cause. This roadway has the potential to become a major alternate throughway with direct access to the Santa Clarita Valley including the Valencia Industrial Center, a major employment support for the area. In addition, recent traffic studies in this area fail to address the accidents that occur during snow season. Bouquet Canyon has no CHP/Sheriff support during this time (no CHP/Sheriff in area with four wheel drive) and accidents in this location during snowfall remain unreported. Residents have reported dozens of accidents with cars sliding into ditches on a daily basis during snow season. Traffic studies have not addressed this issue, as they failed to factor in the unique characteristics of this mountain and canyon location.*

LVTC Response to Project Number TR0066952; RENVT200700035
West of & Abutting Bouquet Canyon Road;
Assessor's Parcel Numbers 3206-003-007, & 001 & 008

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Project Design ☐Traffic Report ☐Consultation with Traffic & lighting Division

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **traffic/access** factors?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on traffic/access factors. Ingress and egress at the area of 87th Street West could result in dire consequences during a firestorm or other emergency event. The road is suited for the current population but is not inadequate nor meant to support a large increase in traffic.

Discussion, Traffic/Roadways

Bouquet Canyon Road entrance/exit sites

- *The County of Los Angeles Department of Public Works recently determined that Bouquet Canyon Road is not an "all weather" road. It is subject to failure in a 10-year capital storm. This roadway failed adjacent to the subject site in 2005 and was closed for several months. There were also several failures in the 1980s, 1995 and 1998, indicating that the "primary" access to this site is not secure or safe. As such, 87th Street West, a small rural street will become the primary ingress/egress route.*
- *The access area at Bouquet Canyon Road needs to be widened to accommodate left & right turn lanes.*
- *Driveways into current homes along Bouquet Canyon Road near these sites need to be studied and upgraded for safety purposes due to the increase in traffic and change in traffic patterns and usage in this area.*
- *Cumulative impact on Bouquet Canyon Road – Traffic study needed, including projected traffic impact from approved developments in Palmdale & Lancaster as non-Leona Valley commuters use Bouquet Canyon as an alternative to the (14) Antelope Valley Freeway.*
- *It is not likely that Bouquet Canyon Road would be widened or improved as it winds through Angeles National Forest, parallels a Blue Line creek and is a valuable wetland habitat.*
- *A recent study found the death rate on this particular 7 mile section of Bouquet Canyon Road is already over 1000% higher than the State average for comparable roads.*
- *Bouquet Canyon Road is subject to closure during winter flooding and snow conditions. Snow is not cleared regularly. Ingress/egress will be inadequate during winter storm and firestorm conditions. This can and will result in 87th Street West becoming the primary ingress/egress to and from the site.*

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

87th Street West & Leona Avenue

- *90th Street West (a limited secondary roadway) and Elizabeth Lake Road is the only access into and out of the south side of Leona Valley where ¾ of the population currently reside and where the project plans to use to route their residents out of the development. Particularly when Bouquet Canyon is closed, this intersection is insufficient to handle the additional traffic the project would generate and could present a serious safety issue. There is no other egress for those residents who exit at 90th Street West and Leona Avenue.*
- *The developer has indicated that the primary ingress/egress will be Bouquet Canyon Road. This is unlikely since Leona Valley School is located at the corner of 90th Street West and Leona Avenue, which is the preferred access via 87th Street West. In addition, the commercial district in Leona Valley is located at 90th Street West and Elizabeth Lake Road. The shortest route to this location is via 87th Street West.*
- *87th Street West is a 24' secondary roadway that services the south side residents. There are possibly two parcels that are yet to be developed. Therefore, expansion of these roadways to 40' or more to accommodate the project's commuters, would be unlikely. Furthermore, an expansion of the 87th Street West beyond a paved area of twenty-four feet wide would be in violation of the Antelope Valley Areawide General Plan. The tract map provided to Regional Planning fails to adequately provide a comprehensive overview of the project, its planned access roads, and impact on the community's current traffic system.*

Lost Valley Ranch Road:

- *This is a private non-County maintained one-lane dirt road, which provides access to the homes in this canyon part of Leona Valley. If the developer improves a small portion by the project, what of the remaining segment of road?*
- *Lost Valley Ranch Road is also the location of a blue-line creek with regular flooding and road loss requiring four-wheel drive access during winter conditions. At times, four-wheel drive access is not even possible. The addition of a gated development will put an undue hazard, particularly during firestorm, flood & snow conditions on this difficult access area. Lost Valley Ranch Road has been relocated four times in the last thirty years due to the expansion of the blue line creek. The blue line creek that traverses Lost Valley Ranch Road reaches the subject site and floods properties and the roadway along 86th Street West & 87th Street West. The project design fails to address the uncontrolled stream on Lost Valley Ranch Road.*

Gated Urban Development

- *The project calls for a gated urban development within an established rural community. This is out of character for Leona Valley and segregates a large section of the community within the bounds of the community. Therefore, the Leona Valley Town Council requests that all of the roads in the development be public with access to all members of the community. This will further facilitate better ingress/egress to the south end of Leona Valley during a firestorm, snow storm or flood hazard conditions.*

End of Planning's Page 16

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

SERVICES – 2. Sewage Disposal

a. If served by a community sewage system, could the project create capacity problems at the treatment plant?

Planning's Response – No

LVTC's Comments

There is no sewage treatment plant in this area. The developer may be planning a sewage treatment system specifically on this site.

b. Could the project create capacity problems in the sewer lines serving the project site?

Planning's Response – No

LVTC's Comments

The area is not serviced by public sewers.

c. Other factors?

Planning's Response – No input

LVTC's Comments

Not Applicable

STANDARD CODE REQUIREMENTS

Sanitary Sewers and Industrial Waste – Ordinance No. 6130

Plumbing Code – Ordinance No. 2269

MITIGATION MEASURES **OTHER CONSIDERATIONS**

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **sewage disposal** facilities?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

End of Planning's Page 17

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

SERVICES – 3. Education

a. Could the project create capacity problems at the district level?

Planning's Response – Yes

LVTC's Comments

Leona Valley Elementary School is currently at full capacity and is slated to accept additional students from the City of Palmdale's Ritter Ranch (Sun Cal) up to the 500th home, and will be accepting students from the Ana Verde housing development also in Palmdale. Therefore, this elementary school is beyond capacity without the addition of significant capital improvements. There are an insufficient number of schools in the area to support the population base without the addition of significant infrastructure.

b. Could the project create capacity problems at individual schools that will serve the project site?

Planning's Response – Yes

LVTC's Comments

Leona Valley Elementary School is already at full capacity and cannot accept additional students without substantial expansion of the facility and grounds.

c. Could the project create student transportation problems?

Planning's Response – Yes

LVTC's Comments

LVTC concurs.

d. Could the project create substantial library impacts due to increased population and demand?

Planning's Response – Maybe

LVTC's Comments

LVTC concurs.

e. Other factors?

Planning's Response – No

LVTC's Comments:

There are no plans to build an additional school or expand the existing school in Leona Valley. The District is also at full capacity with 7,200 homes pending at Ritter Ranch and additional homes in Ana Verde. Both projects directly impact the Leona Valley School.

LVTC Response to Project Number TR0066952; RENVT200700035
West of & Abutting Bouquet Canyon Road;
Assessor's Parcel Numbers 3206-003-007, & 001 & 008

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**
Comments: Mitigation through School Fee

☐Site dedication ☐Government Code Section 65995 ☐Library Facilities Mitigation Fee

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **educational** facilities/services?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC Comments: *The Leona Valley Town Council disagrees with the response "less than significant", particularly since the Planning Department has three "yes" answers and one "maybe" that would suggest an immediate and serious problem.*

The community is serviced by one school, which educates kindergarten through eighth grade students. According to the Westside Union School District, Leona Valley School provides education for approximately 161 students and is at full capacity. Leona Valley Elementary is already bound by a pre-existing settlement agreement to accept students from the Ritter Ranch/SunCal development in the Palmdale City limits, up until the 500th home is constructed. In addition, our elementary school will be accepting students on a mandatory basis from the new Ana Verde development. Therefore, our elementary school is beyond full capacity. Mitigation through school fees will not be sufficient to expand the existing elementary school or buy additional school property in the area.

End of Planning's Page 18

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

SERVICES – 4. Fire/Sheriff Services

a. Could the project create staffing or response time problems at the fire station or sheriff's substation serving the project site?

Planning's Response – Maybe

LVTC's Comments

The LVTC disagrees with the response of "Maybe" The nearest staffed fire station is in Quartz Hill, Palmdale and Lake Hughes. Leona Valley Fire Station 140 is a call (volunteer) fire station and staffing is intermittent. There have been fierce firestorms in this area in recent years and a substantial added population will create a tremendous burden on this community that already has limited resources.

A Sheriff's sub-station does not service this location. The property is serviced by the Palmdale Sheriff's station, which is approximately twelve miles from the subject site. The response time has consistently been in excess of thirty minutes to hours based on actual calls to the Bouquet Canyon region. There is one assigned Sheriff in the area, which services the communities of Leona Valley/Bouquet Canyon, Green Valley, Lake Hughes, Elizabeth Lake and Three Points. This means that the police officer that services this area could be as far as twenty miles away in a mountain area.

b. Are there any special fire or law enforcement problems associated with the project or the general area?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this answer. The Leona Valley/Lakes region is generally underserved by law enforcement.

Because this is a Very High Fire Severity Area with only a volunteer fire station and limited reliable water resources, this is considered to be a Potentially significant problem.

c. Other factors?

Planning's Response – No input

***LVTC's Comments**: The County Planning Department indicates the project is 1.25 miles from Fire Station 140, which is accurate. However, this is not a staffed fire station. It is 100% volunteer. The nearest staffed fire station which services Leona Valley is located at 5030 West Avenue L-14, Quartz Hill 93536. This is nine miles from the subject site. The driving route is via Godde Hill Road, a mountainous and winding access.*

☐ **MITIGATION MEASURES** ☐ **OTHER CONSIDERATIONS**

☐ Fire Mitigation Fee

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Planning's Response –

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **fire/sheriff** services?

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Because of the lack of adequate and reliable water supply and because the Leona Valley Fire Station is a 100% volunteer call department with intermittent response to calls in a high fire severity area, we believe this project has a Potentially significant impact until these issues are resolved. The addition of 121 propane tanks in a concentrated area can have an adverse impact during firestorm or earthquake events.

End of Planning's Page 19

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

SERVICES – 5. Utilities/Other Services

a. Is the project site in an area known to have an inadequate public water supply to meet domestic needs or to have an inadequate ground water supply and proposes water wells?

Planning's Response – Maybe

LVTC's Comments

Planning's response is inadequate and should state, "Yes".
According to officials from the California Water Service Company at the August 2004 Leona Valley Town Council meeting, Leona Valley currently has an inadequate water supply to service the needs of the existing population base. The water company specifically stated that the wells in Leona Valley produce only 80 acre feet of water per year, while the community uses approximately 365 acre feet per year. The shortfall is obtained from Antelope Valley East Kern Water Agency (AVEK), which is an interruptible source and has been shut off for days to weeks at a time. AVEK water is agricultural water. It is also interruptible if an inadequate allotment is made to our area by authorities or in the event of an earthquake, accident or unforeseen shutdown.

Yet, California Water Service issued a will-serve letter for the project's additional 121 units. Given the company's earlier dire predictions about water availability for current residents in Leona Valley, the company appears to be contradictory in its estimation of water availability and flawed in its assessment. If the water supply in Leona Valley is inadequate to sustain the current community, how can California Water Service claim to be able to provide for an additional 21% increase in housing units?

The water situation in Leona Valley must undergo a thorough study to determine whether water wells have adequate supply and tanks have adequate storage to ensure that the entire population base (old and new) will have a safe and reliable water supply. Potential negative impact to the nearby well water users (along Bouquet Canyon Road, Lost Valley Ranch Road, Lonesome Valley Road, 86th Street West, 87th Street West, Godde Hill Road, Elizabeth Lake Road and Vientos Drive) also need to be studied and addressed.

When the developer's representative made a presentation to the Leona Valley Town Council, he indicated that the developer was considering the addition of new wells, which may or may not be located in the community, in order to allow construction on this site. If a well is improved and/or constructed outside the boundaries of Leona Valley, it will not serve Leona Valley and will not meet the immediate needs of what California Water Service considers a dire situation.

b. Is the project site in an area known to have an inadequate water supply and/or pressure to meet fire fighting needs?

Planning's Response – Maybe

LVTC's Comments

The Leona Valley Town Council disagrees with the response "maybe". The answer should be "yes". In 1994, there was a fire at the location of 107th Street West at the southwest end of Leona Valley. Shortly after the fire started, the fire hydrants went "dry" and air support was necessary to battle this devastating blaze. This is not because of inadequate water pressure alone, but because the water wells in Leona Valley went dry.

c. Could the project create problems with providing utility services, such as electricity, gas, or propane?

Planning's Response – Maybe

LVTC's Comments

Leona Valley will need an upgrade in infrastructure to support such a large development. Many of the water lines date back to the mid-1940s and there have been breaks in the lines on 87th Street West. Because Leona Valley has the second highest water rate in the State of California and because Leona Valley is responsible for infrastructure improvements of the pipes through rate hikes, a new housing development could result in the need to upgrade this system. This will put an additional financial strain on homeowners who are already suffering from recent exorbitant rate increases.

d. Are there any other known service problem areas (e.g., solid waste)?

Planning's Response – No

LVTC's Comments

Natural disasters have stopped trash haulers and propane deliveries to homes for up to 3 weeks. Fires, ice storms have shut down electricity for up to 1 week. There is a long-range shortage of landfill capacity in the Antelope Valley region.

e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services or facilities (e.g., fire protection, police protection, schools, parks, roads)?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with the response "no". The response should be "yes". There will be significant impacts on the community as a whole, because there will be a substantial increase in the population base with no provisions to update/upgrade or expand the current infrastructure without incurring environmental and cost impacts.

Other factors?

Planning's Response –No

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

LVTC's Comments

Water

- *California Water Service obtains water for Leona Valley from one area well and from the Antelope Valley East Kern Water Agency (AVEK). AVEK water is considered a secondary water source and the developer must provide a primary water source. If on-site wells were used, these wells would draw down water from wells west of site. Water in Leona Valley is not from an aquifer – pockets of water are contained along San Andreas faults & fissures and are subject to cumulative usage, drawdown, and recharge.*
- *The developer indicated that he might install a few wells in the area of the development to service the project. Wells along Lost Valley Ranch Road (contiguous to the development) regularly go dry in the summer and are subject to having water "trucked" to the homes, particularly during draught years. This higher density project will compete with the pre-existing developed sites for water that has already proven insufficient to service the existing population.*
- *In 2004, the AVEK water line to Leona Valley was disrupted for days. This is a secondary water source to the primary California Water Service supply. AVEK has indicated that their supply can stop "at will" and they are not obligated to supply water to Leona Valley. 30% of Leona Valley's water is from local wells (70% from AVEK, which can be stopped at will), which are now inadequate to permanently supply this Valley. Leona Valley has three water wells maintained by California Water Service. One well has high fluoride levels; the second well is dry; and the third well is insufficient to supply our community. The community will be charged for any expansion to the existing water system. Water rates in Leona Valley are currently the second highest in California. An expansion of 121 homes will put an undue stress on an over-taxed water system*
- *As of 2004, Leona Valley used one acre foot of water per day; on average only 80 acre feet is pumped from our active water well, when approximately 365 acre feet are needed to service this community in one year. A further expansion of the population base will have an unmitigatable negative impact to the Leona Valley infrastructure.*
- *Introduction of water to the project for household and landscaping usage, and wastewater from leach fields will impact water quality and quantity. County Department of Health Services and the County Engineer needs to conduct a hydrological study to determine the effects and identify possible mitigation.*
- *Before a tentative tract map and density allowance is determined, water service and resources (absent the assistance and supplement of AVEK) must be proven as there are currently dangerously inadequate water resources in Leona Valley.*

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

STANDARD CODE REQUIREMENTS

☐Plumbing Code – Ordinance No. 2269 ☐Water Code – Ordinance No. 7834

☒**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design

Planning's Response –*California Water Service Company has agreed to provide water services letter dated April 12, 2007. Southern California Edison's letter dated April 16, 2007 indicates that service will be available for project site*

LVTC Comments
(See Services 5, a.)

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **utilities** services?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments

The Leona Valley Town Council disagrees with the Planning Department. We believe the impact of this project is Potentially significant and could produce dire consequences if not rectified prior to approval.

- *Improvements to infrastructure are necessary to the water delivery system, which are passed onto the ratepayers.*
- *Leona Valley has insufficient water to supply the community, except when supplemented by AVEK, an interruptible water source.*
- *Local water wells that supply water to metered customers went dry during the 1994 firestorm.*
- *Bouquet Canyon Road cannot withstand a ten year capital storm as determined by the Department of Public Works*
- *87th Street West & Leona Avenue are narrow streets and are unlikely able to accommodate the additional traffic*
- *Leona Valley Elementary School is at full capacity with pre-existing agreements to take students from Ana Verde and Ritter Ranch (SunCal).*
- *There is no permanently staffed fire station in Leona Valley*
- *Underground utilities are included in the plan and are necessary to protect the view-scape of this scenic location.*

End of Planning's Page 20

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

OTHER FACTORS – 1. General

a. Will the project result in an inefficient use of energy resources?

Planning's Response – No

LVTC's Comments:

The Leona Valley Town Council does not have sufficient information to comment on the energy resources for this project.

b. Will the project result in a major change in the patterns, scale, or character of the general area or community?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this answer. According to Dataquick, as of July 2007 there are 520 single-family homes in Leona Valley, all of custom construction. There are no subdivisions within the bounds of this Valley. The estimated population of this rural community is 1,846 residents. With an average household containing 3.18 residents, the proposed project will result in a population increase of over 20% to our Valley.

A number of factors in the Leona Valley area suggest that it would be desirable to limit development to mimic the present low-density character of the area. Not only is low density an important element of the visual environment, and thus of community identity, but it is also essential in preserving the present lifestyle of Leona Valley residents. It is also instructed by the Antelope Valley Areawide General Plan for a development to mimic the character, density and identity of a non-urban community. In addition, natural features of the area indicate that maintenance of the existing density character would be in the best interest of public health and safety.

- *Agricultural & equestrian oriented*
- *The pattern of land development and parcel sizes in Leona Valley as generally followed the land use and zoning plans established in 1960.*
- *Individual quality custom homes sited in harmony with natural land formations and contours*
- *Antelope Valley Areawide General Plan identifies Leona Valley as a low density, designated rural community*
- *Community Standards District exists to preserve and promote current community rural character and opportunities*

Tract 066952

- *Urban tract development*
- *Gated community (a separate community within a community)*
- *Homeowners Association*

- *Urban amenities required*

Conflicts
Target market – urban homeowners

- *Require urban infrastructure and amenities not required or desired in Leona Valley*
- *Culture conflict between urban and rural lifestyles*
- *Leona Valley promotes and provides opportunities for raising & keeping of livestock and equine and agricultural endeavors, i.e., U-Pick fruit orchards, vineyards, and lilac production.*
- *Leona Valley historically is a cohesive community of like lifestyles that are non-urban & agriculture-oriented. Insertion of a gated urban development with it's own Covenants, Codes & Restrictions (CC & R's), Homeowner Association, and urban demands for expanded infrastructure is not compatible with the current community*
- *Growth in Leona Valley is generally 2 to 3 new homes a year and of an in-fill nature, has been easily assimilated into the community and the County's ability to adequately support. Assuming all 121 tract homes would sell, it would suddenly increase Leona Valley's population by over 20% and overburden its current ability to support.*

The policies pertaining to designated rural communities as contained in the Antelope Valley Areawide General Plan (page IV-13) specifically states,

> *"Where further development does occur, it should be of an "in fill" nature, consistent with the existing community character and service levels, and in no event should exceed the densities specified on the Antelope Valley Wide General Plan Land Use Policy Map."*

The Project is in conflict with the density of the existing homes and development in Leona Valley. Furthermore, it will put an undue burden on the school, water resources, police/fire support and other infrastructure of this rural community.

The following is an aerial photograph of the proposed urban development in contrast to the highest density area of Leona Valley. The highest density area of Leona Valley contains approximately one home per 4.68-acres. The proposed urban development has nearly double the density, even though it is in a hillside management area.

LVTC Response to Project Number TR0066952; RENVT200700035
West of & Abutting Bouquet Canyon Road;
Assessor's Parcel Numbers 3206-003-007, & 001 & 008

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

c. Will the project result in a significant reduction in the amount of agricultural land?

Planning's Response – Yes

LVTC's Comments

The project will result in a significant reduction of agricultural land. Because of the very small building pad sizes (10,000-31,000 square feet), the likely buyers in this urban development will not have sufficient space to support the continued trend of expanding the agricultural identity of this rural community.

d. Other factors?

Planning's Response – No

LVTC's Comments

Hillside Management

According to the Antelope Valley Areawide General Plan, the Hillside Management Area Policy is designed to protect the health and safety of the public from hazards typically associated with hillside areas and to preserve natural resources and scenic values commonly occurring in these environs. Wildfires, floods, mudslides, erosion and landslides are typical hazards confronting hillside properties. Leona Valley is a Class IV Fire Hazard area and is subject to regular firestorm activity. In addition, the area is subject to flooding, mudflow, erosion and high ground water conditions. The plan as proposed does not appear to be in compliance with the Hillside Management ordinance for the Antelope Valley Areawide General Plan based on the non-urban designation. The project's plot plan fails to indicate what portions of the sites are dedicated to "open space" or "conservation" easements, thereby indicating a larger than actual total land area for each site. The effective lot size (net of restricted areas) of each parcel is reflected by the building pad sizes, which vary from 10,000 to 31,000-square feet. Therefore, it does appear that most of the sites are sub-standard in comparison to the County of Los Angeles Hillside Ordinance for Non-Urban areas. In addition, properties in the Leona Valley Community Standards District have a minimum lot size requirement of 2½ acres, assuming no undue restrictions exist such as slope, hazards, conservation considerations or biotic resources.

Plotting Density & Impacts

Plotting density for an urban housing tract on vacant land that contains 25 – 50% slope inclines is premature without first conducting thorough applicable studies.

Factors impacting this property:

1. *San Andreas Rift Zone*
2. *High Fire Severity Hazard Zone*
3. *Abuts and contributes to Blue line creek*
4. *Wildlife corridor and habitat*

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

5. *Likely archaeological site*
6. *Floodwater and debris drainage course*
7. *Contributes to water table which feeds wells for Leona Valley's primary source of water*
8. *Roadways undersized to safely and efficiently handle increase in traffic*
9. *Slope instability after 50% of site is graded and natural landforms altered*
10. *LA County's Hillside Management ordinance*
11. *Identification of property in Significant Ecological Area*
12. *Leona Valley Community Standards District*
13. *No urban infrastructure to support this urban housing development*

Therefore:

Footprint for lots needs to be selected on an individual basis AFTER the above results are completed and applied. While one County code may allow for building of X number of units per acre, any one of the above factors may negate that feasibility. It would be more efficient and result in a far better project, if the above factors are first addressed and then, based on those results, the plot plan is developed.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

STANDARD CODE REQUIREMENTS

State Administrative Code, Title 24, Part 5, T-20 (Energy Conservation)

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

☐Lot Size ☐Project Design ☐Compatible Use

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to any of the above factors?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments

The Leona Valley Town Council disagrees with the Planning Department's assessment that this project will have a less than significant impact. We believe the population increase, combined with the change in character of the community will cumulatively have a major impact on Leona Valley as a whole. We believe the Hillside Management Ordinance has been misapplied. Contrary to the requirement of the Antelope Valley Areawide General Plan for rural communities, this urban development is not "in-fill" in nature. The type of sites, the small building pads and the gated orientation isolate this project in terms of character in contrast to the rest of Leona Valley.

Leona Valley is a unique rural residential area located on the north-facing slope of the Angeles National Forest and is comprised of ranches, cherry orchards, pear and apple farms, lilac production, as well as vineyards. Its topography is level to rolling and land elevations generally range from 3,200 to 3,600 feet. Leona Valley is dedicated to the expansion of farming and equestrian uses in accordance with the Antelope Valley Areawide General Plan, which establishes agricultural activities as a priority land use over adjacent, potentially incompatible development, discouraging the conversion of agricultural land to other uses. This urban development, in its current form, is incompatible with the community.

Previously Stated Conflicts

Target market – urban homeowners

- *Require urban infrastructure and amenities not required or desired in Leona Valley*
- *Culture conflict between urban and non-urban lifestyles*
- *Leona Valley promotes and provides opportunities for raising & keeping of livestock and equine and agricultural endeavors, i.e., U-Pick fruit orchards, vineyards, and lilac production.*

- *Leona Valley historically is a cohesive community of like lifestyles that are non-urban & agriculture-oriented. Insertion of a gated urban development with it's own Covenants, Codes & Restrictions (CC & R's), Homeowner Association, and urban demands for expanded infrastructure is not compatible with the current community*
- *Growth in Leona Valley is generally 2 to 3 new homes a year and of an in-fill nature, has been easily assimilated into the community and the County's ability to adequately support. Assuming all 121 tract homes would sell, it would suddenly increase Leona Valley's population by over 20% and overburden its current ability to support.*

The Leona Valley Improvement Association (LVIA) has served the community since the 1940s. LVIA's Community Center, includes the community building, a horse arena, and the Leona Heritage Park. All community events are held here – meetings, BBQ's, and socials. LVIA publishes the town newsletter, sponsors the Community Queen contest and stages an annual Cherry Parade. The addition of a private urban homeowner's association within such a small community will negate the value and authority of LVIA and set the two associations at odds with each other since both have such greatly differing viewpoints and goals for the community.

The Antelope Valley Areawide General Plan has specific provisions for Non-Urban Residential Developments exceeding one dwelling unit per five acres. As identified on page V1-25 of said plan, the project can be approved to substantial compliance subject to the following conditions:

(a) *The proposed development will not adversely affect local environmental quality or degrade significant natural resources such as sensitive habitat areas, riparian woodlands and scenic vistas.* ***LVTC: Leona Valley is part of a Significant Ecological Area and is known for its riparian location, scenic vistas and diverse habitat.***

(b) *The proposed use will not be detrimental to public health and safety because of hazardous or special conditions.* ***LVTC: The proposed use will be detrimental to the public health and safety due to inadequate water resources in this high fire severity location.***

(c) *The proposed use will not substantially contribute to the deterioration of air or water quality.* ***LVTC: Leona Valley already has a proven shortage of water and the water resources are insufficient to support the existing population base.***

(d) *The proposed use, individually or in combination with other existing and proposed use patterns, will not require extension of urban services and facilities.* ***LVTC: The development proposes an urban type gated subdivision. The density of the development is in conflict with the surrounding area.***

(e) *The proposed use is conveniently accessible by paved road, and will not individually or in combination with other existing and proposed use patterns, overburden existing non-urban roadways.* ***LVTC: According to the Antelope Valley Areawide General Plan, secondary roads such as 87th Street West are to be developed to 24 feet in width, in compliance with a non-urban roadway standard. Bouquet Canyon Road cannot withstand a ten-year capital storm. The introduction of 121 homes will overburden the existing non-urban roadways, particularly, the eastern section of Leona Avenue, 90th Street West and 87th Street West.***

(f) *The proposed use is served by water supplies and distribution facilities of sufficient capacity to meet anticipated domestic and fire protection needs.* ***LVTC: The water supply in Leona Valley is insufficient in capacity to meet domestic and fire protection needs, without the introduction of a new subdivision. The proposed use is compatible with the character of the surrounding development patterns. LVTC: The proposed subdivision is out of character with the surrounding development patterns and community character. Development in Leona Valley has been historically just a few homes a year. There has never been a subdivision in the boundaries of Leona Valley. The proposed development is comprised of tract homes in a subdivision. The existing layout of Leona Valley is consistent with a rural community in which no two homes are alike. The residential set back for the existing homes in Leona Valley are significant. Valley Vineyards tract map indicates homes are far closer than what currently exists in this community. The existing layout of the Valley accommodates the raising of farm animals. The proposed urban subdivision, due to hillside management and clustering applications will not accommodate this type of use and has small building pad sizes, which vary from 10,000 to 31,000-square feet. This is inconsistent with surrounding development patterns. The typical lot size of developed residences within the APN 3206 (which surround this development) is over 4½ acres with blended uses dedicated to a variety of agricultural and equestrian activities. The development in its current configuration is gated and caters to an urban type occupant while Leona Valley is culturally a rural and cohesive community. The gated urban development is isolated from the rest of Leona Valley and creates a sub-community within a community. Based on these factors, we believe the proposed development is not compatible in character to the surrounding development patterns of the community.***

End of Planning's Page 21

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

OTHER FACTORS – 2. Environmental Safety

a. Are any hazardous materials used, transported, produced, handled, or stored on-site?

Planning's Response – No

LVTC's Comments, None

b. Are any pressurized tanks to be used or any hazardous wastes stored on-site?

Planning's Response – No

LVTC's Comments

The project calls for the use of propane tanks. There were be 121 pressurized propane tanks on this site. Therefore, the Planning Department response is in error.

c. Are any residential units, schools, or hospitals located within 500 feet and potentially adversely affected?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council Agrees with this response.

d. Have there been previous uses that indicate residual soil toxicity of the site or is the site located within two miles downstream of a known groundwater contamination source within the same watershed?

Planning's Response – No

LVTC's Comments

We are unaware of ground water contamination. The Department of Fish and Game has been actively protecting the sensitive eco system related to the Bouquet Canyon Creek, which crosses this site.

e. Would the project create a significant hazard to the public or the environment involving the accidental release of hazardous materials into the environment?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council agrees with this answer.

f. Would the project emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council agrees with this answer.

g. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council agrees with this answer.

h. Would the project result in a safety hazard for people in a project area located within an airport land use plan, within two miles of a public or public use airport, or within the vicinity of a private airstrip?

Planning's Response – No input

LVTC's Comments

The Leona Valley Town Council agrees with this answer.

i. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this answer. There is a potential to block traffic on 87th Street West due to the excessive influx of traffic from the development.

j. Other factors?

Planning's Response – No

MITIGATION MEASURES ☒**OTHER CONSIDERATIONS**

☐Toxic Clean-up Plan

Planning's Response – *None*

CONCLUSION

Considering the above information, could the project have a significant impact relative to **public safety**.

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments: None.

End of Planning's Page 22

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

OTHER FACTORS – 3. Land Use

a. Can the project be found to be inconsistent with the plan designation(s) of the subject property?

Planning's Response – No

***LVTC Comments**: The Leona Valley Town Council disagrees with the Planning Departments Response. Its primary purpose is to segregate uses that are thought to be incompatible; in practice, zoning is used as a permitting system to prevent new development from harming existing residents or businesses. Zoning is commonly controlled by local governments such as counties or municipalities.*

Zoning commonly includes regulation of the kinds of activities which will be acceptable on particular lots (such as open space, residential, agricultural, commercial or industrial), the densities at which those activities can be performed (from low-density housing such as single family homes to high-density such as high-rise apartment buildings), the height of buildings, the amount of space structures may occupy, the location of a building on the lot (setbacks), the proportions of the types of space on a lot (for example, how much landscaped space and how much paved space), and how much parking must be provided.

The policies pertaining to designated rural communities as contained in the Antelope Valley Areawide General Plan (page IV-13) specifically states,

> *"Where further development does occur, it should be of an "in fill" nature, consistent with the existing community character and service levels, and in no event should exceed the densities specified on the Antelope Valley Areawide General Plan Land Use Policy Map."*

The project is in conflict with the density of the existing homes and development in Leona Valley. Furthermore, it will put an undue burden on the school, water resources, police/fire support and other infrastructure of this rural community.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Hillside Management

According to the Antelope Valley Areawide General Plan, the Hillside Management Area Policy is designed to protect the health and safety of the public from hazards typically associated with hillside areas and to preserve natural resources and scenic values commonly occurring in these environs. Wildfires, floods, mudslides, erosion and landslides are typical hazards confronting hillside properties. Leona Valley is a Class IV Fire Hazard area and is subject to regular firestorm activity. In addition, the area is subject to flooding, mudflow, erosion and high ground water conditions. The plan as proposed does not appear to be in compliance with the Hillside Management ordinance for the Antelope Valley Areawide General Plan based on the non-urban designation. The plot plan fails to indicate what portions of the sites are dedicated to "open space" or "conservation" easements, thereby indicating a larger than actual total land area for each site. The effective lot size (net of restricted areas) of each parcel is not indicated. Therefore, it does appear that most of the sites are sub-standard in comparison the County of Los Angeles Hillside Ordinance for Non-Urban areas. In addition, properties in the Leona Valley Community Standards District have a minimum lot size requirement of 2½ acres, assuming no undue restrictions such as slope, conservation considerations or biotic resources.

The Calculation of Thresholds in Non-urban Hillside Management Areas.

Builder's Density Calculation:

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY	Minimum Or Natural Area Required
0-25% 133.2 Acres	0.5 DU/AC*** 66.6	0.5/DU/AC*** 66.6	---- (?)
25-50% 143.2 Acres	1 DU/10 AC 14.3	1 DU/2 AC 71.6	70%
50% 16 Acres	N/A ----	1 DU/20 AC 0.8 AC	70%
Totals:	80.9, SAY 80 DU	139.0, SAY 139	

****Exceeds Maximum Density in Land Use Classification;*

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Calculation Based Upon County of Los Angeles General Plan, Hillside Management Draft

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY	Minimum Or Natural Area Required
0-25% 133.2 Acres	----	1/DU/1 AC*** 133	70%
25-50% 143.2 Acres	----	1 DU/10 AC 14	70%
50% 16 Acres	----	1 DU/20 AC --	70%
Totals:		146/DU	
High Fire Severity Zone	Discount by 25%	110/DU	
Seismic Hazard as Per USGS**	Discount by 25%	73 DU	

*Plan Requires Rounding Down to the Nearest Whole Number
**Major Earthquake Shaking Potential, San Andreas/Leona Valley Rift Zone; Liquefaction Zone;
***Exceeds Land Use Classification

Calculation Based Upon County of Los Angeles General Plan, Hillside Management Significant Ecological Area

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY*	Minimum Or Natural Area Required
0-25% 133.2 Acres	1 DU/5 AC 26.64	1 DU/2.5 AC 53.28	70%
25-50% 143.2 Acres	1 DU/10 AC 14.3	1 DU/2.5 AC 57.28	70%
50% 16 Acres	1 DU/20 AC .80	1 DU/20 AC .80	70%
Totals:	41.74	107.36	

*As per Community Plan

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Clustering, Page VI-2, Antelope Valley Areawide General Plan
The developer has indicated that the clustering rule applies to this development. Page V1-2 indicates that densities in the Antelope Valley should be considered "average" densities for the total proposed development to promote clustering. Clustering is defined as a rearrangement of units allowed within a single land use classification on a project site. When this option is utilized, the open space should be classified by the County as non-buildable area. This classification has not yet been applied. Furthermore, 70% of the project is its entirety is required for open space or natural area, which has not been applied to this development, even though the clustering rule has been applied. The open space or natural area if calculated at 70% of the total gross land area is 204.68 acres, leaving 87.72 acres for residential development with clustering up to 1.5 acres of land. This will allow for fifty-eight single-family residences with the application of the clustering rule on the entire development. A suitable open space maintenance agreement shall be required for the life of the development.

Conditional Use Permit in Hillside Management & SEA's *in Non-Urban Hillside Management Areas, with residential uses exceeding the low-density threshold.*

Plotting Density & Impacts
Plotting density for an urban housing tract on vacant land that contains 25 – 50% slope inclines is premature without first conducting thorough applicable studies.

Factors impacting this property:

1.) San Andreas Rift Zone
2.) High Fire Severity Hazard Zone
3.) Abuts and contributes to Blue line creek
4.) Wildlife corridor and habitat
5.) Likely archaeological site
6.) Floodwater and debris drainage course
7.) Contributes to water table which feeds wells for Leona Valley's primary source of water
8.) Roadways undersized to safely and efficiently handle increase in traffic
9.) Slope instability after 50% of site is graded and natural landforms altered
10.) LA County's Hillside Management ordinance
11.) Identification of property in Significant Ecological Area
12.) Leona Valley Community Standards District
13.) No urban infrastructure to support this urban housing development

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

Therefore:

Footprint for lots needs to be selected on an individual basis AFTER the above results are completed and applied. While one County code may allow for building of X number of units per acre, any one of the above factors may negate that feasibility. It would be more efficient and result in a far better project, if the above factors are first addressed and then, based on those results, the plot plan is developed. Many of the guidelines in the Antelope Valley Areawide General Plan and the Hillside Management Ordinance are open for interpretation and as such, require more intensive study by a neutral experienced party.

b. Can the project be found to be inconsistent with the zoning designation of the subject property?

Planning's Response – No

LVTC's Comments

Based upon the above analysis, the project is found to be inconsistent with the zoning designation as well as the policy of the Antelope Valley Areawide General Plan to permit developments of an "infill" nature within a rural community.

c. Can the project be found to be inconsistent with the following applicable land use criteria:

Planning's Response – No

LVTC's Comments

Yes.

Hillside Management Criteria?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with the Planning Department's Response.

SEA Conformance Criteria?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with the Planning Department's Response. While the mapping program for the County of Los Angeles does not indicate the property is located in a Significant Ecological Area, this is contrary to the Antelope Valley Areawide General Plan.

Other?

Planning's Response – No input

LVTC's Comments

Reserved.

d. Would the project physically divide an established community?

Planning's Response – No

LVTC's Comments

The Leona Valley Town Council disagrees with this response. The developer plans on gating this urban development at ingress/egress points and establish a homeowners association specifically for that project's inhabitants. There are no other gated housing developments in Leona Valley. This development will isolate itself from the rest of the community.

e. Other factors?

Planning's Response – No input

LVTC's Comments: *The Leona Valley Town Council believes that the clustering rule has been misapplied; and that the standards of the Leona Valley Community Standards District and the area specific restrictions by the Antelope Valley Areawide General Plan has not been applied.*

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **land use** factors?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

LVTC's Comments: *The Leona Valley Town Council disagrees with this response. Because this project will represent a 20% increase in population; and because we believe the planning and zoning codes have not been properly applied, we propose that a density analysis be conducted independently (not by the developer or the developer consultant) with a density determination completed after an environmental impact report is completed. The density analysis shall include the standards of the Antelope Valley Areawide General Plan, the County of Los Angeles Hillside Management Ordinance (including the Draft interpretation) in conjunction with the Leona Valley Community Standards District. Considering the bio-diversity of this location, the calculations made must consider the area resources and must not put the existing population at risk.*

End of Planning's Page 23

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

OTHER FACTORS – 4. Population/Housing/Employment/Recreation

a. Could the project cumulatively exceed official regional or local population projections?

Planning's Response – No

LVTC's Comments

Yes. Leona Valley has had very little population growth over the last two decades. The current population is just over 1,800 residents based on 3.18 persons per household. With the addition of 121 homes (121 x 3.18=373/projected increase) there is a projected population increase of over 20%. This far exceeds any increase in population for Leona Valley in decades.

b. Could the project induce substantial direct or indirect growth in an area (e.g., through projects in an undeveloped area or extension of major infrastructure)/

Planning's Response – No

LVTC's Comments:

The Leona Valley Town Council disagrees with this response. There will be a dramatic increase in population, which will require an extension of major infrastructure, as it currently does not exist in this community.

c. Could the project displace existing housing, especially affordable housing?

Planning's Response – No

LVTC's Comments

No.

d. Could the project result in substantial job/housing imbalance or substantial increase in Vehicle Miles Traveled (VMT)?

Planning's Response – Maybe

LVTC's Comments

A large portion of the population of the Antelope Valley is a commuter population. This urban development could result in an increase of commuters to relocate to this area.

e. Could the project require new or expanded recreational facilities for future residents?

Planning's Response – Maybe

LVTC's Comments

There are currently no County parks or municipal recreation services in Leona Valley. New recreational facilities would likely be required as part of an urban amenity.

f. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Planning's Response – No

***LVTC's Comments**: No.*

g. Other factors?

Planning's Response – No

LVTC's Comments: *Leona Valley lacks the infrastructure to support an urban development. There are no parks, libraries or other infrastructure to support this type of development.*

☐**MITIGATION MEASURES** ☐**OTHER CONSIDERATIONS**

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **population, housing, employment,** or **recreational** factors?

☐Potentially significant ☐Less than significant with project mitigation ☒Less than significant/No impact

Leona Valley Town Council: *Disagrees with the assessment "less than significant". We believe that an increase in population of over 20% represents significant impact on the community.*

End of Planning's Page 24

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

MANDATORY FINDINGS OF SIGNIFICANCE

Based on this Initial Study, the following findings are made:

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plan or animal, or eliminate important examples of the major periods of California history or prehistory?

Planning's Response – Maybe, *site has potential to support both raptor and songbird nest.*

LVTC's Comments: *There are numerous threatened, endangered and species of interest located in Leona Valley. A summary is as follows:*

- *Mojave Ground Squirrel (threatened)*
- *The Unarmored Threespine Stickleback Fish (endangered)*
- *Red Legged Frog (endangered)*
- *Least Bell's Vireo (endangered, limited to region)*
- *Kangaroo Rat (endangered)*
- *Southwest Willow Flycatcher (endangered)*
- *Tri-Colored Blackbird (species of interest)*
- *Long Billed Curlew (highly imperiled)*
- *California Horned Lizard*
- *California Spotted Owl (species of interest)*
- *Desert Tortoise (endangered)*
- *Golden Eagle (nesting region)*
- *Southwestern Pond Turtle (threatened)*
- *Burrowing Owl (threatened)*

The significant ecological area that is part of the overlay for Leona Valley states there are specific State and Federally endangered or threatened species that are indigenous to this area including rare vascular plants as well as sensitive bird and reptile species. According to the proposed SEA, these communities include: Joshua tree woodland, valley oak woodland, native grassland, wildflower field southern cottonwood-willow riparian forest, freshwater marsh, alkali marsh, alluvial wash and southern willow scrub. The Draft General Plan reports sensitive species to include, but are not limited to: Nevin's barberry, short-joint beavertail, Pierson's morning glory, alkali mariposa lily, California red legged frog, southwestern pond turtle, California horned lizard, coast patch-nosed snake, two-striped garter snake, Merlin, prairie falcon, mountain plover, burrowing owl, California spotted owl, southwestern willow flycatcher, California Condor, Mojave ground squirrel, and the southern Grasshopper mouse.

While nearly all of the species identified by the Draft plan have been known to be located in this community and live on or around the subject site, the California condor that resided in Leona Valley has been captured and relocated out of the area.

b. Does the project have possible environmental effects that are individually limited but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Planning's Response – No

LVTC's Comments: *There are no other urban subdivisions in Leona Valley. The low-density non-urban nature of this community has created an environment where wildlife and residents generally live in harmony. This includes open fencing, large pasture areas and the expansion of agricultural farming in the community. The proposed development is to be gated and is of much higher density than the remainder of Leona Valley, which will have an adverse impact on the wildlife that share this region.*

In peak years, Leona Valley has never had the construction of more than six homes in one year. The introduction of 121 homes with a 20% grown to the population base, will put an undue stress on the infrastructure of the community. There have been no past projects of this scale in Leona Valley.

c. Will the environmental effects of the project cause substantial adverse effects on human beings, either directly or indirectly?

Planning's Response – No

LVTC's Comments
The Planning Department has indicated "Yes" and "Maybe" responses in Hazard – 1. Geotechnical, 2. Flood, 3. Fire. 4. Resources. 5 Agricultural. 6 Education. The LVTC finds it unreasonable that this item would be "Maybe" with so many "Yes" and "Maybe" responses from the County. This item should be "Yes".

There are significant issues pertaining to geology, flood, fire protection and water quality. There is a pre-existing insufficient water supply in Leona Valley and the additional metering of 121 homes could result in severe shortages, the necessity to truck in water (contrary to the County requirements) and could result in losses of lives and property during firestorm events.

If the developer were to add additional wells in this community, the proposed extraction may be excessive and could harm the water supply of family farms and private residences that are already on water wells in the same community. There is inadequate fire protection.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the environment?

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

LVTC's Comments

Based on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on the environment.

Because the United States Forest Service and the Department of Fish and Game have made an aggressive effort to protect the Bouquet Canyon Creek and Lost Valley Ranch Creek, then there is clearly a Potentially significant impact if these agencies have deemed the creeks to be sensitive and worth protecting. Property owners on Bouquet Canyon Road, 86th Street West and 87th Street West have been restricted from clearing their sites of mudflow and debris, even to provide safe access, because of the environmental sensitivity of this creek and known endangered species that occupy this location.

The site is comprised primarily of a foraging range of native grassland with a nearby water source offering excellent interconnectivity of all of the species that inhabit this biologically diverse region. The site and Leona Valley are a major wildlife linkage to the Ritter Ridge (held by the Santa Monica Mountains Conservancy), the Angeles National Forest and the Sierra Pelonas.

Leona Valley has a severe water shortage with little possibility of correction in the near future. While steps are being taken by the Town Council to help correct this situation, it will be many years before any plans are funded or implemented, if ever. The addition of 121 single-family residences in a community that is short approximately 285 acre feet of water per year can be devastating, particularly during draught conditions. The approval of such a large urban development under these circumstances because of the purveyor's premature and unsubstantiated issuance of a "will serve" letter will put the community at significant risk.

End of Planning's Page 25

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

GENERAL ASSUMPTIONS AND LIMITING CONDITIONS

The Leona Valley Town Council, its community committee and volunteers have prepared a response to the Initial Study and Impact Analysis Matrix by the County of Los Angeles Department of Regional Planning Project Number TR0066952; RENVT200700035 also known as Assessor's Parcel Numbers 3206-003-007, & 001 & 008. This response, and its precursor document, the April 16, 2007 letter issued to the County of Los Angeles Department of Regional Planning, is subject to the following general assumptions and limiting conditions:

Care has been taken to obtain all information from reliable sources. The authors cannot guarantee or be responsible for the accuracy of this information.

That maps, photographs and exhibits included herein are for illustration only as an aid in visualizing matters discussed within the response. They should not be considered as surveys or relied upon for any other purpose, nor should they be removed from, reproduced or used apart from this response.

That no opinion is expressed as to the impact, if any, of subsurface oil, gas or mineral rights or whether the property is subject to surface entry for the exploration or removal of such materials except as is expressly stated. That no opinion is intended to be expressed for matters that require legal expertise or specialized investigation or knowledge.

That the Leona Valley Town Council, its volunteers and Development Committee assumes that there are no hidden or unapparent conditions of the property, subsoil or structures. We assume no responsibility for such conditions, or for engineering, which might be required to discover such factors.

The Americans with Disabilities Act ("ADA") became effective January 26, 1992. We have not made a specific compliance survey and analysis of this property to determine whether or not it is in conformity with the various detailed requirements of the ADA. It is possible that a compliance survey of the property/project, together with a detailed analysis of the requirements of the ADA, could reveal that the property is not in compliance with one or more of the requirements of the Act.

Possession of this response thereof does not imply right of publication, not use for any purpose by any other than the person to whom it is addressed, without the written consent of the authors.

No part of this response is to be used in any other context except in the response itself.

The writers of this response have no specialized expertise in the fields of biology, geology, drainage, environmental impact, land use planning, zoning, roadways, trends, populations studies, hydrology, archeology or other elements related to this project. We have relied upon private and outside technical reports and studies related to these issues and assume said reports are accurate and reliable. Because of the significant impact on the community and because of the specific lack of professional expertise in these areas, and because of the public's concern over the impact of this project, it is requested that the associated recommended studies, including an environmental impact report, be completed for the purpose of this project.

LVTC Response to Project Number TR0066952; RENVT200700035 West of & Abutting Bouquet Canyon Road; Assessor's Parcel Numbers 3206-003-007, & 001 & 008

EXHIBIT LIST

1. Leona Valley Species & Wildlife Corridor
2. Leona Valley High Fire Severity Zone
3. Leona Valley Flood & Road Hazard Conditions

SUPPORTING DOCUMENTATION

1. County of Los Angeles Department of Public Works Storm Report January 11, 2005
2. County of Los Angeles Department of Public Works Storm Recovery Report February 24, 2005
3. County of Los Angeles Department of Public Works Recovery Report Status Update March 7, 2005
4. Bouquet Canyon Fault
5. Earthquake Shaking Severity Map
6. Fault Rupture Hazard Zones in California
7. Sleepy Valley Quadrangle
8. San Andreas Rift Zone
9. Excerpt, California Fault, Thurston Clark ©1996
10. Minutes to Special Town Meeting on Water Shortage, August 11, 2004
11. R.W. Robinson, Cultural Resource Investigation (Leona Valley), December 11, 1989
12. Automobile Club of Southern California Bouquet Canyon Circa 1920 Road Map
13. Palmdale Planning Department, Bouquet Canyon Scenic Roadway
14. Antelope Valley Area Wide Plan
15. County of Los Angeles Hillside Ordinance Draft
16. Biological Resources Assessment, Newhall Water District (Santa Clara River Project)
17. U.C. Santa Barbara, Prioritizing Sites Along the Santa Clara River for Conservation of Threatened & Endangered Species
18. The Status & Distribution of Unarmored Threespine Stickleback Fish in the Angeles National Forest
19. Parasite Analysis of Native & Non-Native Fish in the Angeles National Forest
20. West Mojave Habitat
21. Vermillion Flycatcher
22. State of California Department of Fish & Game, Distribution, Reproductive Success and Impact of Nest Parasitism of Brown Headed Cowbirds on Least Bell's Vireos
23. Critical Habitat Units for the California Red-Legged Frog
24. Red Legged Frog Territory Map
25. Bureau of Land Management, West Mojave Reptiles, Amphibians & Fish
26. Bureau of Land Management, West Mojave Birds
27. Bureau of Land Management, West Mojave Mammals
28. Bureau of Land Management, West Mojave Plants
29. Lauren Development (re: subject site) Response to the Antelope Pardee Transmission Lines
30. Santa Clarita Signal Newspaper, Indians in Leona Valley
31. Santa Clara Watershed, Description
32. Santa Clara Watershed, Birds
33. Santa Clara Watershed, Habitat
34. Bureau of Land Management, Sierra Pelona

(12)

April 16, 2007

Jodie Sackett
Land Division Section
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

RECEIVED
APR 19 2007

Re: PROPOSED TENTATIVE TRACT MAP NO. 066852

Dear Mr. Sackett:

During our April 9, 2007 Leona Valley Town Council meeting, John Allday, Vice President of Lauren Development, Incorporation made a presentation to the our citizens on the proposed Valley Vineyards project, which is to be located one mile south of Elizabeth Lake Road and west of Bouquet Canyon Road. A copy of the meeting minutes is attached herein.

Leona Valley is a unique rural residential area located on the north-facing slope of the Angeles National Forest and is comprised of ranches, cherry orchards, pear and apple farms, lilac production, as well as vineyards. Its topography is level to rolling and land elevations generally range from 3,200 to 3,600 feet. Leona Valley is dedicated to the expansion of farming and equestrian uses in accordance with the Antelope Valley Area Wide Plan, which establishes agricultural activities as a priority land use over adjacent, potentially incompatible development, discouraging the conversion of agricultural land to other uses.

According to Dataquick, as of April 2007 there are 520 single-family homes in Leona Valley, all of custom construction. There are no subdivisions within the bounds of this Valley. The estimated population of this rural community is 1,800 residents. With an average household containing 3.18 residents, the proposed project will result in a population increase of over 21% to our Valley.

The community is serviced by one school, which educates kindergarten through eighth grade students. According to the Westside Union School District, Leona Valley School provides education for approximately 161 students and is at full capacity.

Members of the community voiced serious concerns over this project. Primary concerns included, but were not limited to the following:

- Higher density/incompatible land use
- Adverse Impact on Leona Valley School
- Inadequate ingress/egress & traffic
- Fire Safety/Fire Department Volunteer Only
- Water service/pre-existing lack of water resources

- Does not match the character of Leona Valley
- Community is against gated developments
- Impact on natural resources
- Septic system/contamination of ground water/waste treatment
- Disruption of fire access
- Excessive population increase
- Lack of equestrian access/uses (dedicated/deed restricted)
- Wetlands protection
- Bouquet Canyon is not an "all weather" road. Subject to failure in 10-year capital storm;
- No dirt access for horses (horses cannot walk on asphalt)

The following pages will address the citizens concerns. This should give you insight on our rural environment and hopefully will provide you with adequate information to ask the appropriate questions when you meet with the developer. Because our Valley is unique to the County of Los Angeles, I would like to extend an invitation for you to visit Leona Valley so that you can understand the need to protect this wonderful rural community.

Respectfully,

Richard Thomas,
President
Leona Valley Town Council

CC: Norman Hickling, Deputy to Supervisor Michael D. Antonovich

PROJECT INCOMPATIBLE WITH CURRENT CHARACTER OF LEONA VALLEY

A number of factors in the Leona Valley area suggest that it would be desirable to limit future development and maintain the present low-density character of the area. Not only is low density an important element of the visual environment, and thus of community identity, but it is also essential in preserving the present lifestyle of Leona Valley residents. In addition, natural features of the area indicate that maintenance of the existing density character would be in the best interest of public health and safety.

- Agricultural & equestrian oriented
- The pattern of land development and parcel sizes in Leona Valley as generally followed the land use and zoning plans established in 1960.
- Individual quality custom homes
- Antelope Valley Area-wide General Plan identifies Leona Valley as a low density, designated rural community
- Community Standards District exists to preserve and promote current community rural character and opportunities

Tract 066852

- Urban tract development
- Gated community (a separate community within a community)
- Homeowners Association
- Urban amenities required

Conflicts

Target market – urban homeowners

- Require urban infrastructure and amenities not required or desired in Leona Valley
- Culture conflict between urban and rural lifestyles
- Leona Valley promotes and provides opportunities for raising & keeping of livestock and equine and agricultural endeavors, i.e., U-Pick fruit orchards, vineyards, and lilac production.
- Leona Valley historically is a cohesive community of like lifestyles that are non-urban & agriculture-oriented. Insertion of a gated urban development with it's own Covenants, Codes & Restrictions (CC & R's), Homeowner Association, and urban demands for expanded infrastructure is not compatible with the current community
- Growth in Leona Valley is generally 2 to 3 new homes a year and of an in-fill nature, has been easily assimilated into the community and the County's ability to adequately support. Assuming all 121 tract homes would sell, it would suddenly increase Leona Valley's population by 21% and overburden its current ability to support.

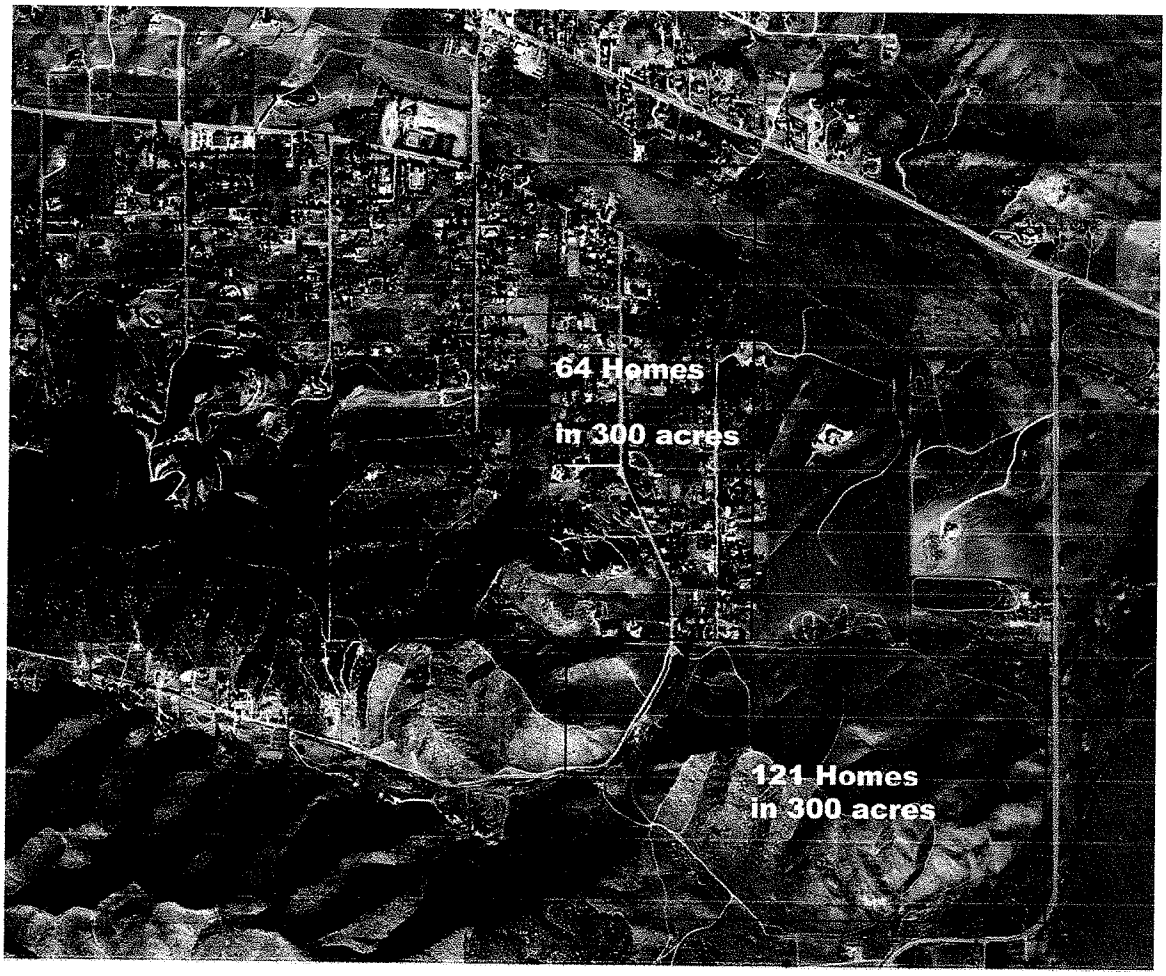
The policies pertaining to designated rural communities as contained in the Antelope Valley Area-Wide Plan (page IV-13) specifically states,

> *"Where further development does occur, it should be of an "in fill" nature, consistent with the existing community character and service levels, and in no*

event should exceed the densities specified on the Antelope Valley Wide General Plan Land Use Policy Map."

The Project is in conflict with the density of the existing homes and development in Leona Valley. Furthermore, it will put an undue burden on the school, water resources, police/fire support and other infrastructure of this rural community.

The following is an aerial photograph of the proposed development in contrast to the highest density area of Leona Valley. The highest density area of Leona Valley contains approximately one home per 4.68-acres. The proposed development has nearly double the density, even though it is in a hillside management area.



Septic Systems

Sewage disposal problems have considerable impact on land use in the Leona Valley area. These problems are related not only to the physical environment, but also the number and density of sewage-producing land uses.

- Leona Valley does not have sewers or a community disposal system, and such a system is not considered economically feasible at the present time. Thus, residents must depend on private, individual home sewage disposal systems, such as septic tanks and leach fields. Not all land or land uses can adequately accommodate septic tanks and leach fields.
- The increased use of septic tanks and leaching fields may pose a hazard to the physical environment in terms of groundwater quality and be further complicated by introduction of imported water into an already high water table area. Therefore, studies need to be conducted to evaluate the feasibility and impact of 121 private septic and leach field systems in the project site area.
- The 1989 submission of a similar tract plan for the same approximate property resulted in the County requiring an on-site waste treatment plant, as the site was not capable of supporting a high concentration of septic systems.
- Cut/fill lots not suitable for septic/leach lines as per County guidelines
- Flood & drainage area
- According to the United States Geological Survey, Sleepy Valley Quadrangle, the site is located in an area known for liquefaction or ground water conditions indicating a potential for ground displacements.
- Up-hill from two Blue Line creeks (Bouquet Canyon & Amargosa)

Water

- Developer claimed he has a "will-serve" letter from California Water Service Company. (Will-serves usually aren't issued until a project is further into the process.)
- California Water Service obtains water for Leona Valley from one area well and from the Antelope Valley East Kern Water Agency (AVEK). AVEK water is considered a secondary water source and the developer must provide primary water source. If on site wells are utilized, these wells would draw down water from wells west of site. Water in Leona Valley is not from an aquifer – pockets of water are contained along San Andreas faults & fissures and are subject to cumulative usage, draw-down, and recharge.
- The Developer indicated that he may install a few wells in the area of the development to service the project. Wells along Lost Valley Ranch Road (contiguous to the development) regularly go dry in the summer and are subject to having water "trucked" to the homes, particularly during draught years. This higher density project will complete with the pre-existing developed sites for water that has already proven insufficient to service the existing population.
- In 2004, the AVEK water line to Leona Valley was disrupted for days. This is a secondary water source to the primary California Water Service supply. AVEK has indicated that their supply can stop "at will" and they are not obligated to

supply water to Leona Valley. 30% of Leona Valley's water is from local wells (70% from AVEK, which can be stopped at will), which are now inadequate to permanently supply this Valley. Leona Valley has three water wells maintained by California Water Service. One well has high fluoride levels; the second well is dry; and the third well is insufficient to supply our community. The community will be charged for any expansion to the existing water system. Water rates in Leona Valley are currently the second highest in California. An expansion of 121 homes will put an undue stress on an over-taxed water system

- As of 2004, Leona Valley used one acre foot of water per day; on average only 80 acre feet is pumped from our active water well, when approximately 365 acre feet are needed to service this community in one year. A further expansion of the population base will be disastrous to the Leona Valley infrastructure.
- Introduction of water to the project for household and landscaping usage, and wastewater from leach fields will impact water quality and quantity. County Department of Health Services and the County Engineer needs to conduct a hydrological study to determine the effects and identify possible mitigation.
- Before a tentative tract map and density allowance is determined, water service and resources must be proven as there are currently dangerously inadequate water resources in Leona Valley.

No Natural Gas

- Housing units would require delivered propane to individual tanks. Minimum 121 propane tanks in this highly concentrated area needs additional safety features in the event of a wildland interface fire or earthquake.

Traffic / Roadways

Bouquet Canyon Road entrance/exit sites

- The County of Los Angeles Department of Public Works recently determined that Bouquet Canyon Road is not an "all weather" road. It is subject to failure in a 10-year capital storm. This roadway failed adjacent to the subject site in 2005 and was closed for several months. There were also several failures in the 1980s, 1995 and 1998, indicating that the "primary" access to this site is not secure or safe. As such, 87th Street West, a small rural residential street will become the primary ingress/egress route.
- The access area at Bouquet Canyon Road needs to be widened to accommodate left & right turn lanes.
- Driveways into current homes along Bouquet Canyon Road near these sites need to be studied and upgraded for safety purposes due to the increase in traffic and change in traffic patterns and usage in this area.
- Cumulative impact on Bouquet Canyon Road – Traffic study needed, including projected traffic impact from approved developments in Palmdale & Lancaster as non-Leona Valley commuters use Bouquet Canyon as an alternative to the (14) Antelope Valley Freeway.
- It is not likely that Bouquet Canyon Road would be widened or improved as it winds through Angeles National Forest, parallels a Blue Line creek and is a valuable wetland habitat.

- A recent study found the death rate on this particular 7 mile section of Bouquet Canyon Road is already over 1000% higher than the State average for comparable roads.
- Bouquet Canyon Road is subject to closure during winter flooding and snow conditions. Snow is not cleared regularly. Ingress/egress will be inadequate during winter storm and fire storm conditions. This can and will result in 87th Street West becoming the primary ingress/egress to and from the site.

Elizabeth Lake Road

- 90th Street West (a limited secondary roadway) and Elizabeth Lake Road is the only access into and out of the south side of Leona Valley where ¾ of the population currently reside and where the project plans to use to route their residents out of the development. Particularly when Bouquet Canyon is closed, this intersection is insufficient to handle the additional traffic the project would generate and could present a serious safety issue.
- The Developer has indicated that the primary ingress/egress will be Bouquet Canyon Road. This is unlikely since Leona Valley School is located at the corner of 90th Street West and Leona Avenue, which is quickly accessed via 87th Street West. In addition, the commercial district in Leona Valley is located at 90th Street West and Elizabeth Lake Road. The shortest route to this location is via 87th Street West.

86th Street West, 87th Street West, and Leona Avenue are 24' secondary roadways that service the southside residents. There are maybe two parcels that are yet to be developed. Therefore, expansion of these roadways to 60' to accommodate the project's commuters as planned by the developer, would be unlikely. The tract map provided to Regional Planning fails to adequately provide a comprehensive overview of the project, its planned access roads, and impact on the community's current traffic system.

Lost Valley Ranch Road:

- This is a private non-County maintained one-lane dirt road, which provides access to the homes in this canyon part of Leona Valley. If the developer improves a small portion by the project, what of the remaining segment of road? Acceptable to Public Works?
- Lost Valley Ranch Road is also the location of a blue-line creek with regular flooding and road loss requiring four-wheel drive access during winter conditions. The addition of a gated development will put an undue hazard, particularly during fire storm, flood and snow conditions on this difficult access area.

Seismic Safety

The project site is located in the San Andreas Fault that runs through the Leona Valley, and the Powerline Thrust Fault that appears to be entirely south of Elizabeth Lake Road (and the project site). Seismic safety considerations must be

identified and implemented not only for the welfare of the project's residents, but the Leona Valley community at large.

Hillside Management

According to the Antelope Valley Areawide Plan, the Hillside Management Area Policy is designed to protect the health and safety of the public from hazards typically associated with hillside areas and to preserve natural resources and scenic values commonly occurring in these environs. Wildfires, floods, mud slides, erosion and landslides are typical hazards confronting hillside properties. Leona Valley is a Class IV Fire Hazard area and is subject to regular fire storm activity. In addition, the area is subject to flooding, mud flow, erosion and high ground water conditions. The plan as proposed does not appear to be in compliance with the Hillside Management ordinance for the Antelope Valley Area Wide Plan based on the non-urban designation. The plot plan fails to indicate what portions of the sites are dedicated to "open space" or "conservation" easements, thereby indicating a larger than actual total land area for each site. The effective lot size (net of restricted areas) of each parcel is not indicated. Therefore, it does appear that most of the sites are sub-standard in comparison the County of Los Angeles Hillside Ordinance for Non-Urban areas. In addition, properties in the Leona Valley Community Standards District have a minimum lot size requirement of 2½ acres, assuming no undue restrictions such as slope, conservation considerations or biotic resources.

The Calculation of Thresholds in Non-urban Hillside Management Areas. Density thresholds for residential uses in non-urban hillside management areas shall be calculated using the analysis of slope categories required by Subsection D2b, as follows:

1. Low-density Threshold. The low-density threshold for a proposed development shall be determined by:
a. Multiplying the number of acres in each of the following slope categories by the density threshold indicated as follows:
i. One dwelling unit per five acres of land within the zero to 24.99 percent natural slope category,
ii. One dwelling unit per 10 acres of land within the 25 to 49.99 percent natural slope category,
iii. One dwelling unit per 20 acres of land within the 50 percent and above natural slope category;
b. The resulting total number of dwelling units obtained by adding all three categories is then divided by the total acreage of the project, obtaining the low-density threshold applicable to such project.
2. Determination if Conditional Use Permit Required. If the density per acre of the proposed development exceeds the low-density threshold of such development obtained in subsection E1 above, a conditional use permit is required.
3. Maximum Density Permitted. The maximum density for a proposed development shall be that permitted by the adopted area-wide, community or specific plan for the area in which the proposed development is located. Where there is no adopted area-wide, community or specific plan, the maximum density shall be that established by the land

use element of the General Plan. However, in no event shall the maximum overall density permitted for a proposed development exceed a total of one dwelling unit per acre for slopes of less than 50 percent, plus one dwelling unit per 20 acres for slopes of 50 percent or greater.

This calculation threshold appears to be contrary to the Developers plot plan which indicates for example 133.2 acres at 0-25% slope, one unit per ½ acre rather than one dwelling unit per 5 acres. 143.2 acres at 25-50% of slope at one dwelling unit per 2 acres rather than one dwelling unit per 10 acres as indicated for non-urban hillside management areas. Therefore, the calculated and illustrated density as per the developer's plan is highly excessive in comparison to the actual Hillside Ordinance for Non-Urban properties such as the subject. Although there is an allowance for increased density, the characteristics of the site and surrounding environs lend itself to a lower density development.

Equine Issues

- County allows for the keeping of 4 horses per acre (should 1 ½ acre be approved, that's 6 horses per lot). Horses add to the potential nitrate contamination of the ground water already in question due to the proposed 121-septic/leach fields.
- Developer claims horse trails to be established in tract project but would be available to the public. This idea would not succeed and cause conflict between the residents and non-residents.
    - a.) Development is gated with no public access
    - b.) Homeowners Association will not want to assume costs and responsibility for usage by non-residents.
    - c.) Property owners in the development will likely prohibit non-resident usage or eliminate the equine trails altogether
    - d.) Therefore, the trail development and public access must be deed restricted

Vineyards

Developer proposes planting vineyards in open spaces in the project site that would be maintained by the project residents. Vineyards are a serious and expensive agricultural investment in the Leona Valley. Growers purchase only certain vines, pest-free, and those specific to this climate and soil conditions. Start-up costs run in the millions. It is highly unlikely this concept would succeed.

Fire & Emergency Service

Call Fire Station 140 currently services Leona Valley. The nearest fire stations are 20 minutes away providing weather conditions are good. The Los Angeles County Fire Department needs to assess impact of 121 new tract homes as to their ability to adequately access and respond, including analyzing the cumulative impact on their services from new projects in Lancaster and Palmdale already approved.

Sheriff

Leona Valley is currently served by a Resident Deputy Sheriff whose area of responsibility covers the rural communities of Leona Valley, Lake Hughes, Elizabeth Lake, Bouquet Canyon and Three-Points. The expanse of coverage for Leona Valley alone is over twenty miles. The impact to the health and safety and ability to service the additional proposed development needs to be studied.

Wildlife

Leona Valley shares the land with a wide variety of wildlife. The project site is habitat and forage area to mountain lion, bear, coyote, rattlesnake, Mohave Green, raccoon, opossum, migratory fowl, Mohave ground squirrel, red legged frog (in immediate vicinity), three-spine stickleback fish (in wetland areas), Red-tailed Hawk, eagle and owl, to name a few.

Project abuts to large riparian area, often flooded with a high water table and fed by the Blue-line Amargosa Creek.

Impact of loss of habitat needs to be addressed.

Potential for conflict: Homeowners drawn to this urban project in a non-urban area are not likely to be "comfortable" sharing space with mountain lions, bears, or coyotes. Foraging and hunting paths have been used by wildlife "forever" and they are not aft to readily change this pattern of behavior. The resulting conflict between suburbanites and wildlife would be catastrophic: the first family pet eaten by a native predator would result in hysteria and death to the predator (as reported often in other similar urban developments plunked into natural rural habitats.)

PENDING COUNCIL APPROVAL

Leona Valley Town Council
General Meeting Minutes
April 9, 2007

Call to Order: Richard Thomas, 7:30 PM

Pledge of Allegiance: Lead by Richard Thomas

Council Roll Call, Conducted by Alexis Upton Knittle: Alexis Upton Knittle; Robert Wood, Larry Tyler; Bill Elliott; Richard Thomas were all present;

Review of Minutes: March 12, 2007 minutes were approved as submitted.

Bill Elliott, Treasurer's Report: Accounts decreased by $1,390.49 due primarily to San Francisco trip (CPUC); Franklin Account made $400. $119,365.33 total of all accounts; $6,506.57 for power line fund;

PROGRESS REPORTS

Richard Thomas, Franchise Trash Collection There is a draft of a new survey for all of the Town Council's in the Antelope Valley area. Will be out in the next couple of months.

Utilities, Robert Wood: In the month of May we will set up our Environmental Pride Month with Waste Management.

Drug Rehab, Bill Elliott: Article in the Santa Clarita Valley Signal; there are some problems with Bouquet Canyon Road (not an all weather road); problems with drainage; minutes to April 4, 2007 have not been posted with the Department of Regional Planning website yet; May 2, 2007 hearing has not yet been cancelled; still working on conditions document.

Bill Elliott, Community Standards District: We don't represent Bouquet Canyon residents but would like to expand our boundaries to include Bouquet Canyon; will consider a survey of the homeowner's of Bouquet Canyon to see if they are interested.

SPECIAL GUEST SPEAKERS

Bob Barjam, Ritter Ranch (Sun Cal): Update of Elizabeth Lake Road and Equestrian facilities.

Grading Operation has had progress; at 35th West to the connection of ELR that was previously graded; about ½ mile east of Godde is where the new improvements ended; they have now connected to that grading shoulder; still have grading to do in front of the Donato (buffalo) portion and Joshua Ranch. In the months to come they will be placing fill in the area; will be using some of the fill materials from the Joshua Ranch tract;

installing water lines on Elizabeth Lake Road; when this is done, they will connect to the County water line. Elizabeth Lake Road project will be on going for months to come. Traffic will flip another time at the west end;

Equestrian: some of the residents mentioned concern that there is not a staging area; it is not in the Specific Plan. Would like to know how many spaces will be needed; has no idea what it would look like or what will be needed; is anxious to hear the input from the community as the residents are the ones with the horses.

Sherry: How much area for a staging area?

Marcy Watton: No loops; connections; only one way in and out;

Answer: don't have a particular size—so that is why he is here; needs to now how much to accommodate; 20 or 25 spaces; looking for help from community. Project is starting on the east end of the development. They are miles away from making a connection to this end of the project. Will have to do phases 2 and 3 to make the connection. There is going to be a trail along Elizabeth Lake Road.

Thought the trails were going to the Ana Verde Tract; city of Palmdale says this is not the case; there is a connection to the trails at Bouquet Canyon and at Lazy T Ranch.

Bill Elliot suggests forming a citizens group to work with Bob Barjam and Suncal. Larry Tyler will set up a group;

Bob Barjam will give a CD to Bill Elliott; the CD will provide an illustration or mapping of the trails; Bill Elliott will put on the Leona Valley Town Council website;

Bob from Lazy T: there is a potential 2-3 acre staging area near Lazy T that could fit 60 horse trailers; it is wasted area between the road and the creek;

Mary Ann Floyd: What is happening to the museum project? We need to get this back up and going;

Bob Barjam: John Valenzuela, San Fernando Valley Band of Indians has been working with the developer for the location of the artifacts.

Mary Ann Floyd suggests: would like it at the old winery site;

Bob Barjam: Sun Cal has tried four different areas without success; has not given up;

Alis Claussen, Southern California Edison
On first 3 segments,
March 1 voted for Segment 1, which is the existing right of way; forest service has yet to approve; the area is through private property; there are problems with the reservoir;

Regarding Segments 2 and 3; Segment 2 materially impacted Leona Valley; decision March 15, 2007; decided on Option A, which means the lines will come towards west Lancaster to Acton and then will cross over and avoiding the big properties on that existing route; crosses Elizabeth Lake Road and uses the route through the Sun Cal project; stays completely on their property; the Pink Route was not chosen;

For the next couple of months, they are still completing surveys for endangered species/environmental; June will be the final engineering certification; end of this year, they will break down; property owners who have additional easement requirements on their property, real estate persons will begin making offers. Edison is not offering money for easements at this time (will be later); construction activities will start the last quarter of this year; deciding access roads; they will remove old equipment and will be putting in new foundations; mitigation measures will be taken;

"The Tehachapi Renewable Energy Project": they are now planning the next segments for this project. This will include sub-stations; taking out old lines; installing new lines; there are eight kinds of zones; Zone A is Kern County including a new sub station; new lines in an existing right of way to Lancaster; another could connect to segment 3; segments 4, 9 and 10 are in Kern County;

Segment 5, will interest local residents; the interior lines in the right of way in between Vincent and Antelope Station; they will take the existing line and install a 500 tower line in the right of way; does not require a new right of way; Segments 6 and 11 head south and into the forest in an existing right of way;

Brought some of the fact sheets for review by the community; Zone B inserts in the fact sheets; downloadable at SCE.com. Have been providing updates to Alexis Upton Knittle of the Leona Valley Town Council;

Segment 7 is in San Gabriel Valley; Segment 8 in Montebello; Segment 9 is substation upgrades;

Open house Wednesday night at the Rosamond library; 30th Street West and Rosamond Boulevard;

Open House on Thursday night in Lancaster at SCE facility: 42060 10th Street West 4:30 to 7:30 PM; handouts will be available.

If you would like to be on the Edison mailing list, give your name to Alexis Upton Knittle, who is in charge of the Power Line committee.

Terry Kenney: On behalf of many property owners, we recognize that there are easements; please have the surveyors use the easements and not cross onto private property. Are you using Aspen for EIR's?

Claussen: We do not use Aspen; that is the CPUC.

Alexis Upton Knittle: indicates the decision by the forestry service will be in May 2007;

Jennie: Cabin owner below Bouquet Reservoir; stake right near her cabin; why are you surveying when a decision has not been made? No cabin owners were informed;

Claussen: We were ordered to complete the surveys; forest service is pending on the decision;

Cabin Owner: no fire suppression for the cabin and property owners as per EIR; Leona Valley and Green Valley will suffer; (addressing residents of Leona Valley) Please write a letter for the cabin owners;

Bernard: Are the scoping meetings to explore alternatives;

Alis Claussen: that is part of the Public Utilities Commission process; not SCE.

Alexis Upton Knittle When we went to San Francisco, the CPUC did not know how to find rural people or find property owners impacted by the project. Talked with Alene Tabor: sent out letters requesting intervener status;

Alexis Upton Knittle, continued: A re-route was requested of Alternate 2, route 4; they were entertaining a re-route if there is a fire suppression issue; has been working with Supervisor Antonovich's office; San Francisco CPUC contact person received a letter addressed to Mr. Troy Whitman who is the fire control officer for SCE. They don't think there is a issue with fire suppression on the proposed route; Linda Love the secretary of the Cabin Owners Association in Bouquet Canyon just got notified two weeks ago; there is an issue the way the route is going through the canyon; it will put the cabin owners at risk of loss due to fire. Not one person in the canyon was notified of the project; they (fire department) do not intend to fight the fire if it starts in the canyon and goes toward the road; we should support the Bouquet Canyon cabin owners; go to www.SaveLeonaValley.com for more information; also, there is some information on the Leona Valley Town Council website; write to Buck McKeon; Supervisor Antonovich's Office; Jody Noiron in charge of Angeles National Forest should be contacted with letters from community;

Ron Howell: CPUC window ends on Friday; contact directly to the California Public Utilities Commission; suggested to write to the attorney for CPUC;

John Allday, Valley Vineyards:
Lauren Development owns the Valley Vineyard site; 1 mile south of Elizabeth Lake Road to the curve in the road on Bouquet Canyon Road, then to the 86th Street West; 300 acres; does not include the 20 acre piece owned by Copeland; started this project 1 year ago;

Pre-Planning Review includes:

- Plant and Animal Inventories
- Wetland Analysis
- Archeo/Paleo/Hist Studies
- Geotechnical Studies
- Topography Studies
- Government Regulation Review
- Attendance at Leona Valley Town Council meetings

Above action items were done prior to Planning Reviews;

Site is comprised of flat and rugged topography; reviewed all of the government regulations; has been coming to the Leona Valley Town Council meetings for last ten months; trying to figure out the community wants;

Planning Considerations:

- Traffic (87th West) to design a plan that did not force traffic through this community; currently no easement access for some existing properties; will maintain the access to existing property owners who have no easement; thinks 95% of people will use the Bouquet Canyon access (except when going to Jackie's); (did not address school);
- Access to Lost Valley:
- Grading Ridgeline Preservation
- Riparian Area: wetlands preservation;
- Equestrian: now and in the future; there is a trail for the project;

Compliance and Regulations:

- General Plan—Non Urban 1 (1 unit per 2 acres)
- Primary Zoning: A-2-2 (1 unit per 2 acres)
- Secondary Zoning: LV CSD (thinks he can cluster to an acre and a half because of hillside clustering; actual minimum lot size is 2.5 acres)
- Hillside Management Ordinance: encourages and requires that one try to plan around the natural contours of the land; cluster units if that will help; contour grading; it also says when you total the number of units allowed in the categories; should allow for 139 units; this is more than the Leona Valley CSD; He believes the Leona Valley CSD allows for 117 units; staff told him that the lot size in the secondary zoning is dictated by that-the 1.5 acre minimum; the number of lots is dictated by Hillside Management Ordinance.

If the site was perfectly flat, here is a display of what the project could be; but this is not real because there is topography on our site (shows potential plot plan);

If hillside management on the site did not exist, this is another example (shown)of what the project could be (shows a plan with 2.5 lots); differences of 500 feet in elevation; ridge would not be preserved;

Because the ordinance exists (shows actual plan) and because the Leona Valley CSD exists (Allday says you can cluster to 1.5 acres) then you can have smaller lots while preserving the ridgeline; 49.5% of the site is not graded; main entry is off of Bouquet access; pave Lost Valley Ranch Road; all other streets will be private;

Smallest graded pad is 10,000 square feet, but the lot is about 8 acres;

Showing 5,500 square foot house including garage (footprint) sticks to the plot plan to show perspective;

Not touching major riparian area; they will cross over one riparian area; County Environmental Impact Analysis said that this would actually improve the environmental impact because of sedimentation issues;

Proposed a equestrian trail at the area of the existing trail;

Per Allday: Project is 121 lots; Leona Valley CSD= 117

Considering growing grape vines on property; some of the graded slopes will be grape vines; some of the natural areas will have grapes too; if that is done—they are reviewing the soil content and climate; the homeowners association will maintain the vines;

Questions to John Allday:
Q. Septic Tanks?:

A: Have had soils engineers there; did some borings; site does percolate;

Q. Would the HOA be outside the Community Standards?

A. Will still be part of Leona Valley CSD. Will have controls on lighting; preserve dark skies; will not change the standards; clustering is permitted to 1.5 acres if in a hillside;

Q. What about our small elementary school? What benefits are there to the community?

A. The zoning and general plan standards applies to all of the hills in Leona Valley; this is the first large scale project; we are not going to come in here and not be heard; we are creating a plan which we think will easily be a precedent for other developments for other hillsides in Leona Valley (future projects); this will set the stage for future projects; School district will give a will-serve letter; will enhance the school district;

Grape vines is an offer-not a "carrot".

Marcy Watton: Increase population of Leona Valley by 17.3%; will not match Leona Valley; will change the character of Leona Valley; we will look like Quartz Hill; Leona Valley is against gated developments; does not match area; will disrupt fire access; you will change the entire nature of the community; will have a major impact on natural

resources; there are ground water issues; strong septic issues; we don't have much water in Leona Valley to cover the increase; should have your own waste treatment plant; the trails are already county designated; I have a map to prove that; gated community will be dangerous as this is a fire-storm area; HOA does not have to follow developer's original regulations; we will lose agricultural zoning with that many homes; will erode the community standards district; we will have a 15-17% increase in population in our schools; (audience clapping);

Juanita Kirkpatrick: Water? Is that area in boundaries of California Water Service? Not enough water for area already.

A: Yes, water to be supplied by California Water Service; Anticipates 3,000 to 5,000-square foot homes; California Water Service does not know the size or type of water connections to property;

Q. Will rates be increased to upgrade water system?

A: Builder will upgrade water service;

Q: No curbs, no gutters; no sidewalks?

A: Yes, they will meet the rural standards; 24 foot wide streets per Leona Valley standards; County requires wider than 24 feet; must be safety and access requirements;

Q: Will there be horses on the properties with access to the trail system?

A: The trail will be dedicated to the County; will not be given to the association; some lots will be dedicated as equestrian; will possibly dedicate a portion of the properties along the trail to be equestrian lots; too early in the stage for that; will be in writing;

Q: John Grimm, Leona Valley Fire Department: will there by an upgrade of our fire department?

A: The plan was submitted to the County on February 5th; The County could require contributing $1,000 or $10,000 towards a new fire station; tentative approval will take a year; this is a concept, but it is going to change; it is involving;

Q: Street lights?

A. No street lights.

Q. How does routing a horse trail through a gated development work?

A: The trail does not go through any gates;

Q: Water? From where?

A: Builder may have to dig on-site wells to supplement water;

Q: During dry years—there is a problem; wells have gone dry in that area of Leona Valley, particularly on Lost Valley Ranch Road;

A: I can only tell you what the water purveyor tells us;

Q: No block walls; how will it be gated;

A: No block walls; none are proposed; strongly considering a gate wrought iron type gate or an open wood gate; controlled vehicular access;

Q: Houses are also planned on Godde Hill; have the plans been submitted?

A: No; they are behind this project; we own 300 acres behind big orange house on the hill at Godde;

Q: Wetlands protection?

A: Yes;

Comment: Copeland property already has a map on it;

Q: Fires 2002/2003; we could not get in from Godde to Leona Valley; with the lack of access that is demonstrated in this project there is a concern for ingress/egress during the fire storms—which are often and regular; we are right on the San Andreas fault; those two roads will not be helpful in the event of an emergency; will there be a street light on Bouquet? Will there be a stop sign exiting Bouquet?

A: I do not know; the County will tell me; the fire department has regulations for access points for a certain number of units; the County requires 2 access points;

Q: Traffic? Is this part of Ritter Ranch? Bouquet has 3,000 commuters per day; there will be a great increase of commuter traffic on this two lane rural canyon road; it is a disaster; if there is a fire on Bouquet/mudslides (2005 rains); the roads were displaced in the area of your development; What are you planning on doing?

A: No, this is not Ritter Ranch;

Bill Elliott, LVTC: County will address the traffic on Bouquet Canyon.

Q: We put 2 – 3 homes a year in Leona Valley, that is the mode of our growth; 2 gas pumps; 2 restaurants; what is the timeline?

A: A year for map approved; another year for engineering; first permit probably in 2 years; open for sale; sell 1 per week; sold in additional 2 years (depending on economy); we are a semi-custom home builder;

Q: how many phases;

A: have not got there yet;

Q: If you are going to preserve A-2 zoning, you can't have equestrian access without dirt access for horses; if you don't do this—it won't be rural properties; if all roads are paved, horses cannot access the area;

A: No comment;

Q: If you put wells, this will harm the water access to Lost Valley Ranch Road (goes dry during draught/residents now trucking in water adjacent to site);

A: If there is no water, we will have to look for more resources.

Q: Lost Valley Ranch Road: currently no lush landscaping because we don't want to impact neighbors water; can the project can there be no lush landscaping and more native landscaping?

A: We could control landscaping in CC & R's.

Comment, President Richard Thomas: Next Meeting on Project: April 23rd: Either downtown or Alhambra; Town Council cannot speak at the meeting; we will present questions to the County; Town Council feels this is extremely important; this is the first subdivision in Leona Valley; 15 years ago, this property was scheduled for development; it will set the standard for other big acreage in Leona Valley; this is why the Leona Valley long range plan is so important;

Adjournment Time: 9:40;

(14)

Subject: Town Council invitation
From: "Alexis Upton-Knittle" <auk9@earthlink.net>
Date: Tue, 27 Mar 2007 08:49:38 -0800
To: "John Allday" <johna@laurendevelopment.com>

Hi John,

You have been invited to the next Leona Valley Town Council meeting to discuss the Valley Vineyards project. You will have 20 minutes to present and then 10 minutes for Q/A. The date is April 9 at 7:30 pm.

We received a copy of the map from Regional Planning yesterday for the TC to review.

Please let me know if you can come.

Alexis

Leona Valley Town Council
P.O. Box 795 • Leona Valley • California 93551

Meeting Minutes
Special Water Meeting
August 11, 2004

Call to order/Time: Victor Conklin, Time 7:05 PM

Council Roll Call: Conducted by Alice Benoit: Members in attendance: Victor Conklin, Charles Crandall, Jim Davis, Bill Elliott & Alice Benoit;

Special Guests:

- Chris Whitley, California Water Service
- Jose Ojeda, California Water Service
- Russell Fuller, AVEK
- Keith Dyas, AVEK
- Frank Donato, AVEK
- Russell Fuller, AVEK
- Carl Hunter, AVEK
- Dave Rizzo, AVEK
- Andy Ruteledge. AVEK
- Laurene Lopez, Los Angeles County Fire Department
- Mark Bennett, Battalion Chief, Los Angeles County Fire Department

Question to Russell Fuller, AVEK

Question: What is AVEK's agreement with California Water Service pertaining to the following:

a.) Amount of water to be permanently supplied to Leona Valley on a daily basis?

b.) AVEK claims they can stop providing water at will, if this is fact, then why is there very substantial connection fees levied for a new water by California Water Service for AVEK, claiming that these fees are because AVEK backed up there system. If AVEK is collecting fees for backing up a potable water system, it would introduce theory, that AVEK is liable for providing that potable water to the end user through their contract with California Water Service and therefore could be potentially jointly liability for any catastrophic lost caused by the failure to provide the water, that the District is contractually obligated to provide.

If applicable: Is there a notification process prior to restricting flow of water?

Answer by Russell Fuller: AVEK is a secondary supplier. AVEK contracts from State of California and then supplies water to the Antelope Valley. This does not include fire suppression water; Supply is subject to interruption and is not reliable; interruption can occur for a few days or a few years; fees are collected since 1992 from new home construction to fund for additional water capacity; AVEK has a partnership with all water retailers in all of the Antelope Valley. Collected funds from area new construction go to the Quartz Hill plant;

There is a notification process to retailers; California Water Service was notified within one-hour of service interruption;

Question: AVEK line near the roadway was not protected. Why?

Answer by Russell Fuller: *Will consider adding blockades;*

Question: What is the percentage of water supplied by local wells?

Answer by Chris Whitley: 70% from AVEK; 30% from local wells-back to 1991; New well was added in 1994, but the fluoride level is too high to operate; will consider blending water with AVEK water; California Water Service will inform the Fire Safe Council in the future when there are problems.

Question: Why didn't California Water Service immediately inform the Fire Department and other officials of the problem?

Answer by Chris Whitley: Informed Fire Department of the breakage; went home at 5:00 (instead of monitoring) and thought there was enough water to supply the town; town ran out of water at 3:00 AM; indicates there were 500,000 gallons in the storage tanks; there is no dialing system to inform customers to conserve or advise of a crisis; Leona Valley uses less than 1-acre foot per day; last year we pumped 80 acre feet; capacity is 80 days of water without AVEK; an acre foot is 326,000 gallons of water; if there is a fire the town has no recourse if Cal Water is unable to supply water; put up sign at community building to advise to conserve water;

Leona Valley has three wells; 1 well-the fluoride levels are too high; second well is dry; third well is operational; the pump was on that night and runs about 100 gallons per minute; at 3:00 PM there was 500,000 gallons in the tank; California Water Service has trucked water to other areas in the past, but did not truck in during this incident; recommends community purchase their own back-up water tank;

Fluoride well can produce 100/gallons a minute, but is contaminated; Feels if entire town were informed by phone to conserve water, the town would probably use more, not less water;

Comment by Frank Donato: In the event of a seismic event, it is possible that the town will be without water as long as thirty days; we will run out of water in less than one-day if AVEK cuts service; California Water Service has no obligation to provide water if there is no water to supply;

Comment by Andy Rutledge: indicates aqueduct system is in fact our back-up storage;

Chris Whitley: California Water Service has property on 90th for a helicopter facility, however, has not maintained; Probation crew to maintain this area; There is a master facilities plan in process ($57,000) allocated for entire water system to study water needs; There are no plans to protect from terrorism;

Adjournment/Time: 8:55 PM

JUNE 29, 2011 REGIONAL PLANNING COMMISSION PUBLIC HEARING

AGENDA ITEM NO. 6

PROJECT NO. TR066952-(5) "VALLEY VINEYARDS"

CORRESPONDENCE FROM THE APPLICANT (2007-2011)

1. (6-15-11) E-mail and letter from applicant: "General Response" letter
2. (6-9-11) Latham and Watkins (attorney) response to public hearing scheduling
3. (10-29-10) PCC (engineer) letter regarding hillside management density calculations
4. (10-21-10) Applicant response to staff summary table of project holds
5. (4-15-09) Applicant response to staff revised Initial Study, MND and MMP
6. (3-23-09) Applicant letter to Steve Afriat (consultant) regarding water availability
7. (2-24-09) Applicant letter responses to individual community members regarding traffic
8. (2-10-09) Applicant's forwarded e-mails (to staff) from three project proponents
9. (2-2-09) Kunzman Assoc.(consultant) letter regarding traffic analysis & resident concerns
10. (1-9-09) Applicant supplemental information booklet
11. (9-25-08) Schmitz Assoc. (consultant) response regarding vineyards as open space
12. (3-21-08) Jackson De Marco et al. (attorney) response regarding vineyards operation
13. (2-5-08) Applicant letter to LVTC regarding project submittal and LVTC website posting
14. (1-24-08) Applicant letter response to draft CSD changes proposed by LVTC
15. (1-14-08) Applicant letter to LVTC regarding material posting on LVTC website
16. (10-15-07) Applicant letter to LVTC regarding draft CSD changes proposed by LVTC
17. (10-4-07) Applicant letter to staff regarding project revision and LVTC proposed CSD changes
18. (9-7-07) PCR (consultant) responses to LVTC comments on draft Initial Study
19. (9-7-07) Applicant letter and full responses to LVTC comments on draft Initial Study
20. (4-2-07) Applicant e-mail and letter to LVTC accepting meeting invitation

1

Sackett, Jodie

From:	Bill Ford [billf@laurendevelopment.com]
Sent:	Wednesday, June 15, 2011 2:32 PM
To:	Sackett, Jodie
Cc:	Alexanian, Sorin; Tae, Susan; Paidar, Nooshin; evizcarra@bos.lacounty.gov; 'Hickling, Norm'; Peter.Gutierrez@lw.com; Steven Afriat; aaron@afriat.com; johna@laurendevelopment.com; Jeff Boren
Subject:	Applicant's Response to Community Letters, VTTM 066952
Attachments:	General Response to Community Letters.pdf

Jodie,
Please find attached a General Response letter addressing the majority of the issues raised by those who submitted letters to the County.

Since many of the letters did not include a return address, I would like to request that this General Response letter be added to the County web site when you next update it. I think it will help to have a place where all those who were not able to receive this letter directly can go to read it, as well as for those others who prefer to just visit the web site.

Additionally as you have formatted the web site for correspondence as follows: :

- Staff Response To Letters
- Community Letters (28)
- Board Response To Letters

It may be appropriate to add the line under which heading this letter could be placed to ensure equal access by all:

- Applicant Response to Letters

Thank you in advance for your consideration of this request.

Bill

Bill Ford

PO Box 790
Agoura Hills, CA 91376
of - (818) 575-9983 x3

THE VINEYARDS

June 15, 2011

Addressed to All Individuals
Who Have Sent Letters to
The County as of June 15, 2011
See Attached List

Re: Response to Neighbors' Issues
VTTM 066952

Dear Neighbor,

I am pleased with the number of letters written by my neighbors in Leona Valley. It was gratifying to learn that the majority of those interested enough to write letters were not opposed to what we have planned, but are rather interested in receiving more information or answers to specific questions related to a few aspects of the proposal. It is to those inquiries that I would like to address this open letter.

The information below is only a summary of what has been provided to the County in the form of numerous studies and papers, most of which we have supplied to the Town Council and can be found on the Leona Valley Town Council's website for easy reference. However, should anyone desire additional information of more detailed research to support any of the responses that follow, I would be more than happy to supply it. Just drop me an email at billf@laurendevelopment.com.

→ **Density and Leona Valley CSD's:** On the issue of "density," we are asking for no more than any other resident has a legal right to request for the use and enjoyment of his or her property. The number of lots allowed for our property is set by the County General Plan, Zoning laws and our Leona Valley Community Standards District (CSD). We are not proposing any changes to these existing requirements. This is what was established by the Town Council. Valley Vineyards is a 293 acre project and our CSD's allow for 1 lot per 2.5 acres, therefore, 293 acres/2.5=117 lots, just what we are requesting. Some people have said to me: "117 homes, that's a lot of homes." However that is the exact number that we, you, and any other property owner in Leona Valley is allowed. This project unequivocally abides by all of the Leona Valley CSD's and all other laws.

→ **Water:** On the issue of water, any water that is needed for Valley Vineyards needs to come from outside Leona Valley and must not draw on the limited supply found under Leona Valley. We have agreed not to add wells on our property and have worked with Cal Water to ensure that any water needed will not draw on Leona Valley's existing resources. This fact has been amply documented with the County, as they expressed similar concerns. Further, we will be installing more fire hydrants, new distribution lines and a water tank to help increase water pressure, which helps everyone. All new water infrastructure for Valley Vineyards will be added at our expense so that no rate increases will be required of existing ratepayers. In fact, according to a Cal Water statement, the addition of this project may actually *decrease* the cost of water to existing

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

customers compared to what it is today. This is how any new development should be planned so as not to impact our resources but at the same time improve what is already here.

→ **Septic Systems:** The use of antiquated septic systems is quite prevalent throughout Leona Valley. Evidence shows that these systems pollute and may be polluting the very water many rely on for personal use. What we are proposing is a very "clean" and very "green" approach for the efficient processing of wastewater. This is not new technology. It has been in use for quite some time in California and across the nation. These advanced systems produce water that is 98% cleaner that the effluent generated by a traditional septic system. Taking this one step further, this highly treated water will then be dispersed throughout the site to irrigate landscaping in specific dispersal areas rather than allow it to just percolate back into the Valley's ground water. I would hope that everyone in the community might want to take a closer look at these advanced treatment systems, and consider installing them on their own lots, in order to ensure the long term quality of our well water.

→ **Minimal Grading, Preservation of Open Space, and Agriculture:** The ridgelines on the site are preserved and protected and only a small percentage of the site is being graded. Of the total 295 acres of land, only about 50 acres is devoted to graded home sites. The balance of the land is devoted to permanent open space including about 70 to 100 acres of agriculture in the form of vineyards. Leona Valley's CSDs' stated purpose is, among other things "to protect the community's unique appeal, including its rural agricultural character." More agriculture is needed as this is what keeps Leona Valley rural. We have agreed to set aside up to 2/3rds of our property for permanently preserved natural and open space uses, including the vineyards. This is a precedent we all need and this should be required of all new development in order to keep Leona Valley rural agricultural character.

→ **Gates and New Traffic:** There has been a lot said about the proposed gates for the project as well as the increased number of vehicles this project could bring to Leona Valley along 87th Street. When designing this project, we learned from our traffic engineers that without the gates to control the flow of vehicles, there would be a negative impact on the people living on 87th Street. We have attempted to stop that from occurring. The project's traffic studies confirm, and the County concurs, that the street layout of this project will keep 90% of the small amount of vehicle trips *away* from 87th Street and direct it instead to Bouquet Canyon Road. It is true that a few of the residents from the Valley Vineyards project will take 87th Street, but that insignificant impact will only be about 56 cars using this route to leave and enter the community in any 24 hour period or about one car every 15 to 30 minutes. That's it! And, Valley Vineyards will build an alternate emergency route into Leona Valley proper – something badly needed in case of fire, mandatory evacuations or other emergencies when quick access into or out of our community is required. Did you know that over 280 homes have only 90th Street as the access point into and out of their neighborhood and current County Fire Department requirements would allow nor more than 75 homes to have only one access point. This presents a significant existing safety hazard to a number of residents in Leona Valley, a dangerous situation that Valley Vineyards is hoping to rectify.

THE VINEYARDS

→ **Traffic Light at Elizabeth Lake and Bouquet Canyon Roads:** We don't want it. By the County's own admission, Valley Vineyards will generate only a tiny fraction of the projected future traffic that may eventually necessitate a signal at this location. Please join us in petitioning the County to remove this requirement from our project.

→ **Contributions to our Neighborhood:** This project will pay $1,400,000 plus an additional $90,000 per year from property taxes to our schools; $400,000 to our fire department; $90,000 to libraries. What we need to do as a community is make sure the County directs this money into Leona Valley and does not divert it to some other place.

We, the owners of Valley Vineyards, have owned this property since 1990. We are taxpayers and members of this community just like everyone else. We pay for the schools, support the fire department and sheriff's deputies and are law abiding citizens, just like everyone else. Like most everyone else in Leona Valley, we also believe in basic property rights – a basic fundamental right afforded to us all. But more than just abiding by the laws that govern our property – requirements within the CSDs, the Zoning Code, State Law, etc. – we have worked hard to propose a project that is environmentally sensitive, exceptionally "green," and creates a positive precedent to all those that follow.

Valley Vineyards preserves the rural nature of Leona Valley. There will be no cookie-cutter, or "tract" homes in Valley Vineyards – this won't be Ritter Ranch or Santa Clarita or Agoura Hills. Valley Vineyards will be comprised of unique, custom-built homes. No two homes will look alike. But more than that, Valley Vineyards will be primarily a working, producing vineyard – the property is devoted more to agriculture and open space than homes. I am of the firm belief that Valley Vineyards will be a positive enhancement to this great community without changing the character, spirit, or sense of community.

Most Sincerely,

Bill Ford
Manager

cc: Supervisor 5th District Michael Antonovich
Los Angeles County Regional Planning Commission
Department of Regional Planning
Leona Valley Town Council

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

THE VINEYARDS

List of Addresses Letters were sent to:

First Name	Last Name	Address
Stephen	Ordway	39670 87th St, Leona Valley, CA 93551
Robert/Valerie	Harpham	39933 87th St, Leona Valley, CA 93551
Julie	Marshall	8769 Vientos Dr, Leona Valley, CA 93551
Elaine/Karlo	Johnson	9149 Elizabeth Lake Rd, Leona Valley, CA 93551
Ron	Howell	36917 Bouquet Canyon Rd, Santa Clarita CA 91390
Karl	Pearcy	9710 North Side Dr, Leona Valley, CA 93551
Nancy	Smith	8844 Leona Ave, Leona Valley, CA 93551
Marcy	Watton	PO Box 816, Leona Valley, CA 93551
Phil	Spangenberger	PO Box 753, Leona Valley, CA 93551
Sherrie	Stolarik	25241 Carson Way, Stevenson Ranch, CA 91381
Theodora	Gable	10650 Leona Ave, Leona Valley, CA 93551
Elaine	Macdonald	43031 40th St, Lancaster CA 93535
Donna	Evens	8845 Penhaven Lane, Leona Valley, CA 93551
Richard	Thomas	9250 Elizabeth Lake Rd, Leona Valley, CA 93551
John/Deanna	Cosola	7817 Elizabeth Lake Rd, Leona Valley, CA 93551
Emilie	Martins	40239 98Th St W, Leona Valley, CA 93551
Marcella	Mahan	8728 Leona Ave, Leona Valley, CA 93551
Lisa	Collinson	9211 Elizabeth Lake Rd, Leona Valley, CA 93551
Larry	Tyler	40255 98th St, Leona Valley, CA 93551
Steven/Anne	Breight	40047 97th St, Leona Valley, CA 93551
John	Sevmour	39909 86Th St W, Leona Valley, CA 93551
Christine	Stoddard	40155 95Th St W, Leona Valley, CA 93551

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

(2)

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LATHAM&WATKINS LLP

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STAFF
Alexander
Paidar
Sadkett
Keane

File No. 049898-0000

June 9, 2011

Los Angeles County Regional Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple Street
13th Floor
Los Angeles, CA 90012

Re: Valley Vineyards – Tract No. 66952
Public Hearing Scheduled June 29, 2011

Honorable Chairman Modugno and Members of the Commission:

On behalf of our client Valley Vineyards LLC ("Applicant"), I am writing to express deep concern about proceeding with a public hearing on Tract No. 66952 (the "Project") because of the fact that the environmental document is not yet complete and two County departments have placed holds on the case. We believe, based on the record, that the Commission's has expressed its clear intent to hear this Project after the environmental document is complete and when the case is ready. Without an environmental document, your Commission lacks complete information to evaluate the Project. Projects are simply not scheduled for public hearings until applications are complete, which means all department holds are lifted and an environmental document has been prepared and is ready for review. Yet, Department of Regional Planning ("Planning") staff insist that a public hearing on this Project proceed on June 29, 2011, despite our efforts to temporarily postpone that hearing and in light of the fact that County staff recently requested additional documentation which is being prepared by the Applicant as directed.

When we appeared before you on June 1, 2011, you directed staff to work with the Applicant's representatives with respect to our request for a continuance noting that such matters are appropriately resolved through negotiations between staff and an applicant. What we received instead of a discussion or negotiation was a unilateral declaration that the case would proceed on June 29, 2011. (See Attachment A.) We believe that to proceed with a public hearing despite the two department holds and lack of an environmental document deprives the Applicant of the ability to have a fair and impartial hearing on the Project in violation of the Applicants substantive and procedural due process rights.

The Case is Not Ready to Be Heard By Your Commission

Recent events provide ample evidence to conclude that this Project is not ready to come before your Commission. Specifically,

- *On February 9, 2011, County Planning staff sent a letter to the Applicant indicating the application was incomplete.* (Attachment B.) The letter indicates that after the receipt of conditions from the Subdivision Committee at its March 3, 2001 meeting, the Applicant would be notified whether additional information was required or whether "all department holds have cleared and your project is ready to be scheduled for public hearing." Interestingly, the day on which staff was going to know whether or not the "project is ready to be scheduled for a public hearing" was the day *after* a scheduled March 2, 2011 hearing at your Commission.

- *On March 2, 2011, staff appeared before your Commission to ask that the Project public hearing be continued in part because the environmental document was "still pending staff review."* The Subdivision Committee meeting scheduled the following day was not mentioned. Although staff said they were waiting to hear back from the State Clearinghouse with respect to the environmental document, in fact, the environmental document had not even been submitted to the State Clearinghouse at the time the statement was made and to date still has not been submitted to the State Clearinghouse. Currently, the environmental document remains pending due to holds placed on it by County staff.

- *On March 9, 2011, the Department of Public Works ("Public Works") placed a hold on the application* due to issues related to the proposed onsite wastewater treatment system ("OWTS"), including clarification with the Department of Public Health ("Public Health") concerning the roles of the respective departments in approval of the system. (Attachment C.) This hold has not been lifted.

- *On March 11, 2011, the Applicant was notified by Public Health that two prior letters dated May 28, 2010 and November 12, 2010, which postponed compliance with certain OWTS conditions, were being rescinded.* (Attachment D.) Public Health stated that it could not recommend approval of the tentative map until concerns relating to establishment of a service district were resolved to the satisfaction of the County; these concerns have yet to be resolved. This determination also placed a hold on the application.

- *On May 3, 2011, Public Works asked for an additional study concerning the lifetime costs of the OWTS to individual lot owners* during a meeting between the Applicant, Public Health, Public Works and the Lahontan Regional Water Quality Control Board ("RWQCB") to discuss long term maintenance of the OWTS and other OWTS issues. At this meeting, Public Works indicated that its hold could

not be lifted until the report was submitted and approved by them. Public Health was prepared to remove their hold in light of the Applicant's proposal for the long term maintenance, but was reluctant to do so until after Public Works has reviewed the requested report. The Applicant is working on that study which involves engineering of the proposed system, input from the maintenance company as well as information from the manufacturers of system components. The report is expected to be completed by the end of June, but will necessarily require review by Public Works, Public Health and the RWQCB before the department holds can be lifted.

All of these recent events illustrate the fact that the Project is simply not ready to be heard by your Commission. As you know, the environmental document for a project is a critical piece of evaluative and analytic evidence without which decision makers do not have a complete file before them. It is a long standing County policy that cases are not scheduled for public hearing until the environmental document is complete. Without complete information, here critical environmental information, your Commission does not have a full picture of the potential environmental effects of a project or how such potential effects are addressed.

A Continuance Is Necessary In Order To Promote Fairness and Due Process And Avoid Prejudice to the Applicant

A public hearing is an evidentiary proceeding at which individual rights and interests are adjudicated. Here, the rights of the Applicant to a fair hearing are implicated. Actions by a decision-making body at a public hearing are subject to due process considerations including providing a fair hearing to an applicant. Since a public hearing is an opportunity for the Applicant to present evidence in support the Project, the deprivation of the ability to fully present evidence supporting an application constitutes a deprivation of due process.

Here, the Applicant is being compelled to present its case before the Commission in the absence of environmental documentation which is currently held up in the hands of County staff. To make things worse, as recently as May 3, 2011, Public Works asked for additional information from the Applicant without which its hold cannot be lifted. Public Works and Public Health placed holds on the application making it impossible for the Applicant to present a compete case as it does not know what the outcome of the further evaluation by Public Works and Public Health will be or what, if any, additional mitigation measures may be requested. All told, the missing documentation will make it impossible for the Commission to fully evaluate the merits of this land use case and prevent the Applicant from receiving a fair hearing to which it is entitled.

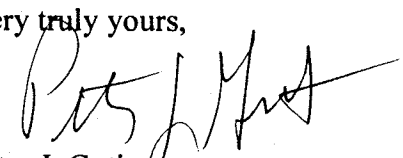
Your Commission recognized the need for additional time to complete the Project evaluation. On June 1, 2011, we appeared before your Commission to request that the June 29, 2011 hearing be continued because the case is not ready to come before you. At that time, you told staff that cases come to your Commission when they are "ready." At your March 1, 2011 meeting the project hearing was taken off calendar in recognition of the fact that the case was not "ready" because the environmental documentation was not ready. Clearly, without an

environmental document and with two department holds, the case is not "ready" to come before you. Yet, instead of discussing a continuance of the public hearing with the Applicant as suggested by your Commission, we received a unilateral declaration by staff that the case would proceed on June 29th. (Attachment A)

It is patently unfair to compel the Applicant to proceed while two County departments have placed holds on the case and without an environmental document. These circumstances create severe prejudice and compromise the Applicant's ability to receive a fair and impartial hearing since the Commission will not have a complete file to consider. The Commission would be placed in a position where it could only deny or continue the case.

While we apparently have no choice but to be as ready as we can to proceed with the public hearing on June 29th, we believe that our ability to receive a fair a hearing at that time has been severely compromised.

Very truly yours,



Peter J. Gutierrez
of LATHAM & WATKINS LLP

Enclosures

cc:

Edel Vizcarra, Planning Deputy
Fifth Supervisorial District

Sorin Alexanian, Deputy Director
Department of Regional Planning

Susan Tae, Supervising Regional Planner
Department of Regional Planning

Jodie Sacket, Senior Planner
Department of Regional Planning

Patricia Keane, Esq., Principal Deputy County Counsel
Office of County Counsel

Bill Ford

Damon Mamalakis, Esq.

A

Gutierrez, Peter (LA)

From: Tae, Susan [stae@planning.lacounty.gov]
Sent: Wednesday, June 01, 2011 11:51 AM
To: Gutierrez, Peter (LA)
Cc: Paidar, Nooshin; Pkeane@counsel.lacounty.gov; billf@laurendevelopment.com
Subject: RE: Valley Vineyards - Follow-up Meeting Request

Hi Peter,

Based on the Commission discussion today, staff will be moving forward with preparing the project for the Commission to hear on June 29. As we've been in discussion regarding these issues for some time, at this point I think it makes more sense to forward any additional information or exhibits you'd like us to consider as we prepare these hearing materials. As discussed this morning, the distribution of hearing packages will be on June 16 so certainly the sooner you provide the better, especially if new information is being provided. All of the materials provided to date will also be made available to the Commission.

Please let us know if you have any questions.

Thanks

Susan Tae, AICP
Supervising Regional Planner
Zoning Permits North
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012
http://planning.lacounty.gov
213-974-6443

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From: Peter.Gutierrez@lw.com [mailto:Peter.Gutierrez@lw.com]
Sent: Tuesday, May 31, 2011 11:43 AM
To: Tae, Susan
Cc: Paidar, Nooshin; Pkeane@counsel.lacounty.gov; billf@laurendevelopment.com
Subject: Valley Vineyards - Follow-up Meeting Request

Susan:

As you may recall, due to the press of our various schedules, our last meeting on May 10th ended before we could discuss the clustering issues related to the project.

Bill and I would like to have a follow-up meeting to complete the clustering issue discussions and to present some additional graphics which Bill has prepared depicting the areas of the tract to remain in their natural condition.

We are available to meet at your earliest convenience.

Peter

Peter J. Gutierrez

LATHAM & WATKINS LLP

355 South Grand Avenue

Los Angeles, CA 90071-1560

Direct Dial: +1.213.891.7309

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****
*****
To comply with IRS regulations, we advise you that any discussion of Federal tax issues in this
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Latham & Watkins LLP

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

B

February 9, 2011

JOHN L ALLDAY
THE VINEYARDS
PO BOX 790
AGOURA HILLS CA 91376

SUBJECT: TENTATIVE TRACT MAP NO. 066952
NOTICE OF INCOMPLETE FILING

Dear Mr. Allday:

An initial review of the materials submitted for this project indicates that your application is incomplete.

Your project has been scheduled on the March 3, 2011 Subdivision Committee Agenda for receipt of conditions from the Subdivision Committee. You are not required to attend this meeting. Subsequent to the meeting, the planner assigned to your project will notify you whether additional information is required for processing, or all department holds have cleared and your project is ready to be scheduled for a public hearing.

Please note that any zoning violations on the property discovered after the filing of this case may affect the scheduling of a public hearing pursuant to the "Clean Hands" provisions of the County Code in Section 22.04.110.

Please do not hesitate to call me at (213) 974-6433 if you have any questions or if I can be of further assistance. Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m. (closed on Fridays). We are located in Room 1382 in the Hall of Records.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Richard J. Bruckner
Director

Gloria Taylor
Land Divisions Section

c: Richard Doss/Pacific Coast Civil, Inc.

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • Fax: 213-626-0434 • TDD: 213-617-2292
RTM TR066952

C

Date 03/09/11

TO: Susie Tae
Department of Regional Planning

Attention Alejandrina Baldwin/Carolina Blengini/Ramon Cordova/Gunnar Hand/ Josh Huntington/Mi Kim/Donald Kress/Jeff Lemieux/Jodie Sackett/ Kim Szalay

FROM: Henry Wong/John Chin
Department of Public Works

TRACT NO. 66952

[✓] Public Works' report for NO SCM map dated 02/03/11.

[ ] Revised Public Works' report for map dated _____.

[ ] Revised pages of Public Works' report for map dated _____ as follows.

[ ] Revised Public Works' report clearing previous _____ denial(s).

[✓] Public Works ~~still~~ has Sewer denial(~~s~~).

[ ] Public Works' clearance for Public Hearing.

[ ] Please forward the attached Engineer's and City's copy.

[ ] A waiver for the final map may be filed.

[ ] Other:

FILES\TM Report Transmitttal\Regional Planning (rev. 04-29-09).doc

cc: Pacific Coast Civil, Inc. (Richard Doss)

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION – SUBDIVISION

TRACT NO. 66952 (Rev.)

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

It is recommended that this tentative map not be approved at this time. This recommendation is based upon information or lack of information that is available concerning the subject property. The removal of this recommendation is contingent upon the submission and satisfactory review of the following:

- Please see attached Sewer review sheet for comments and requirements.

HW

Prepared by Henry Wong Phone (626) 458-4910 Date 03-09-2011

tr66952L-rev4.doc

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION - SEWER
TRACT NO. 066952 (Rev.)

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

It is recommended that this tentative map not be approved at this time. This recommendation is based upon information or lack of information that is available concerning the subject property. The removal of this recommendation is contingent upon the submission and satisfactory review of the following:

- The proposed decentralized sewer treatment system is not approved at this time. The Department of Public Works is currently discussing this issue with the Department of Public Health to clarify the roles each department will have, if any, in the approval of such a system.

HW

Prepared by Julian Garcia Phone (626) 458-4921 Date 03-09-2011
tr66952s-rev4.doc

COUNTY OF LOS ANGELE
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION – SUBDIVISION

TRACT NO. 66952 (Rev.)

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

- If this recommendation of disapproval is changed to a recommendation of approval based on additional information, the following reports would be recommended for inclusion in the conditions of tentative approval:

HW

Prepared by Henry Wong Phone (626) 458-4910 Date 03-09-2011

tr66952L-rev4.doc

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION – SUBDIVISION
TRACT NO. 66952 (Rev.)

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

The following reports consisting of ___ pages are the recommendations of Public Works.

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. Details and notes shown on the tentative map are not necessarily approved. Any details or notes which may be inconsistent with requirements of ordinances, general conditions of approval, or Department policies must be specifically approved in other conditions, or ordinance requirements are modified to those shown on the tentative map upon approval by the Advisory agency.

2. Easements are tentatively required, subject to review by the Director of Public Works to determine the final locations and requirements.

3. Easements shall not be granted or recorded within areas proposed to be granted, dedicated, or offered for dedication for public streets, highways, access rights, building restriction rights, or other easements until after the final map is filed with the Registrar-Recorder/County Clerk's Office. If easements are granted after the date of tentative approval, a subordination must be executed by the easement holder prior to the filing of the final map.

4. In lieu of establishing the final specific locations of structures on each lot/parcel at this time, the owner, at the time of issuance of a grading or building permit, agrees to develop the property in conformance with the County Code and other appropriate ordinances such as the Building Code, Plumbing Code, Grading Ordinance, Highway Permit Ordinance, Mechanical Code, Zoning Ordinance, Undergrounding of Utilities Ordinance, Water Ordinance, Sanitary Sewer and Industrial Waste Ordinance, Electrical Code, and Fire Code. Improvements and other requirements may be imposed pursuant to such codes and ordinances.

5. All easements existing at the time of final map approval must be accounted for on the approved tentative map. This includes the location, owner, purpose, and recording reference for all existing easements. If an easement is blanket or indeterminate in nature, a statement to that effect must be shown on the tentative map in lieu of its location. If all easements have not been accounted for, submit a corrected tentative map to the Department of Regional Planning for approval.

6. Quitclaim or relocate easements running through proposed structures.

7. Adjust, relocate, and/or eliminate lot lines, lots, streets, easements, grading, geotechnical protective devices, and/or physical improvements to comply with ordinances, policies, and standards in effect at the date the County determined the application to be complete all to the satisfaction of Public Works.

8. Label driveways and multiple access strips as "Private Driveway and Fire Lane" and delineate on the final map to the satisfaction of Public Works.

9. Reserve reciprocal easements for drainage, ingress/egress, sewer, water, utilities, right to grade, and maintenance purposes, etc., in documents over the common private driveways to the satisfaction of Public Works.

10. Dedicate vehicular access rights to the rear of double frontage residential lots. If the Department of Regional Planning requires the construction of a wall, complete access rights shall be dedicated.

11. Place a note on the final map to the satisfaction of Public Works to convey as a unit both portions of ownership within Lot 7, separated by Bouquet Canyon Road, and connect said portions with a standard land hook.

12. The street frontage requirement needs to be waived by the Advisory Agency. All lots are to be accessed by a private driveway and fire lane system.

13. A final tract map must be processed through the Director of Public Works prior to being filed with the Registrar-Recorder/County Clerk's Office.

14. Prior to submitting the tract map to the Director of Public Works for examination pursuant to Section 66442 of the Government Code, obtain clearances from all affected Departments and Divisions, including a clearance from the Subdivision Mapping Section of the Land Development Division of Public Works for the following mapping items; mathematical accuracy; survey analysis; and correctness of certificates, signatures, etc.

15. A final guarantee will be required at the time of filing of the final map with the Registrar-Recorder/County Clerk's Office.

16. Within 30 days of the approval date of this land use entitlement or at the time of first plan check submittal, the applicant shall deposit the sum of $2,000 (Minor Land Divisions) or $5,000 (Major Land Divisions) with Public Works to defray the cost of verifying conditions of approval for the purpose of issuing final map clearances. This deposit will cover the actual cost of reviewing conditions of approval for Conditional Use Permits, Tentative Tract and Parcel Maps, Vesting Tentative Tract and Parcel Maps, Oak Tree Permits, Specific Plans, General Plan Amendments, Zone Changes, CEQA Mitigation Monitoring Programs and Regulatory Permits from State and Federal Agencies (Fish and Game, USF&W, Army Corps, RWQCB, etc.) as they relate to the various plan check activities and improvement plan designs. In addition, this deposit will be used to conduct site field reviews and attend meetings requested by the applicant and/or his agents for the purpose of resolving technical issues on condition compliance as they relate to improvement plan design, engineering studies, highway alignment studies and tract/parcel map boundary, title and easement issues. When 80% of the deposit is expended, the applicant will be required to provide additional funds to restore the initial deposit. Remaining balances in the deposit account will be refunded upon final map recordation.

HW

Prepared by Henry Wong Phone (626) 458-4910 Date 03-09-2011

tr66952L-rev4.doc

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
WWW.DPW.LACOUNTY.GOV

TRACT NO.: 66952

TENTATIVE MAP DATE: 2/03/11
EXHIBIT MAP DATE: 2/03/11

STORM DRAIN AND HYDROLOGY SECTION CONDITIONS OF APPROVAL, PHONE: (626) 458-4921

Prior to Improvement Plans Submittals:

1. Submit an analysis of the design storm event for design of drainage facilities to the satisfaction of the Department of Public Works. The analysis should include burned and bulked watersheds for undeveloped areas in accordance with Department of Public Works requirements.

    a. The analysis shall be a hydrology study addendum only for the design storm event. The approved hydrology study need not be resubmitted, subject to compliance with the conclusions and design standards of the approved Drainage Concept / Hydrology Study / Standard Urban Stormwater Mitigation Plan (SUSMP) / Low Impact Development (LID) Plan to the satisfaction of the Department of Public Works.

Prior to Improvement Plans Approval:

1. Comply with the requirements of the Drainage Concept / Hydrology Study / SUSMP / LID Plan which was conceptually approved on 12/28/10 to the satisfaction of the Department of Public Works.

    a. Debris conveyance devices and debris desilting areas as depicted on the approved drainage concept shall be provided to the satisfaction of the Department of Public Works.

2. Obtain approval or letter of non-jurisdiction from the State Department of Fish and Game.

3. Obtain approval or letter of non-jurisdiction from the State Water Resources Control Board.

4. Obtain approval or letter of non-jurisdiction from the Corps of Engineers.

5. A maintenance permit may be required from the State Department of Fish and Game, the Corps of Engineers, and the State Water Resources Control Board to the satisfaction of the Department of Public Works.

Prior to recordation of a Final Map:

1. Submit plans of drainage facilities as required by hydrology study for design of drainage facilities to the satisfaction of Department of Public Works.

2. Show and dedicate to Flood Control District or to the County of Los Angeles easements and/or right of way on the final map to the satisfaction of the Department of Public Works.

    a. Dedications shall include necessary easements for existing road culverts traversing Bouquet Canyon Road at MM 0.7 and MM 1.7 to the satisfaction of the Department of Public Works.

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
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3. Show and label all natural drainage courses and flood hazard areas to the satisfaction of the Department of Public Works.

    a. Flood hazard areas as depicted on the tentative map are not necessarily approved and off-site flood hazard limits are not enforceable.

4. Dedicate to the County the right to restrict the erection of buildings in the flood hazard area.

5. An assessment district shall be formed to finance the future ongoing maintenance and capital replacement of all drainage devices/systems identified by the Department of Public Works. The Subdivider shall deposit the first year's total assessment based on the Public Works engineering report. This will fund the first year's maintenance after the facilities are accepted. The second and subsequent year's assessment will be collected through the property tax bill. This is required to the satisfaction of the Department of Public Works.

6. Prior to final map approval a covenant or agreement shall be recorded in the office of the Los Angeles County Registrar-Recorder/County Clerk indicating that the owner of the subject development is aware and agrees to the requirements of County Code Section 12.84.460 Subsection B.

Prior to Improvement Acceptance for Public Maintenance:

1. Any maintenance permits of the regulatory agencies must be active at the time of acceptance.

Name Lizbeth Calderón Date 3/07/11 Phone (626) 458-4921
LIZBETH CALDERON

County of Los Angeles Department of Public Works
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION
GEOLOGIC REVIEW SHEET
900 So. Fremont Ave., Alhambra, CA 91803
TEL. (626) 458-4925

DISTRIBUTION
1 Geologist
__ Soils Engineer
1 GMED File
1 Subdivision

TENTATIVE TRACT MAP	66952	**TENTATIVE MAP DATED**	2/3/11 (Rev.)
SUBDIVIDER	Leona Valley Estates, LTD.	**LOCATION**	Leona Valley
ENGINEER	Pacific Coast Civil, Inc.		
GEOLOGIST	GeoConcepts, Inc.	**REPORT DATE**	1/14/10, 11/6/09, 9/30/08
SOILS ENGINEER	GeoConcepts, Inc.	**REPORT DATE**	1/14/10, 11/6/09, 9/30/09

TENTATIVE MAP FEASIBILITY IS RECOMMENDED FOR APPROVAL FROM A GEOLOGIC STANDPOINT

THE FOLLOWING CONDITIONS MUST BE FULFILLED:

1. The final map must be approved by the Geotechnical and Materials Engineering Division (GMED) to assure that all geotechnical requirements have been properly depicted. For Final Map clearance guidelines refer to GS051.0 in the Manual for Preparation of Geotechnical Reports (http://www.dpw.lacounty.gov/gmed/manual.pdf).

2. A grading plan must be geotechnically approved by the GMED prior to Final Map approval. The grading depicted on the plan must agree with the grading depicted on the tentative tract or parcel map and the conditions approved by the Planning Commission. If the subdivision is to be recorded prior to the completion and acceptance of grading, corrective geologic bonds may be required.

3. Prior to grading plan approval a detailed engineering geology and soils engineering report must be submitted that addresses the proposed grading. All recommendations of the geotechnical consultants must be incorporated into the plan (Refer to the Manual for Preparation of Geotechnical Reports at http://www.dpw.lacounty.gov/gmed/manual.pdf).

4. All geologic hazards associated with this proposed development must be eliminated. Alternatively, the geologic hazards may be designated as restricted use areas (RUA), and their boundaries delineated on the Final Map. These RUAs must be approved by the GMED, and the subdivider must dedicate to the County the right to prohibit the erection of buildings or other structures within the restricted use areas (refer to GS063.0 in the manual for preparation of Geotechnical Reports).

6. The Soils Engineering review dated 2/17/11 is attached.

Prepared by _____ Reviewed by _____ Date 2/17/11
Charles Nestle

Please complete a Customer Service Survey at http://dpw.lacounty.gov/go/gmedsurvey

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
GEOTECHNICAL AND MATERIALS ENGINEERING DIVISION
SOILS ENGINEERING REVIEW SHEET

Address: 900 S. Fremont Ave., Alhambra, CA 91803
Telephone: (626) 458-4925
Fax: (626) 458-4913

District Office 8.0
Job Number LX001129
Sheet 1 of 1

DISTRIBUTION:
1 Drainage
1 Grading
1 Geo/Soils Central File
___ District Engineer
___ Geologist
1 Soils Engineer
1 Engineer/Architect

Tentative Map (Tract)	66952
Location	Leona Valley
Developer/Owner	Leona Valley Estates, Ltd.
Engineer/Architect	Pacific Coast Civil, Inc.
Soils Engineer	GeoConcepts, Inc. (3563)
Geologist	GeoConcepts, Inc.

Review of:

Tentative Tract Map and Exhibit Dated By Regional Planning 2/3/11 (Rev)
Soils Engineering and Geology Report Dated 1/14/10, 11/6/09 (surficial debris), 9/30/08
Previous Review Sheet Dated 3/4/10

ACTION:

Tentative Map feasibility is recommended for approval, subject to conditions below.

REMARKS:

Note: Submitted surficial slope stability analysis does not satisfy request for surficial slope stability analyses, due to the assumed depth of saturated surficial materials being analyzed.

At the grading plan stage:

1. Provide surficial slope stability analyses for natural slopes based on an assumed saturation depth of 4 feet if no on-site slope data is provided for the slope in question. Or provide on-site boring/trench/test pit that physically confirms the assumed depth of the surficial material. For example, the newly submitted Cross Section for N-N' does not indicate a boring/trench/test pit on the slope in question and assumes a saturation depth of 3.5 feet. Therefore the submitted surficial slope stability analysis does not satisfy request for surficial slope stability analyses, due to the assumed depth of saturated surficial materials being analyzed. Recommend mitigation if factors of safety are below County minimum standard.
2. Provide surficial slope stability analyses for the proposed cut slopes that expose alluvium or colluvium and fill slopes. For example Cross Section D-D'. Recommend mitigation if factors of safety are below County minimum standard.
3. Provide chemical test results (sulfate, chloride, resistivity, etc.) for the on-site soils to address the presence of chemicals deleterious to concrete and ferrous metals. The tests must be in accordance with California Test Methods, Department of Transportation, or equivalent (aqueous solution tests, such as EPA Tests or similar methods are not acceptable for determination of resistivity). Resistivity tests must be performed on soils samples in a saturated condition.
4. Show on the grading plans:
   a. Location of areas subject to liquefaction hazards.
   b. All recommended mitigation measures.
5. Requirements of the Geology Section are attached.
6. Include a copy of this review sheet with your response.

NOTE(S) TO THE PLAN CHECKER/BUILDING AND SAFETY ENGINEER:
THE SOILS ENGINEER HAS PROVIDED A GEOTECHNCIAL MAP OUTLINING THE AREAS SUBJECT TO LIQUEFACTION HAZARDS AND HAS PROVIDED RECOMMENDATIONS FOR REMOVAL AND RECOMPACT TO BEDROCK. THE GEOTECHNICAL MAP IS IN THE REPORT DATED 1/14/10.

REGISTERED PROFESSIONAL ENGINEER
JEREMY WAN
NO. C67563
EXP. 6/30/11
STATE OF CALIFORNIA

Prepared by Olga Cruz Reviewed by Jeremy Wan Date 2/17/11

Please complete a Customer Service Survey at http://dpw.lacounty.gov/go/gmedsurv
NOTICE: Public safety, relative to geotechnical subsurface exploration, shall be provided in accordance with current codes for excavations, inclusive of the Los Angeles County Code, Chapter 11.48, and the State of California, Title 8, Construction Safety Orders.
P:\gmepub\Soils Review\Olga\Sites\66952 TR, Leona Valley, TTM-A_9.

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION – GRADING
TRACT MAP NO. 66952 REV

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

REQUIREMENTS PRIOR TO GRADING PLAN APPROVAL:

1. Provide approval of:

   a. The latest drainage concept/hydrology/Standard Urban Stormwater Mitigation Plan (SUSMP)/Low Impact Development (LID) plan (if applicable) by the Storm Drain and Hydrology Section of Land Development Division.

   b. The location/alignment and details/typical sections of any park/trail, as shown on the grading plan, to the satisfaction of the Department of Parks and Recreation.

   c. The grading plan by the Geotechnical & Materials Engineering Division (GMED).

   d. Permits and/or letters of non-jurisdiction from all State and Federal Agencies, as applicable. These agencies may include, but may not be limited to the State of California Regional Water Quality Control Board, State of California Department of Fish and Game, State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), and the Army Corps of Engineers.

REQUIREMENTS PRIOR TO FINAL MAP RECORDATION:

2. Submit a grading plan for approval. The grading plan must show and call out the following items, including but not limited to: construction of all drainage devices and details, paved driveways, elevation and drainage of all pads, SUSMP and LID devices (if applicable), and any required landscaping and irrigation not within a common area or maintenance easement. Acknowledgement and/or approval from all easement holders may be required.

3. A maintenance agreement or CC&Rs may be required for all privately maintained drainage devices, slopes, and other facilities.

MDE
Name David Esfandi Date 03/01/11 Phone (626) 458-4921

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The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. The request to waive street frontage is subject to approval by the advisory agency. If not waived, the subdivider shall revise the tentative map and provide street frontage to every parcel to the satisfaction of Public Works

2. The minimum centerline radius is 350 feet on all local streets with 64 feet of right of way and on all the streets where grades exceed 10 percent.

3. Curves through intersections should be avoided when possible. If unavoidable, the alignment shall be adjusted so that the proposed BC and EC of the curve through the intersection are set back a minimum of 100 feet away from the BCR's of the intersection.

4. At tee intersections involving local streets, the maximum permissible grade of the through street across the intersection is 10 percent. For intersections involving multi-lane highways, the maximum permissible grade of the through street is three percent.

5. The central angles of the right of way radius returns shall not differ by more than 10 degrees on local streets.

6. Design details for the typical sections of 87th Street West and Bouquet Canyon are not necessarily approved at this time.

7. Conform with the approved conceptual signing and striping plan dated November 30, 2010. Provide detailed 40 foot scale signing and striping plans for Bouquet Canyon Road to the satisfaction of Public Works.

8. Associated grading and storm drain plans must be approved or in direct check.

9. Provide minimum landing area of 100 feet for local collectors, 50 feet for local access roads, and 25 feet for cul-de-sacs at a maximum 3 percent grade on all "tee" intersections.

10. Provide intersection sight distance for a design speed of:

    a. 65 mph (725') or to the satisfaction of Public Works on Bouquet Canyon Road from "A" Court (northerly and southerly directions).

b. 40 mph (650 feet) on 87th Street West from "B" Street (easterly and westerly directions) and from "F" Court (northerly and southerly directions).

Line of sight shall be within right of way or dedicate airspace easements to the satisfaction of Public Works. Additional grading may be required. With respect to the position of the vehicle at the minor road, the driver of the vehicle is presumed to be located 4 feet right of centerline and 10 feet back the top of curb (TC) or flow line (FL) prolongation. When looking left, we consider the target to be located at the center of the lane nearest to the parkway curb. We use 6 feet from TC as a conservative rule, in the case of pop outs we use 6 feet from TC of the travel lane. When looking right, the target is the center of the lane nearest to the centerline or from the median TC (when present). We use 6 feet from centerline or from the median TC as a conservative rule.

11. Provide property line return radii of 13 feet at all local street intersections, and 27 feet at the intersection of local streets with planned highways (those on the County Highway Plan) and where all planned highways intersect or where one of the roads serves a commercial or industrial development plus additional right of way for corner cut off to meet current guidelines of the Americans with Disabilities Act (ADA) to the satisfaction of Public Works.

12. Dedicate vehicular access rights on Bouquet Canyon Road.

13. Dedicate right of way 43 feet from centerline along the northerly/westerly side of Bouquet Canyon Road. An additional 13 feet of right of way is required beyond the existing right of way.

14. Dedicate right of way 32 feet from centerline for the proposed 87th Street West.

15. Locate the entry gate or key pad (if one is provided) a minimum of 50 feet beyond the right of way of Bouquet Canyon or 87th Street West and construct a turnaround with a minimum turnaround radius of 32 feet in the private driveway and fire lane on "A" Court, "B" Street, and "F" Court preceding the gated entrance to the satisfaction of Public Works. The minimum gate setback shall be increased, if necessary, to accommodate adequate stacking distance as determined in each case by the traffic engineering consultant at final engineering. Setback the raised median nose in the private driveway and fire lane on "A" Court, "B" Street and "F" Court a minimum of 20 feet from the right of way to the satisfaction of Public Works. The details of the gated access as shown on the tentative map are not necessarily approved.

16. Construct rural improvements on 87th Street West to the satisfaction of Public Works.

17. Construct rural secondary highway improvements on Bouquet Canyon Road consistent with the approved signing and striping plan dated 11/30/2011, including transition paving to the satisfaction of Public Works.

18. Construct drainage improvements on Bouquet Canyon (culverts and headwalls as needed) and offer maintenance easements as needed the satisfaction of Public Works. Where streets or highways are located within flood hazard areas or subject to inundation, provide adequate slope protection to the satisfaction of Public Works.

19. Execute a covenant for private maintenance of curb/parkway drains, if any, to the satisfaction of Public Works.

20. Prior to final map approval, enter into an agreement with the County franchised cable TV operator (if an area is served) to permit the installation of cable in a common utility trench to the satisfaction of Public Works; or provide documentation with steps to provide cable TV to the proposed subdivision have been initiated to the satisfaction of Public Works.

21. Comply with the mitigation measures identified in the attached May 19, 2009 memoranda/letter from our Traffic and Lighting Division to the satisfaction of Public Works.

22. The midblock trail crossing on 87th Street as shown on the Tentative Map is not approved. Relocate the trail crossing to the nearest intersection to the satisfaction of Public Works and Parks and Recreation.

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

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

IN REPLY PLEASE
REFER TO FILE. T-4

May 19, 2009

Mr. Frank Lee
Kunzman Associates
1111 Town and Country Road, Suite 34
Orange, CA 92868-4667

Dear Mr. Lee:

VALLEY VINEYARDS
TENTATIVE TRACT MAP NO. 066952
REVISED TRAFFIC IMPACT ANALYSIS (MARCH 11, 2008)
RESPONSE LETTER (MAY 9, 2009)
LEONA VALLEY AREA

As requested, we have reviewed the revised Traffic Impact Analysis (TIA) and subsequent response letter from the developer dated May 9, 2009, (copy enclosed) for the proposed Valley Vineyards project. The project site is located west of Bouquet Canyon Road and south of Elizabeth Lake Road in the unincorporated County of Los Angeles area of Leona Valley.

We generally agree with the TIA that the traffic generated by project alone will have a significant impact to the County intersection listed below. As indicated in the developer's response letter, the required improvements shall be the sole responsibility of the project. The traffic signal shall be installed and operational concurrently with the installation of a curb, gutter, first lift of asphalt pavement, and temporary traffic detection loops if needed.

<u>Elizabeth Lake Road at Bouquet Canyon Road</u>

Install traffic signal. Please note, per AB 1581 and the guidelines that Caltrans will be adopting, this signal is to include detection for bicyclists.

A 40-foot-scale site plan of the project showing access locations in relationship to adjacent intersections and driveways shall be submitted to our Land Development Division for review and approval prior to the issuance of a building permit.

If you have any questions regarding this review, please contact Ms. Nayiri Vartanian of our Traffic Studies Section at (626) 300-4778.

Very truly yours,

GAIL FARBER
Director of Public Works

WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

NV:cn
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Enc.

cc: Department of Regional Planning (Susan Tae)
Lauren Development (John Allday)

bc: Land Development (Narag)

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION - WATER
TRACT NO. 66952 (Rev.)

TENTATIVE MAP DATED 02-03-2011
EXHIBIT MAP DATED 02-03-2011

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. A water system maintained by the water purveyor, with appurtenant facilities to serve all lots in the land division, must be provided. The system shall include fire hydrants of the type and location (both on-site and off-site) as determined by the Fire Department. The water mains shall be sized to accommodate the total domestic and fire flows.

2. There shall be filed with Public Works a statement from the water purveyor indicating that the water system will be operated by the purveyor, and that under normal conditions, the system will meet the requirements for the land division, and that water service will be provided to each lot.

3. If necessary, install off-site water mainline to serve this subdivision to the satisfaction of Public Works.

4. Depict all line of sight easements on the landscaping and grading plans.

5. Easements shall be granted to the County, appropriate agency or entity for the purpose of ingress, egress, construction and maintenance of all infrastructures constructed for this land division to the satisfaction of Public Works.

6. A "Written Verification" from the water supplier. Provide a "Written Verification" and supporting documents from the water supplier to indicate the availability of a "Sufficient Water Supply" as required per Section 66473.7 of the Subdivision Map Act (SB 221) prior to filing any map or parcel map to the satisfaction of Public Works and the Department of Regional Planning.

HW

Prepared by Julian Garcia Phone (626) 458-4921 Date 03-09-2011

tr66952w-rev4.doc

COUNTY OF LOS ANGELES
Public Health

JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

KENNETH MURRAY, REHS
Director of Environmental Protection Bureau

Land Use Program
Patrick Nejadian, REHS
Chief Environmental Health Specialist
5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5380 • FAX (626) 813-3018

BOARD OF SUPERVISORS

Gloria Molina
First District

Mark Ridley-Thomas
Second District

Zev Yaroslavsky
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District

March 11, 2011

John L. Allday
Lauren Development, Inc.
P.O. Box 790
Agoura Hills, CA 91376

SUBJECT: VALLEY VINEYARDS PROJECT – VESTING TENTATIVE TRACT MAP 66952 BOUQUET CANYON ROAD, LEONA VALLEY

Dear Mr. Allday:

This letter supersedes the Department's previous letters dated May 28, 2010 and November 12, 2010, regarding the conditions of approval for Vesting Tentative Tract Map 66952. In these letters, the Department postponed compliance with certain approval conditions to the final map approval relating to the proposed decentralized onsite wastewater treatment system (OWTS).

The conditions required 1) joint authorization from other regulatory agencies, including the County Department of Public Works and the Los Angeles Regional Water Quality Control Board, 2) approval from the DPW regarding the configuration of wastewater lines, and 3) the availability of a qualified management entity (such as a service district) that is supported and approved by the County to ensure proper maintenance and continuous operation of the proposed decentralized OWTS.

However, after a recent meeting with other County officials, it was determined that a service district is not feasible because of concerns and limitations associated with the establishment/operation of a service district. As a result, the Department is rescinding its decision to postpone compliance of the above conditions. Furthermore, the Department cannot recommend approval of the tentative map until concerns relating to establishment of the service district have been resolved to the satisfaction of the County.

If you should have any questions regarding this decision or would like to schedule a meeting to discuss and explore other possible alternatives for this project, please feel free to contact me at (626) 430-5390.

Best regards,

Patrick Nejadian, Chief EHS
Land Use Program

③

PACIFIC COAST CIVIL, INC.
30141 AGOURA COURT, SUITE 200
AGOURA HILLS, CA 91341
PHONE: (818) 865-4168
FAX: (818) 865-4198
email: rich@pacificcoastcivil.com

October 29, 2010 W.O. 486

William D. Ford
Valley Vineyards, LLC
P.O. Box 790
Agoura Hills, CA 91376

RE: VESTING TENTATIVE TRACT 066952- VALLEY VINEYARDS HILLSIDE MANAGEMENT DENSITY CALCULATIONS

This letter is in response to County of Los Angeles' request for an explanation of the methodology and rationale used in determining the allowed densities for the subject subdivision. I welcome this opportunity. We have used the rationale explained below on many occasions when designing subdivisions in the unincorporated area of the County, and have received concurrence from staff in each instance. In fact, in late 2006, I inquired of staff about this methodology on your behalf, with this project in mind, prior to submitting it for review. As I will detail below, staff concurred with this interpretation at that time. It is quite disconcerting that they are taking an approach totally contrary to precedent, to their codes and to previous statements to me on this specific project regarding this subject.

The County of Los Angeles establishes general location and land use intensity through the Land Use Element of its General Plan, and, in the case of the Valley Vineyards project, more specifically established in the Antelope Valley Areawide General Plan. Both plans have been adopted by the Board of Supervisors and are the operative documents governing land use for the property.

The 292.5-acre Valley Vineyards site is located within the Non-Urban 1 (N-1) land use category, as shown on the adopted Antelope Valley Areawide General Plan *Land Use Policy Map,* which limits development to 0.5 dwelling units per acre, yielding a maximum of 146 dwelling units for the site.

The General Plan and Areawide General Plan also provide additional, and more restrictive, guidelines for orderly development in what are referred to as "Special Management Areas." There are several Special Management Areas identified in the General Plan, including significant ecological areas, agricultural preserves, and hillsides, to name a few. Special Management Areas are defined in the General Plan both verbally and by the "Special Management Areas Policy Map." In the case of the Valley Vineyards project, the pertinent special management regulations relate to hillsides, or "Hillside Management Areas" as they are called in the General Plan.

<u>In both the General Plan and Areawide General Plan, Hillside Management Areas are defined as mountainous and foothill terrain having a natural slope of 25% or more.</u>

Residential development densities in Non-Urban (N–1) Hillside Management Areas are subject to the density standards shown in Table LU-A1 of the General Plan (see page LU-A11, included herein as Exhibit A). This table clearly shows that densities are regulated only when the natural terrain exceeds 25% slope,

and not when the slopes are less than 25%. Though additional Minimum Natural Area requirements are defined on page VI-23 of the Areawide General Plan, the residential density standards in the Areawide General Plan are identical to those of the General Plan. Here, also, the densities are regulated only when the natural slope exceeds 25% and not regulated when the slopes are less than 25%.

Beyond these density standards, the County has provided additional regulations within the Planning and Zoning Code regarding the requirements for issuance of Conditional Use Permits in Hillside Management Areas. These added rules are defined in Code subsection A.2.b. of Code Section 22.56.215 (the "Hillside Management Regulations"), which, in turn refers to subsection E of 22.56.215, "**Calculation of Thresholds in Nonurban Hillside Management Areas.**"(emphasis added)

Section 22.56.215E states that "Density thresholds for residential uses in **nonurban hillside management areas** shall be calculated using the analysis of slope categories required by Subsection D2b...(emphasis added)", and follows with a description of the methodology for calculating the Low Density Threshold, which adds to the General Plan definition by defining density of one dwelling unit per five acres in the 0-24.99% slope category.

However, subsection D2b of the Hillside Management Regulations describes the Low Density Threshold calculation procedure thusly, "For proposed residential uses in areas **identified as nonurban hillside management areas in the General Plan**, the number of acres within the [three] slope categories, as determined by a licensed civil engineer...(emphasis added)" Repeatedly throughout the Hillside Management Regulations it is made clear that they only apply to areas identified as nonurban hillside areas in the General Plan.

As mentioned above, the General Plan, though, does not merely consist of words. It also incorporates maps that graphically describe General Plan elements. Included in the General Plan is a *Special Management Areas Policy Map*, part of the General Plan's Conservation and Open Space Element, which outlines Hillside Management Areas, identified thereon by the abbreviation "HM".

The Valley Vineyards project lies outside the limits of any HM areas. A copy of the *Policy Map* with the Vineyards project thus located is included herewith as Exhibit B.

Our search for defined Nonurban Hillside Management Areas is not limited to General Plan documents, however. The Los Angeles County Department of Regional Planning has implemented a Geographical Information System (GIS), an electronic version of the General Plan maps, which can be accessed by the public and professionals alike, and which can display specific parcel attributes, such as the limits of Hillside Management Areas (again, designated HM). The Valley Vineyards parcels are not so designated. A color printout of the GIS map with land use and zoning attributes displayed, showing the Valley Vineyard parcels, is included herewith as Exhibit C.

Based on the above, therefore, the only way to determine the Low Density Threshold, and the way that we have employed it for this development, is by using the General Plan formula in Table LU-A1, which makes no reference to terrain with slope less than 25% because that land is simply not defined as hillside management area.

Thus, the density calculations use the N–1base density of 1dwelling unit per 2 acres, for a Low Density Threshold of 80 units, and not 1 unit per 5 acres (40 units).

William D. Ford
Valley Vineyards, LLC
October 29, 2010

It is important to point out that we have corresponded with County staff on this point with respect to several projects over the last two decades, and with respect to your project as well. At no time were any of the calculations called into question. Our office and County staff have both recognized the distinction between areas designated for hillside management and terrain where no such designation exists.

In regard to the Valley Vineyards project, DRP Regional Planning Assistant II, Donald Kress, in an email of December 19, 2006 (after consulting with Ms Susan Tae, per his email), actually directed me to the formula on page VI-23 of the Antelope Valley Areawide General Plan.

On another developer's project, TTM 062921, a property located on Sierra Highway with explicit HM designation over a portion of the site, our calculation of Low Density Threshold included density of 1du/5 acres in the 0-25% slope range, in deference to the Code. That Low Density Threshold calculation was supported by staff.

Professionals that we are, developers, civil engineers and County staff all must be up to date with current regulations in the dynamic land development field. But as members of the public, we all share in the need for a transparent process and reasonable interpretation of basic development guidelines. This has been our goal throughout the development of the Valley Vineyards project. For the above reasons, the density thresholds for the Valley Vineyards project were established as follows:

% Slope	Low Density Threshold	Maximum Density
0-25% 133.2 Ac.	0.5 Dwelling Unit/Acre 66.6 D.U.	0.5 Dwelling Unit/Acre 66.6 D.U.
25-50% 143.2 Ac.	1.0 Dwelling Unit/10 Ac. 14.3 D.U.	0.5 Dwelling Unit/Acre 71.6 D.U.
50% + 16.0 Ac.	N/A ------	1.0 Dwelling Unit/20 Ac. 0.8 D.U.
	80.9, say **80 D.U.**	139.0, say **139 D.U.**

I hope that this analysis is helpful to you. If you have any further questions regarding our determination of density thresholds for the Valley Vineyards project, please do not hesitate to contact me.

Sincerely,

Richard E. Doss, PE, AICP, LEED AP

Table LU-A1

Countywide Density Threshold
Non-Urban Hillside

Natural Slope	Low	High
25 to 50%	1 d.u./10 acres	1 d.u./2 acres
Greater than 50%	Not Applicable	1 d.u./20 acres

In areas of greater than 50% natural slope, a maximum density of one dwelling unit per 20 acres shall apply in all unincorporated areas. In areas with slopes ranging from 25% to 50%, development proposals exceeding the low density threshold are subject to the Hillside Management/Performance Review Procedure. The density granted will reflect the extent to which performance criteria are met.

Adopted local plans may establish the maximum permitted non-urban densities for lands ranging from 25% to 50% natural slope. However, in no case will such densities be greater than the one dwelling unit per acre maximum established for all non-urban areas.

Under the Performance Review Procedure, development proposals with densities above the low threshold shall be required to demonstrate the following:

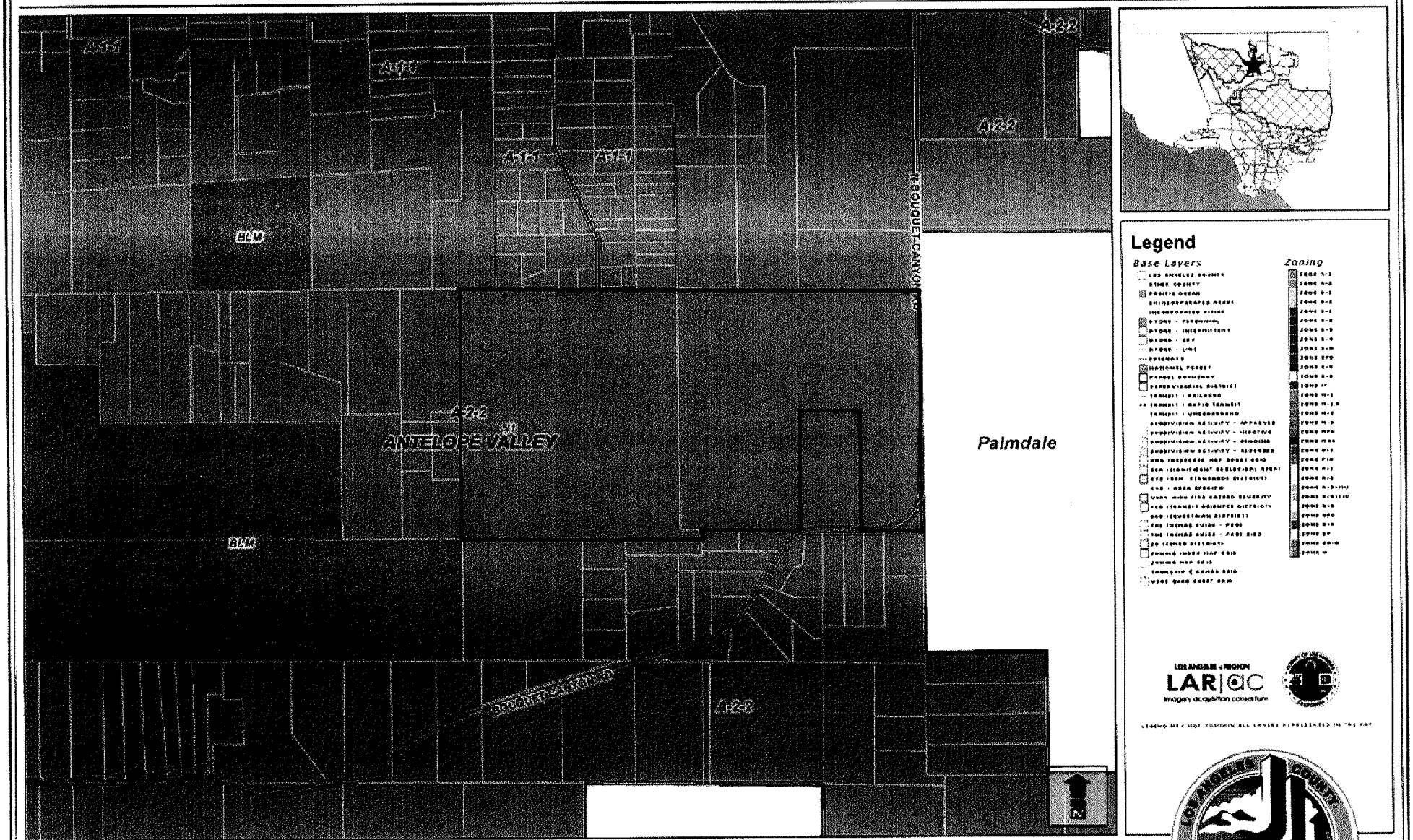
1. Public Safety:

   The proposed project is located and designed so as to protect the safety of current and future community residents and will not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood or erosion hazards.

2. Resource Protection:

   The proposed project is compatible with the natural biotic, cultural, scenic and open space resources of the area.

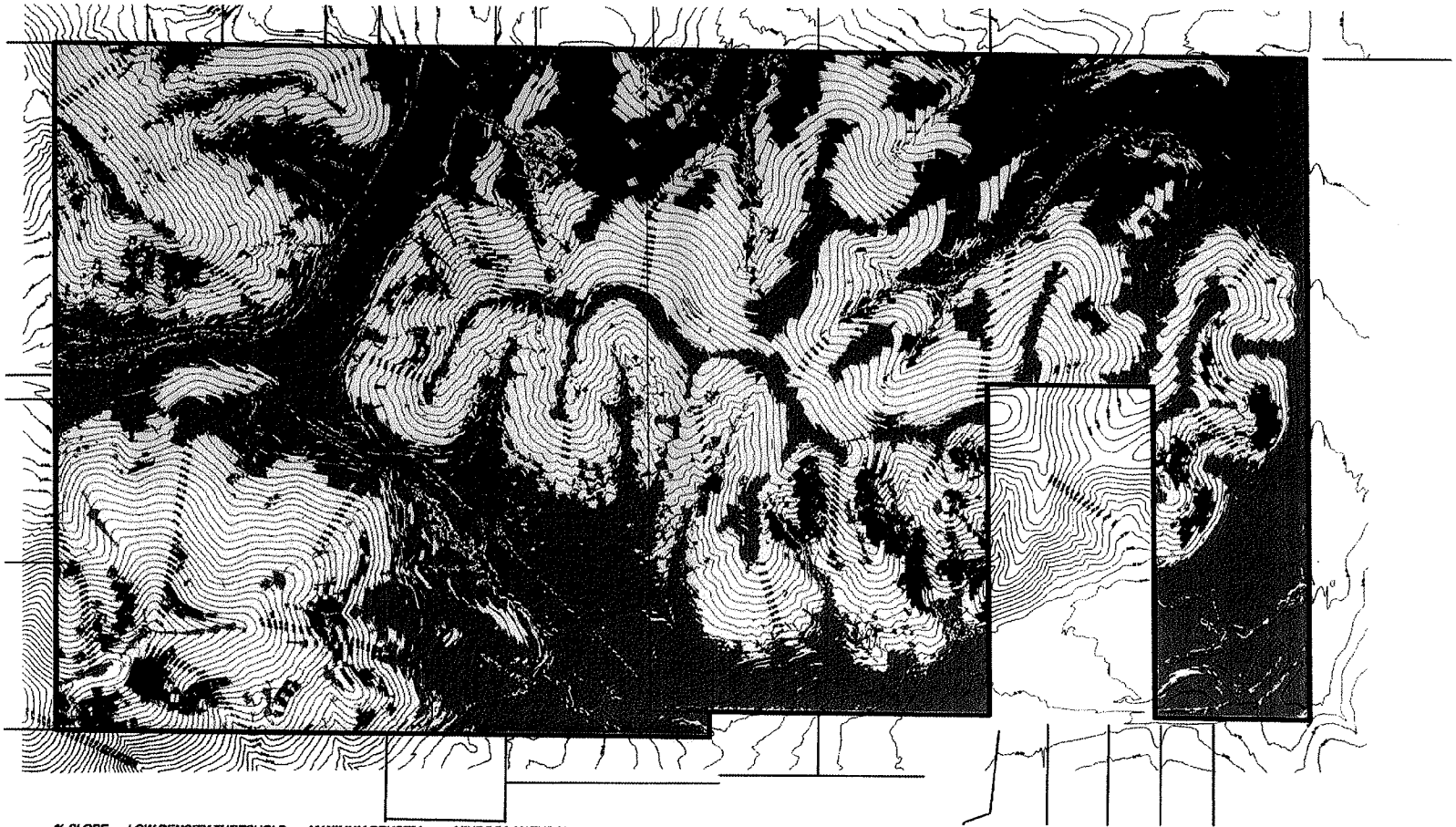
Los Angeles County
Department *of* Regional Planning | Zoning



Scale: 1:17,500
Printed On: Oct 27, 2010
GIS-NET | Public Web Mapping Application

Copyright 2007 - Los Angeles County Department of Regional Planning, created by the GIS Section
Printed with permission by the Los Angeles County Dept. of Regional Planning. All rights reserved.
Note: This map represents a quick representation of spatial imagery or vector layers using GIS-NET.
The map should be interpreted in accordance with the disclaimer statement of GIS-NET.

Exhibit C



% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY	MINIMUM NATURAL AREA REQUIRED
0 - 25% 133.2 AC	0.5 DU/AC 66.6 DU	0.5 DU/AC 66.6 DU	
25 - 50% 143.2 AC	1 DU/10 AC 14.3 DU	0.5 DU/AC 71.6 DU	70%
50% + 16.0 AC	N/A —	1 DU/20 AC 0.8 DU	70%
	80.9, SAY 80 DU	139.0, SAY, 139 DU	

SCALE: 1"= 200'

LEGEND:

Color	Layer	Range Beg.	Range End	Percent	Area
■	SRF-RNG1	0.00	25.00	45.6	5905161.78 = 133.3 ac
	SRF-RNG2	25.00	50.00	49.0	6235247.71 = 143.2 ac
■	SRF-RNG3	50.00	10000.00	5.5	697295.62 = 16.0 ac

PACIFIC COAST CIVIL, INC.
30141 AGOURA ROAD, SUITE 200
AGOURA HILLS, CA 91301
PH: (818) 865-4196
FAX: (818) 865-4196

Exhibit
D

VALLEY VINEYARDS, LLC
SITE SLOPE ANALYSIS

JANUARY 15, 2008

(4)

TR066952 The Vineyards
Table of differences, summary of remaining technical holds
October 21, 2010

	Applicant	Staff (per Jodie Sackett)	***Corrections to Staff's Assertions:*** **The majority of these items were discussed at a meeting held on October 23, 2008, which was chaired by Sorin Alexanian. Attending - Susan Tae, Jodie Sackett, Impact Analysis, County Counsel and the Applicant – Agreement was reach with staff on the items discussed below to allow Planning Commission to make a final determination and staff further agreed to present these items in a "neutral and unbiased" format.**
Density	117 units is ok since under the max allowed with the CUP	89 units ("midpoint density") is more appropriate based on terrain	***This was resolved at the 10/23/2008 mtg – allow Planning Commission (PC) to determine, with staff taking a neutral, unbiased position.*** Project meets the required area calculations of DCD and Hillside Mgmt Ord (HMO) o The Applicant's engineer believes that Staff has calculated the mid-point incorrectly. It is not 89, but 110 units. o A registered civil engineer has determined the correct numbers, which have been submitted to DRP: Low: 80 du **Mid: 110 du** → **Our Proposal: 117 du** High: 139 du o Staff should be able to easily support that the project density is acceptable since it is closer to the mid-point of 110 du than the high point of 139 du. (Staff has previously concurred with the Applicant at the mtg that 139 du is in fact the max, thereby tacitly concurring with the applicant's calculations)
Clustering/Design	Clustered "pads" is ok, throughout the entire project site	Clustered "lots" is more appropriate, and in less areas on the site, to avoid steep hillside disturbance	***This was resolved at the 10/23/2008 mtg – allow PC to determine, with staff taking a neutral, unbiased position. IN ADDITION County Counsel concurred with the Applicant's finding that easements do the same job as dedicated fee lots. Staff has conceded that there is nothing in the code requiring adherence to the "midpoint" of the density range.*** 1.) Lots and pads are really the same thing for this project. The lot lines by necessity must cover all of the land to be subdivided to make the min 2.5 ac requirement. The Applicant must clustered the pads to keep them off the slopes and ridge lines. Therefore the "pads" are what must be clustered as the pad is the only area of disturbance. 2.) Staff operates from the incorrect belief that all of the open space should be dedicated fee lots, therefore clustering of smaller lots around the opens space lots would meet their assessment. However, there is no requirement that the lots be dedicated (see "Open Space" below for rationale). 3.) Also see attached "Clustered Subdivision" exhibit from General Plan.
Open Space	Including the space inside residential lots as OS is ok, since other County hillside projects have allowed it	OS should be dedicated is separate fee lots, more appropriate for clustering	***This was resolved at the 10/23/2008 mtg – allow PC to determine, with staff taking a neutral, unbiased position.*** 1.) There is no requirement that Open Space occupy its own lot – quite the contrary. The key is that the land/area is dedicated to perpetual uses as open space, which the applicant is proposing through the dedication of about 210 acres committed to permanent open space by easement. County Counsel agrees with this interpretation. 2.) To make the 210 ac a separate open space lot would be impractical: 300 ac of total land of which 210 ac is open space (or 80% of the total land - but recall only 70% is required by county); if the 210 ac were dedicate in fee, that would leave the applicant with 90 ac to subdivide; at an avg of 2.5 ac for each lot, the total yield would be 36 lots.
Grading	Current grading amount and design is ok	Reduce overall amount of grading by reducing density and reducing disturbance to steeper 50%+ slopes; use more contoured grading	From the very beginning of the process Staff has had conflicting reports and opinions on this item. Staff initially reported that the Applicant was grading 4,000,000+ cu yds. The fact was it was closer to 2,000,000; Staff inaccurately calculated the grading levels, as indicated by this explanation of the formula staff used: "you cut 1 yd and then fill it somewhere else on the site therefore your cut and fill is equal to 2 yards, or double the amount" (Jodie Sackett) The inaccuracy of this formula is evidenced by the fact that when County fees are paid for a grading permit, the cut/fill is only counted once – not twice. Nevertheless, the Applicant revised the map in 2008 (the current plan submitted to the County) to decrease

		in design	this original amount by half, or just over 1,000,000+ cu yds, or about 10,000 cu yds per lot, (a very small amount of grading for a project like this). With the applicant's voluntary commitment to reduce the amount of grading, the Applicant will be required to NOT mass grade the site, as is the conventional practice. Each lot will need to be individually graded so as not to disturb the 210 acres of open space and to keep the quantities of grading down. There are few if any other projects in LA County that preserve open space and reduce grading to such a great degree. Further, 90% of the slopes in the project are specifically designed to be contour graded.
Private Vineyards	Can legally include this commercial-agricultural use within the required 70% OS areas; counts as "greenbelt" under Plan policy/OS definition	Cannot include it within the required OS areas, is not a "greenbelt"	***This was resolved at the 10/23/2008 mtg – allow PC to determine, with staff taking a neutral, unbiased position.*** Staff's original position on this item was that commercial operations in open space are not allowable. The applicant then questioned why then are golf courses both a) allowable and b) considered open space. Staff then ceased defending the above-position, but continues to not accept the language in the County Code that allows for open space to be a commercial operation. The Applicant's position argument is that current L.A. County Code (as well as several other jurisdictions throughout California) allow for vineyards in open space areas. In fact some codes encourage it – as does L.A.'s code: **Los Angeles County Draft Preliminary General Plan 2008 (pg 27)** A. RURAL Rural land use designations provide appropriately located areas for a variety of agricultural activities, agricultural production, associated housing for agricultural activities, resort recreation, equestrian uses, single-family homes, service establishments, and other related rural activities that maintain the character of and serve rural areas. Agriculture (AG) Purpose Identifies and establishes areas suitable for agricultural uses, agricultural production, and associated housing for agricultural activities. The agricultural designations can: • Produce row and field crops, dry crops, orchards and vineyards, grazing, and other related agricultural activities; **Zoning Code** Part 9 -OPEN SPACE ZONE **B. Permitted uses in Zone O-S are as follows:** **– Crops--Field, tree, brush, berry and row, including nursery stock.** **Antelope Valley Areawide General Plan** The intent of Plan policy is to provide assistance to those landowners who desire to remain in production through such measures as tax relief and "right to farm" legislation to discourage inappropriate nuisance suits. b. Non-residential Uses in Non-urban Areas *[our project designation]* (e) Agricultural activities including livestock grazing, bee-keeping, orchards and vineyards.
Septic system	New innovative system will store and treat wastewater on each individual lot, allowing re-use within the site for irrigation; should be allowed	Previously rejected but now accepted by DPH (no position by DRP)	***STAFF NEVER REJECTED THE APPLICANT'S APPLICATION*** – Any assertion otherwise is factually inaccurate.
Circulation	Innovative private street system proposed, which integrates bio-swales and reduces impervious	Laudable effort, but requires a waiver of public street frontage per Title 21, which DRP currently rejects due to	***Susan Tae agreed to our circulation plan and waiver at the 10/23/2008 Meeting*** 1.) There is NO PUBLIC STREET FRONTAGE. All the interior streets are designated as "Private Drives and Firelanes" At the 10/23/2008 mtg this issue was raise in part. In order to be as "Green" as the Applicant is proposing, the County would not allow the Applicant to build public streets which required curbs, gutters and sidewalks (also prohibited by the CSDs). Therefore the DPW allowed the Applicant to use "Private Drives

	surface	overall project design (why approve the street waiver when the project is over-developed?)	and Firelanes". This made the streets private and exempt for most of the "public street" requirements (which is also why the applicant decided to gate the project - HOA must maintain, liability, etc). 2.) Re the statement "Why approve the street waiver when the project is over-developed" Answer: Firstly it is not overdeveloped (139 max units allowed vs. the 117 proposed) and second, because waivers are meant to be given if nothing adverse results from it – in Staff's description – the Applicant's plan is "laudable" – i.e. better

(See corrections to Staff's assertions in **BOLD**)

Technical holds:

- Completion of environmental determination (may be an EIR due to a significant traffic impact, per DPW)
  This is untrue for at least two reasons:
  1.) If Staff is referring to:
  a) Traffic Studies - At the 03/2009 Subdivision Committee mtg – Staff noted (in his own handwriting contained in public documents) that the "Traffic Study was Approved."
  b) The issue of improvements to Bouquet Canyon Road – DPW resolved this issue two weeks ago (early October 2010)
  2) Further, it should be noted that the environmental determination is NOT a condition of releasing a hold on a TTM – these are separate issues. Once the various departments release their technical holds on the project, the clock starts on the County to complete the Initial Study. When staff (not Mr. Sackett but a different Dept. of DRP) finishes the Initial Study, it then makes an environmental determination recommendation to the Planning Commission. Impact Analysis Staff has informed the Applicant that it will be recommending a Mitigated Negative Declaration for the project, not an EIR.
- Public Works, Subdivision Committee (rev. map submittal, geology, soils, drainage, traffic)
  1.) The geology and soils sections of DPW have released their hold.
  2.) The traffic section of DPW approved the road design and striping for the project and released their hold.
  3.) The drainage section of DPW gave the Applicant some very minor corrections to make to the project two weeks ago, which included a request for a letter from the City of Palmdale accepting some drainage. DPW indicated it would expedite its review once this letter is submitted. With the exception of the letter from the City of Palmdale, all materials have been resubmitted to DPW staff.
  4.) The Applicant fully expects this hold to be released within the seven to fourteen days. (This latest hydrology correction required a minor change to the approved Bouquet Canyon road plan. This has been completed and resubmitted to DPW. The temporary hold from the traffic section for this minor correct will then be released.)
- Regional Planning, Subdivision Committee (rev. slope density map, minor map corrections, rev. application)
  1.) The Applicant met with Jodie Sackett and Susie Tae on June 7, 2010 and gave them a copy of the final VTTM with all anticipated changes (all of which were very minor from the last time they had seen it). They advised the Applicant to wait until all technical holds are released before submitting multiple copies of the map and all other final documentation to move forward

Clearances:

- Fire Dept., Subdivision Committee
- Parks/Rec., Subdivision Committee
- Pub. Health, Subdivision Committee

ALSO:

- **GEOLOGY**
- **SOILS**
- **TRAFFIC**
- **ROADS (UPON REVIEW OF DPW REQUESTED CHANGES TO BOUQUET CANYON)**
- **HYDROLOGY (WITH SUBMITTAL OF LETTER FROM PALMDALE)**
- **DRAINAGE**

EXHIBIT 1

It is interesting to note that the LA COUNTY GENERAL PLAN: Fig 5.6, outlines what the County feels is a Model Project. The Applicant MEETS ALL OF THESE CRITERIA, as the Applicant used all of these features in our design as follows:

Figure 5.6: Design Guidelines for a Model Project in Hillside Management Areas	***Valley Vineyards Proposed Plan for development***
1. Minimize grading and removal of native vegetation.	***Done*** *- 210 acres of open space (80% of site). Reduced grading to pad level (not mass) and clustered pads. Only 10,000 cu yds per lot average for site.*
2. Preserve distinctive natural features and existing topographical forms.	***Done*** *- No ridgelines impacted, pads kept down slope to lessen offsite visible impact, contour grading of all cut slopes.*
3. Preserve prominent skyline ridge silhouettes; locate roads and structures below skyline ridges.	***Done*** *- See 2. Above.*
4. Design circulation routes that incorporate existing contours; undulating road patterns, culde- sacs, split roadways and varying grades.	***Done*** *- added roundabouts, kept roads on valley floor.*
5. Incorporate hiking, bicycle, walking and equestrian trails where appropriate; integrate trails and open space with existing networks.	***Done*** *- Over 2 miles of public trails and 5 miles of private trail.*
6. Vary lot sizes, setbacks and building orientation and elevations to ensure views and avoid monotony.	***Done*** *- Lots range in size for 1.5 acres to 10 acres. All lots varied to take advantage of natural view, elevations between pads vary greatly.*
7. Preserve steep hillsides by clustering buildings and using other innovative site design approaches.	***Done*** *- See 1., 2., 3. Above*
8. Use flag lot design where essential to reduce grading.	***Done****, although Regional Planning required that we delete some of these lots as they did not concur that flag lots were a positive feature. Fire required separate drives also, which increase the impermeable surfaces.*
9. Preserve significant trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.	***Done*** *- ALL water coursers were avoided, even a bridge was added so as not to disturb a jurisdiction streambed.*
10. Consider the project's appearance from higher, lower or adjacent roads or development.	***Done*** *- Entire site modeled on a computer and a physical model was created to review and adjust pad siting for just this purpose.*
11. Place water tanks and other unsightly forms below ridgelines and in a beamed and naturally landscaped area.	***Done*** *- This is exactly what we did with the water tank placed on the site, including extensive berms to shield it from offsite visibility.*

LAUREN
DEVELOPMENT INC.

April 15, 2009

Michele Bush
Impact Analysis Section
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles CA 90012

RE: TR066952 / Renvt200700035 – Update to Draft Initial Study and Draft Mitigated Negative Declaration

Dear Ms. Bush:

We concur with your decision to update and redistribute the Draft Initial Study (DIS) and Mitigation Monitoring Program (MMP) for this project. In addition to changes that reflect the major improvements made to the plan during the last two years, there are a number of revisions we believe should be made to the DIS and MMP so they remain unquestionably consistent with CEQA guidelines and procedures. We would note that subsequent to the previous circulation of the earlier DIS in June, 2007, we asked our consultants to examine certain additional issues raised in the responses to the earlier DIS and to provide certain clarifications to aspects of the project. We have also engaged additional consultants to address certain issues raised in the course of the CEQA review process. Accordingly, a strong administrative record exists to substantiate staff's findings reporting this project's anticipated environmental effects and the appropriateness of the use of a Mitigated Negative Declaration for this project, and we strongly encourage staff to use and reference this factual information and expert analysis in the DIS, MMP and proposed MND.

Our suggestions are as follows:

DRAFT INITIAL STUDY:

Description of Project:

We suggest the following wording: "The proposed project is a request for a Vesting Tentative Tract Map to subdivide 3 parcels on 292.50 acres into 117 lots ranging in size from 1.5 to 10.5 acres for single-family residential and agricultural purposes. An additional lot, Lot 118, is reserved for a water tank. Graded pads for home sites account for 47.8 acres (16% of the total site) and will range from approximately 10,000 sq ft to 30,000 sq ft. All streets (25.4 acres) will be private, with the exception of the connection road between 87th Street West and Lost Valley Ranch Road (currently a non-public dirt road used by residents of Lost Valley Ranch Road), and will be improved, paved and dedicated to the County as a public street. Of the total 292.50 acres, 212.1 acres will remain as open space. Of the 212.1 acres of open space reserved on the property (79.4% of the net project site), approximately 120 acres will be used for vineyard greenbelts. The property is currently vacant and undeveloped. The project applicant is requesting two CUPs (RCUP 200700038 and _____). Single family homes will consist of one and two-stories, but are not yet designed. Drought tolerant landscaping is proposed for both common and private yard areas. Each lot will have its own Advanced Treatment System (ATS) for domestic waste. A total of 1,160,000 cubic yards of dirt will be graded (9,800 cubic yards per lot) and balanced on site. Five miles of bio-swales, in addition to bio-retention areas and rain-water capture devices, are included throughout the project to reduce stormwater runoff and replenish

ground water. All riparian areas are avoided, and thus preserved. Seven miles of public trails are proposed, of which approximately 2 miles will be dedicated to the County Department of Parks and Recreation."

Environmental Setting:

We suggest the following wording: "The project site is located on Bouquet Canyon Road approximately two-thirds of a mile south of Elizabeth Lake Road and 1.1 miles east of Angeles National Forest. It is 2.5 miles southeast of the Warnack Nature Park and approximately 8 miles west and 7 miles north of the Antelope Valley Freeway, within the unincorporated Los Angeles County community of Leona Valley. Surrounding land uses within a 500 ft radius consist of approximately 16 single family dwelling units and 15 vacant lots. The project site contains 1.62 acres of jurisdictional "waters" located in two riparian areas on the property, but the project design will have no impact on any jurisdictional "waters" within the boundaries of the property; those areas will be avoided. There are no oak trees on site."

1. Hazards - 1. Geotechnical

Item A.

Typo. Should read: "Project is located approximately 1 mile from San Andreas Fault zone."

Mitigations:

On the previous DIS, no boxes were checked under "Standard Mitigation Measures" or "Other Considerations / Mitigations." I believe all four boxes should be checked.

We suggest the following mitigation measures:

- An engineering geologic report shall be required to confirm the feasibility of the proposed subdivision. A Preliminary Geologic and Soils Engineering Investigation report is required to be submitted and approved prior to subdivision approval. Additional geotechnical analyses are required during the grading and construction process. All reports shall comply with the provisions of "Manual for Preparation of Geotechnical Reports." The above reports shall address the potential for liquefaction and ground failure. All the above reports shall address and evaluate the site and the proposed development. All the reports shall indicate measures that must be taken to insure that the development is safe. All recommendations contained in the reports shall be imposed on the project by the County and shall be adhered to in order to insure impacts shall be less than significant.
- The project shall conform to the Uniform Building Code standards, which include design requirements to reduce the potential for significant damage to structures resulting from strong seismic ground shaking. The UBC and County building standards and procedures, including those associated with hillside management, shall be enforced through review of plans and inspection of structures during construction. By complying with the UBC and County standards and procedures, project impacts related to ground shaking would be less than significant.
- The project shall provide chemical test results (sulfate, chloride, resistivity, etc.) for the on-site soils to address the presence of chemicals deleterious to construction materials and utility lines. Any such chemicals shall be removed or modified in accordance with County regulations in order to insure that impacts shall be less than significant.
- The project shall comply with the County's Hillside Management regulations.

Also, we suggest your proposed mitigation regarding compliance with SCM conditions be more specific, such as:

- The project shall comply with all approved conditions and requirements of the County Department of Public Works concerning geotechnical issues.

2. Hazards - 2. Flood

Item A.

We suggest the following wording: "There are two unnamed watercourses on the property. Both are north or east flowing tributaries of Armagosa Creek, which is located approximately ½ mile to the north. Grading near the southeast corner of the site, where one of the watercourses is located, is generally 200'-300' away (horizontally) and 80'-100' higher than the creek, although in one location the grading is approximately 150' away from the creek. Grading near the second watercourse, which runs adjacent to the dirt connection road between 87th Street West and Lost Valley Ranch Road, shall also be kept away from that watercourse. One private road will cross over this second watercourse; however a bridge will span the creek thereby avoiding any impact on this riparian area as well."

Item D.

We suggest the following wording: "Government regulations such as RWQCB Peak Flow Policy dated February 1, 2005 require that the velocity, volume, location and peak flows of water presently leaving the site not be increased by the project. This project shall comply with this requirement." The MMP should have this condition added to it.

Item E.

We suggest the following wording: "Currently, the dirt connection road between 87th Street West and Lost Valley Ranch Road, and the adjacent creek, are periodically scraped and re-graded by neighbors to maintain the dirt road's accessibility. Full improvements to this road by this project shall help to prevent erosion, dust, debris and auto-related pollutants from entering the creek. The project's Homeowners' Association shall be charged with the long term maintenance and protection of this creek area"

Mitigations.

Suggested mitigation measures are:

- Permits from the California Department of Fish & Game (in accordance with Sections 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) will not be required due to design changes which obviate any jurisdictional impacts. However if the plan changes and permits are required, they shall be obtained.
- The subdivision shall conform to the design standards and policies of Public Works.
- The project shall offer for dedication to the County the extension of 87th Street West over the subject property. The project shall improve the extension to "all weather" conditions.
- Prior to construction, all drainage facilities and street improvements shall be approved by the County Department of Public Works.
- Prior to tentative map approval for drainage/grading, the project shall submit a drainage concept showing the extent of drainage impacts and shall provide mitigation acceptable to the County to insure that any drainage impact is less than significant. The analysis should address

increases in runoff, any change in drainage patterns, debris producing areas, and the capacity of existing storm drain facilities. The project shall provide line identification of all proposed drainage facilities. Preliminary soils and geology reports related to debris, retention, and detention basins may be required by the County based on geographic and adverse geotechnical conditions. The project shall comply with all drainage requirements of the County. The County Department of Public Works shall review and approve the measures to control this drainage to ensure no significant impact.

- The project shall provide engineering calculations to support sizing of any debris, retention, and detention basins as required. The project shall provide appropriate flood hazard and bank erosion setbacks and lot identifications (as needed). The project shall show slopes for existing and proposed streets. The project shall provide a letter of intent for any offsite work.
- The project shall comply with Interim Peak Flow Policy, adopted by the Regional Water Quality Control Board February 1, 2005. The Peak Flow Standard shall require that all post-development runoff from a 2-year, 24-hour storm shall not exceed the pre-development peak flow rate, burned, from a 2-year, 24-hour storm. The Peak Flow Standard shall also require that post-development runoff from the 50-year capital storm shall not exceed the pre-development peak flow rate, burned and bulked, from the 50-year capital storm.

On the previous DIS, under "Other Considerations / Mitigations" it is stated "Comply with SCM recommendations from Public Works." We suggest this be more specific, such as:

- Comply with all approved conditions and requirements of the County Department of Public Works concerning flooding issues.

3. Hazards - 3. Fire

Item C.

The "No" box should be checked. We suggest the following wording be added here: "The project has 117 lots and two (2) access points, one onto Bouquet Canyon Road and one onto 87th Street South."

Item D.

The "No" box should be checked. The initial plan did not propose a water tank. We suggest the following be added here: "The plan has been revised to include a water tank which shall enhance fire fighting capabilities for the community by increasing capacity and line pressure. The location and elevation of the tank shall be selected to insure that adequate water pressure shall result."

Item G.

We suggest the following be added here: "According to the County Fire Protection Department, grape vines are acceptable plant material in fuel breaks. Approximately 120 acres of this site may be used for vineyards, which shall reduce the potential dangers from the periodically dry vegetation on the property."

Also, we suggest the following be added here: "Development of this site will improve fire safety in the community by 1) Clearing of the site of brush will provide a buffer between existing homes and remaining fire prone areas; 2) Construction of a water tank that will enhance present fire fighting capabilities; 3) At present, in times of emergency, the only escape route neighboring residents can take is to Elizabeth Lake Road via 90th Street West. This development will create a second emergency access route to Bouquet Canyon Road."

Mitigations:

Suggested mitigation measures are:

- A "Fuel Modification Plan" shall be submitted and approved prior to final map clearance.
- Access shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 902 of the Fire Code, which requires all weather access.
- Where driveways extend further than 300 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.
- All street widths and lengths shall meet the approval of the Fire Department.
- Fire hydrant locations shall be approved and located by, and meet the design standards of, the Fire Department.
- Fire fees shall be paid for this project at the time of building permits.
- Access for emergency vehicles shall be allowed through the project (between Bouquet Canyon Road and 87th Street West).
- During an emergency, if public officials order a community evacuation, full access shall be allowed through the project (between Bouquet Canyon Road and 87th Street West).
- In addition to serving domestic water needs, the water tank on the property shall be designed to enhance current fire fighting capacities in the community.

On the previous DIS, under "Other Considerations / Mitigations" it is stated "Comply with SCM recommendations from Fire Department." We suggest this be more specific, such as:

- Comply with all approved conditions and requirements of the County Fire Protection Department.

4. Hazards - Noise

On the previous DIS, no mitigations are identified. We recommend both boxes be checked. Any other regularly imposed noise related conditions should also be identified.

5. Resources - 1. Water Quality

Item A.

We suggest changing the existing note to read "The project will use domestic water from the local provider for residential use. The project also has long standing contracts to use agricultural water from the Antelope Valley East Kern Water Company (AVEK) for vineyard purposes, therefore agricultural water may not be needed from the domestic water retailer. Alternatively the developer may assign its rights to this agricultural water to the domestic provider as supplementary water, and in that case the domestic provider will also supply the property's agricultural water needs.

Item B.

The existing note, under the first part of Item B, should be revised to read: "All domestic waste shall be subjected to Advanced Treatment System (ATS) technology. Domestic waste shall be collected and treated by an ATS at each lot in lieu of traditional septic systems. Each ATS system shall be

continuously monitored employing web based technology. Cleaned and treated effluent shall then be conveyed to one of four (4) evapotranspiration / infiltration (ET/I) areas within the development. Within these four ET/I areas, the incoming highly treated effluent shall be subjected to additional treatment, then dispersed via a closed loop, round the clock, pressurized, underground system that emits the highly treated effluent in small bursts to allow absorption by plant materials. These ET/I areas shall also be monitored. Absorption by vegetation further treats the effluent, and it then "evapotranspirates" up into the atmosphere rather than percolating down into the groundwater. During periods of extreme wet weather, the highly treated effluent will percolate downward."

Under the second part of Item B, add the following note: The required separation of ET/I areas from any drainage course shall be maintained."

Item D.

We suggest the following note be added: "Paving of the presently dirt connection road between 87th Street West and Lost Valley Ranch Road shall help to prevent erosion, dust, debris and auto-related pollutants from entering the creek.

We also suggest the following note be added: "The five (5) mile bio-swale system and bio-retention areas, throughout the project will reduce the quantity and increase the quality of stormwater runoff. Bio-swales also filter urban runoff, so fewer pollutants will enter the storm system. Permeable paving, roof rainwater collection systems and rain gardens will also control the quality of runoff."

Mitigations:

Under "Other Considerations" we believe the "Project Design" box should be checked, and the following note be added: "The project's use of the Advance Treatment System (ATS) technology for treatment of domestic waste will significantly reduce the potential for adverse impacts upon groundwater."

Mitigation measures should be listed here, and also listed in the MMP. Suggested mitigation measures are:

- Advanced Treatment System (ATS) technology shall be employed in the treatment of domestic waste.
- Evapotranspiration / Infiltration (ET/I) shall be employed in the dispersal of treated effluent.
- Bio-swales, roof rainwater collections systems, permeable paving and rain gardens shall be employed to reduce urban runoff and increase replenishment of groundwater supplies.
- All requirements of the County Department of Public Health and the Lahontan Regional Water Quality Control Board shall be adhered to.

5. Resources - 2. Air Quality

No revisions recommended.

6. Resources - 3. Biota

Item B.

We believe the "No" box should be checked. The biological survey from September, 2006[1] and the supplemental biological memo dated December 23, 2008[2] clearly demonstrate the minor amount of "natural habitat areas" on the property. Also, these reports demonstrate that the site does not support any sensitive plant communities or sensitive habitats.

We suggest the existing note be changed as follows: "Approximately forty-eight percent (48%) of the site will be graded. No sensitive plant communities or sensitive habitats are on the property. The project site has historically been used for grazing and no sensitive plant communities will be removed by the proposed project. Non-sensitive vegetation will be replaced with grapevines."

The following vegetation types and approximate acreages are on the property:

- Chamise chaparral - 100.4 ac.
- Mixed chaparral - 16.5 ac
- Big sagebrush scrub – 3.2 ac
- Buckwheat/deerweed scrub - 54.8 ac
- Mule fat scrub - 5.2 ac
- Disturbed riparian scrub - 5.9 ac
- Non-native grasslands - 92.4 ac
- Ruderal - 10.8 ac
- Disturbed - 3.3 ac

None of the riparian areas will be removed by the proposed project.

Item C.

Your note on the previous DIS runs off the page. We suggest the following note be put here: "There are two unnamed watercourses on the property. Both are north or east flowing tributaries of Armagosa Creek, which is located approximately ½ mile to the north. These watercourses and associated jurisdictional "waters" will be untouched by this development."

Item D.

This note on the previous DIS also runs off the page. We suggest the following note be put here: "There are two unnamed watercourses on the property. Both are north or east flowing tributaries of Armagosa Creek, which is located approximately ½ mile to the north. The project avoids any impacts to the riparian habitat on the site. All areas containing 'waters' or riparian habitat under the jurisdiction of the California Department of Fish & Game or the U.S. Army Corps of Engineers will be avoided."

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[1] PCR Services Corporation, Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California, August 15, 2006

[2] PCR Services Corporation, UPDATE TO TWO PRIOR REPORTS FROM PCR ENTITLED: (1) "Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site (TTM 066952), Unincorporated Los Angeles County, California" Dated August 15, 2006, and (2) "Response to Comments from Leona Valley Town Council Regarding Biological Resources within the Draft Initial Study for the 292.49-Acre Bouquet Canyon Project Site (TR 066952), Unincorporated Los Angeles County, California" Dated September 27, 2007.

Item F.

We recommend this note be revised as follows: "The site has been surveyed by qualified biologists. Biological reports and surveys do not detect any State or federally listed threatened or endangered species on the project site. The Site is within the 450,000 acres currently designated in California as critical habitat for the California red-legged frog; however, biological surveys have concluded that suitable habitat for this species does not occur within the project site. 'Critical Habitat' is a federal designation under the Federal Endangered Species Act intended to guide federal agencies in the manner in which they evaluate federal agency action in designated areas. (The U.S. Fish & Wildlife is currently proposing to designate more than 1.8 million acres in California as critical habitat for this species.) Biological surveys have also concluded that the site does not provide suitable habitat for the unarmored threespine stickleback, or any other sensitive aquatic species.

We recommend this note also be included: "Impacts to sensitive species (which are not state or federally listed) with the potential to occur on site would not be significant as any impacts would not cause populations to drop below self-sustaining levels."

A mitigation measure is added below to ensure that project impacts to raptors and songbirds are less than significant.

Mitigation Measures:

The DIS should list all the mitigation measures being imposed on the project or should specifically refer the reader to the MMP for a list of these measures and provide a copy of the MMP with the IS that it re-circulates.

Mitigation Measures:

- To protect nesting birds regulated by the Migratory Bird Treaty Act and avoid any significant impacts to songbirds and raptors, efforts shall be made to schedule vegetation removal between August 16 and February 14 to avoid the nesting season. If vegetation removal activities (whether in the form of clearing or grading) cannot be avoided during the nesting season (i.e., February 15 through August 15), all suitable habitat will be surveyed for the presence of nesting birds by a qualified biologist within two weeks prior to vegetation removal. If any active nests are detected, those nests will be flagged, along with a minimum 100-foot buffer (the nest buffer may range between 100 and 300 feet as determined by the monitoring biologist) and will be avoided until the nesting cycle is complete or until the monitoring biologist determines that the nest has failed. The buffer zone shall be flagged or otherwise clearly delineated to operators in the field, to the satisfaction of the qualified biologist. In addition, if vegetation removal occurs between February 15 and August 15, a qualified biologist shall be present on the site to monitor the vegetation removal to ensure that nests not detected during the initial survey are not disturbed until the young of any nesting birds have fledged (or it is determined that the nest has failed).

- Permits from the California Department of Fish & Game (in accordance with Sections 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) will not be required due to design changes which obviate any jurisdictional impacts. However if the plan changes and permits are required, they must be obtained, and all requirements thereof complied with.

Mitigation Measures / Other Considerations

We suggest the "Project Design" box should be checked.

7. Resources - 4. Archeo / Historical / Paleo

Item A.

Typo. Comments in the DIS run off the page.

We suggest the following wording: "There are two unnamed watercourses on the property. Both are north or east flowing tributaries of Armagosa Creek, which is located approximately ½ mile to the north. An archaeological record search of the property was conducted, which revealed at least two prior site specific surveys and concluded that there were no artifacts on the site. Due to the age of the prior archaeological surveys, this report recommended an onsite inspection for archaeological resources. Subsequently a Phase 1 Archaeological Study of the site was conducted, which revealed that: 1) at least two prior reports have been conducted on the subject site, each of "which failed to yield evidence of prehistoric or historic land use;" 2) that "no prehistoric or historic archaeological resources were encountered," and 3) that "any improvements within [the site] will have no adverse impacts on known cultural resources."

Item B.

We suggest the following wording: "A paleontological record search of the property was conducted, which revealed that no fossil localities have been identified within the boundaries of the site."

Item C.

In that the question refers to historic structures or sites found on "the project site," in our opinion it is not appropriate here to refer to a site that is "some miles" away, and this wording should be deleted. The box checked should be the "No" box and not the "Maybe" box.

6. Resources - Agriculture

Items A. & C.

We suggest the "No" box be checked in both items. While the DRP E-NET may show the site to be within "Grazing Land Designation," over 100 acres of the property is designated on the proposed plan for vineyard agriculture use. This project would increase the number of acres of agricultural uses in Leona Valley by nearly two-thirds. Currently there are only approximately 150 acres currently in active agricultural use in Leona Valley, including approximately 60 acres planted in cherries, 28 acres in grapes vines, 10 acres in Asian pears, 10 acres in Arkansas black apples, 20 acres in hay, 5 acres in vegetables, 10 acres in lilacs, and 2 acres in Christmas trees. This project will devote approximately 100 acres of the site to an agricultural element - viticulture.

7. Resources - Visual

Item B.

We suggest the following explanatory wording: "The Northside Trail and Pacific Coast Trail are located within the project site. The project will not obstruct views from these trails. Approximately 2 miles of publicly accessible riding and hiking trails will be constructed and dedicated to the County Department of Parks and Recreation. Additionally, 5 miles of bio-swales paralleling both sides of the interior streets will be designed to also function as riding and hiking trails. These interior trails will

also be publicly accessible, Thus, the project will provide approximately 7 miles of riding and hiking trails for the community."

Item C:

We suggest the following explanatory wording. "A County secondary highway and three residential streets abut the property – three County-maintained public streets and one private dirt road. One heavily used dirt road bisects the property. There are 75 lots and approximately 43 homes within 1,000' of the site. This is not an undeveloped or undisturbed area."

Item D:

We suggest the following wording: "The project has been designed in accordance with the County's hillside management regulations, utilizing contour grading, clustering of homesites and ridgeline preservation. The site will not be "mass graded;" the entire property will not be cut or filled to create building sites. Rather, grading will be limited to the location of the home pads. In order to fully implement contour grading of the site, graded slopes will be less steep than 2:1 and/or engineered to have undulating slopes that mimic the natural topography."

Mitigations / Other Considerations:

We suggest the "Lot Size" and "Project Design" boxes be checked.

8. Services -1. Traffic

Item A.

Change number of units to 117.

We suggest the following additional wording: "A traffic analysis has been prepared by a licensed traffic engineer and approved by the County. This report measured: 1) Existing Traffic Conditions, 2) Project Traffic conditions, 3) Existing Plus Ambient Growth Traffic Conditions, and 4) Existing Plus Ambient Growth Plus Project Traffic Conditions. The conclusions and reconditions of the engineer have been incorporated into the design of the development. The conclusion of the traffic engineer is that:

1. study intersections are projected to operate at Level of Service A during the peak hours for Existing Plus Ambient Growth traffic conditions.
2. study intersections are projected to operate at Level of Service A during the peak hours for Existing Plus Ambient Growth Plus Project traffic conditions.
3. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 without project traffic conditions.
4. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 with project traffic conditions."

Item B.

Suggest the following wording: "No. See above comment."

Item C.

Suggest the following wording: "No. See above comment."

Item D.

Suggest the following wording: "No. The project will create a needed second emergency access point for the community, thus shortening the distance and improving the speed for emergency vehicles accessing the area."

Item E.

This answer should be "No." We suggest the following explanatory wording:

"The project will not add 50 peak hour trips to the Congestion Management Program highway system. The intersections analyzed in the TIM 066952 (Valley Vineyards) Traffic Impact Analysis (Revised) prepared by Kunzman Associates (March 11, 2008) are not classified as Congestion Management Program intersections by the County of Los Angeles. During the evening peak hour, the project is projected to add approximately 49 (122 x 40%) vehicle trips east of the Godde Hill Road/Elizabeth Lake Road intersection, 43 (122 x 35%) vehicle trips north of the Godde Hill Road/Elizabeth Lake Road intersection, 13 (122 x 10%) vehicle trips west of the 90th Street West/Elizabeth Lake Road intersection, and 19 (122 x 15%) vehicle trips along Bouquet Canyon Road south of the project site.

The project will not add 150 peak hour trips to a Congestion Management Program freeway mainline link. The project is projected to generate approximately 122 vehicle trips during the evening peak hour and thus the threshold of 150 peak hour trips will not be met.

(See attached letter from Kunzman & Associates dated April 7, 2009, which explains the above.)

Item F.

Suggest the following wording be added:

"The project includes approximately seven miles of riding and hiking trails."

Mitigations / Other Considerations:

We suggest the "Project Design" and "Traffic Report" boxes be checked.

We suggest the following Mitigation Measures be included:

- The project shall be responsible for the installation of a future signal at the intersection of Bouquet Canyon Road at Elizabeth Lake Road, the timing of which shall be determined by the County. A reimbursement agreement may be entered into with the County to share these costs with other developments impacting this intersection.
- All recommendations of the Traffic Engineer's Traffic study shall be incorporated into the project's design.
- The project shall construct 87th Street West from the north project boundary to Lost Valley Ranch Road at its ultimate cross-section width including landscaping and parkway improvements in conjunction with development.
- The project shall construct Bouquet Canyon Road from the north project boundary to the south project boundary at its ultimate half-section width including landscaping and parkway improvements in conjunction with development.
- Sight distance at the project accesses shall be reviewed with respect to California Department of Transportation/Los Angeles County standards in conjunction with the preparation of final grading, landscaping, and street improvement plans, and the project shall comply therewith.

- On-site traffic signing and striping shall be implemented in conjunction with detailed construction plans for the project.

9. Services - 2. Sewage Disposal

Item B.

We suggest the following wording be added:

"Treatment of domestic waste on this site shall be via an Advanced Treatment System (ATS) consisting of three main components. First, the enhanced treatment of household waste will occur in sophisticated equipment located underground on each individual lot. This treatment has the effect of making the resultant effluent up to 98% cleaner than effluent produced by a traditional septic system. Second, the highly treated effluent is then conveyed to one of four (4) decentralized evapotranspiration and infiltration (ET/I) areas where, if necessary, additional disinfection or treatment is carried out. Third, the then-twice treated liquid is dispersed by means of a continuously pressurized drip system for absorption by and evaporation through plants. This "evapotranspiration" of wastes greatly diminishes the amount of effluent that would otherwise percolate into the ground."

"The ATS is a sophisticated system that incorporates the use of computer controlled pressurized lines that deliver the treated effluent to a looped distribution network. In a traditional septic system, uncontrolled amounts of untreated effluent flow by gravity to leach lines where it percolates into the soil. In an ATS, the treated effluent is dispersed in much smaller, computer controlled amounts over a 24 hour period. And since the distribution network is located approximately (8") inches below the ground surface, the highly treated effluent is further treated by soil and vegetation. All systems are monitored and controlled by onsite-integrated computers and offsite via web based control systems 24 hours a day."

"A licensed geotechnical firm investigated the capability of the site to handle the dispersal of this effluent. Their report, "Private Sewage Disposal System Report for VTTM 66952, Bouquet Canyon Road, Leona Valley, California by GeoSystems, Inc., dated March 25, 2009" was submitted to the County. That report states: 'Although the majority of highly treated effluent will evapotranspirate rather than percolate, we realize [the County's] need for tests to prove that, on those rare occasions when the effluent percolates, the site geology can accommodate this. This report summarizes the findings of in-field perc tests for the four (4) ET/I areas on the site. All areas percolate adequately and are suitable for the proposed use.' The report continues: 'There is no evidence of near-surface groundwater within the proposed ET/I areas. Water infiltration from irrigation and sewage disposal should not significantly raise the groundwater table.'"

"The testing of the twenty eight (28) test pits yielded an acceptable flow rate in the areas of proposed evapotranspiration. During most days of the year, the highly treated effluent will evapotranspirate up through the roots rather than percolate. In the event of prolonged periods of heavy rain, the rain water and the treated effluent will percolate into the ground without significantly raising the water table or cause groundwater mounding."

"The areas of proposed evapotranspiration shown on the attached map and insets are calculated based on the sewage generated by a traditional septic system. The effluent of the ATS is highly treated and therefore should require less area to percolate."

Mitigations / Other Considerations:

We recommend the following Mitigation Measure:

- The method of treatment of domestic waste shall be approved by the County Department of Public Health and the Lahontan Regional Water Quality Control Board. The project shall adhere to all permits and conditions required by these agencies.

10. Services - 3. Education

Items A and B

We suggest the following wording be added:

"As provided by law, this development shall be required to mitigate impacts on school facilities by paying fees to the districts prior to issuance of building permits. Home sizes have not yet been determined for this development, however based on and estimated average square foot per home of 4,000 square feet and current school fee rates, these rates could generate approximately $1,950,000 in funds for the districts."

Item C.

We suggest the following wording be added:

"Antelope Valley High School District states in their will-serve letter that school bus transportation is available to students who reside more than three miles from each comprehensive high school site. To assist with the operation costs of this program, a transportation fee for 2006-07 is assessed at $75.00 per rider per semester; or $150.00 per year."

Item D.

We suggest the following wording be added:

"Library Facilities Mitigation Fees of approximately $750 per unit are required. At that rate, this would amount to approximately $88,000 in library mitigation fees."

Mitigations / Other Considerations:

We suggest the following wording be added:

- The project shall pay Library Facilities Mitigation Fee prior to issuance of building permits.
- School fees shall be paid prior to building permits.
- A transportation fee shall be assessed for students using buses in the Antelope Valley High School District

11. Services - 4. Fire/Sheriff

Item A.

Change number of units to 117.

We suggest the following comments be added:

"The project is located within one of the three zones where the Fire Department's developer fee program for funding new fire stations is in effect. The County requires Fire Mitigation Fees to be paid at time of building permits for the Valley Vineyards project. Based on 2009 fees ($0.85 / square foot, including garage space) and estimated sizes of the Valley Vineyard homes, close to $450,000 will be paid to the County in fire mitigation fees. These fees will be used for fire station improvements and to pay for other fire safety measures.

The plan has been revised to include a water tank which will enhance fire fighting capabilities for the community. The location and elevation of the tank is selected to insure that adequate water capacity and pressure will result.

According to the County Fire Protection Department, grape vines are acceptable plant material in fuel breaks. Grapevines will be planted on this site, which will reduce the potential dangers from the periodically dry vegetation on the property.

Development of this site will improve fire safety in the community by 1) Clearing of the site of brush will provide a buffer between existing homes and remaining fire prone areas; 2) Construction of a water tank that will enhance present fire fighting capabilities; 3) At present, the only access point to Elizabeth Lake Road – the main escape route for many Leona Valley residences – is via 90th Street West. This development will create a second emergency access route to Bouquet Canyon Road."

The County Fire Department's 5-Year Plan includes a new station in the Ritter Ranch development approximately 3 line-of-sight miles southeast of Valley Vineyards.

The Fire Department's requirements for construction, access, water mains, fire flows and hydrants are addressed by the Fire Department during the subdivision map review stage. The project has been reviewed by the Fire Department and conditions have been set for the development. The statutory responsibilities of the Fire Department include erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archeological and culture resources, and the County's oak tree ordinance. The areas germane to these statutory responsibilities have been addressed."

Mitigations / Other Considerations:

Suggested mitigation measures are:

- The project shall strictly adhere to the requirements of the Fire Department.
- Fire Mitigation Fees shall be paid at time of building permits for the project.
- A "Fuel Modification Plan" shall be submitted and approved prior to final map clearance.
- Access shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 902 of the Fire Code, which requires all weather access.
- Where driveways extend further than 300 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.
- All street widths and lengths shall meet the approval of the Fire Department.
- Fire hydrant locations shall be located and approved by, and meet the design standards of, the Fire Department.
- Access for emergency vehicles shall be allowed through the project (between Bouquet Canyon Road and 87th Street West).
- During an emergency, if public officials order a community evacuation, full access shall be allowed through the project (between Bouquet Canyon Road and 87th Street West).
- In addition to serving domestic water needs, the water tank on the property shall be designed to enhance current fire fighting capacities in the community.

12. Services - 5. Utilities

Item A.

We suggest the following additional wording:

"No indication has been given by the water retailer that there is an inadequate public water supply to meet the domestic needs of the project or that there is an inadequate ground water supply. The water retailer has provided a will-serve letter dated April 12, 2007 and updated January 15, 2009 agreeing to provide water to the project subject to the installation of facilities to provide additional primary groundwater sources for the development. No limitation has been put on the location of said groundwater sources, therefore concerns that the development will adversely impact the groundwater in the vicinity of the project or in any other location are without foundation. The project will locate and, if necessary, obtain rights for additional primary groundwater sources to the satisfaction of the water retailer prior to construction.

This property has long standing contracts to use agricultural water from the Antelope Valley East Kern Water Company (AVEK) for vineyard purposes, therefore agricultural water may not be needed from the domestic water retailer. Alternatively the developer may assign its rights to this agricultural water to the domestic provider as supplementary water, and in that case the domestic provider will also supply the property's agricultural water needs. According to recent studies by UC Davis, on average, grape vines use less than half as much irrigation water as cherry trees, which is another significant agricultural crop in Leona Valley. Use of AVEK water should reduce domestic water needs by over 34.8 acres feet per year.

It is common in many areas of Los Angeles County and throughout the State of California to rely on water both from primary and secondary sources. By definition and design, two systems supplement each other in case one or the other has shortfalls.

The Advanced Treatment System (ATS) proposed for domestic waste treatment will have positive impacts on the community water supply. Treated effluent will be conveyed from each lot to one of four Evapotranspiration and Infiltration (ET/I) areas where it will be dispersed under ground and thence either soaked up by plant roots and evaporated into the air, or allowed to percolate down into the ground. This treated water that is going into the groundwater is water that is not now falling naturally on the property, thus increasing ground water replenishment more than is occurring under current conditions and more than would occur in a subdivision served by a sewer system. The quality of this additional water is closely regulated by government agencies and monitored continuously during dispersal, so this replenishment is of better quality than found in standard septic systems.

A number of other water saving measures will be incorporated into the development. Items such as bio-swales, bio-retention areas, permeable paving, drought tolerant landscaping, rain collection systems, and low water use plumbing fixtures are incorporated into the project. The developer will also contribute water saving devices to the rest of the community. These measures are detailed below as mitigations."

(A letter from Lauren Development, Inc. to California Water Service Company dated March 10, 2009 is attached to this letter. This letter spells out our intentions with regard to water saving measures to be incorporated into the development as well as efforts we will make to decrease water use by the rest of the community.)

Item B.

We suggest the following additional wording:

"Domestic water requirements for this development include considerations for fire protection. Water quantity, pressure and accessibility are calculated and accommodated. Water infrastructure for this

development includes additional fire hydrants and a water tank, the provision of which will enhance fire protection in the community. By paving the extension of 87th Street West, the development will upgrade fire fighting access to residents of Lost Valley. By allowing emergency vehicles to utilize streets within the development for quicker access to the southeast corner of the community, the development will upgrade fire fighting capabilities in the community. By allowing all residents of the community to use streets in the development for access in case of emergencies, danger to human lives from fires will decrease.

According to the water provider[3], in the last 24 years there has only been one interruption in water service lasting more than a few hours, and that was due to an automobile running into an AVEK water facility. According to the water retailer, fire hydrants in the community went dry during a fire in 1994 because of an electrical outage caused by the fire. With no power, the pumps stopped pumping and the hydrants went dry. The wells, according to the water retailer, did not go dry."

Mitigations / Other Considerations:

Suggested mitigation measures are:

- The water retailer may not serve the development unless conditions in the will serve letter dated letter dated April 12, 2007 and updated January 15, 2009 are met.
- All well drilling requirements of the County Department of Public Health and the Lahontan Regional Water Quality Control Board shall be adhered to.
- Rain collection systems, for connection to roof drains, shall be required on each residential lot, for yard irrigation usage or ground water recharge.
- Use of drought-tolerant planting shall be incorporated into all HOA maintained Common Areas, such as landscaping along street frontage, on manufactured slopes and in the planted medians inside roundabouts.
- Sprinkler systems with rain-sensing shut-off systems shall be employed in common area landscaping and added as a requirement to the CC&Rs for all private yard irrigation systems.
- CC&R restrictions shall limit planting of heavy water demanding plants in yard landscaping. The CC&Rs shall include restrictions concerning the use of drought tolerant plant materials by owners for yard landscaping.
- There will be approximately 120 acres of vineyard planting. Grape vines are a very drought tolerant plant. Some grape growers pride themselves on being able to go entire years without irrigating.
- Where possible, grape vines shall be used for fuel modification areas (which will result in less water use than other more water demanding plants such as ice plant).
- The project shall use domestic water from the local provider for residential use. The project also has long standing contracts to use agricultural water from the Antelope Valley East Kern Water Company (AVEK) for vineyard purposes, therefore agricultural water may not be needed from the domestic water retailer. Alternatively the developer may assign its rights to this agricultural water to the domestic provider as supplementary water, and in that case the domestic provider will also supply the property's agricultural water needs.
- Driveways and interior streets may be constructed with permeable paving materials, subject to Public Works and Fire Department requirements that will allow water to percolate into the soil, for ground water recharge.
- Bio-Swales and bio-retention areas shall be constructed along interior streets to absorb lot and street stormwater runoff.

3 Chris Whitley, Manager, Antelope Valley District, Cal Water, August 20, 2007

- Domestic waste shall be treated in an Advanced Treatment System (ATS). The dispersal areas (ET/I areas) shall be carefully planted with landscaping that best works with the evapotranspiration process.
- The developer shall prepare and provide to all buyers an extensive water conservation package, both with regard to landscaping and in-home use.
- For private yard the CC&Rs shall provide that Sprinkler systems we equipped with rain-sensing shut-off systems and low-flow emitters.
- Low volume flush toilets and/or two button flush toilets, low flow shower heads, low flow faucets in all baths and kitchens, and closed loop recirculating hot water systems shall be required for all homes.
- The developer shall participate with the water retailer in a program to offer water saving devices to the entire Leona Valley community, such as Sprinkler systems with rain-sensing shut-off systems and low flow emitters for private yard irrigation systems, low flush toilets and/or two button flush toilets, low flow shower heads, and low flow faucets in baths and kitchens.
- The developer shall work with the water retailer in preparing and distributing an education program regarding water saving practices.

13. Other Factors - 1. General

Item C.

We believe the "No" box should be checked. While the DRP E-NET may show the site to be within "Grazing Land Designation," approximately 120 acres of the property is designated on the proposed plan for vineyard-agriculture use. This project would increase the number of acres of agricultural uses in Leona Valley by nearly two-thirds.

14. Other Factors - 2. Environmental Safety

Item E.

We suggest the following wording:

"This project is an agricultural / residential subdivision, and as such, agricultural pesticides will be used in the vicinity of homes. Pesticide use is regulated by federal, state and local government agencies to insure that farm workers, consumers and those living nearby are not adversely affected.[4]"

"The California Department of Pesticide Regulation is vested with primary authority through the U.S. Environmental Protection Agency to enforce federal and state laws pertaining to the proper and safe use of pesticides. The Department of Pesticide Regulation's enforcement of pesticide use in the field is largely carried out in California's 58 counties by County Agricultural Commissioners.[5]"

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[4] As used herein, "pesticide" includes any product intended to repel, kill, prevent, destroy, control, or mitigate any pest. Pesticides include insecticides, herbicides, plant growth regulators, rodenticides or other vertebrate control agents, repellents, dessicants, fungicides, miticides, disinfectants, sterilants, and sanitizers. Spray adjuvants are pesticides under California law. This is the definition used by the California Department of Pesticide Regulation (see http://www.cdpr.ca.gov/docs/registration/manual/chap1.htm#C.%20WHAT)

[5] California Department of Pesticide Regulation http://www.cdpr.ca.gov/docs/enforce/imp_over.htm

"In Leona Valley, the County of Los Angeles Agricultural Commissioner / Weights and Measures Department serves that regulatory purpose. The Pesticide Regulation Division of this department serves to protect public health and safety, pesticide handlers, agricultural workers, and the environment from the harmful effects of pesticide use. Professional pest control operators, advisers, commercial applicators, farmers, agricultural operators, growers, pesticide dealers, and other users are regulated for the purpose of preventing the inappropriate or illegal use of pesticides.[6]"

"The Pesticide Regulation Division collects samples to be analyzed by the toxicology laboratory for project monitoring and agricultural or structural pesticide related investigations. The Pesticide Regulation Division offers training for other County personnel, governmental agencies, schools and private applicators in the safe and effective use of pesticides. This training is to insure pesticide usage complies with state and federal laws and regulations, is appropriate, and least hazardous to humans, animals, and the environment.[7]"

"The California Department of Food and Agriculture is also involved in the regulation of pesticides and chemicals to insure that disease control and prevention control programs are conducted in an environmentally responsible manner. These efforts include adhering to special notification and consultation processes with federal and state environmental stewardship agencies prior to treatment, ensuring that pesticide applications are performed by licensed pest control professionals in strict accordance with pesticide laws and regulations, and conducting environmental monitoring during some pesticide treatments.[7]"

"The Conceptual Vineyard Greenbelt Exhibit shows a 50' buffer between vineyards and home pads."

"Homebuyers shall be provided information regarding their proximity to agricultural operations. Vineyard areas shall be posted to insure awareness of this proximity."

Mitigations / Other Considerations:

Suggested mitigation measures are:

- The project shall be subject to all regulations of the California Department of Pesticide Regulation
- The project shall be subject to all regulations of the Pesticide Regulation Division of the County of Los Angeles Agricultural Commissioner / Weights and Measures Department
- Employees who handle pesticides or who work in a field where pesticides are applied shall be trained before they are allowed to handle such materials. All training for handlers and/or fieldworkers shall be done by qualified people. Pesticide handlers shall be trained every year and be continually updated to cover any new pesticides that will be handled.
- Field posting of signs shall be installed as required.
- Pesticide storage procedures shall be adhered to.
- The project shall include an approximately 50' buffer between vineyards and home pads.
- The project shall prepare and distribute to buyers an information package that discusses cautions necessary when living near agricultural operations.

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[7] County of Los Angeles, Agricultural Commissioner / Weights and Measures Department http://acwm.co.la.ca.us/scripts/pesticide.htm

Item H.

We suggest the "No" box be checked.

15. Other Factors - 4. Population / Housing / Employment / Recreation

Item D.

We believe the "No" box should be checked. We do not think nor see how a project as small as 117 lots will result in a "substantial" job / housing imbalance or a "substantial" increase in VMT.

Item E.

Change number lots to 117.

We suggest the following wording: The project shall be required to pay park (Quimby) fees. The project is adding 2 miles to the County's equestrian trail system.

Mitigations / Other Considerations:

- The project shall be required to pay park (Quimby) fees.
- The project shall be required to improve equestrian trails and dedicate them to the County Department of Parks and Recreation.
- Multi-purpose trails within the project that are not dedicated to the County Department of Parks and Recreation shall nevertheless be accessible to the public.

16. Mandatory Finding of Significance

Item A.

We believe the "No" box should be checked. We suggest the following wording: "The biological, archeological, paleontological and cultural reports indicate that none of the above described scenarios will occur."

17. Additional

A) On page 3 of 25,

Information at the bottom of the page concerning the Development Monitoring System analysis needs to be completed.

B) On page 4 of 25 (Under Mitigated Negative Declaration),

This checked paragraph indicates that a "Project Changes / Conditions Form" has been prepared and is included with the Initial Study. I do not see it

C: Supplemental Documentation

All documents submitted to your office, either as part of the Initial Study Questionnaire or subsequently, should be identified so as to be clearly made part of the record. We suggest the following list be added to the Initial Study, with a notation that "The following documents were considered during the preparation of the Initial Study:"

- Initial Study Questionnaire, dated February 12, 2007, including
    - Photographs & Index Map
    - Topographic Model of Graded Site (Plan View) showing contour grading and retention of major ridgeline on the site.
    - Topography Map
    - Hillside Slope Analysis Map, from Pacific Coast Civil, Inc. dated September 5, 2006
    - Biological Assessment. "Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California," August 15, 2006 by PCR Services Corporation.
    - Wetlands Analysis. "Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California," August, 2006 by PCR Services Corporation
    - Cultural Report: "Cultural Resource Record Search Report," by PCR Services Corporation, September 08, 2006
    - School Will-Serve Letters from Antelope Valley Union High School District, dated January 29, 2007, and Westside Union School District, dated January 31, 2007.
- Supplemental Archeological Report: "Phase One Archeological Analysis," by Robert J. Wlodarski; Historical, Environmental, Archaeological, Research Team, May, 2007
- "Response, Comments & Proposed Mitigation Measures Re: Draft Initial Study for TTM 066952," by Valley Vineyards, LLC, September 7, 2007, including:
    - "Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California" by PCR Services Corporation, September 07, 2007
- Report on "Dispersed Hillside Clustering, Valley Vineyards, TTM 066952" by Pacific Coast Civil, Inc. dated October 1, 2007
- Update to Two Prior Biological Reports, by PCR Services, dated December 23, 2007.
- Revised Hillside Slope Analysis from Pacific Coast Civil, Inc. dated January 15, 2008.
- Revised Vesting Tentative Tract Map 066952 dated February 4, 2009
- Valley Vineyards LLC Open Space Exhibit dated February 4, 2009
- Valley Vineyards LLC Conceptual Vineyard Greenbelt Exhibit dated February 4, 2009
- Supplemental Report "Vesting Tentative Tract Map 066952, Supplemental Information & Changes to VTTM 066952 (Low Impact Development Features, Mixed Agricultural and Residential Features, Traffic Mitigation and Dark Skies)," by Valley Vineyards, LLC, February 4, 2009
- "TTM 066952 – Response to Residents Concerns Enumerated in Various Letters Sent to The County of Los Angeles," by Kunzman Associates, February 2, 2009.*
- Traffic Report "Los Angeles County, TTM 066952 – Valley Vineyards Traffic Impact Analysis (Revised)," by Kunzman Associates, March 11, 2008.*
- Letter from Lauren Development, Inc. to California Water Service Company dated March 10, 2009 regarding water saving measures to be incorporated into the project.*
- Updated School Serve Letter from Antelope Valley Union High School District dated April 7, 2009.*
- Letter regarding relationship of VTTM 066952 to County Congestion Management Program, by Kunzman Associates, April 7, 2009.*

(* The above documents with an asterisk are submitted to you herewith.)

MITIGATION MONITORING PROGRAM:

We recommend that all mitigation measures listed above be repeated in the Mitigation Monitoring Program.

We recommend that the Mitigation Monitoring Program include by reference "all requirements imposed by the County as conditions of approval of Vesting Tentative Tract Map 066952."

We hope the above information has been of assistance to you in finalizing the Draft Initial Study and Mitigation Monitoring Program. We would appreciate the opportunity to review these documents before you redistribute them. Please call me if you have any questions about this information.

Thank you.

Very truly yours,

Valley Vineyards, LLC
By: Lauren Development, Inc.
It's Operating Manager

John L. Allday
Vice President

Enclosed:

- Traffic Report "Los Angeles County, TTM 066952 – Valley Vineyards Traffic Impact Analysis (Revised)," by Kunzman Associates, March 11, 2008. (will send by US Mail)
- "TTM 066952 – Response to Residents Concerns Enumerated in Various Letters Sent to The County of Los Angeles," by Kunzman Associates, February 2, 2009.
- Letter from Lauren Development, Inc. to California Water Service Company dated March 10, 2009 regarding water saving measures to be incorporated into the project.
- Updated School Serve Letter from Antelope Valley Union High School District dated April 7, 2009.
- Letter regarding relationship of VTTM 066952 to County Congestion Management Program, by Kunzman Associates, April 7, 2009.

P. O. Box 790 Agoura Hills, CA 91376
818 575-9983 FAX 818 575-9009
johna@laurendevelopment.com

(6)

THE VINEYARDS

March 23, 2009

Steve Afriat
4107 Magnolia Boulevard
Burbank, California 91505

Re: VTTM 066952 – Water

Dear Steve,

You asked that I give you an update on any remaining water issues concerning our project. It is true that a couple of members of the Leona Valley Town Council have made it clear that they think this is an area of vulnerability, which they continue to exploit.

Background:
We have attended nearly every Town Council meeting over the past three years. We have spoken about, or provided presentations concerning, our development plans at least a dozen times at these public meetings. We have continually requested to meet and work with the Town Council, or an appointed committee, to seek their input on our development plans and provide a proper forum for the dissemination of accurate information. Unfortunately the Town Council has refused to meet and has routinely treated submitted information as false or inaccurate. We have continuingly run up against a campaign of misinformation being spread throughout the community by a few opponents to our development which create general concern by the residents. Although it is necessary and correct that we be held to a higher standard of proof, it nevertheless concerns us that these few people continue to use the Town Council as a pulpit for the dissemination of inaccurate information.

Domestic Water:
California Water Service Company (Cal-Water) will be the provider of domestic water for the 117 homes proposed for this development. Cal-Water is the largest investor-owned American water utility west of the Mississippi River and the third largest in the country. Formed in 1926, the San Jose-based company serves more than 460,000 customers through 28 Customer and Operations Centers throughout the state. Cal-Water's Antelope Valley District was formed in 2000 and services approximately 1,450 customer connections in the Leona Valley, Lake Hughes, Fremont Valley, Grand Oaks, and Lancaster water systems. The majority of the water they provide is pumped from local aquifers by wells located throughout their service areas. In addition, they also purchase water from the Antelope Valley-East Kern Water Agency (AVEK), as well as other sources throughout the state. AVEK is one of the wholesalers of water to Cal-Water and supplements their water needs over and above that obtained from their local wells and other providers. Cal-Water, AVEK and the CPUC have all advised us that we should only deal with Cal-Water for determining our domestic water needs and availability. The County Department of Public Works (DPW) also advised us that the domestic water will-serve letter will

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

only be acceptable from the retailer of water for the area – in this case from Cal-Water. That will-serve letter was provided to the DPW and County Health in 2006. Both departments requested updating of the will-serve letter, and that request was met with the submittal of an updated letter provided by Cal-Water and delivered to the DPW and County Health in early February 2009 – a clear indication that Cal-Water fully intends to serve this project's domestic needs.

Agricultural Water:
In addition to acting as a third party provider to Cal-Water, AVEK also directly serves many properties in Leona Valley with agricultural water. Valley Vineyards has agricultural water agreements with AVEK to provide the agricultural water needs of the development. These water agreements are long standing and run with the land. We are not, therefore , looking to Cal-Water to provide any of this water. In February 2009, we met with representatives of AVEK and discussed these agricultural agreements. We are continuing to have discussions with AVEK concerning the agricultural water we may need for the proposed vineyards on the property – a crop that is by the way considered drought tolerant.

Supplemental Water:
The will-serve letter issued by Cal-Water – and its update – provides in part that we install all necessary special facilities to provide additional primary groundwater sources into the Cal-Water system as needed. We have met numerous times with Cal-Water to discuss this provision – a provision that is fully obtainable. Cal-Water staff and our engineers have toured Valley Vineyard's property, in addition to many other properties in Leona Valley, to determine where wells might be drilled or where existing but currently unused wells might be utilized. Leona Valley is over 13 square miles and no concern has ever been raised that water could not be found somewhere within the boundaries of Leona Valley, or Cal-Water's service area for that matter. It is important to keep in mind that Leona Valley has a completely different geologic configuration of its ground water supply than does other parts of Antelope Valley. The water shortage issues for the Antelope Valley, including the adjudication of the larger aquifer, are not applicable to Leona Valley. Additionally, we have been advised that we may also have the option of purchasing water from a third party provider which would then be delivered into the Cal-Water system satisfying the condition. We are exploring this option also. Unfortunately, misinformation has led many in the community to believe we must provide this water only from wells located on our property, and that those wells could seriously deplete the water available to upstream existing wells – this is a totally false assumption.

Infrastructure:
In an attempt to be good neighbors, and lacking any input for the Town Council, it was our intention to install infrastructure that would be oversized so as to accommodate residents located contiguous to our development. There is no condition from Cal-Water nor the County to do this. Our thinking was that should the need ever arise where these residents decided to abandon their wells and instead draw domestic water through Cal-Water's system, the infrastructure would be

available. This infrastructure will also help the fire fighting capacity of county and state fire crews by increasing much needed pressure in the system by the installation of an up-system water tank and by adding thirty-six (36) additional fire hydrants into the community. From the standpoint of water infrastructure, The Vineyards will have positive, not negative impacts on the entire Leona Valley Community.

Water Neutrality:
We are working closely with our engineers and Cal-Water to make this project as 'water neutral" as possible. I am attaching a letter that was recently sent to Cal-Water summarizing our plans and requesting participation in several direct water saving measures for the community as a whole.

I am hopeful that the above, together with the will-serve letters submitted to the County by Cal-Water, will provide the necessary assurance that we have met the burden of proof as to water availability for VTTM 066952.

Sincerely,

Bill Ford
Manager

Attachment: Letter of March 10, 2009 to Cal-Water

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

LAUREN
DEVELOPMENT INC.

March 10, 2009

Mr. Chris Whitley
California Water Service Company
7138 Lake Isabella Blvd
Lake Isabella, Ca 93240

Re: Water Saving Program for "The Vineyards" (VTTM 066953)

Dear Chris:

The purpose of this letter is to let you know about some of the water conserving measures we are proposing for The Vineyards and to request from you any suggestions you may have for additional measures. As you will see below, there may also be opportunities where our two companies can work together on a community-wide water saving program.

We will be incorporating a number of water saving measures into our development. Also, we are considering taking some very unique steps that could decrease water use by existing residents of Leona Valley. The objective of both efforts is to create a situation where less water would be used in Leona Valley after our development is completed than is presently being used. We believe such "water neutrality" could be an influential factor in obtaining government approval of our plans. We would very much appreciate your thoughts on these measures. Anything that you can suggest that we could do may help us get the Valley Vineyards project approved by the County.

With respect to the steps we are considering to reduce water use by others in the community, perhaps your company and ours could work together on these. Your company could benefit from good publicity and we, of course, could benefit by getting our development approved. And both of us could benefit in the long run by saving water.

We are trying to figure out the amount of water that would be saved by these steps. That task has proved difficult, but we will continue to try to quantify the water conserving benefits of these measures. Again, any help you can offer would be appreciated.

1. Water Saving Measures Incorporated into the Valley Vineyards Development:

These are some of the steps we are proposing for our lot development and home construction program. Considered separately and for only one lot or home, the water savings might be minimal, but when combined and used for all 117 lots, this will result in a substantial water saving. As you know, some of these are already required, while others are beyond today's code requirements:

P. O. Box 790 Agoura Hills, CA 91376
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johna@laurendevelopment.com

- Rain collection system and use for irrigation of yard landscaping.
    - All homes will be provided a rain water collecting system connected to roof drains. This water could then be recycled for landscape irrigation.
- Use of drought-tolerant planting for HOA maintained Common Areas.
    - There will be approximately 25 acres of landscaping along street frontage, on manufactured slopes and in the planted medians inside roundabouts. According to the landscape architect's calculations, use of drought tolerant plant palettes in these areas can have significant water savings.
    - High tech sprinkler systems with rain-sensing shut-off systems will also be employed in common area landscaping.
- Use of drought-tolerant grape vines.
    - There will be approximately 120 acres of vineyard planting. Grape vines are a very drought tolerant plant. Some grape growers pride themselves on being able to go entire years without irrigating.
    - According to the L.A. County Fire Department, grape vines are acceptable plant material for fuel modification areas, which will result in less water use than other more water demanding plants such as ice plant. Approximately 34 acres of fuel mod areas could be planted in this way. This could result in substantial annual water savings.
    - According to recent studies by UC Davis, on average, grape vines use less than half as much irrigation water as cherry projection, which is another significant agricultural crop in Leona Valley. The nearest vineyard to our property, Leona Valley Vineyards, estimates vineyard water use at .29 acres feet per acre per year. For the 120 acres of grapevines at The Vineyards, this would be approximately their annual water use at 34.8 acres feet per year. If cherries or other high water demanding crop was grown instead of grapes, this water usage could be twice that or more.
- Use of AVEK water for vineyard irrigation.
    - This property has long standing contracts to use AVEK water for agricultural purposes. No water from Cal-Water will be used for the irrigation of the approximately 120 acres of grapevines planted at The Vineyards. Use of AVEK water rather than your company's water will reduce your outflows by over 34.8 acres feet per year.
- CC&R restrictions will limit planting of heavy water demanding plants in yard landscaping.
    - Home builders typically do not restrict the types of plants used by homeowners. However in view of the water use issues in Leona Valley, we will include in the CC&Rs for this project restrictions concerning the use of drought tolerant plant materials by owners for yard landscaping. This could also result in substantial water savings.

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- Permeable Paving
  - Driveways and interior streets may be constructed with permeable paving materials that will allow water to soak into the ground, thus replenishing the ground water, rather than flowing into storm drains and onto other properties
- Bio-Swales
  - Five (5) miles of 12' wide bio-swales in front of each lot and parallel to both sides of all interior streets will absorb lot and street stormwater runoff. This water will soak into the ground rather than flow through storm drains onto downstream properties. By keeping moisture in these locations, less irrigation will be required and the ground water will be replenished.
- Advanced Domestic Waste Treated Water will be recycled into groundwater.
  - Domestic waste will be treated in and Advanced Treatment System (ATS) which involves highly sophisticated processing plants on each lot. This treated effluent will then be conveyed from each lot to one of four Evapotranspiration and Infiltration (ET/I) areas where it will dispersed under ground and thence either soaked up by plant roots and evaporated into the air, or allowed to percolate down into the ground. This treated water that is going into the groundwater is water that is not now falling naturally on the property, thus increasing ground water replenishment more than is now occurring prior to development, and far more than would occur in a subdivision served by a sewer system. Calculation of this amount of increased ground water replenishment is difficult.
  - The quality of this additional water is closely regulated by government agencies and monitored continuously during dispersal, so this replenishment is of better quality than found in standard septic systems. Since the ATS results in effluent that is 98% cleaner than that generated by standard septic systems, it would take 35 of the Valley Vineyard homes to produce as many harmful pollutants as 1 current home in Leona Valley.
  - The ET/I areas will be carefully planted with landscaping that best works with the evapotranspiration process. As the "irrigation" of this landscaping will be accomplished by the treated effluent, no use of Cal-Water water will be required in these areas.
- Design of ATS for possible future use of treated effluent for yard, common area and/or vineyard irrigation.
  - If it ever becomes politically and socially acceptable and if governmental regulations allow reuse this ATS effluent for irrigation of common areas, vineyards and private yard areas, our system will be designed so this effluent could be used in this way. Water savings would be significant.
- Buyer education regarding water saving practices
  - We will prepare and provide to all buyers an extensive water conservation package, both with regard to landscaping and in-home use. (If it was desirable for

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such material to come from your company rather than ours, we could work with you on the preparation and cost of such a document.)

- Home Irrigation and Plumbing Fixtures. We have not yet quantified the savings that would result from including the above in our home construction program, however we believe them to be significant.
    - Our company typically installs irrigation systems for front yards. At The Vineyards, we will use high tech sprinkler systems with rain-sensing shut-off systems and low-flow emitters for private yard irrigation systems.
    - Low flush toilets
    - Two Button flush toilets
    - Low flow shower heads
    - Low flow faucets in all baths, kitchens
    - Closed loop hot water systems

2. Water Saving Measures to be Offered to the Surrounding Community:

We are aware your company offers some of these items to the community, but we are not aware of how many people actually took you up on your offers or how many could have used more than your "two per household" limit. Also, some of the newer fixtures we might distribute may be more efficient than previously available items. We would like to work jointly with your company on additional give-away programs. We could participate in the cost of materials and also offer installation labor.

- Home Irrigation and Plumbing Fixtures.
    - High tech sprinkler systems with rain-sensing shut-off systems and low flow emitters for private yard irrigation systems.
    - Low flush toilets
    - Two Button flush toilets
    - Low flow shower heads
    - Low flow faucets in baths, kitchens
- Buyer education regarding water saving practices
    - We could work with your company on the preparation and cost of a package of information to be provided to all residents of Leona Valley.

The above conservation measures could be offered to all 575 homes in Leona Valley, not just the 450 presently served by your company. This program could affect 431 homes and greatly reduce water use in the entire community. Your company has done a lot in this regard; we would like to help you do more.

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LAUREN
DEVELOPMENT INC.

We would like the opportunity to meet with you or others in your company to further discuss our program as well as the possibility of us working together to reduce water use in the entire community.

Thank you.

Very truly yours,

Valley Vineyards, LLC,
By: Lauren Development, Inc., It's Operating Manager

John L. Allday
Vice President

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(7)

February 24, 2009

Ms. Mary Ann Floyd
40648 90th Street West
Leona Valley, CA 93551

Re: Your Letter Dated August 5, 2008 to the County of Los Angeles, (copy attached)

Dear Ms. Floyd,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

One item mentioned in your letter acknowledged that the Leona Valley Community Standards District was created to establish the guidelines for development in Leona Valley. As a formation chairperson, and a founding member of many of the committees that have formulated land use guidelines for Leona Valley, I want to assure you that we take these particular guidelines very seriously. We have endeavored to design a use for our property that conforms to all of the wishes of the community as described in the Leona Valley Community Standards District guidelines. Our plan does not ask for any relaxation of the rules from any guideline or ordinance that has already been established by the residents of Leona Valley. Beyond the Community Standards District guidelines, we have additionally ensured compliance with all ordinances and requirements of the General Plan, the Antelope Valley Areawide Plan and the Zoning code. We are, however, proposing a change to the way things currently are, to something that is different. I know that change, any change, is never easy. What I do hope is that you will see that this is not just "development as usual" but is truly an attempt to make a change that can be both beneficial to and consistent with the expressed goals of the community..

I was pleased to see in the last paragraph of your letter that you are not opposed to the use of a property owner's land, as long as that use is within the constraints of the standards that were established. I have enclosed a copy of a booklet that we prepared for the County, which outlines this compliance in much more detail. It also addresses many unique features we plan for the site.

Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates
w/Attachment: Supplemental Information VTTM 066952

February 24, 2009

Leona Valley Town Council
P.O. Box 795
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles (copy attached)

Dear Leona Valley Town Council,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the their report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Robert Harpham
39933 87th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Harpham,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

I realize that your letter also spoke to other concerns about our plans. I want to assure you that we take the concerns of all residents of Leona Valley very seriously. We have endeavored to design a use for our property that conforms to all of the wishes of the community as described in the Leona Valley Community Standards District guidelines. The residents of Leona Valley established these guidelines for just this purpose. Our plan does not ask for any relaxation of the rules from any guideline or ordinance that has already been established by the residents of Leona Valley. Beyond the Community Standards District guidelines, we have additionally ensured compliance with all ordinances and requirements of the General Plan, the Antelope Valley Areawide Plan and the Zoning code. We are, however, proposing a change to the way things currently are, to something that is different. I know that change, any change, is never easy. What I do hope is that you will see that this is not just "development as usual" but is truly an attempt to make a change that can be both beneficial to and consistent with the expressed goals of the community.

I invite you all to visit our website to see the many unique elements we have planned for our property, especially the environmental or "green" elements.

Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. Harry Schay
8719 Leona Avenue
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, copy attached)

Dear Mr. Schay,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Ms. Janet Sartain
40114 87th West Street
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Ms. Sartain,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Ms. Marcella E. Mahan
8728 Leona Avenue
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Ms. Mahan,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Duarte and Family
40203 107th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Family Duarte,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. John Seymour
39909 86th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs.Seymour,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Ms. Ruth Perkins
8763 Elizabeth Lake
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Ms. Perkins,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Terry Dupuis
10701 Leona Avenue
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Dupuis,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

I realize that your letter also spoke to other concerns about our plans. I want to assure you that we take the concerns of all residents of Leona Valley very seriously. We have endeavored to design a use for our property that conforms to all of the wishes of the community as described in the Leona Valley Community Standards District guidelines. The residents of Leona Valley established these guidelines for just this purpose. Our plan does not ask for any relaxation of the rules from any guideline or ordinance that has already been established by the residents of Leona Valley. Beyond the Community Standards District guidelines, we have additionally ensured compliance with all ordinances and requirements of the General Plan, the Antelope Valley Areawide Plan and the Zoning code. We are, however, proposing a change to the way things currently are, to something that is different. I know that change, any change, is never easy. What I do hope is that you will see that this is not just "development as usual" but is truly an attempt to make a change that can be both beneficial to and consistent with the expressed goals of the community.

I invite you all to visit our website to see the many unique elements we have planned for our property, especially the environmental or "green" elements.

Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Leon Thompson
40047 87th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Thompson,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Ms. Linda Blackburn
40014 87th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Ms. Blackburn,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Ray Moody
8718 Leona Avenue
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Moody,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Dave Gantenbein
PO Box 715
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Gantenbein,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Richard Clayton
9000 Lost Valley Road
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Clayton,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Again, I would be most happy to answer any question or elaborate on any area that may be of interest to you.

Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

February 24, 2009

Mr. and Mrs. Mike Groninga
40115 87th Street West
Leona Valley, CA 93551

Re: Your Letter to the County of Los Angeles, (copy attached)

Dear Mr. and Mrs. Groninga,

The County of Los Angeles recently forwarded to me your letter focusing on traffic issues relating to the plans for our property. Because there have been several other letters expressing similar concerns about traffic, I instructed our traffic engineer to prepare a comprehensive response. Enclosed is a copy of the report for your review. After reviewing their responses, if you have further questions or concerns, please be assured that I would be more than happy to address them. You can reach me by email through our project website at www.valleyvineyards.net, or by regular mail at the address listed below.

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Sincerely,

Bill Ford
Manager
Valley Vineyards, LLC

w/Attachment: February 2, 2009 Letter by Kunzman Associates

8

Sackett, Jodie

From: Ron Howell [gorilla@rglobal.net]
Sent: Tuesday, February 10, 2009 10:57 AM
To: Bill Ford
Cc: John L. Allday
Subject: Applause

Hi Bill:

Have you ever received applause after a LVTC presentation before?

Marci, the rude crank trying to give you a hard time, is always like that and doesn't rack up a lot of points with the TC as a result. So don't worry about her. She may have helped you actually, in allowing you to magnify the point that your 100+ home project has only the impact of three typical houses in Leona Valley with septic systems.
Which means Marci's home and septic has the negative impact of approximately 35 homes in your cleaner, greener project. That shut her up. She got it. Maybe you could offer the Advanced Treatment System you are going to have to homeowners and council members with septics so they can clean up their act. Ha! Keep that one in your back pocket.

Great job.

Ron

Sackett, Jodie

From: Robert Wood [rwoodtc@yahoo.com]
Sent: Tuesday, February 10, 2009 9:51 AM
To: billf@laurendevelopment.com; johna@laurendevelopment.com
Subject: good to see you

Bill, John,

Good to see you at last night's meeting. Thanks for your presentation. The renderings look beautiful and your proposal for dealing with water is both groundbreaking and extremely sensible. Bravo!

You have my support, and I will be happy to write a letter in support of your project.

Bill, you could not have said it better with "change is inevitable..."

Your company has been very considerate to our community's unique needs. I regret there was not more cooperation with the leadership of the community. However, in light of this, you have offered much on your own in the way of positive features and functions.

Best,

-Robert

Sackett, Jodie

From: Bernhard Staschik [bstaschik@roadrunner.com]
Sent: Monday, February 09, 2009 10:16 PM
To: billf@laurendevelopment.com
Subject: Green Features and updated septic
Attachments: Bernhard Staschik.vcf

Dear Bill,

Thank you for caring. The development has undergone some very positive changes in terms of size and fit for the community.

I also love your green features which you want to incorporate. Could you please forward info on the septic solution you want to incorporate and on the the 'evapotranspiration' I believe. Do you actually try to catch rainwater actively or do you just provide for areas of percolation?

Bernhard

(9)

KUNZMAN ASSOCIATES
OVER 30 YEARS OF EXCELLENT SERVICE

February 2, 2009

Mr. John L. Allday, Vice President
LAUREN DEVELOPMENT, INC.
P.O. Box 790
Agoura Hills, CA 91376

Dear Mr. Allday:

Re: TTM 066952 - Response to Residents Concerns Enumerated in Various Letters Sent to The County of Los Angeles

INTRODUCTION

The firm of Kunzman Associates is pleased to provide this response to community letters received by the County of Los Angeles from the current Leona Valley residents regarding the TTM 066952 (Valley Vineyards) Traffic Impact Analysis (Revised) prepared by Kunzman Associates (March 11, 2008). For a copy of each letter, please see Appendix A. The purpose of this response is to clarify comments and questions noted from these community letters. This report summarizes our methodology, analysis, and findings.

Although this is a technical response, every effort has been made to write the response clearly and concisely so that residents will have a clear understanding of the issues. Additionally, to assist the reader with those terms unique to transportation engineering, a glossary of terms is provided in Appendix B.

LIST OF CONCERNS NOTED FROM THE COMMUNITY LETTERS

Based on the December 9, 2008 meeting with the County of Los Angeles Department of Public Works, the following areas of concern were determined from the various letters submitted. A response to each category is provided below.

1. Traffic Study Methodology
2. Limited Ingress/Egress in Leona Valley
3. Emergency Evacuations
4. Blind Corner at 87th Street and Leona Avenue

1111 TOWN & COUNTRY ROAD, SUITE 34, ORANGE, CA 92868-4667
PHONE: (714) 973-8383 ■ FAX: (714) 973-8821 ■ TOLL FREE: (877) 972-1220

WWW.TRAFFIC-ENGINEER.COM

5. High Accident Rate on Elizabeth Lake Road
6. High Death Rate Claimed by CHP Resident Deputy Study for Bouquet Canyon Road
7. Horse Riders Along 87th Street
8. Traffic Signal at the Intersection of Bouquet Canyon Road and Lake Elizabeth Road
9. Project Access on Bouquet Canyon Road
10. School Related Traffic Issues

RESPONSE TO THE LIST OF CONCERNS NOTED FROM THE COMMUNITY LETTERS

1. Traffic Study Methodology

Project Trip Generation Rate

Stringent guidelines are employed in determining project trips. In part, project trips are determined using standard traffic engineering practice for the industry based on the Institute of Transportation Engineers guidelines. Using these guidelines, the proposed development is projected to generate approximately 1,158 daily vehicle trips, 91 of which will occur during the morning peak hour and 122 of which will occur during the evening peak hour.

On average, 122 vehicle trips are generated from the project (ingress/egress) during the peak hour per the standard Institute of Transportation Engineers guidelines. It is true that future residents may possess more than 1 vehicle per household; however, the Institute of Transportation Engineers trip generation rate takes this likelihood into account. It should be noted that the Institute of Transportation Engineers trip generation rate is obtained by surveying thousands of single-family residential projects.

Project Traffic Distribution

The project distribution has been estimated based on the existing traffic counts and has been approved by the County of Los Angeles. Again, the guidelines employed require that the project traffic is estimated and analyzed for the worst-case scenario at the study area intersections. This project traffic distribution methodology is common industry practice utilized by transportation engineers.

Ambient Growth Rate

The development of the traffic report requires an interaction with the traffic engineer and, in this case, the County of Los Angeles. One of these interactions is that the growth rate employed in our calculations has been provided by the County of Los Angeles.

Outdated Traffic Reports and Distributions

As mentioned above, the analysis for the proposed development is conducted using the worst-case scenario analysis by assuming that all projects within the study area (current and future) will have completed construction and all homes will have been occupied by the time this proposed project is completed and all the homes contemplated by it are occupied. The number of projects, and the total yield produced by these projects are based on the most recent reports approved by the County of Los Angeles and City of Palmdale. The proposed project can be analyzed thoroughly and consistently by using the approved cumulative project list and distributions provided by the County of Los Angeles guidelines.

Ritter Ranch Report

The worst-case scenario analysis included the assumption that the Ritter Ranch project will be constructed and all homes occupied by the time this proposed project is constructed and all homes are occupied (see paragraph above for additional information on worst-case scenario analysis).

Accuracy of Traffic Counts Data

The manual traffic count data employed in the report was conducted by a traffic count professional firm whose reputation is recognized by the County of Los Angeles in addition to other City and County jurisdictions throughout California. The methods used are commonly accepted as traffic engineering industry standards and have been approved for use in traffic studies by the County of Los Angeles.

2. Limited Ingress/Egress in Leona Valley

   There are currently three major accesses existing in Leona Valley: 1) eastbound on Elizabeth Lake Road to Palmdale, 2) westbound on Elizabeth Lake Road to Elizabeth Lake, and 3) southbound on Bouquet Canyon Road to Santa Clarita. It should be noted that the project will not add additional accesses in/out of Leona Valley; however, the proposed project will contribute to the improvement of the access to/from Bouquet Canyon Road for trips originating north, south, and west of the project.

3. Emergency Evacuations

   The existing residents have expressed concerns regarding the existing congestion exiting the community via the intersection of 90th Street and Elizabeth Lake Road in the case of an emergency. Currently, this is the only exit available for the residents. The proposed project will significantly help alleviate any perceived congestion by offering an additional emergency access through the proposed project roadways to and from Bouquet Canyon Road. In addition, the fire trucks, ambulances and other emergency vehicles can access the proposed project roadways to assist the existing residents throughout the community.

4. Blind Corner at 87th Street and Leona Avenue

   A comment has been made regarding the "blind curve" on 87th Street at Leona Avenue. This "blind curve" has not been addressed as part of the subject traffic report since the proposed development will have little or no impact on it. However, it should be noted that the initial design of this section of 87th Street is an uncontrolled intersection that is on a skewed angle other than perpendicular. The solution is to control the traffic going through the intersection so that vehicles maintain their proper lane. Since this is a public road, owned and maintained by the County of Los Angeles, the County should determine if the installation of STOP signs, or some other measures such as large raised pavement markers, or flexible post delineators placed on the centerline of the roadway are preferable.

5. High Accident Rate on Elizabeth Lake Road

   The County of Los Angeles has provided the traffic collision history for the roadway segment and intersections along Elizabeth Lake Road from Bowser Road West to

Bouquet Canyon Road. Table 1 summarizes the traffic collision history (see Appendix C). According to the traffic collision history over the past five years, a total of three traffic collisions occurred on Elizabeth Lake Road from Bowser Road West to Bouquet Canyon Road.

It should be noted that the majority of the reported accidents have occurred during late night or early morning for which the majority of the drivers were under the influence of either drugs or alcohol.

Based on the traffic collision history provided by the County of Los Angeles, an analysis of the total number of accidents reported at the study area intersections and roadways for each year over the last five years has been conducted. These statistics are summarized and presented in Table 2, based upon the following formula:

$$\text{Accidents per Million Vehicle Miles Traveled} = \frac{\text{No. of Accidents}}{(\text{ADT} \times \text{Miles} \times 365 \times \text{Years})/1{,}000{,}000}$$

As shown in Table 2, the Million Vehicle Miles Traveled methodology is applied to calculate accident rates. The calculated accident rate for the study area roadway segment is 0.47 accidents per million vehicle miles traveled. As shown in Appendix D, The County of Los Angeles has provided the Midblock Accident Rates (Accidents Per Million Vehicle Miles) Master Plan Highways and Mountain Roads). This document states that the average midblock accident rates for mountain roads with design speed greater than 35 MPH is 1.82. Based on industry standards and the requirements of the County of Los Angeles, the calculated accident rate for the study area roadways is below the average expected midblock accident rates provided by the County of Los Angeles staff.

6. High Death Rate Claimed by CHP Resident Deputy Study for Bouquet Canyon Road

Bouquet Canyon Road is a regional facility that connects from Leona Valley and Santa Clarita (approximately 22 miles to the south). This road has been improved in numerous locations as development has occurred, and most likely will continue to be improved. The County of Los Angeles routinely monitors Bouquet Canyon Road to assure satisfactory traffic operations. Based on industry standards and the requirements of the County of Los Angeles, the calculated traffic added by the proposed project is insignificant compared to existing volumes.

7. Horse Riders along 87th Street

The majority of the proposed project traffic is projected to utilize Bouquet Canyon Road for ingress/egress. The existing horse-riding residents in Leona Valley utilize trails and roadways west of Bouquet Canyon Road, specifically along 87th Street. To quantify the number of vehicles projected to utilize the 87th Street, 5 percent of the project traffic is projected to utilize 87th Street for ingress/egress. Based on the approved project traffic distribution, the proposed development is projected to generate approximately 6 vehicles during the morning peak hour and 7 vehicles during the evening peak hour.

Therefore, the horse riders are not significantly impacted by the proposed project ingress/egress traffic. Additionally, the proposed development plans to construct approximately six miles of additional public and private horse trails to the community, including a trail paralleling 87th Street through the proposed project.

8. Traffic Signal at the Intersection of Bouquet Canyon Road and Lake Elizabeth Road

Traffic Signal Warrant Analysis

The unsignalized intersections have been evaluated for traffic signals using the California Department of Transportation Warrant 3 Peak Hour traffic signal warrant analysis, as specified in the Manual of Uniform Traffic Control Devises 2003 California Supplement, dated May 20, 2004. A traffic signal will be eventually warranted at the intersection of Elizabeth Lake Road and Bouquet Canyon Road, but is not warranted at this time nor at the project's completion.

Timing of Traffic Signal Installation

The developer plans to post bonds (or provide other assurances acceptable to the County) for the developer's pro rata share of the cost of installing a traffic signal at this location. The traffic signal should be constructed as needed at a future date per the determination of the County of Los Angeles.

9. Project Access on Bouquet Canyon Road

Taper and right turn lanes are determined and designed per the County of Los Angeles guidelines for the project access. A separate improvement and striping plan for

Bouquet Canyon Road along the proposed project's boundary has been required by the County. This plan will provide the required information, design, and requirements for access into this proposed project.

10. School Related Traffic Issues

Child Pedestrians Walking/Riding Horse to School

The majority of the proposed project traffic is projected to utilize Bouquet Canyon Road for ingress/egress. The child pedestrians walking/riding horse to school in Leona Valley utilize trails and roadways west of Bouquet Canyon Road, specifically along 87th Street. To quantify the number of vehicles projected to utilize the 87th Street, 5 percent of the project traffic is projected to utilize 87th Street for ingress/egress. Based on the approved project traffic distribution, the proposed development is projected to generate approximately 6 vehicles during the morning peak hour and 7 vehicles during the evening peak hour.

Therefore, the child pedestrians walking/riding horse to school are not significantly impacted by the majority of the proposed project ingress/egress traffic.

Expansion of Leona Valley School

Leona Valley School is a rural school that does not have many students. The Leona Valley School expansion is not projected to have a significant impact to the traffic counts previously conducted, without or with the expansion.

Additional School Bus Trips

The additional school bus traffic is not projected to cause a significant impact at the study intersections. The following flow of assumptions and calculations are made to project the number of additional bus trips when the project is fully occupied:

a. Each dwelling unit is assumed to have 1.5 school aged students.

b. The proposed development is projected to have approximately 182 school aged students based on the proposed 121 residential dwelling units.

c. Approximately half of the school aged students are assumed to attend elementary school and another half is assumed to attend middle school and high school. Based on the assumption, the proposed development is projected to have 91 elementary school students and 91 middle school and high school students.

d. Half of the elementary school students are assumed to either walk to school, dropped off by parents or parent carpools. Therefore, approximately half of the elementary school students are assumed to utilize the school bus transit. Based on the assumption, 46 students are assumed to utilize the school bus transit.

e. A quarter of the middle school and high school students are assumed to either be dropped off by parents, parent carpools, or self-driven (high school students). Therefore, approximately 75 percent of the students are assumed to utilize the school bus transit. Based on the assumption, 69 students are assumed to utilize the school bus transit.

f. A single school bus carries approximately 60 school aged students. Therefore, one school bus is sufficient to carry 46 elementary school students and two school buses are sufficient to carry 69 middle school and high school students.

g. Based on the previous assumptions, a total of three school buses are sufficient to carry the number of school aged students. Three bus trips are projected to occur in and out in the morning peak hour and three bus trips are projected to occur in and out in the evening peak hour. A total of 12 additional daily school bus trips are projected to occur when the project is fully occupied.

h. Based on the factored average daily traffic volumes of 6,800 vehicles currently exist on Elizabeth Lake Road east of Bouquet Canyon Road. The

12 additional daily school bus trips contribute to less than 0.2 percent of the existing traffic.

i. The additional school bus traffic is not projected to cause a significant impact at the study intersections.

It has been a pleasure to service your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

Sincerely,

KUNZMAN ASSOCIATES

Carl Ballard
Principal Associate

REGISTERED PROFESSIONAL ENGINEER
WILLIAM A. KUNZMAN
No. TR0056
TRAFFIC
STATE OF CALIFORNIA

KUNZMAN ASSOCIATES

William Kunzman, P.E.
Principal
Professional Registration
Expiration Date 3-31-2010

#3934c

Table 1

Traffic Collision History[1]

Elizabeth Lake Road From Bouquet Canyon Road to Bowser Road West (2003-2008)

Collision No.	Date/Time	Location		Type of Collision	Motor Vehicle Involved With	Vehicle 1 Direction of Travel	Vehicle 1 Movement	Vehicle 2 Direction of Travel	Vehicle 2 Movement	Cause of Collision
1	9/9/2005 3:20	2376 feet west of	Elizabeth Lake Road/ Bouquet Canyon Road	Midblock Left Road	Non-Collision	West	Other Unsafe Turning	N/A	N/A	Driving Under Influence
2	4/28/2006 11:00	619 feet west of	Elizabeth Lake Road/ Bouquet Canyon Road	Midblock Head on	Motor Vehicle	East	Croosed into the Opposing Lane	West	Proceeding Straight	Driving Under Influence
3	7/3/2008 5:45	in intersection	Elizabeth Lake Road/ Bouquet Canyon Road	Midblock Fixed Object	Fixed Object	North	Proceeding Straight	N/A	N/A	Unknown

[1] The reported traffic collision history has been provided by the County of Los Angeles (see Appendix B).

Table 2

Traffic Accident Rate Calculations

Descriptor	Number of Accidents							Existing Entering ADT	Accident Rate
	2003	2004	2005	2006	2007	2008	Total		
Roadway Segment									
Elizabeth Lake Road (EW)									
Between Bowser Road West and Bouquet Canyon Road	0	0	1	1	0	1	3	4,400	0.47

APPENDIX A

Leona Valley Resident Letters
Received By the County of Los Angeles

Traffic Report Deficiencies
Valley Vineyard Development
West of Bouquet Canyon Road
@ 87th Street West & Lost Valley Ranch Road
Reviewed August 20, 2008

The Report submitted by Valley Vineyard, does not base its findings on the anticipated completion date of the project; therefore, the actual trends are not adequately addressed or realistically analyzed. The Report needs to be corrected, utilizing the planned completion date to the proposed subdivision and the relevant data for that period of performance.

Note for County: These traffic reports should have an expiration date so that out dated reports are not used or relied upon for new projects, which are often delayed for many years due to economic conditions. A good example of an out dated report is the Ritter Ranch study utilized to support the conclusions of the Vineyard study. The Ritter study was found to be severely flawed when it was conducted several years ago.[1] *The County should insist a project timetable schedule be part of this study and all future reports.*

The report does not adequately address the County's request to include the Ritter Ranch counts. The calculated traffic counts should include the estimated traffic counts from Ritter Ranch *and* Valley Vineyard projects, and not use a percentage of increase. The report does not indicate the true traffic counts that will be realized with the Ritter Ranch, Valley Vineyards, and projected North County growth rates. Table 6 indicates 94,501 trips for the Ritter project, but not its effects on Bouquet Canyon Road. The LVTC insists that the report be updated to reflect the actual projected numbers and not percentages of increase so that the true impact can be ascertained.

The report provides no history of accidents along Bouquet Canyon Road. Bouquet Canyon Road is known to have one of the highest death rates in the State of California.[2] The report is not complete without indicating the increase in the number of accidents as a result of the added traffic, increased ingress/egress, horse crossing and the addition of an intersection on Bouquet Canyon Road. The safety of this roadway and the shortfalls in its design cannot be determined or resolved without knowing where and how accidents occur on the north section of Bouquet Canyon Road.

The Traffic Count Work Sheets indicate the City of Palmdale as the location. The report needs to be updated with the correct location. The Traffic Count Work Sheets should indicate Leona Valley as the studied area. This inaccuracy suggests a lack of familiarity of the area or a deficit of knowledge for this location.

Traffic Count Work Sheets start at 7:00 AM, near the <u>conclusion</u> of the commuting time for this area. Leona Valley is a commuter community, and most of the residents commute

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[1] Leona Valley Town Council v Ritter Park Associates, et al
[2] California Highway Patrol, Resident Deputy Study

to the South. The reports must to be updated with the traffic count starting at 4:30 in the morning.

The Traffic Count Work Sheets indicate the date of study as July 18, 2007. This summer season date is not indicative of typical work day traffic on Leona Valley roads, as this represents summer vacation time. The counting effort should have taken place during normal traffic conditions and must exclude summer and winter breaks (preferably a weekday in September, after school is in session). The traffic count needs to be accomplished during the time of year that there is known high traffic periods.

The report does not mention or take into account Leona Valley School, which is located at the northwest corner of Leona Avenue and 90th Street West. An appropriate analysis must consider the traffic impact, including the direct access to the school, which is a kindergarten through 8th grade institution. The County and the company generating the report must also consider the pending population expansion at the Leona Valley School. The expansion will include the Anaverde subdivision in southwest Palmdale. The student population is expected to triple this year. The report must be updated to address the school, its expansion and the additional traffic that will be generated by the subdivision.

The report indicates all the counts were done on the same day. Unless multiple people did the counts, the actual work sheets are suspect. The work sheet should indicate who took the counts and should be signed by the person performing the task to be officially recognized; there is also no indication as to if there is quality control on the work sheets. Since the proposed project will affect the community over a much longer time span, the counts should be accomplished with automated counting equipment, traceable to a calibration standard. The count should take place over a 7 day period with data recorded over (7) 24 hours periods. The raw data should also be included in the addenda of the report. The traffic count topic has come up several times in the community. No one has come forward to collaborate that actual traffic counting was ever done, because no equipment was observed or noticed by the public. The LVTC requests that the test be performed again by the County or with County oversight utilizing calibrated counting equipment. The report should include the calibration sheet for the equipment and a signed affidavit by the person or persons performing the traffic count. Once the report is updated and resubmitted, the LVTC expects the County validate the data once it is resubmitted by performing spot checks with County traffic counting equipment. The traffic study must include Bouquet Canyon Road, 87th Street West, Elizabeth Lake Road, Leona Avenue and 90th Street West.

6. A traffic signal is projected to be warranted at the following study intersection for Year 2009 without project traffic conditions (see Appendix D):

   Bouquet Canyon Road (NS) at:
   Elizabeth Lake Road (EW)

   The unsignalized intersections have been evaluated for traffic signals using the California Department of Transportation Warrant 3 Peak Hour traffic signal warrant analysis, as specified in the Manual of Uniform Traffic Control Devises 2003 California Supplement, dated May 20, 2004.

The report indicates that a red light will be needed at Bouquet Canyon and Elizabeth Lake Road by 2009, even without the project. The LVTC does not believe the conclusion of the report. The intersection of Bouquet Canyon and Elizabeth Lake Road does not show any signs of needing a traffic signal, therefore the LVTC insists the County perform a traffic study for this intersection to ensure the safety of the citizens of Leona Valley and validate the analysis and the conclusion of the report.

The method sited to calculate the need for a traffic signal seems to be the incorrect process for a rural environment and needs to be adjusted for the traffic and accident rate for this intersection. The traffic flow at this intersection is not known to be a problem and the Leona Valley Town Council has received zero complaints from citizens regarding this intersection in the last ten years. If a traffic signal is required at the Bouquet Canyon and Elizabeth Lake Road intersection, then the project should be put off until the traffic light is installed by the County, or is required to be installed by the Subdivision Developer.

Bouquet Canyon Road, along the referenced subdivision project, is a high-speed section of roadway. The proposed subdivision will be incorporating a new intersection in the middle of this high-speed thoroughfare (55-70 mph/typical), therefore, the County needs to monitor the speed in front of the proposed entrance (A Court) to the project to better understand the design requirements and to ensure that the new intersection is designed to best maximize safety.

The same high-speed section of Bouquet Canyon Road is also noted for unsafe passing. Traffic just south of the subject property is slowed due to the numerous curvatures of the roadway when traveling north; Bouquet Canyon Road, in front of the proposed project, is the first and most common place that cars are able to pass slower moving vehicles. The unsafe passing will take place in the middle of the proposed intersection. The report does not address this safety issue. For safety reasons, the County should require the report address this issue so that the County can ensure a design that best maximizes safety.

> 90th Street West: This north-south roadway currently is two lanes undivided in the study area. 90th Street West is not classified on the County of Los Angeles Highway Plan. It currently carries approximately 1,100 to 1,500 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Bouquet Canyon Road: This north-south roadway currently is two lanes undivided in the study area. Bouquet Canyon Road is classified as a Secondary Highway (80 foot right-of-way) on the County of Los Angeles Highway Plan. It currently carries approximately 2,900 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Godde Hill Road: This north-south roadway currently is two lanes undivided in the study area. Godde Hill Road is classified as a Major Highway (100 foot right-of-way) on the County of Los Angeles Highway Plan. It currently carries approximately 3,300 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session.

> Elizabeth Lake Road: This east-west roadway currently is two lanes undivided in the study area. Elizabeth Lake Road is classified as a Major Highway (100 foot right-of way) on the County of Los Angeles Highway Plan. It currently carries approximately 3,000 to 6,800 vehicles per day in the study area.

LVTC requests the County verify the traffic count when school is in session. The estimated traffic count indicates a very large variation. The traffic on Elizabeth Lake Road is pretty consistent.

> Lost Valley Ranch Road: This east-west roadway currently is two lanes undivided in the study area. Lost Valley Ranch road is not classified on the County of Los Angeles Highway Plan.

Dirt road needs to be added to the description of the road. Lost Valley Ranch Road is also a natural watercourse, which has failed and relocated multiple times in the last two decades.

The project traffic distribution is incorrect. It assumes that most of the traffic will go to the East and not the South. This error appears to be due to the lack of familiarity of this location. Most of the residents in the Antelope Valley commute to the South as this is a bedroom community. Valley Vineyards needs to perform a traffic survey of the local residents to see where they commute to and apply that percentage to the traffic count for the project. Major studies for the Antelope Valley have already been done in recent years, which indicate the majority of residents commute outside of the Valley for employment. The majority of the traffic does not go to Palmdale; most of the citizens commute to the southern work centers in the Santa Clarita Valley, San Fernando Valley, Los Angeles, and points further south. The traffic distribution also does not take into account the traffic to Leona Valley School and the commercial core of this town, to and from the project. The Traffic Distribution uses percentages of increase. This methodology is misleading. Actual counts should be use. The report should be using the calculated counts that include the Ritter Ranch project counts.

A. Method of Projection

For Existing Plus Ambient Growth traffic conditions, an areawide growth rate has been utilized to account for areawide growth on study area roadways. Existing Plus Ambient Growth traffic volumes have been calculated based on a 3.8 percent annual growth rate of existing traffic volumes over a two (2) year period. The areawide growth rate has been obtained from the Los Angeles County Department of Transportation.

Areawide growth has been added to daily and peak hour traffic volumes on surrounding roadways.

With the building limits taking place in the South County, Developers are looking to the north in smaller unincorporated towns to build their medium size subdivisions. Therefore, the growth rate needs to be updated based on this latest trend. The report fails to include the growth rates for the Antelope Valley, taking into to account the population and commuter increases for the cities of Lancaster and Palmdale. Elizabeth Lake Road and Godde Hill Road are utilized by residents of Lancaster, Palmdale and Quartz Hill to commute to Santa Clarita/San Fernando and Los Angeles basin areas. The increased traffic flow should be accounted for based upon the actual growth rates of this region. The report draws conclusions based on old data and growth rates that have not been updated per today's environments. The report needs to be corrected, based on the changing growth rates and demographic patterns.

Table 6

Other Development Traffic Generation

Project	Land Use	Quantity	Units[1]	Peak Hour						Daily
				Morning			Evening			
				Inbound	Outbound	Total	Inbound	Outbound	Total	
PM 062789	Single-Family Detached Residential	3	DU	1	2	3	2	1	3	29
PM 066871	Single-Family Detached Residential	3	DU	1	2	3	2	1	3	29
PM 068295	Single-Family Detached Residential	4	DU	1	2	3	3	1	4	38
TR 062622	Single-Family Detached Residential	11	DU	2	6	8	7	4	11	105
Ritter Ranch TTM 51508[2]	Single-Family Detached Residential	6,305	DU	1,260	3,470	4,730	3,970	2,330	6,300	63,430
	Multi-Family Attached Residential	895	DU	60	330	390	340	160	500	5,350
	Commercial Retail	63	AC	260	110	370	750	780	1,530	17,335
	School	1,800	ST	470	250	720	20	50	70	2,340
	Park	198	AC	110	--	110	--	70	70	725
	Subtotal			2,160	4,160	6,320	5,080	3,390	8,470	89,180
Joshua Ranch TTM 52200[3]	Single-Family Detached Residential	535	DU	102	300	402	342	198	540	5,120
Total				2,267	4,472	6,739	5,436	3,595	9,031	94,501

The numbers used to update this report for Ritter Ranch are not correct. Ritter Ranch no longer includes multi family residential units except for a senior housing project. The Table does not account for the traffic to the Ritter Ranch golf course, the planned equestrian center and shopping centers. The report needs to be updated per the latest proposed design changes made by Sun Cal. The Traffic report developed by Sun Cal should be seen by the County before any action is taken on approving this report or subdivision.

Evaluation of the Road Design

The design does not take into consideration that Bouquet Canyon Road is a scenic byway. More information is required to ensure that the road design enhances the scenic byway. The County needs to require additional design packages to ensure the design meets the Scenic byway requirements.

The proposed road design does not include a deceleration lane on Bouquet Canyon Road for south bound traffic turning into A Court. This section of Bouquet Canyon Road is a high-speed area, with the southbound traffic turning west into the subdivision, A Court, requires a right hand turning lane for safe deceleration and to keep from impeding the flow of southbound traffic. Without the decelerating right had turn lane, southbound traffic will perform unsafe passing to avoid the right-hand turning vehicles. The County needs to ensure the safety of motorists and the residents of Leona Valley by requiring the road design to include a right-hand deceleration lane. The deceleration lane needs to be adequately long enough to maintain the flow of traffic and provide for the safety of the commuters and the residents of the proposed project. As an additional safety precaution, the Developer must be responsible for an additional turn out on the southbound side, between Elizabeth Lake Road and the project site, to allow traffic to pull over before entering the subdivision.

Turning South out of "A" Court, the project design includes an acceleration lane. The Acceleration Lane requires the cars to merge into one south bound lane right in the middle of the turn, defined by segment DD and CC in the provided project drawings. The merge should be carried around the corner with the merge taking place in the straightaway identified as segment BB. The County needs to extend the end of the merge lane to the straightaway between the curves.

The northbound left turning lane into "A' Court needs to be longer to allow for high-speed traffic on Bouquet Canyon Road. After the corner, just before A Court, is the first place north bound backed-up traffic obtains a chance to pass. Provisions need to be made for a passing lane or a longer turning lane so traffic can maneuver around the cars turning left on to "A court".

If the County were to investigate the number and cause of the accidents along this stretch of Bouquet Canyon Road, they will find a high number of accidents are caused by cattle and wildlife deer. on the road. With the increase of traffic from this project, the County should mandate the Developer upgrade the existing fence to a highway fence, built to County or State specification, while still in compliance with the Leona Valley Community Standards District.

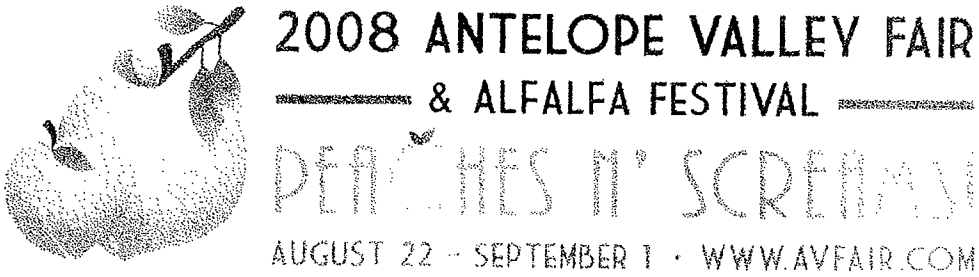
During a Town Council meeting earlier this year, the Developer indicated that that he planned on adding an equestrian crossing at the high speed segment (55-70 mph) of Bouquet Canyon Road. The location is approximately ½ to one mile north of the curve (Cowart's curve). Adding a horse crossing at this location (to connect to the trail system) will put the drivers and the riding community at an unacceptable elevated risk of injury or

death. Therefore, it is recommended that any crossing occur subsurfacely, so that equestrian travelers traversing this area do not interfere with the flow of traffic.

Residents have voiced a large volume of concerns over ingress/egress at the terminus of Lost Valley Ranch Road and 87th Street West, a narrow rural roadway. As per our previous recommendations, we believe this access should be removed in favor of dual access points on Bouquet Canyon Road.

Supplemental Commentary
August 23, 2008

It appears the Developer has traffic counting equipment situated at Lost Valley Ranch Road at 87th Street West on August 23, 2008, a Saturday morning and the week of the Antelope Valley Fair. Leona Valley is a rural community with strong participation in fair events. Most families with children camp out at the Fairgrounds, taking care of livestock and displays, until competitions are over. Therefore, much of the community is absent from August 21 through September 1st. We had previously stated that a traffic study during summer is inappropriate as true traffic counts will not be reflected. This is further exacerbated during fair week and any study done the week of August 22, 2008 to September 1, 2008 should be disregarded.



August 5, 2008

Leona Valley Town Council
Leona Valley, CA 93551

Subject: "Valley Vineyard" Development

PLEASE FORWARD TO THE APPROPRIATE L.A. COUNTY AGENCY

In 1988, a proposal to build a housing development on the same site that "Valley Vineyard" now proposes, was soundly rejected by the community and the County, and was never adopted. Subsequently, that proposed development became the impetus to establish the Leona Valley community standards district, and form a town council, giving unequivocal evidence of this community's commitment to maintaining the rural characteristics and opportunities, as well as the rather unique design pattern of Leona Valley.

Now, 20 years later, a new owner of the property is asking to do the same – build a gated urban housing tract in Leona Valley. Not surprising, after 20 years, nothing has changed; not the environment, topography, infrastructure, impacts - or the community's desire for compatible growth which enhances our quality of life, not changes it.

The Leona Valley town council has done a superb job of analyzing this project and identifying the impacts on the environment and community. I concur with their findings and applaud their effort.

Therefore, please add my voice to those who find this project inappropriate and oversized for this area.

I would be anxious to see what more suitable alternatives the developer can propose and would encourage him to do so.

Mary Ann Floyd

Mary Ann Floyd,

LVIA Land Use Committee Chairman
CSD Formation Chairman
Town Council Co-Founder and Member
ARTC Founder

LEONA VALLEY TOWN COUNCIL

The proposed housing tract "The Valley Vineyard Project:" consisting of 121 homes and a commercial vineyard are not an asset to our valley for numerous reasons. There is a restricted traffic entrance to our valleys on both the north and south slopes and more difficult as the influx of families with children has increased. Lake Elizabeth Road has increased traffic from the east and the west with many accidents monthly reported in the Mountain Yodeler. With the added traffic from the proposed homes will be added traffic from the south on 87th Street West which will require turning onto Leona Avenue , a curve that has seen many past misses and near misses on the curve and of the residents leaving their home driveways. This also will increase the accidents that are presently occurring on 87th Street West. Most of the traffic violations are not sited or recorded due to lack of Sheriff Patrol assigned to this area.

The safety of this rural lifestyle lived here will endanger the children who we see walking to and from school, riding on their skateboards, bikes, scooters, riding or walking their horses dogs or other animals. Also the area has many joggers who use the streets to go into the hills to hike.

I have seen an increase in traffic in delivery , Waste Management, Propane trucks and U.S. Postal trucks in the thirty plus years that I have lived here . There are also the Fire Emergency and ambulance responses that are frequent. During the fires that have occurred there is limited entrances to the areas that are burning and often with evacuation and fire responders there is conflicts. With the projected 100 cars a day increase the hazards will implode to disasters becoming unmanageable.

I am very concerned for those who also will be having the water table drained and left with no water except that which is controlled by water commodity sellers, The California Water District has agreed to selling the developer some water, but there already is a restricted amount of water available, with the global warming more drought conditions are and will occur, meaning less water from the aqueduct There is limited water for fire fighting as it was experienced in past fires.

We need not add to hazards with the addition of this development.

Marcella E. Mahan

DUARTE RANCH

August 5, 2008

To: The Leona Valley Town Council

Our family resides at an 8 acre ranch located at 40203 107th St. West in Leona Valley. It is our understanding that there is currently a proposal to develop a subdivision of 121 residential units with clustering to 1.5 acres between 87th Street West and Bouquet Canyon Road. This is of great concern to our family. Please advise the Los Angeles County that we are stremuously opposed to any such development in Leona Valley.

We have lived here for two years and plan to raise our children here. The environment we have chosen to raise our children in is of the utmost importance to our family. We have made and will continue to make significant sacrifices toward this effort. We carefully researched and specifically chose to live in Leona Valley when we moved here from New York State in 2006. We will have three children in the Leona Valley Elementary School this year. We also have horses, a llama, and many other animals. We plan to have even more farm animals in the future. Our family participates in many community activities and we are also members of the Leona Valley Improvement Association and the Leona Valley 4-H Racketeers. We are active in the Leona Valley Elementary School Parent/Teacher Organization. We ride our horses throughout the community and use Leona Avenue and 90th Street regularly while on horseback. One of our children regularly rides her horse unsupervised to the Jackie's Restaurant to eat with her friends. When our children walk or walk their dogs throughout the community we enjoy an increased margin of safety due to the current level of traffic as well as the nature of a small community where most everyone knows each other. Most of the current traffic consists of the folks who live here and they know they need to drive carefully to protect their neighbors as well as their own reputation in the community!

We are very, very concerned about the significant danger caused by the increased traffic that a subdivision would bring and given that coupled with the very limited egress and ingress to this community it would pose not only a danger but an extreme nuisance. Certainly traffic lights would be needed and we do not want those here. It would also no longer be safe to ride the horses and allow children to walk on Leona Avenue and 90th St. due to the increased traffic. The effect of the increased traffic on Elizabeth Lake Road is another very significant problem. There is already a huge increase in the number of serious accidents on Elizabeth Lake Road since 2003 and many of these occur in the Leona Valley area.

Please consider how the increased traffic and limited ingress and egress would also create an impossible situation should a disaster strike. In Leona Valley the fire and earthquake danger is a very real and daily concern. The problems associated with evacuating the school, located on Leona Avenue and 90th St., and the current student populace of 150 children and their families are of enormous concern to this community even without the significant added problem of an additional 121 residential units and increased student body.

PHONE (661) 270-9367
E-MAIL mtjduarte@aol.com

The smaller size of the lots and the essential "mass production" of tract homes, albeit "custom type" or expensive tract homes, is not in keeping with the style and nature of this community in any way and we are concerned that these future residents could not possibly integrate as a whole into the existing community and would, in fact, become an adversarial community within the same. In addition, there currently exists approximately 500 single family homes in Leona Valley and the effect of such a subdivision would create an oversupply of housing in this area with a detrimental effect on the economy vis a vis the extended absorption rate. The current elementary school would likely double in size. The effect of this would significantly and rapidly create chaos in this school which currently enjoys some of the highest test scores for the entire school district.

The crime rate would likely be increased since the current residents of the community, for the most part, know who lives here and they work well together to keep watch over each other and the children of the community. We are concerned because statistics show that in subdivisions the likelihood that investors would buy many of these tract homes and potentially (and we assume, unwittingly) lease them to sexual predators is significantly increased. The ratio in Leona Valley of homeowners to leaseholders is much different than in Palmdale and Lancaster and it is well demonstrated that the vested interest of homeowners adds to increased safety in the community.

We are additionally concerned about the environment and resources in Leona Valley. Building a subdivision here would have a significant detrimental effect on the land. It could potentially create additional flooding problems on the Lost Valley Ranch Road which is a natural waterway. A subdivision of this size would require an on site sewage treatment plant. More importantly, there is already very limited water resources to sustain the existing community let alone supply sufficient water for this many new homes.

The ultimate effect of a subdivision, of any type, in Leona Valley would essentially put it right "on the road" to make it very similar or otherwise homogenous to the environment down in Palmdale and Lancaster. While this is not meant in any way to make a derogatory statement about those communities; we chose to live in Leona Valley and not Palmdale or Lancaster. Leona Valley is a small, rural community, it is intentionally and historically a small, rural community and those of us who live here have chosen and sacrificed to do so because we want to live this specific, particular, and wonderful lifestyle. If someone wants to buy a home and become a member of this community, then they should do so. However, our family would be terribly upset to see it happen via a subdivision of any type. A subdivision is a subdivision is a subdivision. Please do all you can to keep subdivisions out of our town. Thank you for all of your work and consideration.

Sincerely,

Terri Valentine-Duarte

Terri Valentine-Duarte, Manny Duarte, Nikki Valentine, Lauren Valentine, Joey Duarte, and Tony Duarte

Nikki Valentine

Lauren Valentine

40203 107th St. W.
Leona Valley, CA
93551
P.O. Box 900167
Palmdale, CA 93590

JOEY TONY

August 3, 2008

Lana & John Seymour
39909 86th St. West &
Vacant lot on 87th St. West
Leona Valley, CA 93551-7418
(661) 270-0339

Leona Valley Town Council,

We are writing this letter in protest to the "Valley Vineyard" proposed housing tract and commercial vineyard, one of our issues is the increase in vehicle traffic. We were informed at one of the past meetings by Mr. Allday that there will be a minimum increase of a 100 cars a day traveling along Lost Valley Ranch Road where one of the their main entrances will be located on either side of the roadway.

This will cause a significant impact on 87th St. W which curves on to Leona Ave. especially to the Leona Valley School. School buses picking up and dropping off on 90th St. W and Elizabeth Lake Road morning and afternoons for students attending other elementary, middle schools and high schools not located in this area. Then there will be the "normal" traffic to and from the market, feed store, restaurants and other business etc.

This causes us many safety concerns such as entering or exiting Vientos, this will affect the residents of 86th St. W. We have seen several bad accidents at the corner of Vientos at 87th St. W.

Many of our friends and neighbors walk or run along 87th St. W, as does many of the children in our area who ride their horses, walk their animals, ride their bikes, scooters, skateboards etc. We have witnessed a number of close calls or seen someone speeding past a person riding a horse with no consideration to the rider or animal. In some instinct spooking the horse and nearly throwing the rider. 87th St. is a narrow road not a lot of room for two vehicles passing by one another in many areas, lot alone the adults and/or children and their animals sharing this same roadway.

Plus during the winter rains at times water drainage becomes a significant problem because of the amount of water traveling down the side of 87th St. W that overwhelms the culverts and causes drivers to drive down the middle of the roadway.

When we have had fires in the past and/or emergencies of one nature or another requiring emergency equipment, or various types of delivery trucks getting stuck or breaking down on 87th St. W the road has become blocked for long durations of time. The residents can neither leave nor enter their residents. When the delivery trucks have blocked the roadway you either set there and wait for who knows how long, park your vehicle and

walk or should I say hike up the hill to get home on 86th St. or go some where else and try later.

We can't imagine in the event of an evacuation due to another fire or earthquake or even worse both! What kayos and havoc the existing residents of the South side of Leona Valley could face if this housing project is approved as planned.

To try and evacuate that many more residents out and down 87th St. W while trying to set up emergency equipment, (fire hydrant located at Vientos & 87th St. W). It would be impossible. Once the equipment sets up at this corner traffic comes to a halt. Now what??

The last big fire that swept through Leona Valley's East end via Bouquet Canyon in a fire storm, didn't give the residents of Lost Valley Ranch Road, 86 or 87th St W much time with the winds blowing like they were to get their animals and get out. Do to the narrow roads once the emergency equipment was in place there wasn't enough room to get horse trailers or vehicles by.

We are asking that you please consider our deep concerns for the safety and well being of our neighbor and just how much this project would impact Leona Valley residents.

Sincerely,

Lana & John Seymour

Lana & John Seymour

August 9, 2008

Dear Leona Valley Town Council:

Thank you for taking the time to inform the residents of Leona Valley about the impending housing tract. I would like to go on record as opposing this large a group of homes in an area where evacuation in case of fire would be very difficult.

The corner where 87th St. dead ends into Leona Valley is already dangerous without adding the number of cars that will come with the 121 homes. I think the estimated 100 additional cars on our roads is rather low considering that most households have more than one car per home.

The traffic that will be added to 87th St. W. will be traveling on Leona Ave., 90th St. W., and Elizabeth Lake Rd. Why 121 homes? 21 would sound more reasonable.

Who is going to supply water to those homes? How many school age children will come with the additional homes?

Unfortunately, one small housing tract could ultimately lead to one more, a little bigger, and so on. If things don't go well with this project will Leona Valley be stuck with a mess like Elizabeth Lake Rd. near The Lazy T Ranch.

Can the traffic from those homes be directed out onto Bouquet Canyon Rd?

Thank you so much for your efforts on behalf of the community to keep building of new homes to sensible standards.

Thank you,

Ruth Perkins

Ruth Perkins
(661) 270-1720

Dear Leona Valley Town Counsil:
Re: Subdivision Valley Vineyards

Our concerns regarding this project are:

1. The Lot sizes Do Not Conform with the wishes of the Leona Valley people.
Our town people want to keep the lot sizes to 2 1/2 acres
Why reduce the lot size? That would make it crowded here and we like the open feeling...

2. Environmental/degradation of resources: This will affect:
A. Present water resources
B. Traffic IN Leona Valley and going OUT of Leona Valley
That means more hazards and there will be a need for more Stop signs and even Traffic lights will have to be added for safety. We Don't want that! Soon we will be living in the City NOT the Country.

We Are not against any new developments, but we are against the fact that the developers are not considering the towns peoples needs, they just want to make a fast buck and move on to the next development WE are the ones who LIVE here! Listen to the town people and come up with something that will be a good choice for everyone.

3. What about fire issues? Escape routes? Fire hydrants and enough water to fight the fire?

4. Lighting, streets, another school, waste management? We are concerned about all theses issues.

We always get promises but look what happens, for instance the NEW ROAD..we get left with an uncompleted project, a blighted area not to mention a Great Safety Hazard!

Were just not ready to start another project when there are so many unanswered questions.

Sincerely,
Terry & Aleta Dupuis

To who it may Concern

In regards to the 100+ homes being built and going in to 87th St west which is a two (2) lane Street. There is no Safe way to put that much traffic on 87th St. There is a blind Corner at Leona Valley Ave and 87th St. That is Very dangerous now and as fast as people drive add another 200+ Cars and that would be a safty problem. It would not be safe for Kids walking to school are the Slove And how people riding horses get to the riding trails

In case of a Forest Fire The Fire Dept. is tring to get equipment to the Fire and people are tring to get there horses on trailes and Cars out. The Street gets blocked Very fast now in the last Two (2) Fires. If the traffic from 100+ homes goes into 87th St and we have another Forest Fire May God Help us because we will Need it. And we will have another Forest Fire

Thank you

Leon & Mary Thompson
40047 87th St W.
Leona Valley, CA 93551

April 5, 2008

Alice Wallman - LVIA

I am a resident on 87th St. West in Leona Valley. I am on the Corner of 87th & Leona Avenue where Cars make the turn from Leona Ave on to 87th St West.

I have already had my fence hit twice by Cars not making the turn. Most recently, a Car [illegible] the fence and hit my parked House Trailer. It was $ 41000 in Damage

I Cannot [illegible] anymore Cars on 87th St. West. All the residents on 86th Street have to go down 87th to get on a Connecting Street to their homes. All the Cars on Lost Valley go down 87th St. West to get on their road.

It Wont just be a 100 more Cars, try at least 200 more. All families today have at least two Cars. It will be Bumber to Bumber on 87th W

I do not Want 87th St. West, used by the residents of the Leona Valley Vinyard Project.

Sincerely,

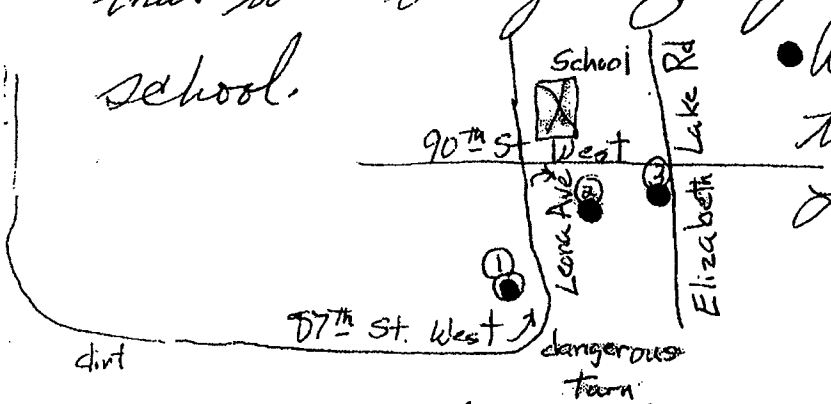
Janet Cartain

[illegible] 87th ST W, Leona Valley

April 5, 2008

Dear Los Angeles County Planning Commission,

I have lived on 87th Street West in Leona Valley for more than twenty years. It is a narrow, two lane country road with limited traffic, because at the moment, the road pass my home is dirt and stops back in a canyon. The developers of the L.V. Vineyard Project are planning to put over one homes next to Bouquet Canyon and they want to use 87th Street West as a secondary exit. The problem I see is the danger of make a turn onto Leona Avenue from 87th Street West and the extra traffic that will be going by our local elementary school.



• Also three turns will need to be make to get to Elizabeth Lake Road

Even with limited traffic, there have been numerous accidents at this corner

Why can't the new project have its secondary exit on Bouquet Canyon? (one on each side of the developement)

Sincerely, Linda Blackburn
40014 87th Street West

To whom It May Concern
3-28-08

We live on the corner of 89th & Leona Ave. & we can't believe anyone would consider putting 100 more cars on these small 2 car roads. Its bearly comfortable passing a car & tight when passing a delivery truck, trash truck & even a large pick-up

We live in clean air here but that wouldn't last putting 100 more cars on these small roads then comes all that dust & pollution My husband cannot take the pollution because of lung damage

Our corner is very sharp & we have heard lots of tires screeching, cars that didn't make the corner & ended in the field and the corner is a blind spot to who is coming people walking children going to school on their bikes people riding horses

The last evacuation was tough between fire trucks horse trailers people

moving out of their homes, it was a nightmare & 1 little extra outlet is not much help with 100 more homes & we all have 2 cars & vacation vehicles, horse trailers & trucks

We have 4 great grandchildren 2 of which are walking & playing outside what if God forbide one got out to the street & 1 of those 100 cars hit one of our babies It would be unbearable. It would be a constant fear with so many cars traveling these streets & passing our home. These roads were not meant to accomodate that many cars.

Because no house hold has just one car to it. It would be 200 cars on that road not 100.

Our answer is No way. a vote of NO.

Ray & Lynne Moody
8718 Leona Ave.

August 20, 2008

Regarding Valley Vineyard:

We moved here for a reason. We came from a land of traffic, planned communities, gated communities, yards the size of postage stamps, people living like rats in a cage and, more importantly, a land where people don't take the time to know their neighbors.

We moved here to give ourselves, and our animals, room to live, to enjoy and explore our surroundings, to breathe without ingesting toxic fumes, to not have to fear being shot, stabbed or robbed in our own neighborhood.

We moved here because we grew up without the fears that today's children have. We wanted to see kids living the life that we knew. Leona Valley kids ride their horses and their bikes to the local market, the local restaurants or to their friend's houses without fear. Their parents know that everyone watches out for them and the kids know that they are being watched.

Now, the Valley Vineyard developers want to take that away from us. They look at our rolling hills and see dollar signs. They spout their fancy rhetoric about the positive aspects of their project. There are no positive aspects of it. We are not the country bumpkins that we are being taken for. We know that a large, gated community will not only increase light pollution, place a big draw on our already stretched resources, add traffic that we don't need or want, and ruin what this community is all about and has always been about. This is not progress. Any development of that property is of detriment to the community that already exists.

There are thousands of empty properties in the immediate area already. Instead of building more, why not do something positive like installing wind generators or large solar panels on that property? Make it a wildlife area. There's plenty of it there. Even better, why not just leave it alone? Go away Valley Vineyard. We don't want you!!!

Janice and Dave Gantenbein

August 1, 2008

To Whom It May Concern

Regarding the Valley Vineyard Project in Leona Valley

As residents of Lost Valley Ranch Road, immediately west of the project, we will be negatively impacted by the traffic the project produces. Since Leona Valley has no bus service for the elementary or middle school children and the high school bus comes to 90th St West and Elizabeth Lake Road, that will necessitate at least 1 or possibly 3 trips in the morning and the same in the afternoon for each home with a school aged child residing within.

Let's say 75% of the homes have children attending school, that would mean that each household collectively, for school alone, not counting work and town trips, would add between 90 and 540 additional daily trips on each of the affected roads. That is an inconceivable number on residential roads. What's worse is the fire hazards and the lack of alternatives for mass exodus. Having lived here over 30 years thru at least 6 or 7 major fires, we can not handle that additional traffic.

Respectfully,

Richard M Clayton
Guyla J Clayton

To Whom It May Concern
Re: Proposal of a One Way Gated Community at the top of 87th St. West, Leona Valley

My wife and I have lived in Leona Valley for over 5 years. Our house is located at the bottom of 87th Street West where it intersects Leona Avenue in a blind 90 degree turn. Our location gives us a unique understanding of the dangers and safety concerns of adding additional vehicle traffic on 87th Street. Over the past several years we have seen the traffic utilizing our street increase substantially. It has become a problem even getting out of our driveway during peak hours. Within the past two months we have observed several accidents and near misses at the intersection with Leona Avenue. The latest incident resulted in a car losing control in the turn, crashing through my neighbors fence and slamming into a horse trailer and corral. The paramedics were needed to attend to the woman's injuries. The turn is very sharp and blind to cars going either direction.

We also have several horses and riders in the area that travel up and down both Leona & 87th streets daily. Most of us in the neighborhood know to slow down and give them as much room as possible on these narrow streets, however, not all. We have seen incidents of horses getting spooked and putting their riders in real danger. We've seen one rider running frantically trying to catch a spooked horse that had thrown her. Adding more traffic to these streets that weren't designed to carry this volume of traffic, will significantly increase the risk of serious accidents and the safety of all the residents who live on and use Leona Avenue and 87th Street.

Our main concern is for the people currently living on the south side of Leona Valley, there is only one evacuation exit to Elizabeth Lake Avenue, this is 90th Street West. Over the last five years there have been significant fires and floods that have affected our neighbors and ourselves. During the fire scare, several residents needed to evacuate horses and other livestock in trailers. This was difficult due to fire fighting equipment leaving little room to maneuver. (This is not a criticism of the Fire Department, it is the reality we face in the event we need to evacuate the area.). In addition, with all the evacuating residents heading East & West on Leona Avenue and North down 90th Street, the intersection of 90th Street and Leona Avenue will become a grid lock and a disaster area in case of a serious evacuation need. Before allowing additional traffic volume that will exacerbate the situation, an impact study should be completed on the issues facing existing residents in case a major disaster hits the south side of Leona Valley and what impact allowing additional traffic down 87th St. would have. All of us that live on or off 87th Street have only one way out in case of an emergency. Allowing people that live behind a one-way gate to use 87th Street during any kind of adverse situation will put the lives and wellbeing of my neighbors and ourselves in great danger. This is a bad idea!

Thank you for consideration of these views,
Mike & Patti Groninga
40115 87th Street West,
Leona Valley, CA 93551

To Whom It May Concern:

RE: Traffic concerns on 87th Street - Leona Vineyard Housing Project

We have resided on 87th Street in Leona Valley for the past 16 years.

We would like to voice our concerns regarding the proposed gate entrance/exit on 87th Street for the Leona Vineyard Housing project. At the Town council meeting on March 10, the developer shared his 'traffic study' report. In their report they state that an additional 100 cars can, at any time of the day, be traveling up and down 87th Street after the completion of this project if the access gate is allowed on 87th Street. Our street already has more traffic than any other street in Leona Valley due to the fact that 86th Street, Vientos, and Lost Valley Ranch Road residents do not have any other way in or out but up and down 87th Street.

I cannot tell you what hazards this will cause in adding an additional 100 cars to our road. This street was built when there were only a few houses on the street many years ago. This street is barely wide enough for two cars to pass, carefully. There are no sidewalks; we like it that way because we are rural. There are many kids that walk or ride their bikes to and from the local elementary school each day. We also have equestrians on horseback and pedestrians walking up and down our streets at different times of the day and evening. This will cause a great issue to their safety due to the narrowness of the road. With that many more cars traveling up and down the street it will become dangerous to enter and exit our driveways, especially at the top of the street where you cannot see around the curve, and the rise in the street just past the middle where the view is blocked.

There are already two entrances/exits planned on Bouquet Canyon Road which is more than adequate for this project. Also, where is the fairness in them being able to take a short cut down our street but we can't take a short cut through their streets to get to Bouquet Canyon? The developer states he will open the gates to all of us in an emergency which will mean the residents from the development will be coming down our street and we will not be able to get out ourselves.

This is just wrong. Please only allow the access to and from Bouquet Canyon for this project.

Respectfully,

Robert and Valerie Harpham

Alice Wollman

Hello,

I am writing to inform you of the affect the new Leona Valley Vineyard Project will have on my community and my home as a homeowner living in Leona Valley near 87 Street West and Leona Avenue.

I have not written a letter in over 60 years, my last letter was to my mother and I was in the service in Korea, informing her of my discharge from naval service. My daughter is assisting me with this letter because I do not like to write letters and cannot spell very well.

Concerning the intersection of 87th Street and Leona Avenue, I was a lead person in the City of Monterey Park – in charge of traffic control for approximately 22 years, I would suggest to the traffic committee this intersection is a blind intersection with trees and bushes on each corner. In the past 22 years of living in Leona Valley we have had roughly 10-15 cars drive through fences from 87th Street coming toward Leona Avenue. Two ran my through fence, destroying an old corral built by the Ritter family, with very little left of this antique monument of Leona Valley history. My wife and I replaced the old wooden fence with chain link fence installed around our front yard and where the old corral once stood. The next person hit our chain link fence costing over $500 which I did recoup in court but could have been avoided. The property next to mine intersecting 87th Street and Leona Avenue has been destroyed by careless drivers speeding down 87th, ending up running through the fence at this intersection and then fleeing the scene. Numerous times I have called the owners, because this resulted in the cattle being let loose into the road, a few of the individuals caught have been illegal aliens attempting to flee the scene and had no drivers license or insurance. Another person coming from Leona Avenue to 87th Street was speeding so fast they jumped the asphalt berm and hit a fence and a trailer situated on that property, there excuse was the sun was in their eyes, which leads me to thin k she should have been travelling at a safer speed. With my past experience in traffic control I believe there should be a stop sign on both streets - 87th Avenue and Leona Avenue where they intersect, including a speed reduction. They currently drive this section of road at various speeds up to 50-60 miles per hour, which results in the accidents at this intersection.

If you would like further information or have any questions about the information contain in this letter please contact me.

Harry Charles Schay

8719 Leona Ave

Leona Valley, CA

APPENDIX B

Glossary of Transportation Terms

GLOSSARY OF TRANSPORTATION TERMS

COMMON ABBREVIATIONS

AC:	Acres
ADT:	Average Daily Traffic
Caltrans:	California Department of Transportation
DU:	Square feet
ICU:	Intersection Capacity Utilization
LOS:	Level of Service
TSF:	Thousand Square Feet
V/C:	Volume/Capacity
VMT:	Vehicle Miles Traveled

TERMS

AVERAGE DAILY TRAFFIC: The total volume during a year divided by the number of days in a year. Usually only weekdays are included.

BANDWIDTH: The number of seconds of green time available for through traffic in a signal progression.

BOTTLENECK: A constriction along a travelway that limits the amount of traffic that can proceed downstream from its location.

CAPACITY: The maximum number of vehicles that can be reasonably expected to pass over a given section of a lane or a roadway in a given time period.

CHANNELIZATION: The separation or regulation of conflicting traffic movements into definite paths of travel by the use of pavement markings, raised islands, or other suitable means to facilitate the safe and orderly movements of both vehicles and pedestrians.

CLEARANCE INTERVAL: Nearly same as yellow time. If there is an all red interval after the end of a yellow, then that is also added into the clearance interval.

CORDON: An imaginary line around an area across which vehicles, persons, or other items are counted (in and out).

CYCLE LENGTH: The time period in seconds required for one complete signal cycle.

CUL-DE-SAC STREET: A local street open at one end only, and with special provisions for turning around.

DAILY CAPACITY: The daily volume of traffic that will result in a volume during the peak hour equal to the capacity of the roadway.

DELAY: The time consumed while traffic is impeded in its movement by some element over which it has no control, usually expressed in seconds per vehicle.

DEMAND RESPONSIVE SIGNAL: Same as traffic-actuated signal.

DENSITY: The number of vehicles occupying in a unit length of the through traffic lanes of a roadway at any given instant. Usually expressed in vehicles per mile.

DETECTOR: A device that responds to a physical stimulus and transmits a resulting impulse to the signal controller.

DESIGN SPEED: A speed selected for purposes of design. Features of a highway, such as curvature, superelevation, and sight distance (upon which the safe operation of vehicles is dependent) are correlated to design speed.

DIRECTIONAL SPLIT: The percent of traffic in the peak direction at any point in time.

DIVERSION: The rerouting of peak hour traffic to avoid congestion.

FORCED FLOW: Opposite of free flow.

FREE FLOW: Volumes are well below capacity. Vehicles can maneuver freely and travel is unimpeded by other traffic.

GAP: Time or distance between successive vehicles in a traffic stream, rear bumper to front bumper.

HEADWAY: Time or distance spacing between successive vehicles in a traffic

stream, front bumper to front bumper.

INTERCONNECTED SIGNAL SYSTEM: A number of intersections that are connected to achieve signal progression.

LEVEL OF SERVICE: A qualitative measure of a number of factors, which include speed and travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience, and operating costs.

LOOP DETECTOR: A vehicle detector consisting of a loop of wire embedded in the roadway, energized by alternating current and producing an output circuit closure when passed over by a vehicle.

MINIMUM ACCEPTABLE GAP: Smallest time headway between successive vehicles in a traffic stream into which another vehicle is willing and able to cross or merge.

MULTI-MODAL: More than one mode; such as automobile, bus transit, rail rapid transit, and bicycle transportation modes.

OFFSET: The time interval in seconds between the beginning of green at one intersection and the beginning of green at an adjacent intersection.

PLATOON: A closely grouped component of traffic that is composed of several vehicles moving, or standing ready to move, with clear spaces ahead and behind.

ORIGIN-DESTINATION SURVEY: A survey to determine the point of origin and the point of destination for a given vehicle trip.

PASSENGER CAR EQUIVALENTS (PCE): One car is one Passenger Car Equivalent. A truck is equal to 2 or 3 Passenger Car Equivalents in that a truck requires longer to start, goes slower, and accelerates slower. Loaded trucks have a higher Passenger Car Equivalent than empty trucks.

PEAK HOUR: The 60 consecutive minutes with the highest number of vehicles.

PRETIMED SIGNAL: A type of traffic signal that directs traffic to stop and go on a predetermined time schedule without regard to traffic conditions. Also, fixed

time signal.

PROGRESSION: A term used to describe the progressive movement of traffic through several signalized intersections.

SCREEN-LINE: An imaginary line or physical feature across which all trips are counted, normally to verify the validity of mathematical traffic models.

SIGNAL CYCLE: The time period in seconds required for one complete sequence of signal indications.

SIGNAL PHASE: The part of the signal cycle allocated to one or more traffic movements.

STARTING DELAY: The delay experienced in initiating the movement of queued traffic from a stop to an average running speed through a signalized intersection.

TRAFFIC-ACTUATED SIGNAL: A type of traffic signal that directs traffic to stop and go in accordance with the demands of traffic, as registered by the actuation of detectors.

TRIP: The movement of a person or vehicle from one location (origin) to another (destination). For example, from home to store to home is two trips, not one.

TRIP-END: One end of a trip at either the origin or destination; i.e. each trip has two trip-ends. A trip-end occurs when a person, object, or message is transferred to or from a vehicle.

TRIP GENERATION RATE: The quality of trips produced and/or attracted by a specific land use stated in terms of units such as per dwelling, per acre, and per 1,000 square feet of floor space.

TRUCK: A vehicle having dual tires on one or more axles, or having more than two axles.

UNBALANCED FLOW: Heavier traffic flow in one direction than the other. On a

daily basis, most facilities have balanced flow. During the peak hours, flow is seldom balanced in an urban area.

VEHICLE MILES OF TRAVEL: A measure of the amount of usage of a section of highway, obtained by multiplying the average daily traffic by length of facility in miles.

APPENDIX C

Traffic Collision History

County of Los Angeles
Traffic and Lighting Division

Traffic Collision History Report
Midblock Collisions

Street: ELIZABETH LAKE ROAD
Limit 1: BOUQUET CANYON ROAD
Limit 2: BOWSER ROAD W

Date Range Reported: 08/01/2003 - 07/31/2008

Seq. No.	Date Time	Dist/Dir	Location	Collision Pattern	Motor Veh. Involved With	DOT1	MPC 1	DOT2	MPC 2	PCF	# Inj	# Kld
17	9/9/05 03:20	2376000' West of	ELIZABETH LAKE ROAD/BOUQUET CANYON ROAD	Midblock Left Road	Non-Collision	West	Other Unsafe Turning			Driving Under Influence	2	0
26	4/28/06 11:00	619' West of	ELIZABETH LAKE ROAD/BOUQUET CANYON ROAD	Midblock Head On	Other Motor Vehicle	East	Crossed Into Opposing Lane -	West	Proceeding Straight	Driving Under Influence	1	1
11	7/3/08 05:45	0' In Int.	ELIZABETH LAKE ROAD/BOUQUET CANYON ROAD	Midblock Fixed Object	Fixed Object	North	Proceeding Straight			Unknown	1	0

County of Los Angeles
Traffic and Lighting Division

Traffic Collision History Report
Midblock Collisions

Street: ELIZABETH LAKE ROAD
Limit 1: BOUQUET CANYON ROAD
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Date Range Reported: 08/01/2003 - 07/31/2008

Seq. No.	Date Time	Dist/Dir	Location	Collision Pattern	Motor Veh. Involved With	DOT1	MPC 1	DOT2	MPC 2	PCF	# Inj	# Kld

Total Number of Collisions: 3 **Segment Length:** 0.79 miles (4,184')

Settings Used For Query

Parameter	Setting
Limit 1	Do Not Include Intersection Related
Limit 2	Do Not Include Intersection Related
Intermediate Intersections	Do Not Include Intersection Related

APPENDIX D

County of Los Angeles
Midblock Accident Rates (Accidents per Million Vehicle Miles) Master Plan Highways and Mountain Roads

LOS ANGELES COUNTY ...

TABLE E

MIDBLOCK ACCIDENT RATES (ACCIDENTS PER MILLION VEHICLE MILES)
MASTER PLAN HIGHWAYS AND MOUNTAIN ROADS

Left Road	Fixed Object	Parked Vehicle	Driveway & MB RE	Peds & Bikes	Others	Total	Fronting Development
1.05	1.21	0.12	0.38	0.09	0.94	3.79	Mountain Roads with Design speed less than 35 MPH (23 samples, 170.10 miles)
1.11	1.13	0.26	0.64	0.27		3.03	Standard Deviation of Mean
0.41	0.72	0.05	0.29	0.00	0.35	1.82	Mountain Roads with Design speed greater than 35 MPH (16 samples, 179.00 miles)
0.31	0.48	0.07	0.29	0.00		0.98	Standard Deviation of Mean
0.19	0.32	0.41	0.78	0.09	0.35	2.14	Mixed Development with Critical speed greater than 45 MPH, Commercial except 56-foot-wide streets (158 samples 61.60 miles)
1.70	0.33	0.49	0.63	0.19		1.27	Standard Deviation of Mean
0.04	0.34	0.23	0.51	0.06	0.37	1.55	Industrial, Residential, Rural and Mixed Development with Critical speed less than 45 MPH (193 samples, 81.05 miles)
0.10	0.35	0.40	0.51	0.16		0.99	Standard Deviation of Mean
0.00	0.49	1.38	0.79	0.20	0.69	3.55	56-foot-wide roads in Commerci areas (4 samples, 7.00 miles)
0.00	0.27	0.51	0.47	0.07		1.00	Standard Deviation of Mean
0.16	0.37	0.21	0.96	0.12	0.35	2.17	Two-lane high speed Undeveloped areas-Lancaster and Palmdale area (6 samples, 66.00 miles)
0.16	0.29	0.33	1.99	0.17		2.92	Standard Deviation of Mean
0.10	0.33	0.32	0.63	0.08	0.37	1.83	Average For Non-Mountain Road: (361 samples, 215.65 miles)
1.12	0.34	0.46	0.62	0.18		1.22	Standard Deviation of Mean

Note: Accident study period for non-mountain roads except for two-lane high speed undevelop roads was 1-1-82 to 12-31-83; mountain roads and two-lane high speed undeveloped roads study period was 2 years, using 12/83 to 12/85 data.

(10)

The Vineyards

VESTING TENTATIVE TRACT MAP 066952

SUPPLEMENTAL INFORMATION

Low Impact Development Features

Mixed Agricultural and Residential Features

Traffic Mitigation and Dark Sky

Prepared by
Valley Vineyards, LLC
January 9, 2009

TABLE OF CONTENTS

I. The Vineyards Design Concepts and Compliance with Regulations

II. Bio-Filters and Bio-Solutions

III. Domestic Wastewater Treatment Systems

IV. Preservation of Open Space, Agricultural & Residential Land Uses

V. New Environmental Programs: GREEN BUILDING, LID, LEEDS

VI. Traffic Mitigation

VII. Dark Skies - Lighting

I. The Vineyards Design Concepts and Compliance with Regulations

Introduction:

The following pages are intended to be used in conjunction with the review of the Vesting Tentative Tract Map 066952 engineered plan. They provide additional facts - and in some cases technical materials – that clarify the steps The Vineyards development is taking to advance sound environmental planning in Los Angeles County.

The Vineyards design not only continues with the many existing programs and controls outlined in the General Plan and Area Plans that are aimed at protecting the environment, but intends to offer new and innovative techniques as an adjunct to these existing policies.

In recent years, environmentally sophisticated technologies have been successfully utilized in various parts of the world and the United States, and are now gaining acceptance and endorsement by more and more public agencies. These proven concepts include "Low Impact Development" (LID) techniques and "Leadership in Energy and Environmental Design" (LEED) techniques. In addition, many municipalities are advancing newer concepts which include such things as enhanced onsite sewage treatment methodologies, and cross supportive land uses such as incorporating a combination of agricultural and residential land uses into one development. We believe that The Vineyards will be the first to introduce many of these new concepts as part of a development located within Los Angeles County.

However, as with anything new, many of the state-of-the-art methods of creating "green and sustainable" development we are proposing are not yet fully understood by the public. We hope the information on the following pages will be beneficial to all those wanting to more fully understand this precedent setting development.

Site Characteristics:

The design concept for The Vineyards development uniquely blends much needed agricultural land use with residential land uses. Situated in the community of Leona Valley in northwestern Los Angeles County – an historical wine growing area – the 292.5 acre Vineyards will be divided into 117 agricultural/residential lots averaging 2.5 acres (292.5 acres / 2.5 = 117 lots) required by the base zoning. Additionally, as recommended by the Leona Valley Community Standards District regulations in order to preserve natural ridgelines, riparian areas, limit grading, etc., The Vineyards has clustered some of the lots creating a range in lot size from a minimum of 1.5 acres up to 10 acres. All lots will be interspersed between approximately 210 acres of Open Space. Included in this Open Space reservation approximately 100 acres will be dedicated to agriculture in the form of fully operational vineyards. Typically residential uses are segregated from agriculture uses, but The Vineyards uniquely plans to integrate the two.

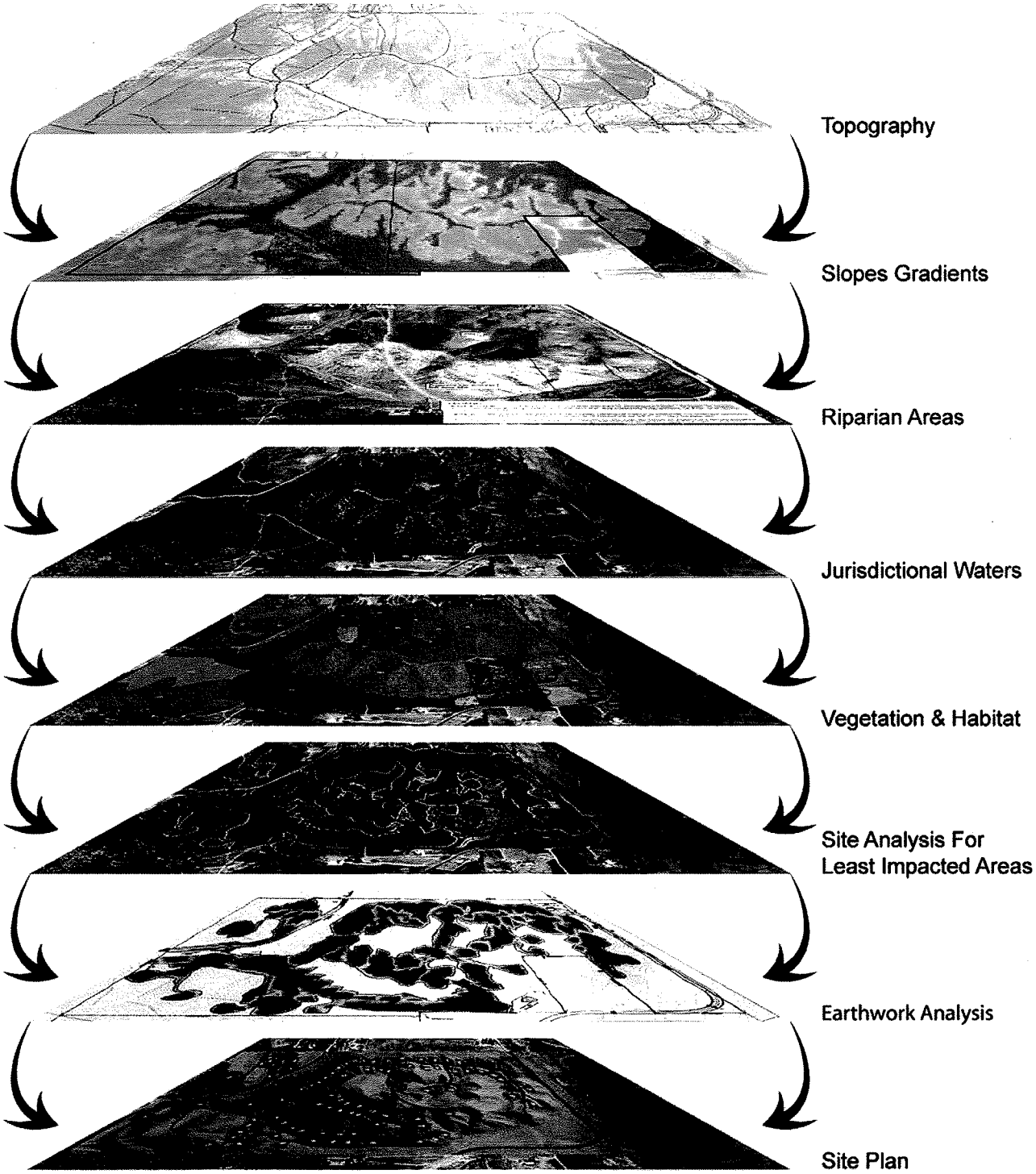
A Model for Development:

It is the goal of The Vineyards: i) <u>to create a model</u> for integrating agriculture uses in a low density residential setting, by introducing producing vineyards into the Open Space areas; ii) <u>to create a model</u> for implementing new Low Impact Development (LID) techniques, such as bio-swales, permeable paving, and rainwater collection systems; iii) <u>to create a model</u> for advancing alternative wastewater management practices such as lot-specific advanced wastewater treatment systems (ATS) and evapotranspiration (ET) beds; iv) <u>to create a model</u> for the pilot Leadership in Energy and Environmental Design – Neighborhood Design (LEED-ND) methodologies; and v) <u>to create a model</u> for complying with Los Angeles County's Hillside Management Regulations.

Environmental Impact:

A basic approach to sensitive environmental planning, and an integral part of the LID and LEED-ND planning process, requires early assessment of important site features such as riparian areas, ridgelines, protected plants and animal species, traffic and other environmental constraints. The mapping and layering of this information for The Vineyards was carried out by a number of professional consultants <u>before</u> the actual site planning for the property commenced.

Composite Site Analysis for The Vineyards



Only after these studies were completed did the planners commence their design. This resulted in a sensitively planned layout where the physical site dictated the development's configuration rather than creating a plan that dominated and damaged the property. Not only have significant environmental features of the site been preserved, but where there are impacts, controls built into the plan and the county's regulatory procedures will mitigate any adverse consequences. This has led the Department of Regional Planning's Impact Analysis Section to propose a Mitigated Negative Declaration for The Vineyards.

Existing Ordinances:

The Vineyards has been designed to adhere to all existing development regulations was well as to implement many state-of-the-art methods for protecting the environment and meeting local, state and national sustainability goals. No General Plan Amendment is sought nor is any Zone Change requested.

The Vineyards was carefully designed to strictly comply with existing Los Angeles County planning regulations for the area. As such, it is consistent with the current Los Angeles County General Plan, the current Antelope Valley Areawide General Plan, the Primary Zoning (A-2-2) for the property and the Supplemental Zoning that takes the form of the Leona Valley Community Standards District (LVCSD) regulations. The Vineyards also fully complies with the County's renowned and widely respected Hillside Management regulations. Additionally, considerations were given to comply with the Draft General Plan Update, the Draft Antelope Valley Areawide General Plan Update, and preliminary versions of the LVCSD update, which are currently being considered by the community.

Adherence to LVCSD (Section 22.44.122) Ordinances:

The Leona Valley Community Standards District (LVCSD) regulations present six (6) important community wide development standards. These regulations represent the wishes of the local community and as such adherence is critical. The Vineyards fully complies with these six standards as follows:

1) The Vineyards development preserves existing natural contours, existing native vegetation and natural rock outcropping features and incorporates new landscaping materials which will integrate the development into the surrounding community. Lot specific grading instead of mass grading will be employed limiting disturbance of the site, ensuring a minimum disturbance to the majority of the natural areas, and ensuring no disturbance to all riparian areas, wetlands and sensitive habitats.

2) The maximum paved width of local street improvements is set at 28 feet, just four feet larger that the LVCSD's provide. The minor increase in size was a requirement of the Department of Public Works and the Fire Department to provide applicable safety and access requirements.

3) Curbs, gutters and sidewalks will not be installed on local streets. In lieu of curbs and gutters, 12-foot wide bio-swales will be installed on both sides of all streets for the dual purpose of implementing LID recommended sustainability techniques as well as adding multi-use trails along all streets throughout the community.

4) Public street lighting will be prohibited in The Vineyards unless the Department of Public Works determines some to be necessary for safety. "Dark Sky" practices will be implemented to limit light pollution, light trespass and reduce energy consumption. Lighting on private parcels shall be designed to prevent off-site illumination, hooding will be used to deflect light away from adjacent parcels and public areas, and automatic shut off controls will be installed to control all exterior lot lighting.

5) Lot sizes comply with the requirement that the overall density of the site – 1 lot per 2.5 acres. The Vineyards further complies with the provision that supports the implementation of clustering and density transfers, provided no individual lot contains less than one and one-half gross acres. Clustering is encouraged for The Vineyards because it is located in a hillside management area (areas over 25 percent slope) and The Vineyards will satisfy all required findings of the Hillside Management Ordinance.

6) Where perimeter fencing is used it will be of an open, non-view-obscuring type such as split-rail or wire, except for retaining walls.

In addition, this innovative plan carefully locates the agricultural/residential lots below sensitive ridgelines, away from riparian streambeds, and along natural contours throughout the property thereby insuring that approximately 79% of the site will remain in permanent open space.

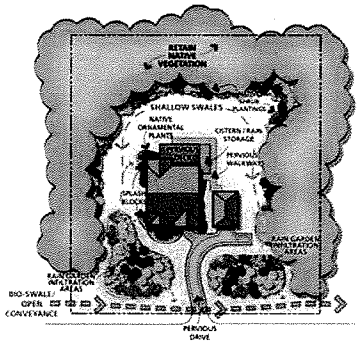
Approvals Sought:

- *Vesting Tentative Tract Map 066952:* 292.5 Gross Acres, 117 residential/agricultural lots, dedicated Multi-Use Trails and 210 acres of Open Space. Due to isolated grading (only pads will be graded, rather than the entire site being mass graded), overall grading is estimated to average a minimal 10,000 cubic yards per lot.
- Conditional Use Permit for Hillside Management areas (Section 22.56.215): The HM-CUP is requested for development compliance with the requirements for density on slope gradients of greater than 25%. Although the Hillside Management regulations will allow a density bonus of up to 136 units for this site, only 117 are being requested. The Vineyards design also adheres to the HM regulations for contour grading, meandering streets, ridgeline preservation and retention of 70% of the site as permanent open space – The Vineyards will have approximately 79% open space, which is 115% of the required minimum.
- Conditional Use Permit for a Density Controlled Development (Section 22.56.205): The DCD-CUP is requested for development compliance with the requirements of the LVCSD's, which allow for lots less than 2.5 acres but greater than 1.5 acres as long as an average of 2.5 acres base zoning density is maintained.

II. Bio-Filters and Bio-Solutions

Introduction:

When it rains, water runs off hard surfaces like roofs, roads and sidewalks. In heavy rain, most of the water that falls on typical grass lawns also turns into runoff. Very small amounts of this water percolate into the soil. Most runoff either drains onto downstream land, with potentially adverse impacts, or must be captured on site by the use of unsightly and inefficient detention and/or retention basins. Through the use of bio-filters, The Vineyards is attempting to capture and manage all of the stormwater that falls on the site to help prevent this kind of unnatural condition.



Bio-Swales:

One of our most important tools for managing stormwater flows is the bio-swale. These systems are recommended by the US Environmental Protection Agency (EPA) under its National Pollutant Discharge Elimination System (NPDES) as a Best Management Practices (BMP) for "Stormwater Management in New Development." In The Vineyards, the bio-swales have been engineered to be a combination of 12-foot wide parkways, which parallel both sides of all interior streets, and the inclusion of roundabouts that are located at all intersections.

When it rains, water runs off surrounding areas into these vegetated bio-swale systems. There, the water is retained in the soil by use of special soil mixtures and plants to maximize retention, allowing for natural evapotranspiration. All of the stormwater that falls on the street surfaces of the will be managed by bio-swales.

The bio-swales serve the dual purpose of providing over 6 miles of pedestrian and equestrian trails within The Vineyards for use by the community and the neighboring Leona Valley residents.

Permeable Paving:

In addition to permeable bio-swales running parallel to the streets in The Vineyards, permeable paving materials will also be used on driveways, portions of streets and other surfaces where allowed by the county. These materials are designed to accommodate pedestrian, bicycle, and vehicle traffic while allowing infiltration, treatment, and storage of stormwater. Research indicates that the pollutant removal capability of permeable paving systems is excellent – 89 to 98 percent for lead, 74 to 98 percent for cadmium, 89 to 96 percent for copper, and 72 to 98 percent for zinc.

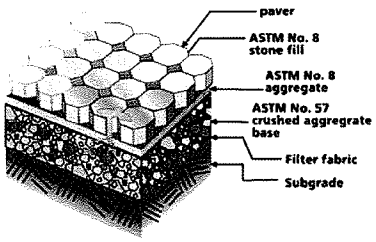
Driveways:

As much as 20 percent of the impervious cover in a residential subdivision can be attributed to driveways. The Vineyards design incorporates several techniques to reduce impervious coverage associated with driveways including:

- Use permeable paving materials and aggregate storage under wearing surface.
- Limit impervious surface to two tracks with remainder in reinforced grass or other pervious surface.
- Direct surface flow from driveways to compost amended soils, bio-retention areas or other dispersion and infiltration areas.

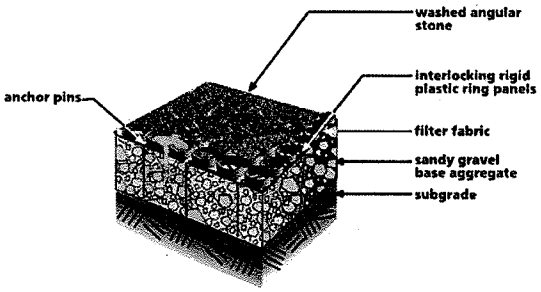
Other areas:

In addition, The Vineyards plans to employ these systems in several other traditionally impervious areas – patios and walkways and some street areas as permitted by the County. The materials planned to be used are primarily permeable interlocking concrete payers, although specific asphaltic concrete mixes are under investigation. These are high-density concrete pavers that allow infiltration through a built in pattern of openings filled with aggregate. When compacted, the pavers interlock and transfer vertical loads to surrounding pavers by shear forces through fine aggregate in the joints.



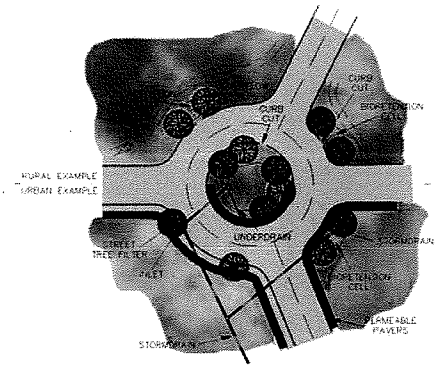
Gravelpave2 and Grasspave2 Flexible Plastic Grid System:

Gravelpave2 (and Grasspave2) is another example of a permeable paving material The Vineyards is proposing for the bio-swale systems paralleling all interior streets. This and other similar plastic grid systems have a large amount of open cell available for infiltration in relation to the solid support structure. Flexible grid systems conform to the grade of the aggregate base, and when backfilled with appropriate aggregate top course, provide high load bearing capability (Gravelpave2 load capacity is approximately 5700 psi).



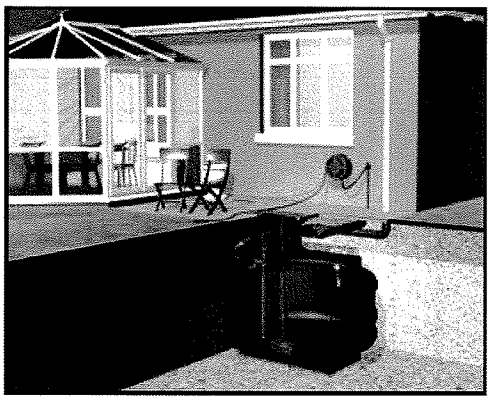
Bio-Infiltration and Bio-Retention Systems:

"Roundabouts" or "traffic circles" have many traffic calming benefits when used in residential areas, such as reducing speeds and increasing safety, and The Vineyards will be constructing roundabouts for these reasons. (See also Traffic section of this booklet.) They also have additional benefits related to LID standards and stormwater runoff. The introduction of vegetation, permeable paving and soil amendments in the roundabouts at The Vineyards will have the effect of transforming these islands into bio-infiltration systems. When these devices are employed, the traffic benefits listed in the Traffic section are enhanced by the ecologic benefits of treating stormwater at its source. There are many examples of this in Oregon and Washington, particularly Seattle's Green Streets Program.



Roof Rainwater Collection Systems:

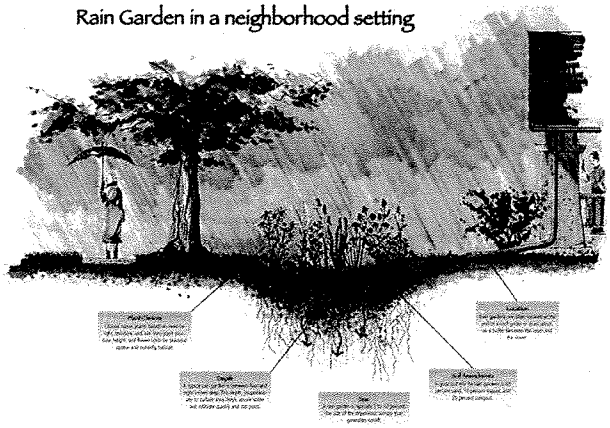
Collecting or harvesting rainwater from rooftops has been used for centuries to satisfy household, agricultural, and landscape water needs. In a Low Impact Development such as The Vineyards, rainwater harvesting will serve two purposes: water conservation and, most importantly, the large reduction of the stormwater contribution from rooftops. Rain barrels are water conservation devices that can be used to reduce runoff volume and, for smaller storm events, delay and reduce the peak runoff flow rates. By storing and diverting runoff from impervious areas such as roofs, these devices reduce the undesirable impacts of runoff that would otherwise flow swiftly into receiving waters and contribute to flooding and erosion problems.



Rain Gardens:

The Vineyards will be incorporating rain gardens into the individual lots. A rain garden is a planted area in a residential yard or neighborhood engineered to temporarily hold and soak in rain water that comes from a house roof, driveway or other open area. A rain garden is not a pond or wetland. It is dry most of the time and holds water after a rain. Water collected in the rain garden slowly infiltrates into the soil to support plant growth. In a properly sited and designed rain garden standing water disappears in less than 48 hours and can process a concentration of nutrients, particularly nitrogen and phosphorus, found in stormwater runoff. Additionally, rain gardens are located close to the source of the runoff and serve to slow the stormwater as it travels downhill, or into other bio-filtration devices, giving the stormwater more time to infiltrate and less opportunity to gain momentum and erosive power.

Rain Garden in a neighborhood setting

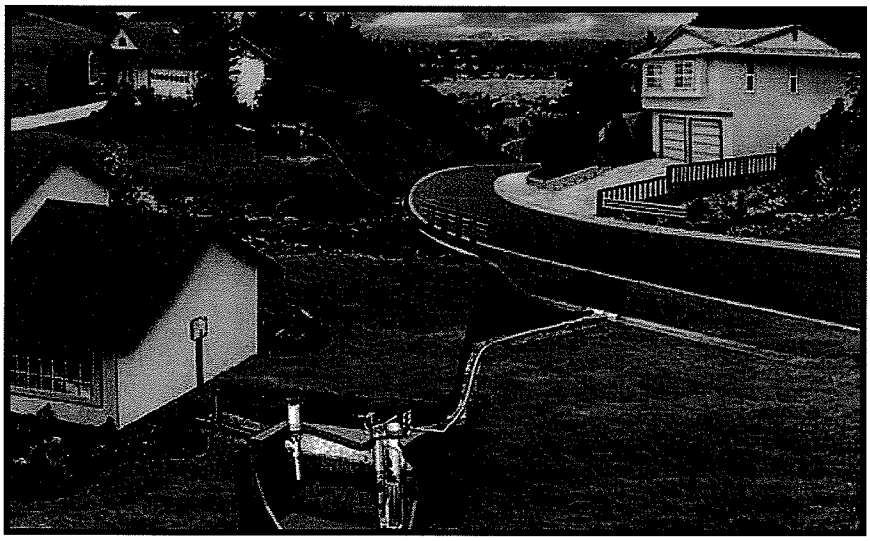


III. Domestic Wastewater Treatment Systems

Introduction:

Treatment of domestic wastewater is a major challenge for areas currently not served by conventional sewer systems and public treatment plants. For many years the lack of such facilities has been satisfied by the common septic tank system – waste is collected in a storage tank, solids are allowed to settle, decompose, and the remaining untreated liquid (effluent) is diverted to a leach field allowing the native soils to treat bacteria or dilute other waste material, such as nitrogen. Over the years such deep ground dispersion of this untreated effluent has caused an increased incidence of ground water contamination.

Recognizing the need for more sophisticated, environmentally sound treatment options, The Vineyards has sought an alternative to the common septic system. Research has shown that highly sophisticated, non-polluting, enhanced domestic wastewater treatment options have been in use throughout the United States, including California, for many years. The Advanced Treatment Systems (ATS) technology proposed for The Vineyards consists of three main components: First, the advanced treatment of the wastewater at the location of each individual lot. This treatment has the effect of making the resultant effluent up to 98% cleaner than effluent produced by a common septic system. Second, the conveyance of that treated effluent to decentralized treatment areas where, if necessary, additional disinfection or other treatment is carried out. And third, the dispersal of the then-twice treated liquid by means of a continuously pressurized drip system for absorption by, and evaporation through plants. This "evapotranspiration" of the wastes greatly diminishes the amount of affluent which would otherwise percolate down into the ground.



Advanced Treatment Systems:

Advanced Treatment Systems differ from conventional septic systems in several ways, but the primary difference is that they treat the effluent one or more times before it is dispersed. ATS incorporate carefully designed treatment steps, and create conditions to facilitate a consistently high degree of treatment. ATS control flows through the system using pumps and timers to avoid overloading the treatment and final dispersal components during periods of high water usage, or "peak flow" conditions. All systems are monitored and controlled by onsite integrated computers and offsite via web based control systems 24 hours per day.

Evapotranspiration / Infiltration (ET/I) Areas:

The final step of ATS is also quite different than the leach fields (or wells) associated with a conventional septic system. Not only is the affluent 98% cleaner than that coming from a conventional septic system, but computer controlled pressurized lines are used to deliver the treated effluent to a looped distribution network. Rather than the affluent flowing in large uncontrolled amounts based on how frequently waste is being generated by the household and

how full the septic tank is, the affluent is dispersed in much smaller amounts through computer controlled emitters over a 24 hour period. And a further improvement to conventional systems is that the distribution network is generally installed within one foot of the ground surface to maximize soil-based and vegetation treatment of the effluent. For the most part, the highly treated affluent "evapotranspirates" up through the plants and into the air rather than leaches down into the groundwater. If public and governmental acceptance of the use of such highly treated wastewater occurs, it is possible this affluent could be used for for irrigation purposes for the agricultural element that The Vineyards is proposing.

Orenco Systems Incorporated:

A number of forward thinking companies manufacture the technically sophisticated equipment necessary to achieve this high level of treatment. One such company is Orenco Systems, Inc., a company that The Vineyards is currently anticipating will provide the required integrated ATS. Orenco's flagship product is the AdvanTex Treatment System, which is designed to provide environmentally sustainable treatment of residential wastewater. Using Orenco's technology, the AdvanTex systems can reduce BOD, TSS, (typically 10 mg/L depending on the loading rate) and Fecal Coliform by up to 98%. Additionally they can reduce nitrogen by up to 70%. The AdvanTex® Treatment System produces effluent that is clean enough to use for subsurface irrigation or discharged to shallow, inconspicuous evapotranspiration areas.

The system has five main functional parts:

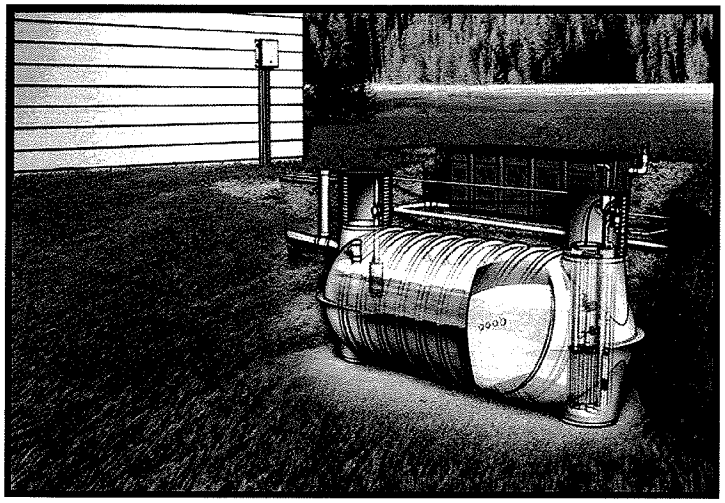
1) VeriComm® Web-based monitoring system are used for remote monitoring and control of AdvanTex pumping operations 24/7.

2) Orenco's injection-molded processing tank with baffle wall separators.

3) Biotube® pumping package to filter out solids so that only liquid from the "clear zone" is pumped.

4) AdvanTex filter Pod which house the synthetic textile filter material.

5) Recirculating splitter valve controls the recirculation of effluent returning from the AdvanTex filter pod.



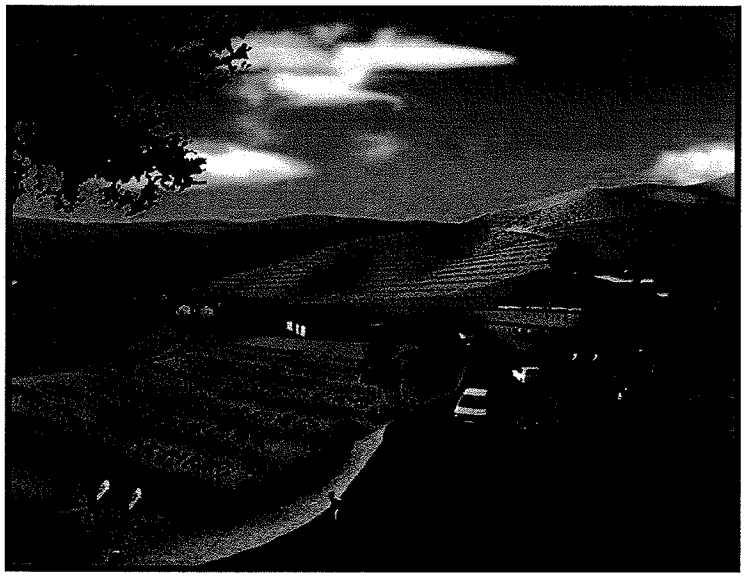
IV. Preservation of Open Space, Agricultural & Residential Land Uses

Introduction:

Exhaustive historical records research, biological surveys, literature research, topographic mapping and other site reconnaissance work was conducted by licensed professionals before the planner first began designing The Vineyards. Once the design was completed, additional potential impacts were identified and the plan was further amended. This methodology allowed for the preservation of large blocks of open space and the broad protection of a majority of environmentally meaningful areas. During this initial study, the concept of combining an agricultural use with a residential use was investigated. The following summarizes the findings of these efforts.

Viticulture:

Leona Valley has a historical association with wine production dating back to the early part of the 1900's. Prohibition put a stop to this. Los Angeles County's Prohibition laws kept wineries out of the County until recently, and wine production is now re-emerging. So much so that Leona Valley was recently awarded the highly prestigious designation as an American Viticulture Area (AVA) by the Federal Government - a designation akin to the "appellations" found in Europe. To take advantage of this resurgence in vine production and wine making, The Vineyards sought a way to meet the demand for much needed housing without sacrificing the equally important need to preserve agricultural lands. The result is an interesting mix of home sites coupled with approximately 100 acres dedicated to vineyard production. It is estimated that this amount of acreage, at full production, can annually yield about 500 tons of grapes – or about 1,000 barrels of wine (or about 150,000 bottles). In order to protect the long range agricultural use, the builder will retain the right or license to maintain the vineyards. Income will be used in part to offset HOA costs.



From a Low Impact Development perspective, the installation of grape vines will require less water than conventional landscaping typically employed on slope and open areas. Also, according to recent studies by UC Davis, vineyards require less than half as much irrigation water as cherry production, which is another significant agricultural crop in Leona Valley.

It is our plan that at such time as the public and governmental acceptance of the use of such highly treated wastewater occurs, this effluent could be used for irrigation purposes for the agricultural element that The Vineyards is proposing.

The concept that makes this all work is the use of Open Space Easement Deeds placed over the residential lots. These easements name the County as beneficiary and provide for restrictions over the land to maintain permanent Open Space/Agricultural areas. The grant to the County would be subject to Vineyard Easements – reservations by the developer of the

right to establish and operate a vineyard on a portion or portions of these Open Space/Agricultural areas. These rights would be styled as perpetual, nonexclusive easements. The developer would reserve the right to permit others to enter and operate the vineyards under license agreements with the developer. This licensing could go to one large vineyard operator. Or it could go to several smaller individual operators who might wish to start a small boutique winery, which is a growing business segment across the nation.

A comprehensive and detailed analysis of the above open space and vineyard easement proposal has been prepared by counsel to The Vineyards and submitted to the office of the County Counsel in March of 2008 for their review.

Riparian Protection:

After a detailed inspection of the site and research of historical documents, two (2) seasonal riparian areas were identified on the property that are considered by the California Department of Fish & Game (CDFG) to be "jurisdictional wetlands" -- identified here as Area A and Area B.

Area A:
The first wetland is an unnamed seasonal watercourse that parallels an existing illegal dirt road connecting 87th Street West with the rural Lost Valley Ranch Road. The total acreage of this jurisdictional wetland consists of a minimal 0.67 acres.

Significantly, this riparian area has been adversely impacted continually over the past years by residents using this access over The Vineyards property as a shortcut between 87th Street West and Lost Valley Ranch Road. The watercourse and dirt road have been continually modified and degraded by residents in order to insure that this road remained passable. As a result, silt and trash is constantly being deposited into the channel. Numerous automobiles, trucks and off-road vehicles traversing the area continuously impact this channel bed.

Nonetheless, the internal road arrangement of The Vineyards was purposely designed to impact this area as little as possible. As a result, only one (1) access point crosses this wetland area, at an optimal location as determined by the consulting biologist. Only after this secondary entry into the development was positioned, was the balance of the interior streets designed. This single point of impact is necessary due to the requirement of a secondary access by the Fire Department. This secondary access will also serve as a secondary emergency access for the residents of Leona Valley who currently only have one exit from their community.

Additionally, The Vineyards plans include the improvement of the dirt road by grading, paving and dedication to the County for use by existing and future residents. The improvements to this new road will intentionally be kept approximately 100' to 200' away from the channel bed to insure the protection and preservation of the riparian area. This will allow the channel to return to its natural condition. The Vineyards Homeowners' Association will be charged with the responsibility to insure that trash is removed and the channel is not further impacted in the future.

Area B
The second riparian area is located at the southeast corner of the property at the point where Bouquet Canyon Road makes a 90 degree bend. The total acreage identified here is also a very small area – 0.95 acres. This seasonal watercourse is an unnamed tributary to Armagosa Creek. It traverses the edge of the development generally running from south to north. The site plan for The Vineyards was intentionally designed to avoid impacting any portion of this riparian area.

Of the 300 acres comprising The Vineyards, only 1.62 acres have been identified as a CDFG jurisdictional streambed and associated riparian habitat. And significantly, only 0.08 acres (3,500sf) of these combined sensitive areas are impacted by The Vineyards.

Plant Resources:

No sensitive plant communities were observed on the site by the professional consulting biologists who investigated the site in accordance with County, State and National survey procedures. However, several sensitive plant species within the vicinity of the site were reported in the California Natural Diversity Data Base Inventory (CNDDB). Therefore, sensitive plant surveys were conducted for Greata's aster, Mason's neststraw, short-joint beavertail, Lancaster milk-vetch, Parry's spineflower, white-bracted spineflower, slenderhorned

spineflower, Mt. Gleason Indian paintbrush, slender mariposa lily, and alkali mariposa lily. None were found.

Animal Resources:

No sensitive wildlife species were observed on site by the professional consulting biologists who investigated the site in accordance with government established survey procedures. Although the property supports suitable habitat for several sensitive wildlife species, these species fall into the category of Species of Special Concern, but are not listed by Federal and State resource agencies.

Even though no active nests were observed during the field assessment conducted by the consulting biologists, nesting raptors and songbirds were identified as a potential constraint to development. The Vineyards, therefore will ensure that vegetation clearing is done prior to February 15 or after August 15 to avoid impacting nesting birds as recommended by the consulting biologists.

Archeo/Paleo/Cultural Resources:

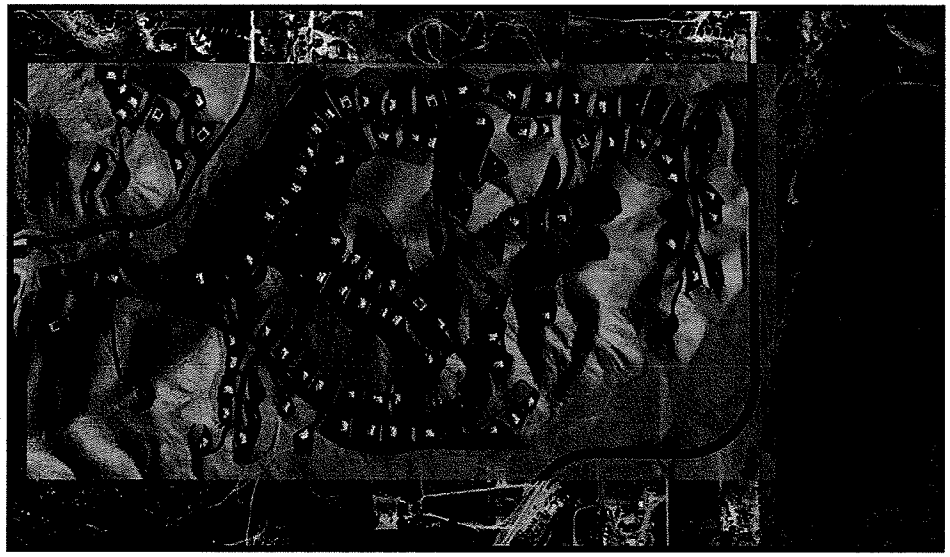
Professional archeologists and paleontologists were employed to evaluate the property.

- The paleontological records search results indicated that no fossil localities have been identified within the boundaries of The Vineyards.
- The cultural resources record search did not indicate any known Native American culture resources within the boundaries of The Vineyards.
- The archaeological records search revealed at least two prior site-specific surveys which concluded that there were no artifacts on the site. Due to the age of the prior archaeological surveys, The Vineyards nevertheless decided to obtain an additional site specific onsite inspection for archaeological resources. A Phase 1 Archaeological Study of the site was conducted, the results of which concluded that no prehistoric or historic archaeological resources were encountered within the boundaries of The Vineyard, and that any improvements within The Vineyards will have no adverse impacts on known cultural resources.

Open Space Protection:

The Hillside Management Regulations of Los Angeles County require a minimum of 70% of this development to be preserved as open space. The Vineyards, in order to impact as little riparian area and natural vegetation area as possible, has designed the development to preserve 79% of the property as Open Space – a full 115% of the maximum required. The categories of open space specified in the Hillside Management Regulations (and acres to be preserved by this development) are as follows:

- Ungraded areas (136.8)
- Slopes graded at less than 2:1 and/or rounded to contour appearance (42.4);
- Riding, hiking and bicycle trails (2.4)
- Landscaped areas adjacent to streets (20.7).



V. New Environmental Programs: GREEN BUILDING, LID, LEED-ND

Introduction:

The practice of environmentally sensitive land use planning is constantly evolving. One of the most significant changes in the last few decades was highly influenced by Ian McHarg's 1969 book Design with Nature, which pioneered the concept of ecological planning. McHarg advocated detailed evaluations of a site's natural features and then locating or "clustering" development in the less sensitive areas so the environmentally significant features of the site could be preserved. The Vineyards embodies many of McHarg's principals into its design – most notably the clustering of homes below ridgelines and away from the riparian areas of the site, the proposed watewater treatment systems and stormwater retention and dispersal systems.

Green Building:

"Green Building" is an overall phrase describing the reduction in environmental impacts and resource use by more carefully considering the land plan, construction methods and building materials. The Vineyards has incorporated many features of "Green Building" into it's land use plan and, as home construction nears, will additional ahere to the national stnadrads for enviornamentaly sound construction.

Low Impact Development (LID):

LID, or "Low Impact Development" is a term describing a planning and engineering design approach to managing stormwater runoff. The LID design approach has received support from the U.S. Environmental Protection Agency (EPA) and is being promoted as a method to help meet goals of the Clean Water Act. The County of Los Angeles has also recently adopted a version of this program. Generally, traditional practices typically employ the use of detention ponds and retention basins which generally do not meet water quality goals. LID techniques emphasize conservation and use of on-site natural features to protect water quality. By designing a project in this way, the stormwater improvements mimic the pre-development conditions by infiltrating, filtering, storing, evaporating, and detaining runoff close to its source rather than channeling the water off property or into concrete onsite basins.

Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND):

The Leadership in Energy and Environmental Design (LEED) Green Building Rating System, developed by the U.S. Green Building Council (USGBC), provides a suite of standards for environmentally sustainable construction. The primary emphasis of the LEED certification process has been on architecture. However the Green Building Council members continue to develop and refine LEED, including the area of Neighborhood Development (LEED - ND). Currently in its pilot period, LEED - ND is a collaboration among USGBC, the Congress for the New Urbanism and the Natural Resources Defense Council. The Vineyards is seeking certification for its design in advance of the programs launch, which is expected to commence in 2009. This will include environmentally sustainable practices for site and building development, setting the stage for future resource conservation. These practices include methods for preventing pollution, both during construction and occupancy of the built environment and use of the land.

VI. Traffic Mitigation

Introduction:

Existing circulation patterns in the area were an early, obvious concern in the design of The Vineyards. In terms of traffic related impacts, the professional planners for The Vineyards wanted to minimize adverse impacts for the existing community, and, if possible, actually improve the circulation for the community. We are confident that this has been accomplished.

Minimizing Traffic Impact on the Community:

The civil and traffic engineers where charged with the task to limit the impact of The Vineyards upon residents of 87th Street and Leona Avenue east of 90th Street. In order to accomplish this, two important features were incorporated into the project design: First, all interior roads were designed to focus entering and exiting vehicles to use Bouquet Canyon Road. Secondly, gates were added to deter outside traffic from traversing The Vineyards streets as a short cut to existing residential and commercial areas of Leona Valley. Such a short cut would have negative impacts on the residents of 87th Street and Leona Avenue east of 90th Street.

The traffic engineer's report for The Vineyards indicates that only 10% of project traffic (100 trips per day) will use 87th Street and Leona Avenue east of 90th Street for access into and out of Leona Valley, with the remaining 90% (1,000 trips per day) using Bouquet Canyon Road.

The county has concurred in this study and concluded that all intersections affected by The Vineyards now operate ant Level of Service A and will continue to operate at Level of Service A, meaning that there will be no adverse impacts on the community from this development.

The county believes that due to currently approved developments in and around Leona Valley a signal will eventually be required at Bouquet Canyon Road and Elizabeth Lake Road. The county is proposing that The Vineyards participate in the financing of this signal, and that is acceptable.

87th Street to Lost Valley Ranch Road:

Approximately 20 homes currently use an unimproved dirt road that crosses The Vineyards to access their properties. This road, which has no easements allowing for this use, was created by residents as a short cut across The Vineyards property. During rainy periods, this road becomes a safety hazard and is, at times, impassable. Initial direction to the site planners for The Vineyards was to improve this road to county standards so that present and future home owners on Lost Valley Ranch Road would have permanent access to their properties.

The Vineyards proposes to pave this road and dedicate it to the County as a public street. Not only will this guarantee neighbors permanent access to their homes on Lost Valley Ranch Road but it will protect the adjacent riparian area from further pollution and degradation.

Emergency access for existing Leona Valley Residents:

Presently, over 900 homes in Leona Valley have only one point of access from the community – 90th Street. This presents two basic problems: 1) in the event of an emergency evacuation, all these homes would be required to drive to the single intersection of 90th Street and Elizabeth Lake Road in order to exit Leona Valley, and 2) emergency vehicles can only enter the community from this same intersection.

By constructing the permanent street system proposed by The Vineyards, all homes in Leona Valley would be afforded a second point of emergency access into or out of the overall community, and emergency vehicles, such as for police and fire, will also be able to use the streets within The Vineyards as access into or out of the entire community

Roundabouts:

The Vineyards has engineered roundabouts into all interior intersection. The safety and traffic efficiency benefits of roundabouts are documented extensively. They provide, on average, a 70% overall safety improvement over a standard intersection and a 90% reduction in severe right angle accidents. They are highly efficient, provide traffic calming, and improve pedestrian safety. Finally, the introduction of vegetation into the roundabout provides a separation buffer

between pedestrians and motorists, and acts as a bio-filtration system for stormwater retention and management.

Other Interior Design Strategies:

The layout of the interior streets were also designed to minimize their environmental impact. The following were some of the strategies used to design the road layouts for The Vineyards:

- Cluster homes to reduce overall development envelope and road length.
- Narrow lot frontages to reduce overall road length per home.
- Reduce the number of cross streets and overall road network per home, and provide mid - block pedestrian and bike paths to reduce distances to access transit and other services .
- Provide paths in open space areas to increase connection and access for pedestrians and bicyclists.
- Reduce road widths and turn around area coverage.
- Eliminate, or reduce to an absolute minimum, all stream crossings.
- Minimize impervious road coverage per dwelling unit.
- Provide adequate turning radius for fire and safety vehicles.
- Provide through-traffic flow with two points of access.
- Provide bio-retention areas.
- Provide a connected pedestrian system that takes advantage of open space amenities.
- Provide additional stormwater conveyance and infiltration for infrequent, large storm events.

VII. Dark Skies - Lighting

Introduction:

Energy conservation through sensible lighting practices means less dollars spent on expensive electricity, and less pollution in generating that energy, primarily by burning fossil fuels. The Vineyards plans to adhere to the Dark Sky requirements in order to diminish:

- Light Pollution caused by misdirected, unshielded, excessive, or unnecessary night lighting;
- Sky Glow from excessive exterior lighting;
- Glare caused by unshielded or overly bright lights; and
- Light Trespass which is intrusive lighting that trespasses onto neighboring properties.

The Solution:

The Vineyards will comply with the shielding standards and lumen caps as determined by County Code, the Counties (draft) Exterior Lighting Standards, or by the USA Pattern Code as applied to the Leona Valley Lighting Zone – E2. All outdoor lights will be directed toward the ground and will have automatic turn off controls when not in use. Pole lights will be installed with shielded fixtures or with light bulbs that direct light to where it is needed. Additional restrictions will be placed on residential construction through the Homeowners" Association Covenants, Conditions and Restrictions (CC&R's).

(11)

✓cc: Jodie Sackett

September 25, 2008

Via Hand Delivery and E-mail

Sorin Alexanian, Acting Deputy Director
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1360
Los Angeles, CA 90012

RE: VALLEY VINEYARDS (TTM 066592): AGRICULTURE/VINEYARDS AS OPEN SPACE

Dear Mr. Alexanian:

We thank you and your staff for meeting with us on July 28, 2008 to discuss the above-referenced project. At that meeting, we discussed whether the agricultural greenbelts (vineyards in this instance) proposed for the Valley Vineyards development could be included in the project's open space calculations. Upon your suggestion, we committed to you at that meeting to research County Codes and policies and provide you with justifications for our interpretation, as well as examples from other jurisdictions where agriculture/vineyards are considered "open space."

You will see upon reviewing this information that throughout the county's codes and adopted plans are abundant references to "agriculture" and "open space" to the extent that they are almost synonymous. Not only are "open space" and "agriculture" compatible land uses, but agriculture is authorized and actually encouraged to be in open space areas.

I. BACKGROUND

The Valley Vineyards property is located in Leona Valley. The site has been designated in the Antelope Valley Areawide General Plan as N-U 1 (Non-Urban 1). It has a base zoning of A-2-2 (Heavy Agriculture) and its supplemental zoning is the Leona Valley Community Standards District. Given the topography of the property, it is also subject to the Hillside Management regulations.

The first wineries in California were established in and around Leona Valley, and an application is now pending with the federal government to recognize Leona Valley as an American Viticulture Area. Retaining agriculture is important to the residents of Leona Valley, and it is the specified intent of the Leona Valley Community Standards District's to maintain the community's "unique appeal, including its rural, agricultural character."

The Hillside Management regulations require developments such as this to have at least 70% of the site preserved as open space. Open space examples listed in the Hillside Management regulations include "greenbelts . . . and such other areas as the hearing officer deems appropriate."

Basic to the Valley Vineyards plan is the integration of vineyard greenbelts throughout the site as a means of maintaining the rural and agricultural character of the community. Our position is that these vineyard greenbelts are clearly allowed as open space in the 70% calculation. (Our plan has approximately 76% open space, of which approximately 105 acres (36% of the site) will be vineyard greenbelts.) We believe the following information supports that interpretation.

II. REFERENCES IN LOS ANGELES COUNTY REGULATIONS THAT SUPPORT AGRICULTURE AND VINEYARDS BEING AN OPEN SPACE USE

A. Title 22: Planning and Zoning Codes

Explicit evidence of the county's intent to include agricultural uses within open space areas can be found in Section 22.40.400 of Title 22, which specifically includes the protection of agriculture among the listed purposes and intent of the **Open Space (O-S) Zone**:

> *"It is the intent of this zone…to protect areas used for the managed production of resources, including but not limited to rangeland and* ***agricultural*** *land. (Ord. 82-0249 § 4 (part), 1982.) (22.40.400.G)*

Also specifically, listed as a permitted use within an O-S Zone are crops:

> "Permitted uses in Zone O-S are as follows:
> -- Apiaries, limited to hives only.
> -- Campgrounds, picnic areas, trails with overnight camping facilities, including fishermen's and hunters' camps but not including accessory buildings.
> **-- Crops--Field, tree, brush, berry and row, including nursery stock.**
> -- Grazing of cattle, horses and other equine, sheep or goats on a lot or parcel of land having as a condition of use an area of not less than five acres, including the supplementary feeding of such animals…" (22.20.410.B)

B. County-Adopted CEQA Guidelines

In 1987, the County Board of Supervisors also adopted *Environmental Document Reporting Procedures and Guidelines* which included a list of categorically exempt projects. Class 17 and Class 25 of the categorically exempt projects specifically include the allowance of agricultural uses within said open space designations.

> **Class 17: Open Space Contracts or Easements** - Class 17 consists of the establishment of agricultural preserves, the making and reviewing of open space contracts under the Williamson Act, or the acceptance of easements or fee interests in order to maintain the open space character of the area. The cancellation of such preserves, contracts, interests or easements is not included.
>
> **Class 25: Transfers of Ownership of Interests in Land to Preserve Open Space** – Class 25 consists of the transfers of ownership of interests in land in order to preserve open space. Examples include, but are not limited to:
> (a) Acquisition of areas to preserve the existing natural conditions;
> (b) Acquisition of areas to allow continued agricultural use of the areas;
> (c) Acquisition to allow restoration of natural conditions;
> (d) Acquisition to prevent encroachment of development into flood plains.

C. Current County General Plan Includes Agriculture as Open Space Use

Further evidence of the county's intent to include agricultural uses within open space areas can be found in the county's current General Plan (1980).

In discussing uses that are compatible with open space, the General Plan states, "Land within the Open Space classification of the countywide General Plan may, as a matter of course, be developed **to any use permitted in Zones O-S** (Open Space) and W (Watershed) of the Los Angeles County Zoning Ordinance, subject to the conditions and standards of those zones. Such uses include a variety of **agricultural**, recreational, mineral extraction, and public and semi-public activities and services. (Land Use Element Appendix A: General Conditions and Standards for Development (Unincorporated County Areas), Page LU-A7 – 4: Open Space Areas)

In discussing open space uses in Non-Urban Hillside Management Areas, such as the subject property, the General Plan states: "Many non-residential uses may be appropriately located in non–urban hillside management areas. Certain uses, by their nature, may require remote hillside locations. Nevertheless, for reasons of public safety, resource protection and general land suitability, safeguards are necessary to discourage intensive development and to minimize environmental disruption and the loss of scenic and open lands. Subject to the above conditions, the following uses may be found appropriate:

> *b.* ***Agricultural*** *activities including livestock grazing, bee-keeping, or chards and* ***vineyards****.* (Page LU-B7 – Non-Residential Uses)

D. Draft 2008 County General Plan Update

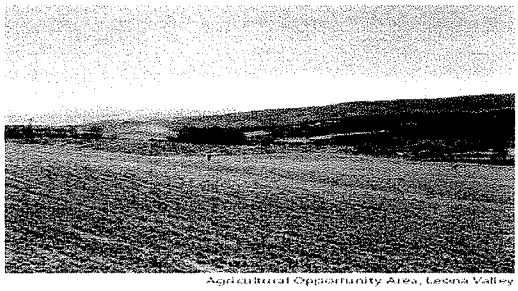
The currently proposed updated General Plan includes numerous policies and provisions that highlight the important role and need for encouraged agricultural use of non-urban lands. Vineyards and other row crops continue to be a specifically permitted use in A-2 and Open Space zones.

Moreover, Leona Valley is called out as an Agricultural Opportunity Area.

(pg 27)

> *Agriculture (AG): Purpose*: Identifies and establishes areas suitable for agricultural uses, agricultural production, and associated housing for agricultural activities. The agricultural designations can:
> • Provide lands suitable for commercial and subsistence agricultural production;
> • Produce row and field crops, dry crops, orchards and vineyards, grazing, and other related agricultural activities;
> • Provide buffering for adjacent non-agricultural uses;
> • Provide housing opportunities for permanent and temporary farm workers; and,
> • Provide areas for suitable support services for agricultural business;
>
> Locational Criteria
> • Underdeveloped areas that are generally adjacent or distant to urban areas; and,
> • Areas where agriculture is in use, has traditionally been located, or has been identified

(pg 53): Examples of an Agricultural Opportunity Area: Leona Valley



Agricultural Opportunity Area, Leona Valley

(pg 142)

The goals and policies which apply to Agricultural Resources are:

- Goal C/OS-6 Productive farmland that is protected for local food production, open space, public health and the local economy.
- ~~Policy C/OS 6.1 Maintain Agricultural Opportunity Areas (AOAs) to identify prime~~ agricultural land.
- Policy C/OS 6.2 Support agricultural practices that minimize and reduce soil loss and water runoff.
- Policy C/OS 6.3 Support innovative agricultural practices that conserve resources and promote sustainability, such as drip irrigation, hydroponics and organic farming.
- Policy C/OS 6.4 Encourage agricultural activity in Agricultural Opportunity Areas and under electricity transmission line easements.
- Policy C/OS 6.5 Cultivate and expand farmer's markets throughout the County.

E. Hillside Management Regulations Include Greenbelts as Open Space

Per Section 22.56.215 of Title 22 of the Los Angeles County Codes, the Hillside Management regulations specify that "open space shall comprise…not less than 70 percent of the net area of a residential development in a nonurban hillside management area." The section further provides that "subject to the approval of the hearing officer, such open space may include one or more of the following:"

i. Undisturbed natural areas,
ii. Open space for passive recreation,
iii. Private yards, provided that certain construction rights are dedicated,
iv. Parks and open recreational areas,
v. Riding, hiking and bicycle trails,
vi. Landscaped areas adjacent to streets and highways,
vii. **Greenbelts,**
viii. Areas graded for rounding of slopes to contour appearance,
ix. Such other areas as the hearing officer deems appropriate.

Although the Los Angeles County Codes do not provide a definition for "greenbelts," they are defined in many other jurisdictions as ribbons of green farmland providing scenery and prime agricultural land, and as areas for protecting open space and agricultural lands.

Greenbelts come in many forms and can encompass many uses, including providing opportunities for both or either active or passive recreational activities, the provision of visual

relief, and to serve as a buffer between non-open space uses. As such, agriculture is an expressly allowed and favored use in greenbelts in various California jurisdictions as it accomplishes both of these goals.

For example, the Greenbelt Alliance of the Bay Area defines greenbelts as areas including "productive farmlands." A predecessor to the Greenbelt Alliance, People for Open Space had as one of its explicit goals a "commitment to preserving additional spaces such as ranch lands, agricultural lands."

In summary, throughout the county's land development policies, plans and regulations, there are numerous provisions which explicitly allow and even encourage agriculture/vineyards to serve as or be located in Open Space areas.

The following sections demonstrate how this practice is similarly followed in communities throughout the State of California.

III. CALIFORNIA CITIES AND COUNTIES CONTEMPLATE AGRICULTURE/VINEYARDS FOR OPEN SPACE

According to the California Department of Food and Agriculture, "the state of California has been the most productive agricultural state for more than 50 years" and there are over 2,500 vineyards throughout California that contribute to this agricultural productivity. In Solano County's Agricultural Conservation Easement Plan, the important role vineyards play in agricultural production and conservation is specifically highlighted:

> **Agriculturally, the existing mix of soils, climate, and water availability, makes portions of Solano County's agricultural land some of the most productive in California. Geographically, these lands are nestled between the Napa Valley wine country, and the Sacramento Valley/Central Valley agricultural regions. Agricultural production in the county varies from vineyards to irrigated row crops to grazing. Other important uses of agricultural land include natural gas wells and wind power generation. Agricultural production in the county currently generates about $200 million in annual direct sales (farm gate sales), with broader economic, social, and conservation benefits that reverberate throughout the county.**

In recognition of the important role agriculture has in our State's history, economy and landscape, the majority of California's municipalities have taken steps to prioritize agricultural use and integrate said use in open space conservation measures.

A. Open Space and Agriculture Special Districts and Trusts

Throughout the State, numerous municipalities have sought to promote and protect agricultural uses through either explicit provisions in their General Plans or municipal codes, or through the creation of specific Open Space, Conservation or Greenbelt districts/areas; in said areas,

agriculture is a specific permitted use. The following are several examples that demonstrate this fact:

1. Santa Clara Open Space Authority
   Santa Clara's Open Space Authority is "dedicated to preserving, protecting and managing, for the use and enjoyment of all people, a well-balanced system of urban and non-urban areas of outstanding scenic, recreational and agricultural importance. The Santa Clara County Open Space Authority is comprised of the cities of Campbell, Milpitas, Morgan Hill, Santa Clara and San Jose, as well as unincorporated areas of Santa Clara County not within the Mid-peninsula Open Space District. The Authority's 5 Year Plan states that it should complete at least one acquisition representing each of the following **open space** goals:

   - Valley floor preservation that includes wetlands, baylands, riparian corridors or other unique habitats.
   - ***Agricultural preservation***.
   - Segment of regionally significant trail.
   - Segment of a greenbelt between cities.
   - Urban open space."

2. Sonoma County Agricultural Preservation and Open Space District
   The Sonoma County Agricultural Preservation and Open Space District is one of the top five **farmland and open space** preservation programs in the nation (Farmland Preservation Report) and the first special district established for the purpose of protecting agricultural lands. It is one of the few jurisdictions in the nation to use a sales tax for the purchase of conservation easements ***to protect agricultural lands*** and preserve open space.

3. Solano Land Trust
   This mission of the Solano Land Trust is the preservation of ***agricultural lands***, **open space**, and resources through the acquisition of land and conservation easements, education, and land management. Since its founding in 1986, Solano Land Trust has permanently protected 19,403 acres of land for the current and future residents of Solano County.

4. The Land Trust of Napa Valley
   The mission statement of the Land Trust of Napa County is "to protect the natural diversity, scenic **open space** and ***agricultural vitality*** of Napa County by preserving lands with significant conservation values for present and future generations and by fostering an appreciation and understanding of the natural environment." The primary vehicle for advancing its mission is the utilization of Land Preservation Agreements. Said agreements allow for the dedication of open space in the form of agricultural uses. The following is an example of a successful Agreement highlighted on the Trust's website.

   > *"Everyone knows that Larry Turley is passionate about making great wine. But last year Larry proved he's equally passionate about land preservation by donating two* ***conservation easements that protect vineyards and open space*** *in northern Napa County. Rattlesnake Ridge, 36 acres on the Howell Mountain ridgeline above Angwin, combines organically-farmed vineyards and stands of oak woodlands while serving as prime agricultural watershed for Conn and Putah Creeks and the Friesen Lakes,*

Angwin's water supply. Larry and his wife, Suzanne Chambers, followed this with a ***second easement that preserves agricultural land*** *in the Preserve and a prominent viewshed north of St. Helena. Just off Highway 29, opposite Bothe-Napa Valley State Park, the Haiku House parcel features an organic, dry-farmed vineyard and preserves a significant stretch of riparian habitat along Mill Creek, which the Turleys have worked to restore."*

This example further illustrates the inextricably linked agricultural use allowance in open space preservation initiatives.

B. Agriculture as Open Space in Other Municipalities' Codes and General Plans

In addition to the utilization of special districts and trusts to preserve agricultural use in open space, many general plans and municipal codes contemplate agriculture, and sometimes specifically vineyards, as open space both explicitly and implicitly.

1. San Diego County General Plan

San Diego County's General Plan explicitly contemplates agriculture as a type of open space as the following excerpts demonstrate:

- In describing the Land Use Element – Agricultural Designations point 2.5 specifically says, "**the Open Space Element addresses the Agricultural Designation as a Category of Open Space**."
- Within the Open Space Element, the general County policy for future open spaces needs specifies, ***"It is the intent of this plan to address agriculture as a type of open space***..."
- Within the objectives of Conservation of Resources and Natural Processes section, point number six is to, "**Encourage the use of agriculture to provide visually pleasing open space**..."
- Goals for the Conservation of Resources and Natural Processes section include, "**Preserve productive agricultural areas and recognize their value as open space**."
- The description of the Rainbow Community Planning Area says "agriculture is an existing resource in the Rainbow area. Agricultural uses are primarily avocado, citrus, nut crops and commercial nurseries. Additionally, small – scale tree crops and *vine crops are grown in conjunction with residential uses.*" This example clearly illustrates that the concept of having vineyards in conjunction with residential developments/uses is contemplated by San Diego County.

2. City of Fairfield General Plan

- In the Open Space, Conservation and Recreation Element: Supporting Text for Open Space Managed Production of Resources, "Primary economic uses of **open space** within the Fairfield Planning Area include ***agriculture***, grazing, mineral extraction and domestic water production. The preservation of agricultural resources, especially intensive row crops, grain production, orchards and *vineyards* is important to the economic vitality of the City and region. ***Additionally, agriculture and its associated open space are essential to preserving regional heritage and contribute to the quality of life for residents in the county.***"

3. Napa County General Plan

- Under the Recreation and Open Space Element, in "Other Elements," the sections of Agricultural Preservation and Land Use Element address "**open space for the managed production of resources**."
- The General Plan includes a designated General Plan Land Use Category entitled "Agriculture, Watershed and Open Space (AWOS)."
- The General Plan specifically notes that "***the spread of vineyards and the economic success of the wine industry have directly benefited open space conservation in Napa Valley...***"
- The Plan's Open Space Conservation Policies includes the following:
    i. The county shall identify, improve and conserve Napa County's agricultural land through... "provid[ing] a permanent means of ***preservation of open space land for agricultural production***."

4. San Luis Obispo County

- Per Section 22.22.150 (e) on Agricultural Lands Clustering, "The proposed clustered development and the conditions, covenants and restrictions governing the homeowners association and/or individual lots are adequate to ensure permanent maintenance of lands to remain **in *agricultural production and/or open space.***"
- In the General Plan the Agriculture and Open Space Element cites to State planning law, which defines open space land as, "any parcel or area of land or water which is essentially unimproved and devoted to open space use...as designated on a local...open space plan as any of the following:...**open space** for the preservation of natural resources...***the managed production of resources***..." (Government Code § 65560 (b))
- 22.22.140(e) of the County Codes which outlines the design standards for a Cluster Division within the Subdivision Design Standards also specifically states that an **open space** parcel may be used for "**crop production** or range land."

5. City of Temecula Municipal Code

- Section 9.20.040, the Temecula Land Use Table is combined with its Noise Standards Table and considers the **Vineyard/Agriculture and Open Space Land Use Designation under the Open Space Use**.

TEMECULA LAND USE/NOISE STANDARDS

Property Receiving Noise		Maximum Noise Level (Ldn or CNEL, dBA)	
Type of Use	Land Use Designation	Interior	Exterior
Residential[3]	Hillside Rural Very Low Low Low Medium	45	65
	Medium	45	65/70[1]
	High	45	70[1]
Commercial and Office	Neighborhood Community Highway Tourist Service	—	70
	Professional Office	50	70
Light Industrial	Industrial Park	55	75
Public/Institutional	Schools	50	65
	All others	50	70
Open Space	Vineyards/Agriculture	—	70
	Open Space	—	70/65[2]

1 Maximum exterior noise levels up to 70 dB CNEL are allowed for multiple-family housing.

2 Where quiet is a basis required for the land use.

3 Regarding aircraft-related noise, the maximum acceptable exposure for new residential development is 60 dB CNEL.

6. Riverside County Integrated Plan (RCIP)

- In Table LU-4 of the RCIP's "Notes" section, with respect to residential clustering in one portion of the site, said provision specifies that "the rest of the site would then be preserved as **open space or a use compatible with open space** (e.g. ***agriculture***, pasture or wildlife habitat)."

7. Marin County

Open Space District Code, Title 1:
1.01.040 Definitions. "(b) **Open Space** as referred to in this code means an area of natural landscape essentially undeveloped, such as ridges, streams, hillsides, canyons, natural shorelines, marshes, scenic buffer areas and areas of **agricultural land**..."

8. County of San Bernardino

2007 Development Code:
Open Space: Land where basic natural values have been retained. **Open space** can include wilderness areas, a small park in the middle of a city, pastures, forested areas, **agricultural groves, vineyards**, golf courses, floodwashes, etc.

IV. CONCLUSION

Pursuant to your request during our July 28th meeting, we identified and have outlined in this correspondence Los Angeles County policies and regulations, and examples from other jurisdictions where agriculture/vineyards are considered "open space" in their codes, general plans and/or conservation programs. We believe that it is clear that your own codes as well as municipalities throughout the state have demonstrated a commitment to preserving agricultural land by allowing and encouraging its existence in land designated as/for open space. In the Valley Vineyards project, this allowance also is in conformance with the character and history of the Leona Valley community. Accordingly, we respectfully request affirmation that the proposed vineyards are appropriately included in this project's designated open space.

Should you have any questions or concerns, please feel free to contact us.

Sincerely,
SCHMITZ & ASSOCIATES, INC.

Donna Shen Tripp

Donna Shen Tripp
Regional Manager

CC: Valley Vineyards, LLC
Jodie Sackett
Susan Tae

(12)

Jackson | DeMarco | Tidus
Petersen | Peckenpaugh

A LAW CORPORATION

March 21, 2008

Direct Dial: 949.851.7421
Email: jleverett@jdtplaw.com
Reply to: Irvine Office
File No: 47008

VIA EMAIL

Mr. Bill Ford
Valley Vineyards, LLC
c/o Lauren Development, Inc.
P.O. Box 790, Agoura Hills, CA 91376

Re: Valley Vineyards, LLC (TTM 066952 and 066950) – Creation of Permanent Open Space and Proposal for Operation of Vineyards

Dear Bill:

This letter discusses the possible mechanisms to create and to ensure the permanency of open space areas on residential lots in the "Valley Vineyards" project in Leona Valley (the "***Community***"), and to establish and operate a vineyard in a portion of the open space in the Community. You have told us that you plan to develop the Community with approximately 176 residential lots ranging in size from 1½ acre to 10 acres, with buildable pads ranging from 10,000 square feet to 40,000 square feet. Consistent with the open space requirements of the Hillside Management regulations and the desires of the Leona Valley Town Council to expand farming uses in accordance with the Antelope Valley Areawide General Plan, you intend to restrict the non-buildable portions of each of the residential lots (totaling approximately 150 acres) as permanent open space, and reserve over a portion of the open space (approximately 100 acres) the right to plant and operate a vineyard.

1. **Creation of Open Space Areas.** Because of the requirements of your development plan and local zoning restrictions, the open space portions of the Community (***"Open Space Areas"***) cannot be mapped as separate legal lots. Therefore, we recommend that you establish permanent open space easements over the Open Space Areas in the Community, and reserve from the broad grant of open space easements the right to establish and operate a vineyard in defined portions of the Open Space Areas. As described, this plan appears to be consistent with California statutes governing the restriction of lands to open space uses, including the Open Space Easement Act of 1974 (California Government Code Section 51070, *et seq.*) among others. Open space easements are commonly used in California to retain open space around proposed projects for the "assurance of the continued availability of land for the production of

food and fiber, for the enjoyment of scenic beauty, for recreation and for the use and conservation of natural resources" (Cal. Govt. Code Section 51071), and for other open space purposes including agricultural uses (Cal. Govt. Code Section 65560(b)(2)). Open space easements may be granted to the County by recorded deed subject to reservations by the landowner to put the underlying land to uses consistent with the open space plan (Cal. Govt. Code Section 51075(d), and when conveyed to the County constitute "a dedication to the public of the open-space character of the lands for the term specified" (Cal. Govt. Code Section 51081).

In the Community, the creation of the open space easements would preserve scenic beauty, conserve natural resources, and provide for an agricultural use, all consistent with the goals of the open space element of your development plan, the County's General Plan and the Leona Valley Community Standards District (LVCSD) ordinances. Furthermore, creating the easements as described above will cause the open space restrictions to appear as encumbrances on title to the underlying land and survive the transfer of the underlying land to successive generations of landowners. Although the Open Space Areas cannot be mapped as separate legal lots, the creation of permanent easements in the Open Space Areas in the manner described in this letter should be satisfactory to the County because it is consistent with the statutory scheme that was adopted by the state legislature for this purpose.

2. **Granting Instrument**. We have prepared a form of easement deed (***"Open Space Easement Deed"***), naming the County as beneficiary of the permanent restrictions over the entire Open Space Area. As described above, the grant to the County is subject to reservation by the developer of the right to establish and operate a vineyard in a portion of the Open Space Areas (each, an ***"Agricultural Area,"*** and collectively, the ***"Agricultural Areas"***). We have styled these rights as perpetual, nonexclusive easements (***"Vineyard Easements"***). The developer reserves the right to assign its Vineyard Easements to a successor or it may retain the Vineyard Easements and permit others to enter and operate the vineyards under license agreements with the developer. The Open Space Easement Deed will be recorded before any escrows close in the Community, so that it appears as a prior encumbrance on title to each of the underlying residential lots in the Community. Recording provides record notice to homebuyers of the permanent open space restrictions and the Vineyard Easements, all of which affect the owners' use and enjoyment of each lot.

3. **Further Conditions.** The restrictions and reserved rights in the Open Space Easement Deed should also be made a condition of approving the maps for the Community. We also recommend that the Open Space Areas be depicted if possible on the final tract maps, with a brief description of the purpose of the open space and vineyard restrictions affecting the depicted areas. This would provide additional notice of the permanent use and open space restrictions to affected lot owners, to their lenders and insurers, and to the taxing authority.

4. **Ongoing Maintenance of Open Space Areas.** The portions of the Open Space Areas that are not operated as vineyards (***"Natural Open Space"***) will be maintained in accordance with the requirements of the Open Space Easement Deed. Ongoing maintenance will include regular erosion control on slopes and fuel modification work, depending on location. Normally, these responsibilities are left to the underlying land owners, but we have found that open space maintenance in residential communities is far more consistent from lot to lot when it is performed by a single well-funded entity such as a homeowners association. An association is the preferred maintenance entity in many communities that have been constructed in or adjacent to natural areas of Southern California. In addition to consistency, assigning the maintenance of the Natural Open Space to a homeowners association would provide the County with some assurance that the required maintenance will be performed regularly and properly because the association has the power under California law to assess its members to cover the costs of the required maintenance. Furthermore, if the Association fails to perform its obligations, the County will have the advantage of pursuing enforcement only against a single entity—the association—rather than pursuing enforcement against multiple individuals.

   To impose the Natural Open Space maintenance obligations on the Association, the developer would incorporate the relevant obligations from the Open Space Easement Deed, applicable fuel management plans and conditions of approval into the Declaration of CC&R's (***"CC&R's"***) that will eventually be recorded against the Community. This makes the obligation a permanent obligation of the Association, and the obligation can be made expressly subject to enforcement by the County. Such enforcement rights would include the right to enter and perform the maintenance work and then bill the association for the costs incurred. To give the County additional assurance that this obligation will not be modified or eliminated by future owners, it is acceptable to add a provision to the CC&R's requiring prior County approval of any amendment that would modify or terminate any maintenance obligation imposed by the County.

5. **Vineyard Operations by Single Entity**. The Agricultural Areas on the majority of the lots in the Community are not large enough to operate as reliable independent grape producers. This approach has been tried in other areas of Southern California and most often the result was inconsistency in maintenance and quality between neighboring parcels, which can hurt the reputation of neighboring producers. To retain consistency of maintenance and eventually encourage consistent quality of fruit, the vineyard would be best operated by a single entity rather than by the individual land owners.

6. **Exercise and Assignment of Vineyard Easements or Subsidiary Rights**. The holder of the Vineyard Easements will have the right to: (a) assign all of its Vineyard Easements to an assignee and have no further involvement with the vineyards; or (b) retain the Vineyard Easements and operate the vineyards itself; or (c) permit others to enter and operate the vineyards under license agreements.

   Operation by Developer or Assignee Farming Entity. Whether the developer assigns all its Vineyard Easements to a third party as described in clause (a) above, or retains the Vineyard Easements for its own benefit as described in clause (b) above, the holder of the Vineyard Easements will have sole control of the agricultural operations in the Agricultural Areas, and its right to operate will be limited to the rights originally reserved to the developer under the Open Space Easement Deed and more fully stated in recorded Vineyard Covenants (described below). Because the Vineyard Easements are perpetual easements, the right to be present on the land and conduct agricultural operations would be perpetual in the hands of whichever entity holds the Vineyard Easements.

   Operation by Licensee. Under clause (c) above, the holder of the Vineyard Easements might also enter into a license agreement with a third party agricultural operator. A license agreement is a revocable contract permitting the licensee to be present on the land during the term of the license. The term of a license is limited by the duration of the rights held by the person granting the license. During the term of a license, the licensee's right to be present is a temporary right, although it may be long-term.

   Moreover, although the Vineyard Easements are perpetual in duration, it is normal practice for a license agreement to state a fixed limited term so

that the provisions of the license can be more easily re-negotiated from time to time. At the end of the stated term, the license expires and the right to be present on the land may be solely exercised by the licensor. Grounds for early termination of such a license normally include, among other things, breach of contractual obligations such as failure by the licensee to carry adequate liability insurance, failure to perform in accordance with applicable land use restrictions, waste, and failure to timely remedy damage caused to the underlying landowner's property.

Operation by Homeowners Association. The homeowners association that will be formed to operate the Community will have the legal right and power under California law to undertake agricultural operations in the Agricultural Areas. We have assisted other developers in establishing communities where associations owned or operated avocado orchards and citrus orchards. Although associations may legally undertake such activities, the association would be best off by hiring a farm manager to carry out day-to-day activities.

If the homeowners association in this Community will operate the vineyards, then it will do so on behalf of and at the expense of its members, and the legal documents of the Community must make the vineyards part of the common maintenance scheme of the association from the outset. The California Department of Real Estate will require that all vineyard operation cost and income estimates be made part of the association's proposed budget before any public reports are issued. Once the developer receives state approval of the budget and legal documents, the developer can turn over the vineyards and the Vineyard Easements to the association without any action by the association's membership. This is because the developer has made full disclosure of these matters to all buyers subject to full state review and oversight, and all sales were made subject to this condition. If you elect not to make the vineyards part of your DRE filing, then the association is under no obligation to accept the assignment in the future (it has neither received official notice of the obligation nor has it budgeted for the expense), and any attempt to turn over control and operation responsibility to the association will require the prior approval of at least two-thirds of the homeowners.

Indemnity by Vineyard Operator. In all events, the operator of the vineyards must indemnify the fee owners of the land for personal injury

and property damage caused by negligence in operating the vineyard, and the operator must carry adequate public liability and other insurance coverage naming the underlying owners as additional insureds. If the association is the operator, these obligations will be stated in the governing documents of the Community and the cost of the required insurance coverage would be borne by all the homeowners as an additional item of common expenses paid through assessments.

7. **Declaration of Vineyard Covenants**. The Vineyard Easements are reserved in the Open Space Easement Deed, but the main purpose of the Open Space Easement Deed is to impose the County's open space restrictions and maintenance obligations against the Open Space Areas. To fully protect the rights and expectations of the underlying lot owners and the holder of the Vineyard Easements, the agricultural operations should be more fully described and set out in a recorded Declaration of Covenants Regarding Vineyard Operations (***"Vineyard Covenants"***). The Vineyard Covenants would not only describe the previously reserved Vineyard Easements, but they would also set out in detail the maintenance and other obligations of the holder of the Vineyard Easements and its assignees or permittees. The Vineyard Covenants will be recorded after the final map(s) and Open Space Easement Deed are recorded, but before any escrows close in the Community. Recording provides constructive notice of the proposed operations to the first and subsequent generation of landowners. It also brings the Vineyard Covenants into compliance with the recordation requirement of California Civil Code Section 1468, which permits restrictions and covenants in a recorded instrument to run with the land to bind future landowners. You should also deliver copies of the recorded Open Space Easement Deed and the Vineyard Covenants to each prospective buyer as part of his due diligence package. Delivery will provide buyers with actual notice of the restrictions.

Separate Instrument. Based on our prior discussions, we recommend that you set out the Vineyard Covenants in a separate legal instrument rather than as part of the CC&R's that you will eventually record against the Community. Merely including Vineyard Covenants in the CC&R's would be workable if you are certain that the vineyards will be operated by the homeowners association. But if you intend the vineyards to be operated independent of the homeowners association, then it makes sense to restrict the land for vineyard purposes in a separate instrument, so that the vineyard operating entity derives all its rights from a legal

document that is outside the amendment and termination control of the homeowners.

We note that the separate document approach will also work should you elect to leave vineyard operations in the homeowners association. The other main advantage of using a legal document outside the CC&R's is that it is narrowly focused on land use restrictions and can be recorded early in the approval process, long before you are ready to submit the CC&R's to DRE review.

Finally, setting out the Vineyard Covenants separately from the Open Space Easement Deed also makes sense in the event you need to terminate vineyard operations altogether (as more fully discussed below). In that situation, you can eliminate the Vineyard Covenants from title without amending the Open Space Easement Deed, so that its underlying open space restrictions remain in place against all the Open Space Areas.

8. **Open Space Maintenance in Vineyards**. Whichever entity operates the vineyards, the erosion control and fuel modification requirements of the Open Space Areas apply to the vineyards, and such maintenance would need to be a part of vineyard maintenance where applicable. This requirement should be incorporated in the Vineyard Covenants described above.

9. **Modification and Termination of Vineyard Operations**. We have proposed in this letter a scheme to permit agricultural operations in the Agricultural Areas on the lots in the Community. We have assumed that the most likely agricultural activity in the Community will be viticulture. However, we recommend that the Vineyard Covenants be drafted broadly enough to permit the operator to make changes in its operations or to terminate them temporarily or permanently, in whole or in part. Changes and terminations fall into the two general categories of alternative crop and discontinuation of agricultural activities.

   Alternative Crop. If the holder of the Vineyard Easements determines that vineyards are not feasible in all or a portion of the Agricultural Areas, then it should have the right to continue operations with a suitable alternative crop. Alternative crops must be compatible with the requirements of the County's General Plan and the Leona Valley Community Standards District Ordinances, but the impact on the

Community and adjoining properties of producing any alternative crop (*e.g.*, noise, traffic, agricultural chemical overspray, dust, odors and the like) should be no greater than the impact imposed by the vineyard operations. The Vineyard Covenants should include such restrictions, and if the County has determined suitable alternative crops, it would be helpful to list them in the Vineyard Covenants as well.

Discontinuation of Operations. Similarly, if the holder of the Vineyard Easements determines that further agricultural operations are no longer feasible in all or a portion of the Agricultural Areas, then it should have the option to discontinue operations either temporarily (until operations become feasible again), or permanently. If operations are temporarily discontinued in all or a portion of the Agricultural Areas, then the holder of the Vineyard Easements will nevertheless remain responsible for ongoing maintenance in the Agricultural Areas in a manner that is at least consistent with that required in the County's General Plan and the Leona Valley Community Standards District ordinances for the Natural Open Space in the Community (collectively, the ***"Open Space Maintenance Standards"***). Such maintenance would include at minimum fuel modification and erosion control until agriculture is re-established in the discontinued area.

If the election is made to terminate agricultural operations altogether, then the holder of the Vineyard Easements would be responsible for the cost of restoring the former Agricultural Areas to Natural Open Space, before releasing its rights and obligations under the Vineyard Easements. This restoration work would include removal of vines (or substitute crops as applicable), equipment and irrigation lines, and grading, replanting and irrigation to the standard required for the existing Natural Open Space in the Community. The Vineyard Covenants should incorporate this requirement. Once the cleanup and re-planting of the former Agricultural Area is complete, then the Vineyard Easements would be released and terminated by recorded quitclaim deed in favor of the owners of the underlying lots. Thereafter, the former Agricultural Areas would be added to the association's existing Natural Open Space maintenance requirements. The governing documents of the Community and the grant deed for each lot must include reservations of easements for entry and maintenance by the Association over all the Agricultural Areas in the event that the agricultural operations are terminated. The potential termination of agricultural operations and

turnover of additional Natural Open Space to the association must be disclosed and explained in the CC&R's and a contingent line item representing the estimated cost of maintaining all Agricultural Areas as Natural Open Space must be added to the proposed association budget for review and approval by the Department of Real Estate. This will ensure that the homebuyers and the association are properly apprised of and prepared for the possibility that some or all of the Agricultural Areas might in the future revert to Natural Open Space maintained by the association. The disclosure in the CC&R's and budget contingency would also make it possible to require the association to assume this burden in the future without a vote of the owners.

10. **Disclosures.** It is necessary to disclose to homebuyers the purpose of the Vineyard Covenants, the impact of the proposed vineyard operations and the potential that the association may in the future incur additional expenses from adding former Agricultural Areas to its Natural Open Space maintenance obligations. We recommend that you make separate written disclosures of the Vineyard Covenants and the details of the proposed operation both in a disclosure statement to the first generation homebuyers, and a similar disclosure in the CC&R's. We find it to be good practice to use the CC&R's to make disclosures of permanent or long-term impacts on the land because the CC&R's will be recorded, thus providing constructive notice of the impact to present and future generations of buyers. Below we have proposed disclosure language that should be used both in the recorded CC&R's and in a separate disclosure statement signed by the first generation of buyers:

> **"Open Space Restrictions and Vineyard Covenants**. The non-buildable area at the rear of each Lot (each, an ***"Open Space Area,"*** and collectively, the ***"Open Space Areas"***) is subject to a recorded Open Space Easement Deed for the benefit of the County (***"Open Space Easement Deed"***), and a Declaration of Covenants Regarding Vineyard Operations (***"Vineyard Covenants"***). The Open Space Easement Deed establishes open space easements over the Open Space Area of the Lot. The Association will be responsible for maintaining designated "Natural Open Space" on each Lot as shown on the Map and in an exhibit attached to the deed for each Lot. Owners may not build any improvement in any portion of the Open Space Area, nor may any Owner take any other action that interferes with the Association's maintenance of Natural Open Space.

The Vineyard Covenants establish for the benefit of Declarant and its assignees perpetual nonexclusive easements (collectively, the ***"Vineyard Easements"***) over a portion of each Lot (each, an ***"Agricultural Area"*** and collectively, the ***"Agricultural Areas"***) for agricultural operations that may include a vineyard or a substitute crop consistent with the requirements of the Vineyard Covenants. The locations of the Agricultural Areas on each Lot are depicted in an exhibit to the Vineyard Covenants and in the grant deed for the Lot. The Vineyard Covenants also prohibit Owners from constructing Improvements on and entry into the Agricultural Areas by the Owner of the underlying Lot and the Owner's Family, tenants and invitees during the term of the Vineyard Easements.

By accepting a deed to a Lot in the Community, each Owner is deemed to understand, acknowledge and agree that the Open Space Easement Deed and Vineyard Covenants impose permanent restrictions on the use, enjoyment and development of the Open Space Areas on the Lot by the Owner. The County, the holder of the Vineyard Easements (during the term of the Vineyard Easements) and the Association will have the right to enforce the terms of the Open Space Easement Deed and Vineyard Covenants (respectively) by all means available under the law."

"Vineyard Operations. Declarant, its assignee and permittees (each, an ***"Operator"***) have the right to enter the Agricultural Areas on each Lot to develop and operate a vineyard or conduct other agricultural activity as permitted under the Vineyard Covenants. By accepting a deed to a Lot in the Community, the Owner is deemed to acknowledge, understand and agree that the Owner has no right to enter or develop any part of the Agricultural Area on the Lot, that the Operator will be solely responsible for all costs of operating and maintaining the Agricultural Area, and the Operator will be entitled to all profits and proceeds (if any) of all Agricultural Area activities. The Agricultural Areas on each Lot are restricted to agricultural use by the Operator during the term of the Vineyard Easements. No Owner, nor any tenant, contractor or invitee of an Owner may take any action or construct any Improvement that would interfere with the full exercise of the Vineyard Easements by the holder thereof, or its assignee."

"Change in Use. As of the date hereof, Declarant anticipates that a vineyard will be established in the Agricultural Areas on each Lot.

However, should the Operator determine in its sole discretion that a vineyard is not feasible in all or a portion of the Agricultural Areas, then it will have the right either to (i) temporarily discontinue vineyard operations until such operations again become feasible, or (ii) terminate agricultural operations altogether, or (iii) farm a substitute crop in such areas as the operator deems to be necessary or desirable.

If operations are temporarily discontinued, the Operator will at its sole cost perform in the suspended Agricultural Areas at least such maintenance as is required under the Open Space Easement Deed, the Vineyard Covenants, the County's General Plan and the Leona Valley Community Standards District ordinance (collectively, the ***"Open Space Maintenance Standards"***).

If the election is made to replace some or all of the grapes with a substitute crop, the Operator shall be solely responsible for all costs incurred in removal of grapes and related vineyard equipment, preparation of the land to make it suitable for the substitute crop, and planting and ongoing maintenance and harvesting of the substitute crop.

The holder of the Vineyard Easements may elect to permanently terminate agricultural operations in all or a portion of the Agricultural Areas. In such event, the Operator will at its sole expense remove plants, irrigation equipment and other agricultural improvements, install substitute plants specified by the County for Natural Open Space, install irrigation lines suited to Natural Open Space maintenance, and grade manufactured slopes where necessary. Irrigation lines will be attached to the water source serving the Lot. Thereafter, the Owner of the underlying Lot will be responsible for the cost of irrigation water used in the former Agricultural Area, and the Association will maintain the former Agricultural Area in accordance with the Open Space Maintenance Standards. Once the agricultural improvements are removed and the Natural Open Space is established to the County's satisfaction, the holder of the Vineyard Easements will release the Vineyard Easements in the former Agricultural Area.

Each release of Vineyard Easements shall be evidenced by a recorded quitclaim deed to the Owner of the underlying Lot. The deed shall describe with sufficient particularity the portion of the Vineyard Easement that has been released on the Lot. Upon recordation of the

quitclaim deed, the Operator will have no further right to enter the Lot, and the released portion will be maintained by the Association as part of the Natural Open Space in the Community."

"**Impact of Vineyard Operations**. Owners and other residents in the Community may notice inconvenience or discomfort from dust, insects, equipment noise at any hour, glare from night lighting, and odors from pesticides, herbicides, soil amendments and other chemicals used in agriculture, including sulfur-based compounds and other chemicals that are dusted or sprayed on vineyards during the year. There will also be visual impact on existing views from the storage of equipment and materials used in vineyard operation. Many procedures normal and necessary to agriculture result in such impacts. Each Owner, for and on behalf of himself, and the members of his family, his tenants, lessees, guests and invitees, expressly acknowledges and accepts these existing and future impacts and forever waives any and all causes of actions against the County, Declarant, its successors and assigns, the Association and their respective directors, officers, employees, agents, representatives and consultants for any damages or injuries which may arise from or relate to any such conditions or risks."

11. **County Counsel Review**. We recommend that County Counsel be given the opportunity to review and approve the Open Space Easement Deed and the Vineyard Covenants, and, if necessary, the disclosures discussed above.

12. **Conditions of Approval**. It may enhance the enforceability of the Vineyard Covenants to make their recordation a condition of approval for the final map(s). In addition, it would be helpful if County conditions of approval include restrictions on further subdivision of Tentative Tract Map Conditions of Approval could contain language prohibiting further subdivision of the lots and could specifically limit the uses on the lots to uses consistent with the goals of the Vineyard Covenants.

Please let us know if you have any questions or comments regarding this letter.

Sincerely,

John M. Leverett

JML:flp

759559.3

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THE VINEYARDS

February 5, 2008

Richard Thomas, President
Leona Valley Town Council
P.O. Box 795
Leona Valley, CA 93551

Re: Additional Materials for your Website

Dear President Thomas:

Enclosed is a disc containing additional materials recently submitted to the county concerning Valley Vineyards. These are provided to you so you may place them on your website, as you agreed to do at our meeting in the office of Deputy Supervisor Norm Hickling.

6.1 Cover Letter TTM &CUP 3rd Application.pdf
6.2 3rd TTM 2008-1-16.pdf
6.3 3rd TTM-Cup.pdf
6.4 South-Slope-Study 200 SCALE.pdf
6.5 Open Space Exhibit.pdf
6.6 Conceptual Vinyard Greenbelts.pdf
6.7 Drainage Concept Tract No. 066952.pdf
6.8 Bouquet Canyon Striping Plan 3 Sheet 1.pdf
6.9 Bouquet Canyon Striping Plan Sheet 2.pdf
6.10 Bouquet Canyon Striping Plan Sheet 3.pdf

Very truly yours,

John L. Allday

cc (w/o attachments): Norm Hickling
Jodie Sackett
all members of the LVTC
Bill Elliott

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

(14)

THE VINEYARDS

RECEIVED
JAN 28 2008

January 24, 2008

Mitch Glaser, AICP
Supervising Regional Planner,
Los Angeles County Dept of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, Ca 90012

RE: Draft Leona Valley Community Standards District Amendment ("Draft")

Dear Mr. Glaser:

As you requested, enclosed are our initial comments on the community standards district regulations being proposed by the Leona Valley Town Council (LVTC). The version we are commenting on is dated January 23, 2008, which was just posted by the LVTC on their website on January 23, in advance of a Town Hall meeting to take place this evening. Our comments are in **bold letters and underlined**, and are interspersed throughout the proposed regulations for ease of reference. Due to the short time afforded to review this draft, our comments must not be considered exhaustive and we will therefore have additional comments at a later time.

In general, we offer the following:

1.) Throughout the Draft the LVTC proposes that most of the requirements affecting future development will only apply to land divisions of over four lots, while divisions of less than four lots and construction on existing single lots will be exempt. No rational planning basis for such a distinction is provided. These proposed regulations seem to be divisive, and in some instances possibly illegal, in their creation of two classes of properties governed by the Draft.

2.) Minimal public participation has occurred during the drafting of these regulations. It is our understanding that only registered voters residing in Leona Valley were contacted. This is especially significant given that approximately 60% of the remaining property within the CSD boundaries is absentee ownership. Given the major impacts these regulations will have on the entire community, it is all the more important that the LVTC should make an effort to contact these landowners prior to submitting them to the County for review.

As you know, representatives of our company requested to participate in the preparation of these documents, however the LVTC elected to conduct their preparation meetings in closed door sessions.

3.) Without any rational planning justification for large portions of this Draft, it is obvious to us that many of these proposed rules are an attempt to hinder or derail the design our Valley Vineyards development. Our plans were developed in accordance with all existing County regulations, including the existing Community Standards District regulations that have been in effect since 1993. The concept that "if you can't win the game, change its rules" should be rejected outright by the county. This concept may be at issue here and caution should therefor be taken that all appropriate noticing, discussion and public comment be cautiously guarded.

Thank you for your request. Please let us know how we can be of any future assistance on this matter.

Sincerely,

John Allday

cc: Norm Hickling
Jodie Sackett
all members of the LVTC

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

Draft
Leona Valley Community Standards District
January 23, 2008

A. **Intent and Purpose**. The Leona Valley Community Standards District is established to preserve, protect and enhance the rural, equestrian and agricultural character of the community and its sensitive features and to ensure that future public and private improvements are compatible with the community's established development patterns. These features include significant ecological areas, wetlands, blue-line creeks, rivers, ponds, floodplains, meadows, hillsides, hilltops, adjacent National Forest lands, archaeological resources, multipurpose trail system, the Leona Divide, and local reserves and preserves. Also to ensure that future public and private improvement are consistent with the community's established development patterns. The Community Standards are intended to ensure reasonable access to public riding and hiking trails, and to minimize the need for installation of infrastructure such as sewers, streetlights, concrete sidewalks, paved roads and concrete flood control systems that would alter the community's character. There are no franchised homes in Leona Valley, and as such, the Community Standards intend to encourage the eclectic architectural mix that makes Leona Valley unique. Furthermore, this section is intended to mitigate potential incompatibilities associated with the close proximity of residential zoning and land use within the district and to enhance the appearance of the district by setting forth development and building standards.

i. County Regional Planning Guidance. When in doubt about County building and zoning ordinances, the County must rule to protect the existing Leona Valley Rural Character. The County must ensure, in accordance with the Antelope Valley Area Wide Plan, Chapter VI, Section D, Paragraph 4, sub-paragraph (g), that any new development is consistent with the existing Leona Valley developmental patterns and character.

ii. These rules are in addition to the Los Angeles County General Plan, the 1986 Antelope Valley Area Wide General Plan and State of California Title 24 lighting standards. When in doubt, the most restrictive of the combined standards must apply in order to maintain the rural character of the community.

The expressed desire above to "minimize the need for paved roads" is in direct conflict with other recent positions taken by the LVTC. In a recent LVTC response to the County's Initial Study on Valley Vineyards, LVTC stated, "Due to the fact that these [unpaved] roads can be impassable during storm events, that mud flow has occurred on nearby properties, and that a protected blue line stream traverses the site...". Therefore consideration may need to be given to various types of improvements to roads to solve these concerns This portion of the Intent and Purpose should be revised to be consistent with recent positions of the LVTC, and more discussion and research should be undertaken to determine the overall impacts of this desire on the public safety and health of the community.

The use of the term "franchised homes" has no legal basis and as defined herein will need much more work and refining. Prohibiting "similar" homes in a "subdivision" and not on single lots (where a "similar" home may have been built by the same contractor in another part of the community, and not in four lot divisions created by a parcel map), is inappropriate. Multiple homes built by a contractor can easily vary floor plans, elevations, roof and façade materials, colors and many other variables to make the homes look different, however someone may still consider them "similar." Alternately, a subdivision as defined herein could produce a series of homes which are non-similar and custom in nature – are these types of subdivisions to be considered "franchised homes?"

B. **Description of District Boundary**. The boundaries of the district are shown on the map attached to the ordinance codified in this section and on file with Ordinance Ord. 1494 Ch. 1 Art. 1 § 101.4, 1927.

C. **Community-Wide Development Standards**

A description of what, if any, current standards will be grandfathered in for existing homes is needed, or will all existing lots/home be subject to these new standards if they meet the criteria outlined herein?]

New dwelling construction or structure additions greater than 400 square feet must be in compliance with the following:

1.) **Design Considerations**.

Hillside Management Requirements: Hillside resources are among the most important features of the Leona Valley community. A hillside management area is any mountainous or foothill terrain having an average natural slope of 25 percent or greater as depicted on the Hillside Management Areas and Significant Ridgelines Map in the Los Angeles County General Plan. Development plans must comply with the following objectives:

i.) Landform Protection. Preserve to the greatest extent possible existing natural contours and natural rock outcropping features.

ii.) Natural Silhouette & Ridgeline Protection. The bold ridges, deep canyons, and interior valleys with their supporting vegetation provide the basis for the natural beauty of the mountains and valleys. Therefore, development must preserve the natural silhouette in significant ridgeline areas. Significant ridgelines are the ridgelines that surround or visually dominate the Leona Valley landscape either through their size in relation to the hillside or mountain terrain of which they are a part, or through their visual dominance as characterized

by a silhouetting appearance against the sky, or through their visual dominance due to proximity and view from existing development, and highways designated as Major, Secondary or Limited Secondary on the Highway Plan.

iii.) View Corridors: Minimize disruption of view corridors, scenic vistas and adjacent property by the use of sensitive site design and grading techniques.

iv.) Public Access and Safety. Structures and required provisions for access and public safety should be designed to minimize encroachment on such features by the use of such techniques as curvilinear street designs and landform grading designs which blend manufactured slopes or required drainage benches into the natural topography.

v.) Density Transfers. Density transfers are prohibited.

vi.) Blending, Heights & Architecture. Blend buildings and structures into the terrain by sensitive use of building setbacks, structure heights and architectural designs.

vii.) Highest Point of Structure: The highest point of a structure that requires any permit must be fifty vertical feet and fifty horizontal feet from a ridgeline, excluding chimneys, antennas and wind energy conversion systems.

viii.) Land Use Restrictions. Hillside management areas are restricted to single-family residential, agricultural or conservation and/or parkland uses.

ix.) Maximum Density/Intensity: The residential density must be calculated by multiplying the acreage and density to the nearest hundredth in each of the following slope categories, adding the individual sums together, then rounding down to the nearest whole number to determine the maximum density:

a. One dwelling unit per two and one-half acres with slopes less than 25%.
b. One dwelling unit per ten acres of land with slopes from 25 to 49.99 percent, and
c. One dwelling unit per 30 acres within slopes of 50% or greater.
d. The minimum lot size requirement is two and one-half acres per site.

The above is inconsistent with the Draft Los Angeles County General Plan. Implementation of the above requirements could lead to projects with severely adverse consequences. Such counterproductive measures need to be evaluated by experts familiar with hillside development. The Draft General Plan states: "Hillside Development and Regulation: To preserve the natural beauty of hillsides in the unincorporated County, land use activities that may result in environmental degradation are subject to regulations and design guidelines that limit hillside development based on slope, soil, natural drainage channels and seismic and fire hazards. By imposing these design conditions, a more sensitive development occurs in a manner that respects the natural topography and biological resources of the area. To this end, the County utilizes the Hillside Management Ordinance and the Hillside Management Conditional Use Permit (CUP) as regulatory mechanisms to consider potential environmental degradation and hillside alteration in areas where the slope is 5% or greater. Figure 5.6 of the Draft General Plan displays the design guidelines for a project within a Hillside Management Area."

The preparers of the County's existing and pending regulations concerning hillside development, as professionals, are fully aware of how a well thought out set of requirements for development in hillsides can have beneficial results. For example, in the Draft General Plan, Figure 5.6 describes a "Model Project" in Hillside Management Area development.
Figure 5.6 of the Draft General Plan: "Design Guidelines for a Model Project in Hillside Management Areas"

1.) **Minimize grading and removal of native vegetation.**
2.) **Preserve distinctive natural features and existing topographical forms.**
3.) **Preserve prominent skyline ridge silhouettes; locate roads and structures below skyline ridges.**
4.) **Design circulation routes that incorporate existing contours; undulating road patterns, cul-de-sacs, split roadways and varying grades.**
5.) **Incorporate hiking, bicycle, walking and equestrian trails where appropriate; integrate trails and open space with existing networks.**
6.) **Vary lot sizes, setbacks and building orientation and elevations to ensure views and avoid monotony.**
7.) **Preserve steep hillsides by clustering buildings and using other innovative site design approaches.**
8.) **Use flag lot design where essential to reduce grading.**
9.) **Preserve significant trees and habitats, natural watercourses, wildlife corridors and distinctive natural features.**
10.) **Consider the project's appearance from higher, lower or adjacent roads or development.**
11.) **Place water tanks and other unsightly forms below ridgelines and in a bermed and naturally landscaped areas."]**

The above requirements proposed by the LVTC should be amended to be consistent with the items called out for by the County for a "Model Project."

Site Specific Allowances.

i.) Residentially zoned sites **[lots?]** in A-1, A-2 and RR zones may have one sea land container as an accessory use provided that it is utilized in connection with lawfully established and verifiable farming, agricultural or non commercial activity occurring on the property. As per County Code 22.28.22.D, the maximum container size must not exceed 10' width x 40' length x 10' height. The container must be painted, free of logos and should be concealed from public view. Secondly, one sea land container may be approved as a temporary storage unit for construction equipment and building materials on an authorized construction site where a valid building permit has been issued. For example, building contractors may store tools and building material supplies for weatherproofing and security protection. In this instance, the container must be removed within one year or upon building permit expiration.

It is unfeasible to have such a container/storage bin without any markings when used in conjunction with building/developing a property. It is quite common throughout the building industry to have one ,but usually more, of these containers/storage bins located on a construction site to safeguard materials and supplies during the construction process. In all cases these container/storage bins will have identifying markers on the exterior typically showing its ownership. Exceptions should be made in this case otherwise a hardship could be imposed on all residents who will by necessity be required to paint the exterior of their contractors' container/storage bins and repaint them back upon completion of the work.

2.) **Billboards and Signs**

A.) Billboards. The Leona Valley Community Standards District is designated a billboard exclusion zone, therefore, billboards are not permitted within the Leona Valley Community Standards District.

B.) Signs. Except as specifically exempted by Section 22.52.810, no sign, including those prohibited by Los Angeles County Code Section 22.52.990, may be erected within the Valley except as provided for by this subsection:

i. Signage must be unobtrusive, and

ii. Wall business signs, as provided by Los Angeles County Code Section 22.52.880, except that no wall business sign attached to a building, including the roof, may be higher than the highest point of the building, excluding chimneys and antennas. The maximum area permitted of a wall sign is one and one-half square feet for each one linear foot of building frontage, not to exceed 60 square feet per tenant and is not to exceed a length of ten feet.

iii. Freestanding business signs, typically monument style, as provided for in Section 22.52.890, except that roof business signs are prohibited, the height of such signs are limited to five feet measured from the natural grade at street level, and the maximum area of combined faces on such signs are limited to 100 square feet;

iv. Temporary, directional, informational and special purpose signs are permitted for sixty days within a twelve-month period. Agricultural signs are excluded from this standard.

v. All signs must comply with the commercial lighting section contained in this ordinance.

vi. All signs in a state of disrepair must be repaired or removed within thirty days from notification that a state of disrepair exists.

vii. Removal of Illegally Installed and/or Maintained Signs: The Director of Planning shall remove or cause the removal of any sign constructed, placed or maintained in violation of this section within 15 calendar days following the date of mailing of registered or certified written notice to the owner of the sign, if known, at his last known address, or to the owner of the property as show on the latest assessment roll. Said notice shall describe the sign in violation and shall specify the violation involved, giving notice that the sign will be removed at the owner's expense if the violation is not corrected within fifteen calendar days.

Project and community identity signs are allowed by County codes and these modification by in LVTC should be amended accordingly.

3.) **Fencing**. In addition to standards provided in Section 22.48.160 of Los Angeles County Code, concerning the height of fences, the following fence design features must apply to the construction of fencing:

i. Open type fences such as split rail, open wood, vinyl rail, wire or wrought iron style or similar open-type fences are permitted, except for the provisions provided in this title.

ii. Except where otherwise required by ordinance, at least 70 percent of the entire fence area must be non-view-obscuring; no slats or other view-obscuring materials may be inserted into or affixed to such fences. Trees, vines and shrubs are permitted. View obscuring fencing may not be located parallel to street frontage. Solid lineal

sections must be primarily for structural purposes or provide minor architectural design features such as pylons or driveway entrance features.

More consideration should be given to the issue of "screening" in relation to other uses and other standards within this CSD. For a 2.5 acres site, the above "70 percent" provision would allow 665 lf of 'view-obstruction' fencing. An enclosure of this size would surround a space 22,556 sf in size – which would conflict with what follows.

Tennis courts and sport courts require these materials for wind protection and should be allowed.

County codes (Ch. 22.20.025) allow parking of motor homes and travel trailers in rear yards and in non-corner lot side yards. Screening of said vehicles when parked in side yards visible from the street should be encouraged, not prohibited as is done by this section.

Solid wooden gates in fences are not uncommon, especially at the front of the home parallel to the street. This section should clarify that a solid gate is not considered a "view obscuring fence."

iii. A small subset of solid fencing within the bounds of a property is permitted for pools, recreation, gardens and/or concealment when privacy is required but must not exceed an enclosure area of 5,000-square feet. The subset of solid fencing is included in the calculated area of allowable view obscuring fencing.

What is the rationale for this size? If lots are required to be a minimum of 2.5 acres, this should be reviewed as this is less than 5% of the total lot, which may restrict its use. This is also in conflict with the 70% criteria outlined above. Consideration should be given to screening trash, tools, equipment, etc. visible from frontage and side streets.

iv. Retaining walls are permitted for slope retention as per Los Angeles County Code.

4.) **Exterior Lighting.** [1]

There is no rational planning basis for making this section applicable only to new dwelling construction or structure additions greater than 400 square feet. Lighting from any one home or business will have the same impacts as one from four homes, from a single home or from a room addition less than 400 sf.

The purpose of the exterior lighting standard is to:

- Preserve dark-sky environment
- Discourage light pollution
- Promote energy conservation
- Minimize light nuisances

According to Title 24 of California State Government Code, there are outdoor lighting standards fundamental to allowable power levels, which are dependent on ambient illumination levels that vary by lighting zones. Four zones have been established, Lighting Zone (LZ)1, LZ2, LZ3 and LZ4. The human eye is highly adaptable to different levels of light. In intrinsically dark environments, visual performance can be maintained at comparably lower levels of illumination, while in areas of high ambient illuminations, higher levels of illumination are required for the same task.

Part of the purpose of the designated lighting zones is to encourage energy conservation by discouraging light pollution and encourage the appropriate usage lighting for the designated zone. Properties located in Lighting Zone 1 stipulates an intrinsically dark environment.

Leona Valley borders the Angeles National Forest, Ritter Ridge and land acquired by the Santa Monica Mountains Conservancy; additionally because Leona Valley is part of the Pelona Ridge and is bisected by the protected Leona Rift Zone, Leona Valley is designated a part of Lighting Zone 1 (LZ1). Leona Valley, as defined by the California Title 24 Standards Table 10-114-A (Lighting Zone Characteristics), is defined as a LZ1 Dark Sky environment.

[1] Portions of our Standards may be utilized for a County-wide rural lighting standard.

Los Angeles County Regional Planning guidance on lighting: When in doubt about lighting determination for a property or improvement, the County must rule to ensure the following: 1.) Preserve the dark sky environment. 2.) Discourage light pollution. 3.) Promote energy conservation. 4.) Minimize light nuisances. 5.) Protect the rural character of the community.

The above paragraph is in conflict with the definitions of other parts of these proposed CSD regulations and with other government regulations, which would establish Leona Valley as a "LZ2 zone." LZ1 zone is defined herein to be - "Lighting Zone 1" (Dark Ambient Illumination) government land, recreation area, or wildlife preserve; While is defined to be "Lighting Zone 2" (Low Ambient Illumination) Rural areas defined by the United States Census." By definition Leona Valley would be considered a LZ2. Also Title 24 requires the State Energy Commission to set statewide default Lighting Zones. If a local jurisdictions (usually a city or County) wishes to change an existing zone to accommodate local conditions, it must follow a public process that allows for formal public notification, review, and comment about the proposed change. The local jurisdiction also must provide the Energy Commission with detailed information about the new Lighting Zone boundaries and submit a justification that the new Lighting Zones are consistent with the specifications in §10-114 of the Standards. The Energy Commission has the authority to disallow Lighting Zone changes. See also: STATE OF CALIFORNIA OUTDOOR LIGHTING STANDARDS]

A.) Exterior Lighting Requirements

Outdoor lighting must not be utilized, except in accordance with the following standards:

a. No lighting fixtures may exceed twenty (20') feet in height measured from ground level to the top of the lighting fixture. A building-mounted fixture must not extend above the ridgeline of the roof or 20 feet in height, which ever is lower, of the building on which it is mounted.
b. Lights mounted at no more than one foot above finished grade must not exceed an illumination level of one-foot candle, measured at a distance of one and one half feet perpendicular to the light source.
c. Lights mounted at more than one foot above finished grade must not exceed an illumination level of two (2) foot-candles, measured at a distance of three feet, perpendicular to the light source.
d. All outdoor lighting fixtures must be hooded and/or directed to confine the lighting within the limits of the property from which they emanate, without shining onto adjoining properties, trails or roadways. The illuminating elements of the lamps with a luminance of 600 lumens or more must not be visible past the property line when measured at an eye height of five feet. In any case, outdoor lighting fixtures must not result in illumination levels above one foot-candle above the ambient level, measured at any point along the property line. Any one dwelling unit must not exceed a total of 8000 lumens for exterior lighting.
e. Lighting fixtures must not be grouped together to focus their illumination onto recreation areas or to create a substantial and bright ornamental arrangement which, together result in illumination level in excess of four (4) foot-candles, measured in the brightest area of combined illumination.

B. Holiday Decorations: Low-wattage holiday decorations may remain on all night.

C. Event Lighting: Lighting for arenas, courts, playing fields, swimming pools and similar uses are subject to the following:

i. Event or task lighting must be full cut-off fixtures and/or directed to confine the lighting within the limits of the property from which they emanate, without shining onto adjoining properties, trails or roadways.
ii. The illuminating elements of the lamps with a luminance of 600 lumens or more must not be visible past the property line when measured at an eye height of five feet.
iii. Event and task lighting should be controlled by a timer.
iv. Event or task lighting will be permitted until 10:00 PM.

D. Prohibited Lighting: The following lighting is not permitted, unless required by the FAA or in emergencies by police and fire personnel or at their direction; or for temporary meteorological data gathering purposes.

i. Search lights
ii. Exterior laser source lights
iii. Tower lighting
iv. Exterior Neon lighting

E. Street Lighting: Street lighting is prohibited except when required by law.

When required by law, new or replacement street lighting must use full cutoff and shielded fixtures. Street-lights must not be required on streets except where required for safety in non-residential zones as determined by the Department of Public Works.

F. Commercial Lighting: Lighting in commercial areas is subject to the following:

i. Lighting of Commercial Signs: Lighting of commercial signs must be extinguished at 9:00 pm or when the business closes, whichever is later.

ii. The total light output used for illuminating areas under canopies or structures must not exceed twenty (20) lumens per square foot of roof area. Light output must include the sum of the lumens from all lighting mounted under the

canopy or roof, including but not limited to fixtures mounted on or recessed into the lower surface of the canopy or roof, and any lighting within signage or illuminated panels.

G. Lighting Plan Required in Subdivisions. All new construction with proposed exterior lighting must submit for Director's Review a lighting plan showing:

There is no rational planning basis for these requirements only being applied to "subdivisions." Lighting from any home can impact the night sky.

Also, who at the County will review such a plan. Will this require more staffing by the County?

i. Location, type of fixtures, mounting height, lamp type and lumen output, and illumination pattern of each fixture; and
ii. Manufacturer specification sheets, cut-sheets, or other manufacturer provided information for all proposed outdoor lighting fixtures and lamps to show fixture diagrams and light output levels; and
iii. Drawings for all building elevations proposed to be illuminated (e.g. with sconces, floodlights, etc.) showing the fixtures, the portions of the elevations to be illuminated, the illuminance level of the elevations, and the aiming point for any remote light fixture.

5.) **Street Improvements**. Street improvements must compliment the rural character of the Leona Valley community.

i. Road development or improvements must use the County's Alternate Rural Highway Standards Road standard.
ii. New developments and/or subdivisions roads must be County maintained public roads.

There is no rational planning basis for this requirement. Private streets are allowed throughout the County. Private streets maintained by homeowners' associations reduce public maintenance costs and the tax burden on all residents. Private streets exist throughout Leona Valley. Private streets maintained by homeowners' associations will be in better condition than the many unimproved private streets existing in Leona Valley. If there was truly a desire to prohibit private streets in Leona Valley, this requirement would be made applicable to all new construction in Leona Valley, to wit, "Prior to issuance of any building permit, property owner shall improve and dedicate to the County the roadway in front of the property."

Additionally, in the case of Valley Vineyards, it is the inclusion of private streets, suggested by several residents of the community, that specifically and deliberately will reduce the unwanted traffic patterns which were a concern of the LVTC. Without private streets in Valley Vineyards, a burden on existing streets would result, to the detriment of the entire community. The environmental impact of such a ruling should be thoroughly researched.

iii. All developments or subdivisions roads must include as part of the design a publicly accessible, dual use equestrian and hiking trail.

There is no rational planning basis for requiring trails in "all developments or subdivisions" without regard for a regional trail plan adopted by the County and coordinated by the County Department of Parks and Recreation. Trails built without regard for an adopted plan would result in a assortment of unconnected and most likely, totally unused and un-maintained trails.

Further, whether in accordance with an overall trail plan or not, there is no rationale for not requiring dedication and construction of trails for all new construction. The County may not wish to take on this additional burden and individual lots may not wish to have this trail located in their front yards when not connected to a larger trail system.

iv. Curbs, gutters, and sidewalks are prohibited except when required by law.

This should be reviewed with the Director of Public Works as curbs and gutters serve a specific purpose for water control as well as contribute to the general health and safety of the public.

v. All required local and highway streetlights must utilize full cut-off fixtures.

vi. Restricted access subdivisions are prohibited.

There is no rational planning basis for this requirement. Unrestricted access over new streets in Leona Valley would have major negative traffic impacts on large segments of the community. Residents of Leona Valley should be thoroughly apprised of the adverse ramifications on their lifestyle should this proposal be submitted for approval. The County should also be aware of the significant adverse environmental impact of this section.

6.) **Utility Services Undergrounding**. Electrical additions and improvements must compliment the reliability, safety and rural character of the Leona Valley community.

The purpose of the utility services undergrounding standard is to:

- Preserve the natural viewscape of the open rural environment
- Reduce outages due to downed poles or snapped wires
- Increase safety while fighting fires or during extreme storms
- Significantly reduce electro magnetic field (EMF) exposure from overhead lines

(A) Underground Utilities Required. All new buildings and structures in Leona Valley must provide underground electrical and communication service laterals on the premises to be served, as hereinafter required.

i.) New Construction. All electrical, telephone, cable television system, and similar service wires and cables which provide direct service to new main buildings, new accessory buildings, and structures, shall be installed underground in compliance with all applicable building and electrical codes, safety regulations, rules of the California Electrical Code, and orders of the Public Utilities Commission of the State of California,

ii.) Existing Buildings. Such service wires and cables shall also be placed underground when existing buildings, existing accessory buildings, and structures are repaired, remodeled, altered or expanded, except where the value, as determined for building permit fee purposes, by the County of Los Angeles Building Code, of such repairs or remodeling, or expansion does not exceed fifty percent (50%) of the value of the building or structure as determined by the Uniform Building Code.

iii.) Wiring. Wiring between the accessory buildings and the main buildings shall be in an underground system.

iv.) Responsibility for Compliance. The Contractor and Owner are jointly and severally responsible for complying with the requirements of this section and shall make the necessary arrangements with the utility companies servicing the structure for the installation of such facilities. If a proposed building or structure would create a situation which would make unreasonable or impractical the continuance of underground utility service to an existing adjacent property (or properties), then the Contractor and owner of the proposed building or structure shall be responsible for relocating such utilities per utility company specifications, and said utilities must be installed underground in compliance with all applicable codes, safety regulations, rules of the California Electrical Code, and orders of the Public Utilities Commission of the State of California

This is difficult to enforce. Who would be tasked with enforcing such compliance? This could place a very large burden on existing lot owners wishing to build or remodel on their property. There is no rational planning basis for this. Further the requirement that contractor and the owner be jointly and severally responsible for compliance will create a burden on the owner as many contactors may not wish to do the work under this constraint, and contractors' insurance carriers may not wish to cover them. The burden should fall solely on the owner of the property.

v.) Appurtenances. For the purpose of this section, appurtenances and associated equipment such as, but not limited to, service mounted transformers, pedestal mounted terminal boxes and meter cabinets may be placed above ground if permitted by and in accordance with the rules of the California Electrical Code, and orders of the Public Utilities Commission of the State of California

What will be required by the affected utility company? Some research will need to be done on this so that compliance is uniform.

vi.) Waiver of Underground Requirements. If topographical, soil, or any other physical conditions make such underground installations impossible or impractical, a waiver of the requirements of this section may be granted by the Department of

Regional Planning Building Official, (a written approval from Southern California Edison is required when necessary). The waiver applies only to that portion which is impossible or impractical and not to the entire project.

If the utility service is not situated on the same side of the public street as the permittee, or not within ten (10) feet of the area enclosed by the extension of any property lines to said public street or utility easement, the permittee must install all conduit, wires, pullboxes, electrical panel and other appurtenances from the structure to an approved location on the property line of the parcel which will facilitate connection to any future underground service; and that the property may continue to be served at the property line, or said approved location, by overhead wires to the property line until said future underground utility service conversion. All new utility service into existing unused utility easements or into new utility easements must be underground.

This could place a very large burden on existing lot owners wishing to build or remodel on their property. There is no rational planning basis for this.

7.) **Required Area**. Standard residential lots or parcels shall contain a gross area of not less than two and one-half acres. Clustering and density transfers are prohibited.

There is no rational planning basis for this major departure from the County Hillside Management regulations, the County General Plan, the proposed County General Plan, and numerous other documents which encourage clustering as a way of minimizing adverse environmental impacts. This regulation, which essentially nullifies the County's acclaimed Hillside Management regulations, would have severely adverse environmental impacts if adopted.

8.) **Subdivisions**. In order to maintain the custom home rural character of Leona Valley, and in addition to the Community Wide Development Standards, Items 1-7, the following requirements must apply to housing subdivisions:

NOTE: There are over 900 lots within the existing LVCSD consisting of over 8,500 acres. There are approx. 110 lots, 1 acre or less in size; approx. 110 lots between 1 and 2 acres; and approx. 175 lots between 2 and 2.5 acres. This totals of approx. 400 lots (almost half of all of the lots within the CSD boundary), which are less than the minimum lot size proposed herein. It is interesting to note that of these 400 lots that are less than 2.5 acres, almost 100% are improved with a home. Conversely, of the 500 lots remaining in the CSD, only about half are improved with a home. Further, LVTC gives no voting power to non-resident property owners and these owners are not typically noticed by the LVTC about important changes that could affect their property rights. It appears inappropriate that residency alone should be the determining factor in creating restrictions that would apply to a majority of the land, yet that same majority has little or no input in process. Further, it also seems inappropriate that the owners of lots less than 2.5 acres are attempting to require that all future residents will not be able to enjoy the same use of their land as they do.

A possible area for discussion is that, the majority of the lots which are less than 2.5 acres are located in the eastern section of the LVCSD, while a majority of the larger undeveloped lots are located in the western section. Consideration could be given to creating two areas for lot density purposes, e.g. no less than 1.5 acres on the land located in the eastern section and no less than 2.5 on land located in the western section.

Whether one home or ten homes are being constructed, development can impact trails (see b. below), habitat (c.), drainage (d.) and agriculture (f). And regulations concerning setbacks (see a. below), architecture (e.), solar energy (g.), EIR's (h), water availability (j.) and processing requirements (k. and l.) are equally relevant regardless of the number of homes that are being constructed. All conditions of these CSD desires should be applied uniformly over all lots. Much more attention and discussion would follow if all of these proposed changes affected each resident and each lot owner equally.

a. Subdivision Set Back Requirements. Subdivisions must have the following minimum setback requirements:
   - Front Yard: Minimum 65 feet.
   - Side Yards: Minimum 65-feet
   - Rear Yard: Minimum 65-feet

There is no rational planning basis behind such onerous setback standards. Requiring a minimum of 130' between homes is irrational. A typical 2.5 acre lot in Leona Valley has a frontage of about 170', which would allow only a home 40' wide to be constructed, with the remaining 75% of the lot's frontage devoted to "sideyard setbacks." The garage alone is typically 30' wide, leaving only 10' for "elevation" purposes. This regulation would promote the design of "franchised homes" as each would necessarily be extremely narrow and built exactly in the middle of the lot. Application of such ill-

advised standards would only encourage the cookie-cutter subdivision of land rather than the clustered, varying lot sizes and shapes encouraged by the General Plan and Hillside Development regulations.

b. Trail Easements. In reviewing and establishing design conditions for any land division, the hearing officer must consider community trails objectives and whether or not they may be promoted or benefited by such division. Alternative proposals for trail easements consistent with community goals must be developed and considered in conjunction with each land division.

This is inconsistent with prior arguments that all subdivisions have trails.

i. Unobstructed multipurpose pathways for both pedestrian and equestrian uses should be developed in each new land division to the satisfaction of both the Los Angeles County Department of Public Works and the Department of Parks and Recreation. Although alignments that are not adjacent to roadways will generally be preferred, road easements may be used when the hearing officer determines that other locations are inappropriate.

ii. Any trail incorporated into a land division must contain a provision for participation in an appropriate trail maintenance financing mechanism; the financing mechanism must be established prior to the construction of the trail.

c. Habitat. Development must respect the unique characteristics of the types of wildlife habitat in Leona Valley and should not alter the surrounding native vegetation. Specifically: Chaparral, Manzanita, cottonwood, oak and sage habitats should not be altered where watersheds could be damaged. The scarce woodland and grassland areas, because of their importance as wildlife habitat, should be protected from damaging development.

d. Drainage, Creeks & Channels: Design Element. The following provisions are intended to slow or reduce runoff from new development and protect and enhance the rural character of Leona Valley. In addition to existing county standards for the control of runoff, the following standards must be observed:

i.) *Minimizing Flood Hazards*: Flood hazards should be minimized by: Limiting development in watersheds; and, keeping development out of natural flood plains. Any project or use, which cannot mitigate significant adverse impacts, as defined in the California Environmental Quality Act on sensitive environmental resources, must be denied.

ii.) *Open Space or Conservation Easements*: Open space or conservation easements or equivalent measures are required in order to protect undisturbed watershed cover and riparian areas located on parcels proposed for development. Where development is proposed adjacent to Environmentally Sensitive Habitat Areas or existing creeks or streams, undisturbed natural open space easements are required in order to protect the resources. To maintain natural vegetation buffer areas that protect riparian habitats development other than driveways and walkways must be set back at least seventy-five feet from the outer limit of riparian vegetation.

iii.) *Soil compaction* must be limited to that only necessary to construct the dwelling or impervious finished surface areas. The compacted soil area must not exceed the structure size by 10%. If the lot will not accommodate this requirement then other means to ensure the structural integrity of the structure must be implemented in lieu of soil compaction. The intent of this requirement is to ensure, to the maximum extent possible, soil absorption of runoff.

Any restrictions on setbacks, soil compaction, "equivalent measures" to open space easements, what may and may not be constructed in certain areas, and many other items in the above paragraphs need to be carefully analyzed by the state and County that already regulate these subjects.

"Environmentally Sensitive Habitat Areas" needs to be defined.

e. Architecture and Design: In order to retain the unique custom house character of Leona Valley, no more than 5% of the homes within a subdivision may have a franchised identical façade and architecture. A façade includes front, rear and sides of the structure (360°). [2]

[2] The County of Los Angeles with the Development Committee will be working to enhance the language of the architecture and design Item "E" in order to create developments that blend seamlessly into Leona Valley.

Again, if only four homes were being built, or a contractor was building on multiple single lots in the community, the homes could all be identical?

f. Agriculture: New home subdivisions may not restrict agricultural endeavors on individual property owners.

There is no rational planning basis for this requirement.

g. Solar Energy: A seller of production homes (Developer) must offer the option of a solar energy system to all customers negotiating the purchase of a new production home.

The term "production homes" needs a definition.

The use of the term "developer" needs a definition. Any builder of their own home on their own property is a developer. This needs clarification – Webster's defines a developer as "A person who develops real estate, especially by preparing a site for residential or commercial use," which would include anyone that wishes to prepare a lot for eventual construction.

There is no rational planning basis for this attempted distinction between "developers" who construct "production homes" and others. Like many other portions of these proposed regulations that attempt to set one set of standards for existing home owners and individuals wishing to only build one to four homes, and another set of standards for larger projects, this is probably illegal in that it is an attempt to impose a requirement on just one sub-class and therefore may be considered discrimination.

h. Environmental Impact Reports and Archeological Reports: An environmental impact report and archeological report is required for residential subdivisions of ten or more dwelling units or when exceeding an area 25 acres.

Such a blanket EIR requirement is illegal.

i. Equestrian Accommodations: All subdivisions must be equestrian friendly developments.

What does "equestrian friendly" mean and how is it different from current zoning ordinances?

j. Water Availability: A Will Serve letter must be obtained from the water service company prior to the approval of a subdivision. Conditional Will-Serves (a will serve letter with conditions) is prohibited. The water purveyor and developer must provide a detailed description of the modifications and infrastructure necessary to support the subdivision.

There is no rational planning basis for this requirement. This is contrary to existing County ordinances and may be incompatible with the Subdivision Map Act. Public utilities or private utility companies commonly impose conditions on their will-serve letters.

k. Proposed Developments: Concurrent with the submission of a subdivision application to the County of Los Angeles Department of Regional Planning, the Developer must present the proposed development to the people of Leona Valley at a regularly scheduled Leona Valley Town Council meeting or, at the Developers expense, at a Town Hall meeting at the Leona Valley Improvement Association Community Building. [3]

There is no rational planning basis for this requirement only applying to subdivisions and not to any and all construction in Leona Valley that is otherwise subject to these regulations.

l. Documentation Requirements: To avoid cost impacts to the community, the Developer **[definition?]**or their representative must provide one copy of all documents submitted to the County of Los Angeles Department of Regional Planning and Associated Departments of the County of Los Angeles concurrently to the Leona Valley Town Council.[4]

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[3] The County of Los Angeles is seeking advice from County Counsel for language and guidance on this item.
[4] See footnote 1

9.) **Enforcement and Notification Requirements**. In order to ensure adherence to the Leona Valley Community Standards District, the following requirements must apply:

i.) Directors Review. Director's review shall be required for all zoning and subdivision applications, pursuant to Part 12 of Chapter 22.56. Room additions or modifications greater than four hundred square feet and for all new home construction to insure that the intent and purpose of the Community Standards District are satisfied. Remodeling and building additions less than four hundred square feet do not require a Director's Review.

ii.) New Construction. Approval of any construction project exceeding 400-square feet of building area must require the recordation of the Leona Valley Community Standards District (22.44.122), either by reference of this code by covenant; or a copy of this document in its entirety; onto the legal title policy of the property.

The legality of imposing conditions of title which are already required by ordinance is questionable

iii.) Town Council Notification. The County of Los Angeles Department of Regional Planning shall provide notice by first-class mail identifying applications filed during the previous 30-day period for projects within the Leona Valley Community Standards District that involve the following considerations:

a.) Zone change
b.) Land division
c.) Conditional Use Permit
d.) General plan amendment
e.) Variance
f.) Annexation

D. **Zone-Specific Development Standards**

The idea of eliminating dozens of "allowed" uses is dangerous in that it completely negates uses that may actually be acceptable given further analysis in the future.

For example, from the lists below all of the following would not be allowed: a local community college wanting to use an existing classroom or storefront for an extension class on a subject that members of the community wished to attend; the local phone company wanting to set up a local office where residents could pay bills; someone wanting to open a drycleaners and laundry; someone wanting to open a small blueprint company; someone wanting to open a small dance studio, or a small business owner wanting to sell radios.

Making a discretionary review of all uses a requirement, such as making them subject to a Use Permit, would be a more prudent approach. Such a discretionary review would be especially appropriate for the many commercial uses the LVTC is proposing to be prohibited. These exclusions would be financially damaging to owners of commercial properties, the owners of which may not yet have been notified.

1. Zones A-2, A-2, A-2H, RR and R-A
Due to the lack of area infrastructure, limited water resources, lack of conformity to the community, and the environmental sensitivity of Leona Valley, the following uses are prohibited in agricultural and residential zones within the Leona Valley Community Standards District:

• Adult day care facilities[5] • Adult residential facilities, including day use, having seven or more persons. • Airports.[6] • Amphitheaters, having a seating capacity of not to exceed 500 seats, but excluding drive-in theaters. • Camping facilities, overnight • Childcare centers, except as otherwise provided in Section 22.24.140.	• Heavy equipment training schools, on a lot or parcel of land having, as a condition of use, an area of not less than 100 acres. • Health retreats • Heliports. (Private and non-emergency) • Helistops. (Private and non-emergency) • Hospitals. • Juvenile halls. • Landfills

[5] The County is going to ascertain whether Leona Valley can limit the construction of Adult Day Care Facilities, Adult Residential Care Facilities (larger) & Child Care Centers as per State Law in A-1 & A-2 zones.
[6] Remote Control (RC) Aircraft Fields Exempt

• Circus winter quarters. • Colleges and universities, including appurtenant facilities giving advanced academic instruction approved by the State Board of Education or other recognized accrediting agency. • Correctional institutions, including jails, farms and camps. • Density-controlled developments, subject to the conditions of Section 22.56.205. • Disability rehabilitation and training centers, on a lot or parcel of land having an area of not less than one acre, where sheltered employment or industrial-type training is conducted. • Electric distribution substations, electric transmission substations and generating plants, including microwave facilities used in conjunction with any one thereof. • Explosive storage • Fairgrounds • Farm labor camps. • Fertilizer plants. • Fairgrounds of a public character, when permanently located, including such commercial uses as are normally accessory or appurtenant thereto. • Fruit and vegetable packing plants (industrial). • Gas metering and control stations, public utility. • Grading projects, off-site transport, where more than 100,000 cubic yards of material is to be transported, subject to the conditions and limitations of Sections 22.56.210 and 22.56.230. • Grading projects, on-site, but excluding projects where the commission or the board of supervisors have previously considered such grading proposal as indicated by approval of an environmental document incorporating consideration of such grading project. • Grange or fraternal organization type halls. • Group homes, children, having seven or more children.	• Landing strips. • Linseed, cottonseed and coconut oil processing plants • Logging operations • Manure processing, the spreading, drying & sale of • Microwave stations. • Mobilehome parks • Multi Family Dwellings • Nudist camps. • Oil Wells • Public utility service centers. • Public utility service storage yards. • Recreation clubs, private, including tennis, polo and swimming; **<u>The County commonly requires and always allows, if the applicant desires, developments to install, common recreation amenities.</u>** • Recreational trailer parks, as provided in Part 6 of Chapter 22.52. • Road construction and maintenance yards. • Sawmills, only in conjunction with logging operations. • Solid fill projects. • Stations—Bus, railroad, taxi. • Storage, temporary, or materials and construction equipment used in construction or maintenance of streets and highways, sewers, storm drains, underground conduits, flood control works, pipelines and similar uses for a period not to exceed one year. • Surface mining operations • Terminals, bus and railroad. • Theaters, drive-in. • Theaters, amphitheaters having a seating capacity of not to exceed 500 seats, but excluding drive-in theaters. • Townhouses, subject to the conditions of Section 22.56.255. • Trade Schools • Youth Hostels

2. <u>Zones M-1, M-1½, M-2, M-2½, M-3, MPD, D-2, B-1 & B-2</u>
   No manufacturing or industrial uses are permitted within the Leona Valley Community Standards District.

3. <u>Zones C-1, C-2, C-3, C-4, C-H, C-M, and CPD</u>
   The commercial zone district within Leona Valley is located at the intersection of 90th Street West and Elizabeth Lake Road. Historically, this neighborhood business zone has provided local commercial needs. The following standards apply to commercially zoned parcels:[7]
   a. Uses Subject to Permits. Where the property not located in the commercial land use category of the Leona Valley Community Standards District, a conditional use permit as

[7] The County of Los Angeles intends to create a rural commercial zoning code and will likely use our guidance and our Standard in restricting commercial uses to small neighborhood establishments in rural areas.

provided in Part 1 of Chapter 22.56 is required for any commercial use otherwise permitted in the basic zone. The hearing officer must find that such proposed commercial use is servicing Leona Valley's local need and is compatible within surrounding land uses located within 5,000-feet. Notwithstanding the above, no conditional use permit is required for a change of an existing commercial use to a new commercial use having the same or lesser parking requirement and occupant load and having the same occupancy classification as described in Title 26, unless such new use is subject to permit in the basic zone.

b. Maximum Height. The maximum height of all structures, except chimneys and rooftop antennas, shall be 35 feet.
c. Maximum Floor Area. The maximum floor area shall be 50% of the net lot area. Floor area shall include all enclosed buildings.
d. Maximum Lot Coverage. The maximum lot coverage shall be 50% of the net lot area. Lot coverage includes all enclosed buildings.
e. Setback. For structures that exceed 17 feet in height and are located on a parcel of land adjacent to a residential or agricultural zone, the maximum height of the structure at five feet from the property line adjacent to the residential zone shall be ten feet and any portion of the structure that exceeds ten feet in height shall be set back and additional five feet for every additional foot of height.

Due to the limited infrastructure, scarcity of water resources, lack of conformity to the community, lack of local need and the environmental sensitivity of Leona Valley, the following uses are prohibited in commercial zones within the Leona Valley Community Standards District:

• Air Pollution sampling stations • Automobile battery dedicated shop • Automobile rental and leasing agency • Automobile/motorized vehicle sales, sale of new and used motor vehicles. • Bakery Goods Distribution • Blueprint shops • Car washes, automatic, coin-operated or hand wash • Child Care Centers, excluding small home based businesses • Colleges, universities and trade schools, including appurtenant facilities. • Comfort Stations • Dental laboratories • Department Stores • Drug Stores over 2,000-square feet • Electric distribution substations • Film laboratories • Family childcare homes with greater than six residents. • Frozen food lockers • Furniture and appliance rentals • Furniture and household goods, transfer and storage • Gas metering and control stations, public utility • Grocery stores in excess of 2,000/Sf	• Parking lots and parking buildings • Photocopying • Photographic equipment and supply stores • Photoengravers and lithographers • Printers • Public utility service centers • Radio and television broadcasting studios, excluding local emergency radio service • Radio and television stores • Recording studios • Recreational Vehicle Sales • Recreational Vehicle Rentals • Mobile Home Sales • Model home display centers **<u>There is no rationale for this exclusion.</u>** • Mortuaries • Motion picture processing, reconstruction and synchronizing film with sound tracks. • Motorcycle or motorscooter rentals • Offices, businesses or professional exceeding 2,000-square feet of building area • Office Machines & Equipment Sales • Parcel delivery terminals • Schools of business and professional including barber, beauty, dance, music, manual training, shop

• Hospital equipment and supply rentals • Laboratories, research and testing • Laundries, hand • Laundries, retail • Laundries, self service • Mail Order Houses • Medical clinics • Medical laboratories • Mimeograph and addressograph services	work, maintenance of machinery or mechanical equipment. • Sporting good stores in excess of 2,000-square feet of building area; • Stations—bus, railroad or taxi • Strip Malls (three or more contiguous establishments) • Trailer sales, box and utility • Truck rentals are permitted but may not exceed four rental vehicles. • Tobacco shops • Recreational clubs (commercial) exceeding 2,000-square feet of building area.

E. **Area-Specific Development Standards**

The Leona Valley Community Center.

Purpose. To preserve the buildings, space and future development of the Leona Valley Community Center for the benefit of the community.

The Leona Valley Community Building, established in 1954, is a multi-use hub for community activities. Owned, operated and maintained by the Leona Valley Improvement Association (LVIA), a non-profit community organization, the Center receives no governmental funding and is supported by volunteers, donations and fund-raising events.

The Center comprises a building for social events and a meeting place for local organizations; an arena for equestrian events; the Leona Heritage Park, including the historic Leona One-room Schoolhouse; recycling stations; and, storage containers.

The Leona Valley Community Center shall continue its current purpose and usage, allowing for on-site expansion, improvements, or layout reassignment as needed.

Definitions. In order to make clear and concise standards, without open-ended interpretation, the following definitions are included: Unless specifically defined below, the words and phrases used in this section shall be interpreted to give the meaning they have in common usage, and to give this section its most reasonable application.[8]

"**Agriculture**" Use of land for the production of food and fiber, including the growing of crops and/or the grazing of animals on natural prime or improved pastureland.

"Clustered Development" Development in which a number of dwelling units are placed in closer proximity than usual, or are attached, with the purpose of retaining an open-space area.

"Curvilinear" Consisting of or bounded by curved lines

"Density Transfer" A way of retaining open space by concentrating densities—usually in compact areas adjacent to existing urbanization and utilities—while leaving unchanged historic, sensitive or hazardous areas. In some jurisdictions, for example, developers can buy development rights of properties targeted for public open-space and transfer the additional density to the base number of units permitted in the zone in which they propose to develop.

Density, Residential" The number of permanent residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

"Directors Review" Review by the County of Los Angeles Department of Regional Planning

"**Environment**" CEQA defines environment as "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, mineral, flora, fauna, noise and objects of historic or aesthetic significance."

"**Environmental Impact Report (EIR)**" A report required pursuant to the California Environmental Quality Act which assesses all the environmental characteristics of an area, determines what effects or impacts will result if the area is altered or disturbed by a proposed action, and identifies alternatives or other measures to avoid or reduce those impacts.

"**Fixture**" (or "luminaire") means a complete lighting unit including the lamp and parts designed to distribute the light, position and protect the lamp, and connect the lamp to a power source.

"**Footcandle** (fc)" means a unit of measurement for the total amount of light cast on a surface (illuminance). One footcandle is equivalent to the illuminance produced by a source of one candle at a distance of one foot.

"Franchised Housing" housing consisting of similar houses constructed together on a tract of land or subdivision.

"**Full cut-off fixture**" means a lighting fixture designed such that no light, either directly from the lamp or indirectly from the fixture, is emitted at or above a horizontal plane running through the lowest point of the lamp shield.

"**Glare**" means direct and unshielded light striking the eye to result in visual discomfort and reduced visual performance.

"**Grading**" Alteration of existing slope and shape of the ground surface.

"**Habitat**" The physical location or type of environment in which an organism or biological population lives or occurs.

"**Hillside Management Areas**" Hilly and mountainous areas with natural average slopes above 15 percent. Instituted to preserve the natural and scenic character of the area and to minimize danger to life and property caused by fire and flood hazards, water pollution, soil erosion and land slippage.

"**Illuminating Element**" means the part of the lamp that generates the visible light, such as the filament of an incandescent lamp.

"**Lamp**" is the generic term for an artificial light source installed in the socket portion of the fixture, to be distinguished from the whole assembly. Commonly referred to as a "bulb".

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[8] The County of Los Angeles will likely limit the definitions to those definitions that are currently not in County Code.

"Light Output" is the sum of the lumens of all unshielded lamps in a fixture, under a building canopy, or on a site plan.

"**Light pollution**" means any adverse effect of artificial light sources including, but not limited to, discomfort to the eye or diminished vision due to glare, light trespass, uncontrolled up-lighting, uncomfortable distraction to the eye, or any artificial light that diminishes the ability to view the night sky.

"**Light trespass**" means light falling where it is not wanted or needed, generally light from one property that shines onto another property or the public right-of-way.

"Lighting Zone 1" (Dark Ambient Illumination) government land, recreation area, or wildlife preserve;

"Lighting Zone 2" (Low Ambient Illumination) Rural areas defined by the United States Census.

"Lighting Zone 3" (Medium Ambient Illumination) Urban areas

"Lighting Zone 4" (High) there are no State designations for this level;

"**Lumen**" means the unit used to quantify the amount of light energy produced by a lamp. For example, a forty-watt incandescent lamp produces approximately four hundred lumens, while a thirty-five-watt high-pressure sodium lamp produces about two thousand three hundred lumens.

"**Open-Space Land**" Any parcel or area of land or water that is essentially unimproved and devoted to an open-space use for the purposes of (1) the preservation of natural resources, (2) the managed production of resources, (3) outdoor recreation or (4) public health and safety.

"Outdoor lighting fixture" means any temporary or permanent lighting fixture that is installed, located, or used in such a manner to provide illumination of objects or activities outside. Outdoor lighting fixtures include all fixtures mounted to the exterior of a structure, poles, bollards, or other freestanding structures, or placed so as to provide direct illumination on any exterior area or activity.

"Private Road/Private Street" Privately owned (and usually privately maintained) motor vehicle access that is not dedicated as a public street. Typically the owner posts a sign indicating that the street is private property and limits traffic in some fashion. For density calculation purposes, some jurisdictions exclude private roads when establishing the total acreage of the site. However, aisles within and driveways serving private parking lots are not considered private roads.

"**Riparian**" A type of environment, usually referring to stream banks or other areas that are adjacent to and dependent on a watercourse or body of water.

"**Riparian Lands**" Riparian lands are comprised of the vegetative and wildlife areas adjacent to perennial and intermittent streams. Riparian areas are delineated by the existence of plant species normally found near freshwater.

"**Ridgeline**" A line connecting the highest points along a ridge and separating drainage basins or small-scale drainage systems from one another.

"Rural" A way of life characterized by living in a non-urban or agricultural environment at low densities without typical urban services. Urban services and facilities not normally found in rural areas include curbs, gutters and sidewalks; street lighting, landscaping and traffic signalization; mass public transit; and commercial facilities dependent on large consumer volumes such as regional shopping centers.

"**Shielding**" means a barrier around a fixture that helps conceal the lamp and control light distribution. A fixture that is "fully shielded" incorporates a solid barrier, emits no light rays above the horizontal plane and effectively obscures visibility of the lamp. A fixture that is "partially shielded" may allow some light to pass through a semi-translucent barrier, and/or may allow visibility of the lamp from certain perspectives.

"Significant Ecological Areas (SEAs)" Ecologically important or fragile land and water areas valuable as plant and animal communities.

"Strip Mall" A shopping complex containing a row of various stores, businesses, and restaurants that usually open onto a common parking lot.

"Subdivision" The division of a tract of land into four or more defined lots, either improved or unimproved, which can be separately conveyed by sale or lease, and which can be altered or developed.

"View Corridor" The line of sight—identified as to height, width and distance—of an observer looking toward an object of significance to the community (e.g., ridgeline, river, historic building, etc.). The route that directs the viewer's attention.

"Viewshed" The area within view from a defined observation point.

"Watershed" The total area above a given point on a watercourse that contributes water to its flow. The entire region drained by a waterway or watercourse that drains into a lake or reservoir.

"Zoning" The division of a city or county by legislative regulations into areas or zones that specify allowable uses for real property and size restrictions for buildings within these areas. A program that implements policies of the General Plan.

(15)

THE VINEYARDS

January 14, 2008

Mr. Richard Thomas
President, Leona Valley Town Council
P.O. Box 795
Leona Valley. CA 93551

Re: Documentation – Valley Vineyards Development

Dear Richard,

Thank you for your letter of January 6th. Our counsel has reviewed your concerns and has further reviewed the various agreements between our professional consultants and Valley Vineyards, LLC. They are of the opinion that there should be no problem providing this electronic material to your community for posting on your web site, provided appropriate safeguards are in place.

We are therefore in a position to deliver all of the documents in an electronic format for easy uploading onto your web site. Further, we have paired down the aggregate size of these files so that they will easily fit within your server's size parameters mentioned at the last Town Council meeting. These files will also be available for printing by residents of your community.

The only safeguard imposed by our counsel was to insert a watermark on each page of each report that reveals itself only when the document is printed. This watermark will not cause any viewing impairment either on your web site or if the document is printed by a resident.

I am very glad to read of your willingness to post these documents on the Leona Valley web site. As I have mentioned on many occasions, it is particularly important that each resident be able to access this information directly so that informed decisions can be made.

Thank you.

Valley Vineyards, LLC
By Lauren Development, Inc
Its Operating Manager

By: _____
Bill Ford
Its: President

cc: Norman Hickling
Jodie Sackett
Daniel Fierros
Town Council Members

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

(16)

THE VINEYARDS

October 15, 2007

Mr. Bill Elliot
Chairman, CSD Revisions Committee
Leona Valley Town Council
P.O. Box 795
Leona Valley, CA 9355 1

RE: Leona Valley Community Standards District (CSD) – Revisions

Dear Mr. Elliot,

When you first convened your CSD committee, we volunteered to share our knowledge and experience in urban planning and assist in the preparation of your new regulations. Unfortunately, but not unexpected, there were concerns that we had ulterior motives behind our offer to help and our offer was declined. At the most recent Town Council meeting, county representatives discussed the difficulties of drafting comprehensive CSD regulations. They additionally indicated that your new CSD regulations are going to be incorporated into, and processed as a part of, the Antelope Valley Area Plan Update. These are daunting tasks and I would once again like to offer our services to your committee.

For some background, a member of our team, John Allday, has a Masters Degree in Public Administration (with an emphasis in Urban Planning), worked as a Senior Planner for Orange County for eight years, was a Planning Commissioner in a rapidly growing Orange County city for seven years, worked as a planning consultant, and has been employed by non-profit and for-profit companies in the land development and housing industry since 1976. He has prepared, reviewed, approved and complied with development standards for almost forty years. I believe that he would be an asset in aiding your committee in the preparation of your new community standards district regulations.

As I mentioned to Richard Thomas and Alice Benoit at a recent meeting, we have an opportunity to use our vineyard plan as a model for future agriculture/viticulture/housing developments in Leona Valley, but we have been limited to developing our plans using the existing Leona Valley CSD guidelines. By working with you and your committee, we may still be able to incorporate many of your future CSD desires into our developing plans and CC&R's, thus setting a prototype for future development in the area.

For now we are left with designing the project independent of your input, something I have continually wished to correct. If we are still perceived to have an ulterior motive it would simply be our desire to create a vineyard housing development that would be a credit to both our company and to your community. I trust that you will accept this offer in the spirit in which it is given and I continue to hope for a working relationship with your committee and the Town Council.

Very truly yours,

Valley Vineyards, LLC
By Lauren Development, Inc
It's Operating Manager

William D. Ford
President

cc: All LVTC Members
Norm Hickling, asst to Supv. Antonovich
Jodie Sackett, County Planning
Daniel Fierros, County Planning
Mitch Glazer, County Planning

Valley Vineyards, LLC
PO Box 790 Agoura Hills CA 91376
818-575-9983

(17)

LAUREN
DEVELOPMENT INC.

RECEIVED
OCT 09 2007

October 4, 2007

Mr. Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles CA 90012

RE: TTM 066952 (Valley Vineyards / 121 Lots in Leona Valley)

Dear Jodie:

We have resubmitted all our plans for re-checking and we look forward to a second Subdivision Committee meeting to discuss our development. Sometime in the next few weeks I'd like to have a separate meeting with you to go over any planning issues that may remain. I will call you to schedule this.

On another note, I want to briefly address how we are handling the Leona Valley Town Council's efforts to modify their Community Standards District regulations. Since we first became involved in this project, we focused on being in complete compliance with the existing general plan, base zoning, supplemental zoning, hillside management regulations and all other county codes and standards. We hired environmental consultants to conduct complete inventories of the property before we had the land planner begin designing the site. We sincerely believe that our plan complies with all county standards, is sensitive to the environment, and will be a credit to the community.

On April 9, 2007, I presented our plan to the LVTC. After the meeting was adjourned, the LVTC secretly formed a committee, which fabricated an accounting of that meeting. Unbeknownst to some LVTC Board members, the LVTC President then sent this inaccurate account to you alleging they were actual "minutes" of the meeting. (The real minutes can be found on their website.) In August the LVTC submitted a 78 page, error-filled response to your department's Draft Initial Study, which we thoroughly challenged on September 7, 2007. The LVTC has repeatedly attempted to convince you and us that we don't comply with county development codes. Now I believe they realize that our project does in fact comply with all existing county regulations, so they are trying to revise their Community Standard District regulations

They have formed a committee to come up with new regs. They announced at their monthly meeting that this committee is "closed" to us so we can neither participate in their creation nor even see what they have in mind. They make no bones that they are rushing these to completion because they know we have a project that will soon be before the Planning Commission.

As we have no control over what the LVTC does, unless you have better advice, we will continue to process our plans, adhere to currently adopted county standards and assume our project is grandfathered under the existing regulations.

Is there a specific group of planners that are involved in reviewing proposed revisions to CSDs? Should I be discussing this issue with them or someone else in your department? Should I talk to the Planning Director?

I look forward to meeting with you about our development plan, and hearing from you on these questions.

Thank you for your assistance.

Very truly yours,

Valley Vineyards, LLC
By: Lauren Development, Inc.
It's Operating Manager

John L. Allday
Vice President

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818 575-9983 FAX 818 575-9009
johna@laurendevelopment.com

(18)

PCR

September 7, 2007

Daniel Fierros
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING
Impact Analysis Section
West Temple Street
Los Angeles CA 90012

Re: RESPONSES TO COMMENTS FROM LEONA VALLEY TOWN COUNCIL REGARDING BIOLOGICAL RESOURCES WITHIN THE DRAFT INITIAL STUDY FOR THE 292.49-ACRE BOUQUET CANYON PROJECT SITE (TR0066952), UNINCORPORATDED LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Fierros:

This letter presents **PCR Services Corporation's (PCR's)** responses to comments regarding biological resources made by the Leona Valley Town Council (LVTC) in a letter dated August 6, 2007 regarding the 292.49-acre Bouquet Canyon Project Site (TR0066952) located in unincorporated Los Angeles County (County), California. In their letter, the LVTC commented on the County's draft Initial Study and recommended Mitigated Negative Declaration dated June 21, 2007. It is important to note that the following technical biological reports prepared by PCR, while submitted to your department as a part of the Initial Study Questionnaire, were not included as attachments to the Initial Study and were apparently not reviewed by the LVTC when they prepared their letter: 1) *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California* (August 15, 2006) and 2) *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California* (August 2006). As a result, the responses contained herein may refer to sections of these technical reports which directly address the comments in detail and do not require further elaboration.

Response to Comment: HAZARDS – 2. Flood, a. page 8. The comments on this page regarding the need for protection by California Department of Fish and Game (CDFG) of Bouquet Canyon Creek or any sensitive species it may support are addressed within both technical reports prepared by PCR. In the *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California*, PCR has delineated waters subject to the jurisdiction of the CDFG. As stated on pages 22 through 24 of that technical document, the CDFG will review the proposed project as it affects streambed habitats within the project area. The CDFG may then place conditions on the Section 1602 clearance to avoid, minimize, and mitigate any potentially significant adverse impacts within the CDFG jurisdictional limits. We have made Valley Vineyards, LLC aware of these requirements and it is our understanding that Valley Vineyards, LLC intends to comply with those requirements. In addition, as mentioned in the *Results of a General Biological*

Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California, the site does not support suitable habitat for the California red-legged frog (*Rana aurora draytonii*) or any other aquatic sensitive species such as the unarmored threespine stickleback (*Gasterosteus aculeatus wiliamsoni*).

Response to Comment: HAZARDS – 2. Flood, Conclusion, page 12. The comment recommends coordination with the CDFG. As discussed in the previous response to comment, the CDFG will review the proposed project as it affects streambed habitats within the project area. The CDFG may then place conditions on the Section 1602 agreement to avoid, minimize, and mitigate any potentially significant adverse impacts within the CDFG jurisdictional limits. We have made Valley Vineyards, LLC aware of these requirements and it is our understanding that Valley Vineyards, LLC intends to comply with those requirements.

Response to Comment: RESOURCES – 3. Biota, a. page 26. The comment disagrees with the County's findings that the project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it is not relatively undisturbed and natural. In response, SEAs are mapped as an overlay within the Los Angeles County General Plan. After reviewing the location and boundaries of the project site in relation to the County mapped SEAs, it was determined that the project site is not within, nor does it overlay, a mapped SEA.

Response to Comment: RESOURCES – 3. Biota, b. page 27. The comment states that natural habitat will be removed from the site and that growing grape vines on a portion of the property would degrade the quality of natural habitat that exists. In response, the project site currently supports 92.4 acres of non-native grassland, 10.8 acre of ruderal areas, and 3.3 acres of disturbed areas. Therefore, these disturbed areas cover more than a third of the existing site. All of these mapped areas mentioned above already exist in a degraded state.

Response to Comment: RESOURCES – 3. Biota, c. page 27. The comment asserts that the on-site Bouquet Canyon Creek is a tributary fed by Amargosa Creek. This is in response to the County's statement that the project site supports two unnamed drainages. In accordance with the *Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles County, California*, there are two unnamed USGS-designated "blue-line streams" that cross the project site that are tributary to Amargosa Creek. Surface water flows through both drainage systems from southwest to northeast. Amargosa Creek does not feed into the on-site systems; rather, is the receiving water body from the on-site drainages. Further, the drainage system near the southeastern portion of the project site is not Bouquet Canyon Creek; Bouquet Canyon Creek begins approximately two miles west of the project site and flows in a south and westerly direction, away from the project site.

Response to Comment: RESOURCES – 3. Biota, d. page 27. The comment is in response to the County's conclusion that two riparian corridors will generally be avoided with respect to the following Initial Study checklist question, "Does the project site contain a major riparian or other sensitive habitat (e.g. coastal sage scrub, oak woodland, sycamore riparian, woodland, wetland, etc.)?" LVTC's comments subsequently state that several sensitive species occur in the vicinity but plant species are listed by common name rather than habitats which are the subject of the Initial Study checklist question.

In response to LVTC's comment, none of the plant species listed have appropriate Latin names and therefore PCR cannot directly comment on their potential to occur within the project site. Nevertheless, the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California* documents the performance of sensitive plant surveys during the appropriate blooming periods. No sensitive plant species were found to occur on-site during these surveys.

To complete the County's response, existing wetlands, totaling 0.01 acre of U.S. Army Corps of Engineers (ACOE)/Regional Water Quality Control Board (RWQCB) jurisdictional wetlands, occur only in the southeastern portion of the site. To address the Initial Study checklist question, this wetland area occurs within an area dominated by disturbed riparian vegetation. All on-site drainages support areas mapped as either disturbed riparian scrub or mule fat scrub. Further, no other major riparian areas or sensitive plant communities occur within the project site.

Response to Comment: RESOURCES – 3. Biota, f. page 28. The comment is in response to the County's conclusion that the site has the potential to support raptor and songbird nests based upon the following Initial Study checklist question, "Is the project site habitat for any known sensitive species (federal or state listed endangered, etc.)?" As stated in the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California,* the following species have the potential to occur on-site based upon habitat present and species distributions: Cooper's hawk (*Accipiter cooperi*), sharp-shinned hawk (*Accipiter striatus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Bell's sage sparrow (*Amphispiza belli belli*), silvery legless lizard (*Anniella pulchra pulchra*), golden eagle (*Aquila chrysaetos*), ferruginous hawk (*Buteo regalis*), northern harrier (*Circus cyaneus*), northern red diamond rattlesnake (*Crotalus ruber ruber*), white-tailed kite (*Elanus leucurus*), prairie falcon (*Falco mexicanus*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*). However, these species are Species of Special Concern or are protected from hunting but are not listed by federal or state recourse agencies as threatened or endangered. Several other sensitive species mentioned in LVTC's comment are not expected to occur primarily due to the lack of suitable habitat. Potential impacts to sensitive species potentially occurring on-site are expected to be less than significant as impacts will not cause populations of these species to drop below self-sustaining levels. As addressed in the PCR report, the site does not support suitable habitat in the form of permanent ponded water with emergent vegetation and

perennial water flow for the California red-legged frog or any other aquatic sensitive species such as the unarmored threespine stickleback, respectively.

Response to Comment: RESOURCES – 3. Biota, g. page 28. The comment disagrees with the County's determination that other factors, such as wildlife corridors and adjacent open space linkages, either do not occur on-site or will not be impacted by the proposed project. LVTC asserts that the site does support a wildlife corridor and that many species have been observed in the vicinity including grizzly bears (only black bears may occur in the vicinity as grizzlies have been extirpated from the State since the early 1900's). The discussion below represents PCR's opinion of the existing conditions within the site as they relate to wildlife corridors and linkages.

Movement on a "local" scale occurs throughout the surrounding vicinity as well as within the site itself. From a regional perspective, the site is situated in Leona Valley, just west of the Palmdale city limits. The site is approximately 7 miles west of State Highway 14 and 1 mile northeast of the Angeles National Forest, and does not lie within any linkages as proposed by the South Coast Wildlands Project Missing Linkages Report.[1] The site connects to rural residences of Leona Valley to the north, beyond which is the City of Palmdale. The rural residences to the north of the site inhibit north-south movement of wildlife through the study area. However, due to its proximity to the Angeles National Forest to the west and open space to the east and south, the site has the potential to support larger mammal species that require larger home range areas and dispersal distances or dense vegetative cover (e.g., mountain lion and bobcat). Therefore, while the project may be linked to a regional open space/habitat system, it in an of itself does not represent a movement corridor that connects large blocks of habitat through surrounding areas that are otherwise "hostile" and not conducive to wildlife movement.

Response to Comment: RESOURCES – 3. Biota, CONCLUSION. page 29. The comment from LVTC disagrees with the finding of "less than significant with project mitigation" and feels that based upon the location of riparian areas, the presence of sensitive species, its location within the foothills of SEA #58, its adjacency to Ritter Ridge SEA, and its location within the proposed San Andreas Rift Zone SEA, impacts are potentially significant. In response, PCR has explained in the responses above that potential impacts to jurisdictional drainages and sensitive species potentially occurring on-site are less than significant. The project site is not located within an existing SEA. A proposed update to the County General Plan, including the SEA maps and policies, is in process. However, until any modifications to the SEA program are adopted by the County Board of Supervisors, the County Department of Regional Planning only recognized the existing SEA overlay.

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[1] *Penrod, K., R. Hunter, and M. Merrifield. 2001. Missing Linkages: Restoring Connectivity to the California Landscape, Conference Proceedings. Co-sponsored by California Wilderness Coalition, The Nature Conservancy, U.S. Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.*

Response to Comment: RESOURCES – 6. Agriculture Resources, a. page 36. The comment agrees with the County's determination that the proposed project would convert farmland to non-farmland use. PCR does not disagree with LVTC's comment that the site was historically used for grazing. However it should be pointed out that the developer is investigating the feasibility of planting approximately 100 acres – or one third of the site – in grapevines. This would increase the amount of farmland in the area. No further response is necessary.

Response to Comment: SERVICES – 1. Traffic/Access, CONCLUSION. page 44. The bulleted comment states, "It is not likely that Bouquet Canyon Road would be widened or improved as it winds through Angeles National Forest, parallels a Blue Line creek and is a valuable wetland habitat." It is true that Bouquet Canyon Road parallels a USGS-designated "blue-line stream" prior to entering the site. However, only a small portion on-site was determined to support a wetland and off-site areas have not been delineated.

Response to Comment: MANDATORY FINDINGS OF SIGNIFICANCE. page 74-75. The comment is in response to the question, "Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plan or animal, or eliminate important examples of the major periods of California history or prehistory?" and the County's response; "Maybe, site has potential to support both raptor and songbird nest." The comment by LVTC lists sensitive wildlife species known from the Leona Valley, describes sensitive plant communities under the proposed SEA, and documents sensitive plant and wildlife species included in the County's draft General Plan. As previously mentioned and included in the *Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California,* no sensitive plant species were observed on-site during the sensitive plant surveys and no sensitive plant communities were found on-site. Further, although the project site has the potential to support both raptor and songbird nests due to the presence of trees, shrubs, and other ground cover, the following mitigation or project design feature will ensure impacts are less than significant: Any vegetation removal shall be conducted between August 16 and February 14, which is outside the nesting season, to avoid potential impacts to nesting birds. If initial vegetation removal occurs during the nesting season, all suitable habitats will be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected, a buffer of at least 100 feet (300 feet for raptors) will be delineated, flagged, and avoided until the nesting cycle is complete, as determined by the biological monitor, to minimize impacts.

Response to Comment: GENERAL ASSUMPTIONS AND LIMITING CONDITIONS. page 77-78. The comments by LVTC describing where they got their information to comment on the Initial Study are accepted and no further response is deemed necessary.

If you have any questions or comments, please contact us.

PCR SERVICES CORPORATION

Steven G. Nelson
Director of Biological Resources

Susan Anon
Senior Biologist

(19)

LAUREN
DEVELOPMENT INC.

September 7, 2007

Daniel Fierros
Impact Analysis Section
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles CA 90012

Re: TR066952 / Renvt200700035; Response to Comments from Leona Valley Town Council to Draft Initial Study.

Dear Mr. Fierros:

Attached please find detailed responses to issues raised by the Leona Valley Town Council (LVTC) with respect to the Draft Initial Study. Our responses, including proposed mitigation measures designed to insure that concerns raised by the LVTC remain insignificant, are in blue.

Although many of the issues raised are of legitimate concern to all, almost without exception the LVTC would not have had to address them had they reviewed the reports prepared for this project, met with the developer to discuss their concerns, or had a greater understanding of how government regulations control many of their speculated impacts. Valley Vineyards, LLC has repeatedly attempted to work with the LVTC regarding the proposed development. We have attended every monthly town council meeting over the past year. We offered to meet with their Development Committee, which prepared their comments. We have offered to share any documentation on our project they would wish to review. We have offered to explain how the impacts are governed by various county regulations. Unfortunately the LVTC has never accepted our offers and therefore remains misinformed as to the facts upon which the Impact Analysis Section's determination was based.

There are three overriding flaws in their response:

1. The LVTC did not avail themselves of, nor review, any of the numerous professionally prepared, site specific reports and documents commissioned for this project (see list of these documents later in this letter);
2. The LVTC attempts to judge the project by non-existent county or state regulations;
3. The LVTC lacks an understanding of the many safeguards inherent in existing government regulations.

Instead they cite general information, which has no relevance to the subject project, or unsupported references to potential impacts, such as their argument regarding SEAs that do not exist, and they repeatedly fail to realize that most of their hypothesized impacts will be mitigated by adherence to government regulations.

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johna@laurendevelopment.com

Our conclusions in this matter are supported by LVTC's own admission, as stated in their "General Assumptions and Limiting Conditions" found at the end of their submitted comments. Specifically, they state:

1. LVTC "cannot guarantee or be responsible for the accuracy of their comments;"
2. That maps photographs and exhibits are for "illustration only as an aid in visualizing matters" and "should not be relied up for any other purpose;"
3. That "no opinion is intended to be expressed for matters that require legal expertise or specialized investigation or knowledge;" and
4. That the LVTC "have no specialized expertise in the fields of biology, geology, drainage, environmental impact, land use planning, zoning, roadways, trends, populations studies, hydrology, archeology or other elements related to Valley Vineyards" and that they "have relied upon private and outside technical reports and studies related to these issues and assume said reports are accurate and reliable."

The numerous technical studies prepared and previously submitted to the county, along with our attached comments and updated reports, correctly state the facts, and are derived from one or more professional's conclusions in each technical field.

The reports which they could have availed themselves of are as follows:

1. Initial Study Questionnaire, Valley Vineyards, LLC; February 12, 2007. (NOTE: This document was submitted to your department on February 13, 2007)
2. Slope Analysis / Low Density Threshold and Maximum Density Threshold Calculations (Slope Analysis Map included); Pacific Coast Civil, Inc., February 22, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
3. Preliminary Geologic and Soils Engineering Investigation, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California; GeoConcepts, Inc.; February 5, 2007. (NOTE: This document was submitted to your department on April 18, 2007)
4. Private Sewage Disposal System, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California; GeoConcepts, Inc.; May 1, 2007.
5. Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California; PCR Services Corporation; August 15, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
6. Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California; PCR Services Corporation; August, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
7. Cultural Resource Record Search Report for the Bouquet Canyon Project; PCR Services Corporation; September 08, 2006. (NOTE: This document was submitted to your department on February 13, 2007)

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8. A Phase 1 Archaeological Study for TTM 066952 Located in Bouquet Canyon, Leona Valley, Los Angeles County, California; Historical Environmental Archaeological Research Team, Robert J. Wlodarski, Principal Investigator; May, 2007. (NOTE: This document was submitted to your department on June 7, 2007)

9. Los Angeles County, TTM 066952 – Valley Vineyards, Traffic Impact Analysis, Kunzman Associates, Frank Lee, Carl Ballard, and William Kunzman, P.E., July 31, 2007 (NOTE: This document was submitted to the public works department on August 10, 2007).

Additionally, the following report is attached, enclosed at the end of the responses:

1. Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California; PCR Services Corporation, September 7, 2007

We continue to believe that the Impact Analysis Section's determination was correctly derived in accordance with the requirements of CEQA and were based on fully verified, accurate reports, studies and research professionally prepared for the subject site.

Moving forward. As a result of the Subdivision Committee Meeting comments and conversations between Valley Vineyards, LLC and the various county agencies over the last few months, we have made some minor changes to the project to bring it into conformity with county requirements and requests. Please note the following for inclusion into the Initial Study:

1. The interior street layout has changed slightly, in order to mitigate fire department concerns regarding street lengths. One cul-d-sac – previously called out as "Street X" – has been revised and is now "Street Y" and "Street Z." This revision has minimal impacts on the overall development so all information previously provided remains accurate.

2. Pad and grade elevations were revised to reduce unnecessary earthwork and allow the site to balance. Grading quantities have therefore been reduced from what was previously provided to you. The corrected quantities are now:1,473,440 cut, 1,403,670 fill. The civil engineer has determined that the site will balance.

3. As you will note in our responses, we have amended our concept for handling sewage to include alternates. A determination of which system has not yet been made. The options presented are: 1) a small localized "packaged" sewer treatment facility, which serves just the homes in Valley Vineyards, providing reclaimed water to support the agricultural elements of the project; 2) individual lot treatment facilities, which could provide reclaimed water on a lot by lot basis; or 3) "enhanced" treatment septic tanks with leach fields or pits located on each lot. Different agencies regulate each option so additional research will need to be conducted to make a final determination.

4. An "Open Space Plan" which clarifies the distribution of open space has been prepared.

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Should you have any questions, please do not hesitate to call me.

Very truly yours,

Valley Vineyards, LLC
By: Lauren Development, Inc.
It's Operating Manager

John L. Allday
Vice President

Attachments:

- ✓ Response, Comments & Proposed Mitigation Measures regarding LVTC Comments on Draft Initial Study; September 7, 2007, by Valley Vineyard, LLC
- ✓ Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California, September 7, 2007, by PCR Services Corporation

Copies (with attachments) to:

Supervisor Michael D. Antonovich
Bruce McClendon, Director, Department of Regional Planning
Norman Hickling, Deputy to Supervisor Antonovich
Jodie Sackett
Leona Valley Town Council

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RESPONSE, COMMENTS & PROPOSED MITIGATION MEASURES

Regarding
Draft Initial Study
for
Tentative Tract Map 066952

Prepared by
Valley Vineyards, LLC
September 7, 2007

(Prepared in response to comments sent to the Los Angeles County Department of Regional Planning, Impact Analysis Section from the Leona Valley Town Council on the above project.)

Impact Analysis Section's comments (Times New Roman, 12pt, regular, black)
Leona Valley Town Council Comments (Times New Roman, 12pt, italic, brown)
Valley Vineyard, LLC Response, Comments & Mitigations (Tahoma, 12pt, italic, blue)

September 7, 2007

Project Number TR0066952; RENVT200700035
West of & Abutting Bouquet Canyon Road;
Assessor's Parcel Numbers 3206-003-007, & 001 & 008

General Information

Location: West of and Abutting Bouquest Cyn Rd. APN (3206-03-; 007, 001 and 008)

Valley Vineyard, LLC Response and Comment:
Please note typographical error. The proper name of the road is "Bouquet Canyon Road."

Description of Project: The proposed project is a request for a tentative tract map to subdivide three parcels, 292.49 acres into 121 lots – 1.5 acres minimum to 17 acres maximum for single-family residential purposes. Home sites graded on each lot will range from approximately 10,000 square feet to 31,000 square feet. All streets will be private with the exception of the connection between 87th Street West and Lost Valley Ranch Road (currently a dirt road used by residents of Lost Valley Ranch Road), will be dedicated as a public street. The current property use is vacant and undeveloped. The project applicant is requesting a CUP (RCUP 20070038). Single-family units will consist of one and two stories. The project will use domestic water and septic sewer disposal systems. A total of 1,033,350 cubic yards of dirt will be graded and balanced on site.

Valley Vineyard, LLC Response and Comment:
In response to various County department comments, the design of Valley Vineyards has slightly changed from the original submittal in the following ways:

- Lot sizes now range from 1.5 acres to 10.0 acres.
- Home site sizes now range from 8,903 to 39,000 sf.
- Grading quantities are 1,438,555 cubic yards cut and fill, balanced on site.
- Septics vs. Local Sewer Treatment Plant. A determination of which system is being fully investigated by Valley Vineyards, LLC, and a final decision on which treatment alternative will ultimately be employed has not yet been made. Because of this, the environmental documentation covers all alternatives. The alternatives are: 1) a small localized "package" sewer treatment facility, which serves just the homes in Valley Vineyards, providing reclaimed water to support the agricultural elements of the project; 2) individual lot treatment facilities, which could provide reclaimed water on a lot by lot basis; or 3) "enhanced" septic tank systems with leach fields or pits located on each lot. Different agencies regulate each option. For example the county Public Works Department would be involved if a localized sewer treatment facility was constructed, while the County Health Department and the Regional Water Quality Control Board would be involved if individual lot treatment or enhanced septic tanks were selected. In any case, existing regulations and testing requirements would make it impossible for any alternative to have adverse consequences for the entire community. All will meet local and state codes that protect the health and safety of the Valley Vineyards residents as well as the surrounding community.
- Open Space/Trail Areas are now mapped and the open space uses clarified. Half the property will remain ungraded and twenty percent of the site will have slopes that are carefully contour graded. It is planned that vineyards will comprise approximately one half

the open space areas, resulting in over 100 acres of the site (over one third of the Valley Vineyards project) being dedicated to an agricultural element. In additional the proposed development will add approximately 1-mile of equestrian trails to the county's dedicated master trail plan. The submitted plan meets the open space requirements of the Hillside Management regulations AND is also consistent with the stated wishes of the LVTC where in they state, "Leona Valley is dedicated to the expansion of farming and equestrian uses in accordance with the Antelope Valley Areawide General Plan."

Gross Area: 292.49

Environmental Setting: The project site is located on Bouquet Canyon and approximately 1.5 mile west of Angeles National Forest. It is 2.5 miles south east of the Warnack Nature Park and approximately 3 miles north of the Antelope Valley Freeway, within the unincorporated Los Angeles County community of Leona Valley. Surrounding land uses within a 500 ft radius consist of - single-family dwelling units. There are no oak trees on site.

Leona Valley Town Council Comment:
There is a correction to this portion of the document. The project is located on Bouquet Canyon Road. It is not three miles from the Antelope Valley Freeway. The site is located eight miles from the Antelope Valley Freeway. Surrounding land uses also include vacant land and grazing land. Leona Valley is a "designated rural community".

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with LVTC's assessment.

Zoning: A-2-2; Leona Valley Community Standards District.

General Plan: N-1, Non-Urban

Leona Valley Town Council Comment:
The County of Los Angeles Planning Department document incorrectly states 0.5 du/acre. According to page IV-6 of the Antelope Valley Areawide General Plan, the entire community is designated Non-Urban 1 permitting a minimum lot size of 2-acres. According to the Antelope Valley Areawide General Plan, those properties in N-1, Non Urban use areas that are also subject to hillside management requirements, have greater restrictions. Furthermore, the development is bound by the Leona Valley Community Standards District, which permits one single-family dwelling per 2½ acres. Based upon the "clustering rule" lot sizes may be reduced to one and one-half acres in Hillside Management Areas, provided that 70% of the entire development is dedicated to natural or conservation area. The Antelope Valley Areawide General Plan has specific provisions for Non-Urban Residential Developments exceeding one dwelling unit per five acres. As identified on page V1-25 of said plan, the project can be approved to substantial compliance subject to conditions, which have not been satisfied. We believe there has been a misapplication of the clustering rule. The plan for the development in its present format does not conform to these requirements.

Valley Vineyard, LLC Response and Comment:
LVTC says that 0.5 units per acre is incorrect but that 2 acres per unit is correct. It should be noted that the two numbers mean the same thing. Therefore the County of Los Angeles Planning Department's statement is in fact correct.

LVTC incorrectly interprets the 70% open space requirements. Open space may include a number of uses including but not limited to landscaped areas, greenbelts, private yard areas (with certain restrictions), riding and hiking trails, and contour graded slopes. (22.56.215.J.1.a.) The submitted plan was designed to meet all requirements of the Antelope Valley Areawide

General Plan, Zoning and Hillside Management regulations, and Leona Valley's own CSD requirements.

It is planned that vineyards will comprise approximately one half the open space areas, resulting in over 100 acres of the site (over one third of the Valley Vineyards project) being dedicated to an agricultural element.

PROPOSED MITIGATION MEASURE: In accordance with Section 22.56.215.J.1.a. Valley Vineyards shall have at least 70 percent open space.

PROPOSED MITIGATION MEASURE: Prior to approval of the TTM, provide an open space exhibit map.

PROPOSED MITIGATION MEASURE: Prior to the issuance of any grading permit, submit and obtain the approval of a landscape plan for agriculture/viticulture areas, riding and hiking trails, areas adjacent to streets and highways and other landscaped areas.

The following is the preliminary response by the Leona Valley Town Council to the Initial Study and Impact Analysis Matrix by the County of Los Angeles Department of Regional Planning on the above referenced project. The Council reserves the right to additional commentary upon receipt of further information or changes in the project design and execution.

This is the first proposed tract home subdivision for Leona Valley, as such, the impact is anticipated to be substantial because of the following reasons:

Valley Vineyard, LLC Response and Comment:
LTVC is incorrect in that this is the first tract subdivision for Leona Valley. Most of the existing lots the members of the LVTC current reside on are a result of a tract subdivision. It is true, however, that this will be the first carefully planned subdivision, designed and engineered to be consistent with all stated objective of the Leona Valley CSD as well as the General plan, Zoning, Community Standards District and Hillside Management regulations. As documented in detail below, over forty percent (40%) of the existing lots in Leona Valley do not meet the General Plan, Zoning, Community Standards District and Hillside Management regulations.

According to Dataquick, as of July 2007 there are 520 single-family homes in Leona Valley, all of custom construction. There are no subdivisions within the bounds of this Valley. The estimated population of this rural community is over 1,800 residents. With an average household containing 3.18 residents, the proposed project will result in a population increase of over 20% to our Valley.

Valley Vineyard, LLC Response and Comment:
According to U.S. Census data, the population of Leona Valley was 1,250 in the year 2000[1]. Assuming LVTC's statement that the population in 2007 is 1,800 is correct, the population of Leona Valley has increased 44% in the last seven years, for an average increase of 6.3% per year. Using conservative rates of absorption, the Valley Vineyards project is anticipated to increase the valley's population at only 4.6% per year. This is well within the normal growth rates for Leona Valley.

The community is serviced by one school, which educates kindergarten through eighth grade students. According to the Westside Union School District, Leona Valley School provides education for

1 Census Tract 9012.06 (Blocks 1000, 1073); Census Tract 9012.07 (Blocks 1017, 1019, 1021, 1023, 1024, 1031, 1033-38, 1042); Census Tract 9102.06 (Blocks 1016, 1028, 1029, 1048, 1053, 1054, 1059)

approximately 161 students and is at full capacity unless significant capital improvements are made. Leona Valley Elementary is already bound by a pre-existing settlement agreement to accept students from the Ritter Ranch/SunCal development in the Palmdale City limits, up until the construction of the 500th residence. In addition, our elementary school will be accepting students on a mandatory basis from the new Ana Verde development in the City of Palmdale. Therefore, our elementary school is beyond full capacity.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC has received letters from all affected school districts indicating that they will serve the development. The Antelope Valley Union High School District letter indicates the site is within their district boundaries and that the subdivision will be served by the Quartz High School (Grades 9-12). The Westside Union School District letter states that the site is within their boundaries and the subdivision will be served by their Leona Valley School (Grades K-8).

As provided by law, this development will be required to mitigate impacts on school facilities by paying fees to the districts prior to issuance of building permits. Home sizes have not yet been determined for this development, however based on and estimated average of 4,000 square feet per home and current school fee rates, Valley Vineyards could generate approximately $2,000,000 in funds for these districts.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of school fees

Members of the community voiced serious objections over Valley Vineyards. Primary concerns included, but were not limited to the following:

- *Higher density/incompatible land use*
- *Adverse Impact on Leona Valley School*
- *Inadequate ingress/egress & traffic*
- *Fire Safety/Fire Department Volunteer Only*
- *Water service/pre-existing lack of water resources*
- *Incompatible with the character of Leona Valley*
- *Community opposes gated developments*
- *Impact on natural resources*
- *Septic system/contamination of ground water/waste treatment*
- *Disruption of fire access*
- *Excessive population increase*
- *Wetlands protection*
- *Bouquet Canyon is not an "all weather" road. Subject to failure in 10-year capital storm*

Valley Vineyard, LLC Response and Comment:
LVTC has misstated the facts. Representatives of Valley Vineyards, LLC have attended every regular meeting of the LVTC for over one year. Presentations have been made to the community both in these LVTC meetings and in other forums. Some of the above points have been raised in opposition to Valley Vineyards at these meetings, however many residents have also expressed satisfaction with the development. The approved minutes of the LVTC meetings (see specifically April 9 and May 14, 2007) do not mention many of the above points. Copies of these minutes can be obtained at the LVTC website - http://leonavalleytowncouncil.org

The following pages will address the citizens' concerns based on information that is fully verified. Supporting documentation is provided for your review in order to make an informed decision regarding all aspects of Valley Vineyards.

Valley Vineyard, LLC Response and Comment:

LVTC statement that the following pages are based on information that is "fully verified" is inaccurate and contradictory. This is supported by LVTC's own admission, as stated in the "General Assumptions and Limiting Conditions" at the end of their comments. Specifically:

- LVTC "cannot guarantee or be responsible for the accuracy of their comments;"
- That maps photographs and exhibits are for "illustration only as an aid in visualizing matters" and "should not be relied up for any other purpose;"
- That "no opinion is intended to be expressed for matters that require legal expertise or specialized investigation or knowledge;" and
- That the LVTC "have no specialized expertise in the fields of biology, geology, drainage, environmental impact, land use planning, zoning, roadways, trends, populations studies, hydrology, archeology or other elements related to Valley Vineyards" and that they "have relied upon private and outside technical reports and studies related to these issues and assume said reports are accurate and reliable."

The numerous technical studies prepared and previously submitted to the county, along with the comments and updated reports presented herein from Valley Vineyards, LLC, are fully verified, accurate, correctly state the facts, and are derived from one or more professional's conclusions in each technical field.

Hazards - 1. Geotechnical

a. Is the project located in an active or potentially active fault zone, Seismic Hazards Zone, or Alquist-Priolo Earthquake Fault Zone?

Planning's Response – No, project is located approximately 1 mile from the San Andreas Fault zones. (Seismic Hazard Zones Map - Sleepy Valley Quad).

Leona Valley Town Council Comment:
The Leona Valley/Bouquet region is bisected by the San Andreas Fault, a seismically active fault-line.

The unusual geotechnical aspects of Leona Valley were featured in the book California Fault by Thurston Clarke. The USGS Geologists have not fully studied Leona Valley and for decades have been in a quandary over seismic and water patterns for this community.

"Mysterious springs have been erupting along the fault (San Andreas). They had started last year when ponds dry for decades suddenly filled with water and attracted families of mallards. Torrents swept through horse barns, a spring erupted in a living room, a pond swarming with tadpoles appeared overnight at the community center, and rivulets flowed down driveways, collecting in puddles that refuse to shrink. USGS geologists took photographs and water samples, but lacked funds to map the springs and determine their source. They speculated the eruptions might be part of the natural recharge pattern caused by a sudden shift from drought to heavy rainfall, or somehow connected to the Landers earthquake or movement of plates along the fault." (California Fault, page 323; © 1996).

These events have occurred up to three miles from the San Andreas fault including areas proximate to the subject site. While we have not had an opportunity to inspect the subject site for these conditions (nor do we have the necessary expertise), similar water features have been observed on a frequent basis for properties contiguous to the subject sites. New springs have appeared in Leona Valley as recent as three weeks ago.

Leona Valley is part of what is referred to as a Rift Zone. A Rift Zone is a large area of the earth in which plates of the earth's crust are moving away from each other, forming an extensive system of fractures and faults. As such, there are fractures and fault lines dispersed throughout Leona Valley.

In addition, according to Geotechnical reports obtained by residents who have constructed homes in the Lost Valley Ranch Road vicinity, there is a fault line that runs through Lost Valley Ranch Road, adjacent to the subject site.

According to Evidence of Steep Faults in the Central Transverse Ranges From Seismic Refraction Data Abstract, "The recent LARSE II seismic experiment crossed the Central Transverse Ranges at a point north of the San Fernando Valley, CA. This experiment had both a dense receiver line (more than 1000 receivers with spacing of 100m to 500m) and a dense set of shots (approximately 100 shots with a spacing of 1km). In the Transverse Ranges, first arrival times, correlated over many shots, reveal the presence of 6 steeply dipping faults. The most prominent one of these is the Bouquet Canyon fault, which separates the younger Vasquez formation on the south, from the Pelona Schist on the north. The seismic data indicates this is a south dipping fault, which when coupled with the observation that the motion is down to the south, indicates that the region was under extension in the recent past. A full waveform modeling method was used to predict the effect of faults on the first arrivals. This was then used to locate the faults, as well as to determine their dips. The San Francisquito fault, the Clearwater fault, and the San Andreas Fault, as well as two buried faults in the Mojave Desert were detected with this method. The seismic signatures of these faults are relatively small features and are only detectable by correlating over many shot points." The site is proximate to the Bouquet Canyon Fault.

SunCal (Ritter Ranch) has recently completed an intensive study of the western section of their development, which is directly east of the subject site. Recent studies (within the last five years)have revealed newly discovered fault-lines which had previously been unknown and not mapped by the USGS. The Developer's mitigation measures fail to reduce the adverse factors to less than significant. Based on the proximity of numerous fault lines to the subject site and the frequency and volume of sudden springs in the vicinity, a more intensive geotechnical study of the site must be completed for the protection of the residents that will inhabit this seismically active location. This must include a site-specific study for earthquake fault lines.

Valley Vineyard, LLC Response and Comment:
(This response applies to paragraphs a., b., c., d. and g. of the Draft Initial Study.)

Prior to submittal of the TTM, Valley Vineyards, LLC commissioned preparation of a preliminary geotechnical analysis of the property. At least thirty (30) test pits were made on the property during that analysis. The report prepared for that investigation discusses the geologic structure, soils, seismicity, liquefaction and landslide potentials of Valley Vineyards project.[2] The report concluded that the project is suitable for the intended use provided standard construction methodologies are utilized. None of the speculations of the LVTC were found to exist by the licensed professionals who were engaged to make such determinations about the property.

A second report dealing with the feasibility of utilizing private sewage disposal systems was also prepared.[3] This report concluded that alternative systems are feasible provided the systems are constructed in conformance with controlling governmental regulations. In accordance with the above-mentioned county requirements, detailed engineering geologic analysis and reporting is currently being prepared and will be submitted for approval by the County prior to approval of the TTM.

Standard County of Los Angeles procedures require the preparation of detailed geotechnical investigations at numerous stages of the development process, and these investigations will all deal specifically with the subject site. Also, State of California regulations govern development when in proximity to certain geologic features. Prior to approval of the Tentative Tract Map, the County requires submittal and approval of a detailed engineering geologic report and a soils report. Prior to grading and again prior to building permits the County requires additional analyses and reports. All the above surveys and investigations are prepared by licensed geologists and/or soils engineers and are reviewed by geotechnical professionals at the county and/or state. County procedures require all grading to be strictly monitored by geotechnical professionals. County and State regulations governing land development insure that if any of the concerns raised by the LVTC are subsequently to be found on the site during the above investigations, or during grading operation, appropriate mitigation will be incorporated into Valley Vineyards plans and proper steps will be taken to satisfy all state and local requirements.

PROPOSED MITIGATION MEASURE: An engineering geologic report will be required to evaluate the feasibility of the proposed subdivision.

PROPOSED MITIGATION MEASURE: Provide a soils report, with sufficient subsurface exploration data, pertinent test results and analyses, which addresses and evaluates the site and the proposed development. The report must comply with the provisions of "Manual for

2 GeoConcepts, Inc., Preliminary Geologic and Soils Engineering Investigation, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California, February 5, 2007

3 GeoConcepts, Inc., Private Sewage Disposal System, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California, May 1, 2007

Preparation of Geotechnical Reports". The above reports must address the potential for liquefaction and ground failure.

PROPOSED MITIGATION MEASURE: Provide chemical test results (sulfate, chloride, resistivity, etc.) for the on-site soils to address the presence of chemicals deleterious to construction materials and utility lines. Recommend mitigation as necessary.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

PROPOSED MITIGATION MEASURE: Prior to tentative map approval for drainage/grading, submit a drainage concept showing the extent of drainage impacts and provide mitigation acceptable to the County. The analysis should address increases in runoff, any change in drainage patterns, debris producing areas, and the capacity of existing storm drain facilities. Provide line identification of all proposed drainage facilities. Preliminary soils and geology reports related to debris, retention, and detention basins may be required based on geographic and adverse geotechnical conditions.

PROPOSED MITIGATION MEASURE: Provide engineering calculations to support sizing of debris, retention, and detention basins. Provide approximate flood hazard and bank erosion setbacks and lot identifications (as needed). Show slopes for existing and proposed streets. Provide a letter of intent for any offsite work. Comply with Antelope Valley Drainage Policy.

PROPOSED MITIGATION MEASURE: Comply with Interim Peak Flow Policy, adopted by the Regional Water Quality Control Board February 1, 2005. The Peak Flow Standard shall require that all post-development runoff from a 2-year, 24-hour storm shall not exceed the pre-development peak flow rate, burned, from a 2-year, 24-hour storm. The Peak Flow Standard shall also require that post-development runoff from the 50-year capital storm shall not exceed the pre-development peak flow rate, burned and bulked, from the 50-year capital storm.

b. Is the project site located in an area containing a major landslide(s)?

Planning's Response – Yes

Leona Valley Town Council Comment:
"Yes", the Leona Valley Town Council agrees with this response. The site is mapped for liquefaction conditions as well as landslides.

According to the Seismic Hazard Zone Report for the Sleepy Valley 7.5-Minute Quadrangle prepared by the Department of Conservation, California Geological Survey 2003, "Landslides are most abundant along the steep north and south facing slopes of the Sierra Pelona in the central part of the Sleepy Valley Quadrangle...Landslides in the area range from small surficial failures along road-cuts and stream cuts to very large translational and rotational landslides."

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

c. Is the project site located in an area having high slope instability?

Planning's Response – Yes, the site is located within a liquefaction area.

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this response.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

d. Is the project site subject to high subsidence, high groundwater level, liquefaction, or hydrocompaction?

Planning's Response – Yes, Liquefaction (Seismic Hazard Zones Map - Sleepy Valley Quad)

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this response. Considering the high water table, the random occurrence of streams/ponds and the fact that the USGS has not fully studied these conditions for this community, special considerations must be taken in the development of this site.

According to the Seismic Hazard Zone Report for the Sleepy Valley 7.5-Minute Quadrangle prepared by the Department of Conservation, California Geological Survey 2003, "In Leona Valley & Pelona Valley, ground-water levels have been measured at less than 10 feet. In narrow canyons ground water depth is assumed to be less than 10 feet during wet periods." Liquefaction conditions are more abundant and likely under these conditions.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

e. Is the proposed project considered a sensitive use (school, hospital, public assembly site) located in close proximity to a significant geotechnical hazard?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this response. The site is not a school or hospital and will not be utilized for public assembly.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

f. Will the project entail substantial grading and/or alteration of topography including slopes of over 25%?

Planning's Response – No

Leona Valley Town Council Comment:
According to the plans supplied by the Developer, approximately 50% of the land area is subject to grading.

Valley Vineyard, LLC Response and Comment:
The County's hillside management regulations (Chapter 22.56.215) are designed to maintain, to the extent possible, the natural topography of an area while allowing development. The Valley Vineyard's plan is in complete compliance with these regulations. The underlying design concept for this development is to minimize grading, which has been done.

The site will not be "mass graded;" the entire property will not be cut or filled to create

building sites. Rather, grading will be limited to only about 50% of the property. The remaining graded area will consist of pads (20% of the site), streets and driveways (11% of the site) and graded slopes (19% of the site).

In order to accomplish contour grading of the Valley Vineyards site, manufactured slopes will be graded with slopes that are less steep than 2:1 and/or undulated to mimic the natural contours of the site.

The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact. Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that houses will not intrude into the ridgeline. Specifically, the pads nearest the ridgeline to the north, on Lots 16, 18, 38, 34, 24, 25, 26, 28 are lower than the ridgeline by 66', 113', 99', 67', 184', 182', 158' and 105' respectively. Pads to the south of the major east west ridgeline, on Lots 30, 31, 32, 33, 40, 41 42, 39 and 7 are lower than the ridgeline by 38', 58', 72', 77', 74', 79', 53' and 54' respectively. Clearly the sensitive grading proposed for Valley Vineyards will not impact the predominant ridgeline on the site.

Given the large size of the Valley Vineyard's lots – 1.5 acres to 10 acres – actual pad sizes could have been much larger. However in order to minimize grading, the actual homesites on each lot will range from 8,903 to 39,000 square feet.

In many parts of the site, a homesite on one lot will be graded separately from the pad on the adjoining lot, instead of running long tiers of graded pads together. This will further add to the natural look of the property.

To further minimize grading, the interior street pattern largely follows the existing topography, thus avoiding the necessity to make major cuts and fills into the existing terrain. For example, "B" Street – the main east/west interior street – straddles the side of the contours and gently increases in elevation, following the natural increase in elevation. The same is true of "C" Street, the second longest street in the devilment. The connector road between 87th Street West with Lost Valley Ranch Road was designed to stay parallel to, but generally away from, the nearby unnamed streambed.

Clearly, the grading plan for this site has been prepared with sensitivity and skill so that the natural contours of the property are respected. In addition attention has been paid to the county's future goals:

> Figure 5.6 in the Conservation & Open Space Element of the **proposed County General Plan** lists eleven (11) "Design Guidelines for a Model Project in Hillside Management Areas." Valley Vineyard's design is consistent with each of those guidelines and is definitely a model for development in a hillside area.

PROPOSED MITIGATION MEASURE: Valley Vineyards is subject to the Hillside Management regulations contained in Chapter 22.56.215. Therefore this project must comply with this ordinance.

g. Would the project be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code (1994), creating substantial risks to life or property?

Planning's Response – No

Leona Valley Town Council Comment:
A soil study has not been provided for review. There are conditions pertaining to this site that could create risks to life and property, therefore, the LVTC wishes to review the soils report in order to ascertain the conditions of this site.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

h. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
The protected Bouquet Canyon Creek appears to traverse this site. The proposed ingress/egress location at Bouquet Canyon Road has historically flooded and closed during heavy winter rains and snow. The Bouquet Canyon Creek traverses the subject site, crosses Bouquet Canyon Road and drains onto the Ritter Ranch/Sun Cal property. This drainage channel then rejoins the Amargosa Creek.

A secondary creek runs from Lost Valley Ranch Road drains off of the subject site and bisects properties between 86th and 87th Street West. A controlled drainage system needs to be installed. The drainage system must be unlined as to protect existing sub-surface, often dormant, endangered habitat that occupies these areas.

The site and improvements are specifically bound by State and Federal requirements. Quoting CEQA guidelines on the State of California website:
"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habit of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."
We believe this requirement would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered unarmored threespine stickleback fish.

Valley Vineyard, LLC Response and Comment:
LVTC incorrectly states that the wetland that skirts the southeast corner of Valley Vineyards is "Bouquet Canyon Creek." Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards. The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small, unnamed, northeast flowing tributary into the Armagosa Creek. This creek – referred to in the Wetlands Analysis as "Drainage Area B" – skirts the extreme southeast corner of the property. Valley Vineyards has been designed to keep all homes and grading completely away from this channel in order to not impact it in any way.

As required by standard county government safety requirements, Valley Vineyards has two (2) points of ingress/egress to the development so if one access point is unavailable

there is an alternative for residents and emergency vehicles to enter/exit the site.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

LVTC states: "a controlled drainage system needs to be installed" for Drainage Area "A" along Lost Valley Ranch Road, and that "it must be unlined." As a part of the standard county development review process, Valley Vineyards, LLC will be required to show that the drainage within this channel will be properly designed and installed.

Statements concerning impacts on downstream areas are unfounded. In accordance with existing government regulations, no more water will leave this site after development than does at the present time. Government regulations require that the velocity, volume, location and peak flows of water leaving a site not be increased, and those requirements are being strictly adhered to in the design of this development. Valley Vineyards, LLC is currently in the process of developing a detail hydrological study as is required by the county.

PROPOSED MITIGATION MEASURE: Comply with Interim Peak Flow Policy, adopted by the Regional Water Quality Control Board February 1, 2005. The Peak Flow Standard shall require that all post-development runoff from a 2-year, 24-hour storm shall not exceed the pre-development peak flow rate, burned, from a 2-year, 24-hour storm. The Peak Flow Standard shall also require that post-development runoff from the 50-year capital storm shall not exceed the pre-development peak flow rate, burned and bulked, from the 50-year capital storm.

The wetlands investigations undertaken for Valley Vineyards, and the design considerations made to minimize the impacts of development on the riparian areas of this property were thoroughly discussed in the Initial Study Questionnaire dated February 12, 2007, which was submitted to the county for Valley Vineyards.

LVTC's discussion of endangered species is without foundation and is refuted by the professionally prepared biological survey reports submitted to the county.[4] By way of example, the LVTC speculates, without any basis for such speculation that: "We believe this requirement [for an EIR] would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area." However the biological survey prepared by licensed biologists for this site clearly states: "The Site is within the critical habitat area for the California red-legged frog however suitable habitat for this species does not occur within the site."

Because of the concern expressed by LVTC, however, Valley Vineyards commissioned a supplemental response was prepared by PCR and is attached hereto[5], they elaborate by stating that the site "does not support suitable habitat for the California red-legged frog <u>or any other aquatic sensitive species such as the unarmored threespine stickleback."</u>

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4 PCR Services Corporation, Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California, August 15, 2006

5 PCR Services Corporation, Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California, September 7, 2007

The subject of wildlife threatened by Valley Vineyards is more fully addressed in "RESOURCES – 3. Biota" below.

Prior to commencement of the design of Valley Vineyards, a detailed analysis of the riparian areas on the site was also prepared. This analysis determined the extent to which review of development plans would be subject to the California Department of Fish & Game (CDFG), the U.S. Army Corps of Engineers (USACofE), and other agencies. This analysis was prepared by professional wetlands experts who conducted on-site investigations on the property. A report summarizing their analysis was prepared and submitted to the county as a part of the Initial Study Questionnaire.[6]

The two riparian corridors on Valley Vineyards will be largely untouched. They are referred to in the aforementioned wetlands study as "Drainage A" and "Drainage B."

- Drainage Area A: This is the unnamed channel that parallels the existing dirt connection road between 87th Street West and Lost Valley Ranch Road. This channel totals 2,790 linear feet and only 0.67 acres (10.5 linear feet average width) is considered to be a CDFG jurisdictional wetland. In order to minimize the adverse environmental consequences of this development, there is only one location, an overcrossing, where the wetlands will be impacted, however this overcrossing was purposely located southeast of the terminus of the "blue line" stream so as to avoid major impact. Otherwise, the <u>proposed site plan intentionally avoids the channel completely</u>. This unnamed channel, and its value as an environmental resource, will actually be improved by this development. This area has been adversely impacted over the years by residents using the adjacent illegal dirt road that has been created across Valley Vineyards property; The channel and roadway have been continually modified by residents in order to insure that this illegal dirt road is passable, and silt and trash is constantly being deposited into the channel. One can also see automobile or truck tracks across this channel bed. Grading and paving of the adjacent street by Valley Vineyards will intentionally be kept approximately 100' to 200' away from the channel bed. This will keep traffic out of the channel and minimize erosion and silt deposition into the channel, allow the channel to return to its natural condition. The Valley Vineyards Homeowners' Association will be charged with the responsibility to insure that trash is not left in the channel.
- Drainage Area B: This riparian area, which will be totally untouched by Valley Vineyards. It is referred to in the aforementioned wetlands study as "Drainage B." It is approximately 41,400 square feet in size. Along its length of 1,590 linear feet, only 0.95 acres (average width of 26 lineal feet) is considered a CDFG jurisdictional wetland. In order to minimize the adverse environmental consequences of Valley Vineyards, <u>the proposed plan intentionally avoids Drainage Area B completely</u>. The plan will have absolutely no impact on this CDFG jurisdictional area.

LVTC incorrectly states that the wetland that skirts the southeast corner of Valley Vineyards is "Bouquet Canyon Creek." <u>Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards.</u> The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small, unnamed, northeast flowing tributary into the Armagosa Creek. This creek – referred to in the

6 PCR Services Corporation, Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California, August, 2006

Wetlands Analysis as "Drainage Area B" – skirts the extreme southeast corner of the property. Valley Vineyards has been designed to keep all homes and grading completely away from this channel in order to not impact it in any way.

Of the nearly 300 acres comprising Valley Vineyards, only 1.62 acres are considered CDFG jurisdiction streambed and associated riparian habitat. With the exception of a required secondary access, all development will deliberately be kept away from these jurisdictional areas. All required permits will be obtained and all mitigation measure required by any agencies will be followed.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

STANDARD MITIGATION MEASURES

☐ Building Ordnance No. 2225 – Section 308B, 309, 310, and 311 and chapters 29 and 70

OTHER CONSIDERATIONS/MITIGATIONS

☐Lot Size ☐Project Design ☐Approval of Geotechnical Report by DPW

Comply with SCM recommendations from Public Works

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on geotechnical factors?

Planning Response:

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

Leona Valley Town Council Comment:

Based on the above LVTC comments, we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on geotechnical factors and should be further examined or disapproved until these factors are resolved to the satisfaction of the community and to prudent safety standards as required by local, State and Federal law.

There are no plans to control drainage onto Bouquet Canyon Road, Feeney Road, 87th Street West, 86th Street West and Lost Valley Ranch Road. The elevation of Lost Valley Ranch Road has changed by four feet in the last thirty years due to debris build-up and flow onto and off of the subject site. No evidence has been provided as to mitigation measures for this site-specific problem.

Valley Vineyard, LLC Response and Comment:

First, numerous professionally prepared geotechnical, biological, environmental and wetlands surveys have been conducted for Valley Vineyards. These surveys show that this site is not inhabited by the endangered species speculated to be on this site by the LVTC and that there are no unusual, significant or un-mitigatable features existing, including any increase to downstream flows.

Second, the design of Valley Vineyards has been in strict adherence to the general plan, existing zoning requirements, and the provisions of the Hillside Management regulations. And most notably, the design of Valley Vineyards has been in strict adherence to the

Leona Valley Community Standards District requirements.

Third, the design of the proposed development is sensitive to exiting watercourses, sensitive habitat areas, ridgelines etc., as discussed above.

Finally, detailed government regulations and review requirements assure that any unsafe conditions will not occur.

HAZARDS - 2 Flood

a. Is the major drainage course, as identified on USGS quad sheets by a dashed line, located on the project site?

Planning's Response – Yes, *unknown creek runs through this site.*

Leona Valley Town Council Comment:
The "unknown:" creek as identified in the Planning Document is the Bouquet Canyon blue-line creek. It connects directly with the Amargosa Creek, which was created by the San Andreas Fault. The Bouquet Canyon Creek is protected by State and Federal agencies. During the heavy winter rains of 2004/2005 many sites along Bouquet Canyon were inaccessible due to over- flooding and extension of Bouquet Canyon creek into the roadway and onto driveways. Water and debris drain from the subject site onto the roadway, at times making it impassable. The Department of Fish & Game prevented grading and removal of the mudflow from these locations because of the protected species within this sometimes dry waterway.

The plan, as submitted, and based on the analysis by the County of Los Angeles, makes no provision to protect this stream with known protected species. Section 1601 of the California Fish and Game Code protects the natural flow, bed, channel, and bank of any river, stream or lake designed by the California Department of Fish and Game (CDFG) in which there is at any time an existing fish or wildlife resources or benefit for the resources. As required by law, project plans must be submitted to CDFG that are sufficient to indicate the nature of the project for construction if the project will do the following:

- *Divert, obstruct, or change a streambed*
- *Use materials from the streambeds*
- *Result in disposal; or deposition of debris, waste or other material containing crumbed, flaked or ground pavement where it can flow into a stream.*

Because of the variances in rainwater fall and water table in this area, the size, width and depth of the stream changes regularly. Nevertheless, the California Department of Fish and Game has taken active measures to protect this natural resource.
As previously stated: The protected Bouquet Canyon Creek traverses this site. A creek that runs from Lost Valley Ranch Road also traverses the site. The proposed ingress/egress location at Bouquet Canyon Road has historically flooded and closed during heavy winter rains and snow. The project may cut and grade near this protected waterway. The Bouquet Canyon Creek traverses the subject site, and crosses Bouquet Canyon Road, draining to the Ritter Ranch/Sun Cal project and rejoining Amargosa Creek.

The site and improvements are specifically bound by State and Federal requirements that have not yet been abided to in this process. Again, quoting CEQA guidelines on the State of California website:

"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."

We believe this requirement would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered unarmored threespine stickleback fish.

Valley Vineyard, LLC Response and Comment:
The assertions by the LVTC that Bouquet Canyon Creek "traverses" or "crosses" the site, and that the proposed plan "makes no provision to protect the stream," are incorrect.

LVTC incorrectly states that the wetland that skirts the southeast corner of Valley Vineyards is "Bouquet Canyon Creek." Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards. The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small, unnamed, northeast flowing tributary into the Armagosa Creek. This creek – referred to in the Wetlands Analysis as "Drainage Area B" – skirts the extreme southeast corner of the property. Valley Vineyards has been designed to keep all homes and grading completely away from this channel in order to not impact it in any way.

(See also response under HAZARDS – 1 Geotechnical, paragraph h above)

The LVTC states that Valley Vineyards has "not yet" abided by state and federal requirements concerning wetlands alteration. As discussed above, Valley Vineyards, LLC commissioned preparation of an on-site investigation of the wetland areas on this property. That report identified precisely which portions of the property are subject to the jurisdiction of the California Department of Fish and Game (CDFG) and the U.S. Army Corps of Engineers (USACofE) and other agencies. That report has been submitted to the county as a part of the Initial Study Questionnaire. The presence of some very minor portions of the property being wetlands was a controlling factor in the design of the property. As indicated above, all development is well away from "Drainage Area B" and only one small portion – an overcrossing – impacts "Drainage Area A" on the site. Valley Vineyards, LLC is aware of – and will comply with – all requirements, permits, etc., of all government agencies concerning development in wetland areas.

LVTC's assertions that there are endangered species on the property have no foundation and do not include any professionally prepared reports specific to the development. Further, their comments are refuted by the professionally prepared biological survey submitted to the county.[7]

For example, the LVTC speculates: "We believe this requirement [for an EIR] would apply to the critical habitat location of the red-legged frog, which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area." However the biological survey that Valley Vineyards, LLC commissioned for this site states "The Site is within the critical habitat area for the California red-legged frog however suitable habitat for this species does not occur within the site."

The subject of wildlife threatened by Valley Vineyards is more fully addressed in "RESOURCES – 3. Biota" below.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Sections 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

7 PCR Services Corporation, Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California, August 15, 2006

Regarding the entry on Bouquet Canyon Road being flooded, Valley Vineyards has two (2) points of access so if one access point is blocked there is an alternative for residents and emergency vehicles to enter and/or leave the site. Roads will be engineered to County Public Works and County Fire standards for safety, including analysis of potential flood conditions. As stated previously, all requirements are in accordance with standard county government safety requirements.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

IT should be noted that current access for all of the homes on Lost Valley Ranch Road is by illegally trespassing over Valley Vineyards' property via a dirt path extension of 87th Street West. There are no recorded easements or public roadway in this area. Over the years this dirt path has flooded due the adjacent street and poor maintenance. It is the intention of Valley Vineyards, LLC, as part of the TT map approval, to improve the roadway to county "all weather" standards, dedicate this road to the county as a public street, and thereby give the residents of Lost Valley Ranch Road legal access to their homes. As a result, the occasional flooding that occurs on this dirt path, which results in difficult access conditions for the homes on Lost Valley Road, will no longer occur.

PROPOSED MITIGATION MEASURE: Offer for dedication to the county the extension of 87th Street West over the subject property. Improve the extension to "all weather" conditions.

b. Is the project site located within or does it contain a floodway, floodplain, or designated flood hazard zone?

Planning's Response – No.

Leona Valley Town Council Comment:
LVTC disagrees with this response. The Bouquet Canyon creek traverses this site. This is a blue line waterway. There is also local flooding of the Bouquet Canyon Roadway. Because of numerous serious capital storm events the County of Los Angeles Department of Public Works has recently determined that Bouquet Canyon Road cannot sustain a ten-year capital storm.

There has been regular flooding events on Lost Valley Ranch Road, 86th Street West, 87th Street West and Vientos Drive. Water drains from the subject site and Lost Valley Ranch Road. This creek is not identified on a map. This active stream floods from Lost Valley at the terminus of 87th Street West and flows north, making this roadway impassable and flooding private property during heavy winter rains. Leona Valley has had repeated documented rainfall in the range of 34 to 50 inches in one year, which is much greater than the County average. Therefore, greater efforts must be made to accommodate the unusually high rainfall in this foothill location.

When private property has flooded in the area of 86th and 87th Street West, the State of California Department of Fish and Game has prohibited residents from clearing their sites of debris or redirecting the stream in any fashion. Therefore, we are of the belief that this is an undocumented blue line stream (with the County) but is protected by the State of California Department of Fish and Game. Furthermore, the original location of Lost Valley Ranch Road was lost four times in the last thirty years, because the roadway turned into a major stream. Access to homes at times requires the use of a four-wheel drive vehicle and at times, could not be accessed at all. Because

of the regular flooding events on Bouquet Canyon Road (cannot sustain a 10-year capital storm), 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road, we believe the response by the County of Los Angeles Planning Department is incorrect.

Valley Vineyard, LLC Response and Comment:
LVTC cites past incidents of flooding on the smaller of the two wetland areas, and concludes by stating "therefore, greater efforts must be made to accommodate the unusually high rainfall in this foothill location." Existing county procedures require the consideration of localized rainfall averages in the design of all facilities, which has been done.

According to the Los Angeles County Department of Public Works, only one all-weather access point is required, which is the 87th Street West access point. According to Public Works, the inadequacy of Bouquet Canyon Road near the main entry into Valley Vineyards is only because silt has built up on the east side (city of Palmdale / Ritter Ranch side) of Bouquet Canyon Road. According to Public Works, minor clean-out work along the east side of Bouquet Canyon Road would remedy any potential for periodic flooding.[8]

LVTC states how the dirt road that traverses this property (87th Street West) has been washed out by prior storms. Standard design requirements of both the county department of public works and the fire department will mandate that this road be an "all weather roadway," as defined by current code. By doing this, Valley Vineyards, LLC will be improving access to those on Lost Valley Ranch Road and the entire community of Leona Valley, as compared with the present condition.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

PROPOSED MITIGATION MEASURE: Offer for dedication to the county the extension of 87th Street West over the subject property. Improve the extension to "all weather" conditions.

c. Is the project site located in or subject to high mudflow conditions?

Planning's Response – No

Leona Valley Town Council Comment:
The LVTC disagrees with the Counties' disposition of "No" this should be a "Yes". As previously stated, the site has been subject to flooding and adjacent roadways have been impassable. (See photos)

Valley Vineyard, LLC Response and Comment:
(This response also covers LVTC's comment on paragraph d.)

Improvements to the connection between 87th Street West and Lost Valley Ranch Road, and the stabilization of the unnamed drainage course that runs adjacent to this roadway, will remedy an existing situation by causing a decrease in mud and erosion rather than the opposite. Government regulations require that the velocity, volume, location and

8 Jeff Harkins, LA County Public Works, August 30, 2007

peak flows of water leaving a site not be increased, and those requirements are being strictly adhered to in the design of this development.

PROPOSED MITIGATION MEASURE: All drainage facilities and street improvements must be approved by the County Department of Public Works.

LVTC is incorrect when they state that the improvements to the connection between 87th Street West and Lost Valley Ranch Road, and the stabilization of the unnamed drainage course that runs adjacent to this roadway, must be approved by downstream property owners. There will be no increase in the flows leaving the subject property. There will be no need for off property improvements. There will be no need for downstream property owners to approve anything.

PROPOSED MITIGATION MEASURE: Comply with Interim Peak Flow Policy, adopted by the Regional Water Quality Control Board February 1, 2005. The Peak Flow Standard shall require that all post-development runoff from a 2-year, 24-hour storm shall not exceed the pre-development peak flow rate, burned, from a 2-year, 24-hour storm. The Peak Flow Standard shall also require that post-development runoff from the 50-year capital storm shall not exceed the pre-development peak flow rate, burned and bulked, from the 50-year capital storm.

d. Could the project contribute or be subject to high erosion and debris deposition from run-off?

Planning's Response – No

Leona Valley Town Council Comment:
Unless significant improvements are made to the areas around the two
streams and roadways (which are already subject to failure) the Leona Valley Town Council must disagree with this response.

It is assumed that the State of California Department and Fish & Game as well as the associated environmental protection agencies will approve the alterations to the existing streams and corrective measures to improve 87th Street West, 86th Street West, Lost Valley Ranch Road, Vientos Drive and Bouquet Canyon Road in order to insure the roadways and adjacent properties are protected from debris disposition, erosion and water flow (assuming such improvements are desired by the homeowners). The property owner has failed to protect adjacent properties from mudflow and adverse drainage over the years, because these are natural streams. Therefore, in order to protect nearby properties, significant alterations must be made to control drainage and protect the streams. These improvements must be approved by the impacted property owners who live on 87th Street West, 86th Street West, Lost Valley Ranch Road and Vientos Drive; as well as the 38700 to 39000 block of Bouquet Canyon Road, Leona Valley. Protective measures must maintain the rural rolled curb of said roadways. The improvements must comply with the rural standards of the Leona Valley Community Standards District and the Antelope Valley Areawide General Plan.

Valley Vineyard, LLC Response and Comment:
Please see (c) above.

e. Would the project substantially alter the existing drainage pattern of the site or area?

Planning's Response – No

Leona Valley Town Council Comment:
In order to make the contiguous and adjacent roadways safe for the increased population demands, significant alterations must be made to the existing streams and drainage that emanates from this site. The property owner has failed to protect adjacent properties from mudflow and adverse drainage over the years, because these are natural streams. Therefore, in order to protect nearby properties, significant alterations must be made to control drainage and protect the streams.

The newly developed sites will be fully compacted in accordance with modern building standards. As such, these sites will not be able to support the same drainage that has historically occurred. As such, there will be an increase in runoff to the existing drainage streams, which are already subject to flooding and contribute to hazardous area conditions.

Valley Vineyard, LLC Response and Comment:
LVTC is incorrect. There will be no impact upon or alteration of the drainage area at the southeast corner of Valley Vineyards (referred to as "Drainage Area B"), nor will Valley Vineyards increase downstream flows.

Paving what is presently an illegal dirt road that runs alongside the unnamed drainage course on the property (referred to as "Drainage Area A") – while remaining away from the drainage course itself – will not alter the drainage pattern. By paving the adjacent dirt road, erosion will no longer enter the channel, and the channel will not be able to damage the road and disrupt access to properties along Lost Valley Ranch Road.

PROPOSED MITIGATION MEASURE: Prior to tentative map approval, Valley Vineyards, LLC will submit a drainage concept plan showing the extent of drainage impacts and provide mitigation acceptable to the County. All county regulations concerning drainage, including the Antelope Valley Drainage Policy will be adhered to.

PROPOSED MITIGATION MEASURE: Comply with Interim Peak Flow Policy, adopted by the Regional Water Quality Control Board February 1, 2005. The Peak Flow Standard shall require that all post-development runoff from a 2-year, 24-hour storm shall not exceed the pre-development peak flow rate, burned, from a 2-year, 24-hour storm. The Peak Flow Standard shall also require that post-development runoff from the 50-year capital storm shall not exceed the pre-development peak flow rate, burned and bulked, from the 50-year capital storm.

f. Other factors (e.g., dam failure)?

Planning's Response – Maybe

Leona Valley Town Council Comment:
Information pertaining to the specific biota/environmental resources of Bouquet Canyon are available in the attached exhibits:

- *USGS Parasite Analysis of Native and Non-native Fish in the Angeles National Forest, 2001 Final Report*
- *Biological Resources Assessment for the Newhall County Water District Vasquez Water Main Project, Santa Clarita, California*
- *University of California Santa Barbara, Prioritizing Sites along the Santa Clara River for Conservation of Threatened and Endangered Species, June 2000*
- *State of California, The Resources Agency, Department of Fish & Game: Distribution,*

Reproduction Success and Impact of Nest Parasitism of Brown-Headed Cowbirds on the Least Bell's Vireo's.

- *West Mojave Habitat*
- *Vermillion Flycatcher*
- *The Antelope Valley Areawide General Plan*
- *San Andreas Rift Zone*

Valley Vineyard, LLC Response and Comment:

All comments by LVTC regarding the biological impacts of this development are entirely unsupported by professionally prepared, site specific studies of Valley Vineyards submitted with the Initial Study and referenced throughout this response..
Please see "RESOURCES – 3. Biota" for detailed information.

STANDARD CODE REQUIREMENTS

☐ Building Ordinance No 2225-Section 308 ☐ Ordinance No. 12,114 (Floodways
☐ Approved Drainage Concept by DP

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐ Lot Size ☐ Project Design
Comments: Comply with SCM recommendations from Public Works

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, impacted by, flood (hydrological) factors?

Planning Response:
☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

Leona Valley Town Council Comment:

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on or will be impacted by flood (hydrological) factors. Therefore, the LVTC recommends significant corrections and interface with the State of California Department of Fish & Game and impacted property owners on Lost Valley Ranch Road, 86th Street West, 87th Street West, Vientos Drive and the 38700 to 39000 block of Bouquet Canyon Road, Leona Valley.

Due to the fact that these roads can be impassable during storm events, that mud flow has occurred on nearby properties, and that a protected blue line stream traverses the site, we believe the hydrological factors are potentially significant and must be resolved prior to the approval of this subdivision.

Valley Vineyard, LLC Response and Comment:

The LVTC statement that compaction of this site will result in an increase in runoff is inaccurate. Existing government regulations restrict increasing downstream water flows, which is an apparent major concern of the LVTC. Valley Vineyards will adhere to all government requirements regarding such drainage.

All CDFG regulations are being considered and will be adhered to.

A secondary access point, in accordance with government requirements, is incorporated into Valley Vineyards.

HAZARDS - 3. Fire

a. Is the project site located in a Very High Fire Hazard Severity Zone (Fire Zone 4)?

Planning's Response – Yes, *Very High Fire Hazard Severity Zone*

Leona Valley Town Council Comment:
The LVTC concurs with the County's assessment of this item. This location is at least 20 minutes from a fully staffed fire station. Green Valley's and Leona Valley's Fire Stations are call (volunteer) stations and presently having staffing problems. The nearest responding fire stations are in Quartz Hill and Lake Hughes.

Valley Vineyard, LLC Response and Comment:
Standard conditions of approval imposed by the county mitigate the fact this site is within a fire hazard zone. For example, a Fuel Modification Plan is required and the developer, future residents and the future HOA must maintain the brush clearance requirements of that plan. The lengths, widths, and surface materials for streets and driveways are strictly enforced, as is the number of access points into such a development. Home construction requirements are stricter in fire hazard zones, with Uniform Fire Code and Uniform Building Code restrictions governing design and materials that mitigate the possibility of fire. Valley Vineyards will comply with all such requirements.

PROPOSED MITIGATION MEASURE: A "Fuel Modification Plan" shall be submitted and approved prior to final map clearance.

PROPOSED MITIGATION MEASURE: Access shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 902 of the Fire Code, which requires all weather access. All weather access may require paving.

PROPOSED MITIGATION MEASURE: Where driveways extend further than 300 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.

PROPOSED MITIGATION MEASURE: All street widths and lengths shall meet the approval of the Fire Department.

PROPOSED MITIGATION MEASURE: Fire hydrant locations shall be approved by and meet the design standards of the Fire Department.

b Is the project site in a high fire hazard area and served by inadequate access due to lengths, width, surface materials, turnarounds or grade?

Planning's Response – No

Leona Valley Town Council Comment:
The LVTC disagrees with Planning's disposition of this item. The site does not presently have

adequate access due to lengths, width, surface materials, turnarounds or grade. 87th Street West was impassable during the last firestorm.

The County of Los Angeles Planning Department in conjunction with the Leona Valley Town Council completed a study of the housing patterns in Leona Valley in the early 1990s. It was determined at that time that 90% of the population of Leona Valley is located south of Elizabeth Lake Road. During a firestorm event, the majority of the occupants of this Valley will exit from the corner of Leona Avenue and 90th Street West.

Because this is an equestrian and agricultural oriented community, evacuations also include hundreds of head of livestock/horses. The ingress/egress for the subject site is at 87th Street West with a secondary access at Bouquet Canyon Road. While the developer has indicated that the main exit area is Bouquet Canyon Road, this is contrary to the direction and formation of the roadways, which better supports an exit at 87th Street West. 87th Street West has better access to the elementary school and the commercial district/restaurants in town, making this the most likely exit point. The topography of the existing road, 87th Street West, is comprised of level and sloping terrain. This means those who travel at the north end of 87th Street West and drive south on 87th Street West cannot see over the grade and are blind to on coming traffic. The same holds true for those driving north on 87th Street West.

During the 2004/2005 winter rains, Bouquet Canyon Road was closed for several months. There was significant mud and debris flow emanating from the subject site onto the roadway. According to the County of Los Angeles Department of Public Works, Bouquet Canyon Road cannot withstand a ten-year capital storm.

87th Street West is a dedicated forty-foot wide residential street, however, is improved to a narrower width in most locations. The improved width is 24 to 30 feet. According to the Antelope Valley Areawide General Plan, future local street improvements should be limited to a maximum paved width of twenty-four feet. Area homeowners should not be required to make widening improvements to the roadway to accommodate Valley Vineyards. When vehicles are parked on one to two sides of the street, the passageway between vehicles is only 14-20 feet.

Ingress/egress is clearly inadequate in this location during firestorms. The turn around for fire trucks and equipment is often difficult when multiple engines are on the scene. It is our understanding that some improvements will be made to Lost Valley Ranch Road (where it connects to the project), which is an unpaved road. 87th Street West and Leona Avenue have not been planned nor is it wide enough to handle the additional traffic for evacuation purposes. Lost Valley Ranch Road has washed out and was relocated four times in the last thirty years.

Valley Vineyard, LLC Response and Comment:

Contrary to statements by LVTC, Valley Vineyards will actually **improve** fire safety for the entire community of Leona Valley. At present, the only access point into Leona Valley proper is via 90th Street West to Elizabeth Lake Road – the ONLY escape route for the valley in case of fire. If there were a disaster in Leona Valley that demanded a massive evacuation of the community, 383 lots (276 homes) now have only one way out.[9] Development of Valley Vineyards will create a much needed secondary emergency access route for the entire community.

9 Los Angles County Assessor

The county fire department reviewed the submitted TTM and recommended certain interior layout changes concerning the length of cul de sacs and driveways for vehicular access and maneuverability. Valley Vineyards, LLC made the requested changes and the site plan is now satisfactory to the fire department. Valley Vineyards is otherwise adequately served by adequate access.

LVTC is incorrect when they speculate that nearby homeowners will be required to make widening improvements to their roads to accommodate Valley Vineyards. That is untrue.

LVTC should be aware that due to the danger of one point of ingress/egress into their community, there could come a time when the fire department will no longer allow issuance of any building permits until a second point of access is developed.

c. Does the project site have more than 75 dwelling units on a single access in a high fire hazard area?

Planning's Response – Yes

Leona Valley Town Council Comment:
The LVTC has no comments at this time.

Valley Vineyard, LLC Response and Comment:
This is a typographical error. This determination should be **"NO"** as Valley Vineyards has two (2) access points, as required by the fire department.

d. Is the project site located in an area having inadequate water and pressure to meet fire flow standards?

Planning's Response – No.

Leona Valley Town Council Comment:
The Leona Valley Town Council strongly disagrees with this comment. In 1994, there was a fire at the location of 107th Street West at the western end of Leona Valley. Shortly after the fire started, the fire hydrants went "dry" and air support was necessary to battle this devastating blaze. This is not because of inadequate water pressure alone, but because the water wells in Leona Valley went dry. The water service in this community is inadequate to support the existing population base. This is substantiated in the meeting minutes for the August 2004 Leona Valley Town Council Meeting. Officials with California Water Service specifically stated that the wells in Leona Valley produce only 80 acre feet of water per year, while the community uses approximately 365 acre feet per year. The shortfall is obtained from AVEK (Antelope Valley East Kern Water Agency), which is an interruptible secondary agricultural water source and has been shut off for days to weeks at a time. It is also interruptible if an inadequate allotment is made to our area by authorities or in the event of an earthquake or unforeseen shutdown or repairs.

A will-serve letter created by California Water Service failed to acknowledge or factor in the pre-existing dire conditions that impact the limited resources of Leona Valley – conditions that the Company itself has cited.

According to California Water Service, the water supply in Leona Valley is inadequate to sustain the current community. How then, with no infrastructure improvements, can the water company claim to be able to provide water for an additional 21% increase in housing units? California Water Service must clarify this discrepancy with sound substantiated documentation before this aspect of the project can be approved.

Valley Vineyard, LLC Response and Comment:

LVTC's water related fears about Valley Vineyards are without foundation. Numerous safeguards are in place, including but not limited to controls by the California Public Utilities Commission, County Health Department, the County Fire Department, and the Regional Water Quality Control Board, all of which will mitigate their concerns.

Further, LVTC's statements concerning the quality and quantity of water and the levels of service provided to them by California Water Services Company (Cal Water) and the Antelope Valley East Kern Water District (AVEK) are disputed by those companies.

According to California Water Services Company[10]:

- 99% of local customers ranked service as "very good or excellent" in most recent survey, and their local staff meets response time targets 98% of the time
- Water rates are set by the CPUC (independent third party) and based on cost of service
- Developers pay for any system upgrades required to serve their projects; costs are NOT born by existing customers
- Conditional "will-serve" letters allow developers to take initial steps, but Cal Water's final commitment to serve new development is granted only when conditions are met
- Cal Water must present thorough water supply analysis to CPUC before it will approve any increase in service area
- Like all communities in Antelope Valley and many communities across the state, Leona Valley depends on an imported water supply
- In the 30 years Leona Valley has received water from AVEK, there has been only one interruption in imported water supply (when a collision damaged an AVEK connection)
- Cal Water received a commendation from the County Fire Dept. in 2005 for its cooperative effort with Leona Valley Town Council and AVEK to add storage for fire protection after the accident
- Previous AVEK shut-downs have not affected service
- In future years, Cal Water will develop additional local groundwater supplies in order to be less dependent on AVEK
- Costs for centralized services are shared by all of Cal Water's 450,000 customers, lowering the costs to Leona Valley customers
- Rates are set by an independent agency, which does not allow rate increases without a thorough analysis
- Regulated water utilities pay taxes and other fees that help pay for public services in Leona Valley

According to California Water Services Company,[11] fire hydrants went dry because of an electrical outage caused by the cited fire. With no power, the pumps stopped pumping and the hydrants went dry. The wells, according to Cal Water, did not go dry as erroneously stated by LVTC.

It is common in many areas of Los Angeles County and the entire state of California to rely on water both from primary and secondary sources. By definition and design, two systems supplement each other in case one or the other has shortfalls. According to Cal

10 Chris Whitley, Manager, Antelope Valley District, August 27, 2007

11 Chris Whitley, Manager, Antelope Valley District, August 20, 2007

Water, in the last 24 years there has only been one interruption in water service lasting more than a few hours, and that was due to an automobile running into an AVEK water facility.

The will-serve letter from California Water Services Company is for the subject property, not for all of Leona Valley. The will-serve letter does not allow for the subject property to use other existing sources of water. The will-serve requires Valley Vineyards to install facilities to provide "additional" groundwater as needed to serve the development. This is standard procedure for Cal Water.

PROPOSED MITIGATION MEASURE: Valley Vineyards, LLC is currently working with Cal Water to comply with the requirements of the will-serve letter. Wells and storage facilities may be required. Cal Water indicates that providing additional wells and or storage facilities on the subject property might enhance their ability to serve the entire community, not just the subject property.

e. Is the project located in close proximity to potential dangerous fire hazard conditions/uses (such as refineries, flammables, explosives manufacturing)?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. There is no natural gas service to this site. The project calls for the installation of at least 121 propane tanks, which can pose a potentially dangerous fire hazard with so many pressurized propane tanks in such a confined area.

Valley Vineyard, LLC Response and Comment:
All Leona Valley homes are on propane tanks. Propane tanks are subject to standard regulations found in fire and building codes, and compliance therewith will mitigate any hazards. There is no minimum lot size or density requirement dealing with homes using propane.

f. Does the proposed use constitute a potentially dangerous fire hazard?

Planning's Response – No

Leona Valley Town Council Comment:
The LVTC disagrees with Planning's disposition of "No" and it should be "Yes". This is because the existing water supply in Leona Valley is insufficient to support further development. The development of 121-additional homes will put an undue strain on the water resources to fight fires in this hazardous area. The addition of 121 propane tanks in a high fire severity area will further increase the potential for fire devastation. The ingress/egress to the site is inadequate and will pose further congestion on a narrow road (87th Street West). The water company states that the community has inadequate water storage and lacks a reliable water source. The community only has a volunteer fire department. The nearest staffed fire station is in Quartz Hill, approximately 20 minutes from Leona Valley.

Valley Vineyard, LLC Response and Comment:
Standard conditions imposed by the county mitigate fire danger. Water pressure requirements are made conditions of approval. The California Public Utilities Commission

governs California Water Services Company. Cal Water's commitment to provide water to this site, subject to their will-serve letter, is not revocable.

Development of this site will actually improve fire safety in the community.

- Clearing of the site of brush will provide a buffer between existing homes and remaining fire prone areas.
- At present, the only access point to Elizabeth Lake Road – the main escape route for the valley – is via 90th Street West. Valley Vineyards will create a second emergency access route.
- Today's standards for fire safety mandate that Valley Vineyards have two access points.
- Additional water infrastructure built for Valley Vineyards may enhance the ability of Cal Water to serve all of Leona Valley, both for fire fighting purposes and general domestic water use.

Existing government regulations regarding development in high fire hazard areas would not allow any new construction in Leona Valley if the fire department considered it unsafe to do so. The fire department has reviewed the development and no indication has been given that it is unsafe to be developed.

g. Other factors?

Planning's Response – None

Leona Valley Town Council Comment:
The Leona Valley Town Council specifically requests when the water availability study and fire hydrant tests are done for this site, they must be completed without the supplement of AVEK water into the Leona Valley waterlines. This will represent the true and correct water flow based upon the actual water resources of the community. This must be done to assure the study is completed under the interruptible and unreliable conditions that currently exist in this town. If such a shut down does occur, water tenders and Los Angeles County Fire Department Staff must be located in the Valley, which has been the procedure when AVEK has shut down in the past. The community must be provided with advance notice of the test.

Valley Vineyard, LLC Response and Comment:
The provision of domestic water from primary and secondary sources is a normal and accepted practice throughout the state. Such a dual-provider system is itself a mitigating safeguard against the water shortages speculated upon by LVTC. LVTC's statement that one source should be eliminated from water availability calculations is completely contrary to the basic design of this dual provider system.

STANDARD MITIGATION MEASURES
☐ Water Ordinance No 7834 ☐ Fire Ordinance No 2947 ☐ Fire Prevention Guide No 4
OTHER CONSIDERATIONS/MITIGATIONS
☐Project Design ☐Compatible Use
Comments: Comply with Subdivision Committee requirements from fire Department

CONCLUSION
Considering the above information, could the project leave a significant impact (individually or cumulatively) on, or be impacted by Fire Hazard factors?

Planning Response:

☐Potentially significant ☒Less than significant with project mitigation ☐Less than significant/No impact

Leona Valley Town Council Comment:
Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on fire hazard factors and should be disapproved until the community has adequate water to sustain the population, based upon the actual water usage for the metered users of Leona Valley. This property is located in a high fire severity hazard area that has been subject to several evacuations in recent years. There is no official evacuation plan.

The property is serviced by Leona Valley Fire Station 140, a call fire department (volunteer). There are no employees and the staffing from this facility is intermittent depending on the work schedules of the volunteers. The secondary fire station that services this site is located in Quartz Hill, twenty minutes drive time, or longer, to the subject site. The paved roadway on 87th Street West is too narrow (as per the Antelope Valley Areawide General Plan, a paved width of 24-feet) to accommodate the increase in traffic safely, particularly during an emergency situation.

Valley Vineyard, LLC Response and Comment:
Existing county requirements, made as conditions of approval as well as in the Building Code and Fire Code, will mitigate fire dangers. As described above, development of the site will itself improve fire safety in the community by providing a second emergency access point for a large portion of the community, by buffering the existing community from wildfires and by enhancing the quality of the community's water infrastructure.

The City of Palmdale contracts with the County of Los Angeles for fire services. Conditions of approval of the adjacent Ritter Ranch development in Palmdale require the construction of one new fire station, and emergency responses from this station would not stop at the city boundary. At this time the exact location of this new Ritter Ranch station is not known, however its presence in Ritter Ranch will obviously benefit all of Leona Valley.

The county requires Fire Mitigation Fees to be paid at time of building permits for the Valley Vineyards project. Based on current fees ($0.7151 / square foot, including garage space) and estimated sizes of the Valley Vineyard homes, close to $400,000 will be paid to the county in fire mitigation fees.

PROPOSED MITIGATION MEASURE: Valley Vineyards, LLC will pay Fire Mitigation Fees as required by the county.

HAZARDS - 4. Noise

a. Is the project site located near a high noise source (airports, railroads, freeways, industry)?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

b. Is the proposed use considered sensitive (school, hospital, senior citizen facility) or are there other sensitive uses in close proximity?
Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comment at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

c. Could the project substantially increase ambient noise levels including those associated with special equipment (such as amplified sound systems) or parking areas associated with the project?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comment at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project?

Planning's Response – Yes, during construction.

Leona Valley Town Council Comment:
There will be an increase in general noise upon the development of this site, because of the 20% increase in population. There will be noise from increased traffic, people and equipment.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

e. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
No LVTC comment at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

STANDARD CODE REQUIREMENTS
☐ Noise Ordinance No. 11,778 ☐ Building Ordinance No 2225-Chapter 3
MITIGATION MEASURES/OTHER CONSIDERATIONS
☐ Lot Size ☐ Project Design ☐ Compatible Design
Comments:

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) on, impacted by, Noise?

☐Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:
No LVTC comment at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

RESOURCES – 1 Water Quality

a. Is the project site located in an area having known water quality problems and proposing the use of individual water wells?
Planning's Response – No

Leona Valley Town Council Comment:
The LVTC disagrees with the Planning's disposition of "No" this should be "Yes". During an August 2004 Water Meeting hosted by the Leona Valley Town Council, California Water Service and the Antelope Valley East Kern Water Agency reported that there are water quality and quantity issues in Leona Valley. There are three water wells that service the metered portions of the community. Of the three wells, one is dry and one has high fluoride levels and has been determined to be unfit for human consumption. This is the well located closest to the subject site, east of 90th Street West, north of Leona Avenue. (Please refer to meeting minutes exhibit). Several properties adjacent to the subject site are serviced by private water wells. Well water studies indicate that some locally pumped water is also contaminated with arsenic and excessive nitrates.

Homeowners who presently have metered water through California Water Service have reported drops in water pressure during draught conditions for those who are located at the end of a line or are situated at higher elevations.

When the developer's representative made a presentation to the Leona Valley Town Council, he indicated that they were considering the addition of new wells, which may or may not be located in the community in order to allow construction on this site. If a well is improved and constructed outside the boundaries of Leona Valley, it will not serve Leona Valley and will not meet the immediate needs of what is considered a dire situation. Some local wells are contaminated. California Water Service is obtaining the shortfall of water from AVEK. This water is interruptible and is considered a secondary source. Based on these facts, we believe the Planning Department's response is inaccurate.

Valley Vineyard, LLC Response and Comment:
Normal water treatment will mitigate any water quality issues. According to California Water Services Company, the focus by LVTC on the purity of local well water is misguided, as all water is treated to bring it to satisfactory levels.[12]

Requirements to provide additional water rather than use existing water sources will mitigate LVTC concerns. Cal Water may not take water from existing users for the benefit of new users; the will-serve letter issued by Cal Water requires Valley Vineyards to install facilities to provide "additional" groundwater as needed to serve the development. This is standard procedure for Cal Water.

LVTC's statement that water from one of their two regular providers should be eliminated from water availability calculations is completely contrary to the basic design of this dual provider system. Having dual water providers is very common throughout Los Angeles County and California. The provision of domestic water from primary and secondary sources is a normal and accepted practice. Such a dual-provider system is itself a mitigating safeguard against the water shortages speculated upon by LVTC.

12 Chris Whitley, Manager, Antelope Valley District, August 20, 2007

Valley Vineyards, LLC has been issued a Will-Serve letter from California Water Services Company. California Water Services Company is regulated by the California Public Utilities Commission and as such cannot commit to providing potable water for domestic purposes that is not available. LVTC's concerns are unwarranted.

Valley Vineyards, LLC is currently working with Cal Water to comply with the requirements of the will-serve letter. Wells and storage facilities may be required. Cal Water indicates that providing additional wells and or storage facilities on the subject property might enhance their ability to serve the entire community, not just the subject property.

Standard conditions imposed by the county mitigate fire danger. Water pressure requirements are made conditions of approval. The California Public Utilities Commission governs California Water Services Company. Cal Water's commitment to provide water to this site, subject to their will-serve letter, is not revocable.

Development of this site will actually improve fire safety in the community.

- Clearing of the site of brush will provide a buffer between existing homes and remaining fire prone areas.
- At present, the only access point to Elizabeth Lake Road – the main escape route for the valley – is via 90th Street West. 383 lots (276 homes) rely on this single access point into and out of Leona Valley.[13] This is an extremely unsafe condition. Valley Vineyards will create a second emergency access route.
- Today's standards for fire safety mandate that Valley Vineyards have two access points. If the present Leona Valley community were developed today, it would not be approved because it is unsafe and does not have two access points. Valley Vineyards will provide the second emergency access point that Leona Valley so badly needs.
- Additional water infrastructure built for Valley Vineyards may enhance the ability of Cal Water to serve all of Leona Valley, both for fire fighting purposes and general domestic water use.

Existing government regulations regarding development in high fire hazard areas would not allow any new construction in Leona Valley if the fire department considered it unsafe to do so. The fire department has reviewed the development and no indication has been given that it is unsafe to be developed.

b. Will the proposed project require the use of a private sewage disposal system?

Planning's Response – Yes, *septic tank is proposed.*

Leona Valley Town Council Comment:
The current location of the site is inappropriate for 121 individual septic systems. A presentation made before the Town Council by the developer indicated that the septic systems would likely be eliminated in favor of an on-site sewage treatment plant. Based on this assertion, a complete study of the site should be made in order to ascertain if the property can support such a project. The Leona Valley Town Council needs to be informed of the proposed location of this treatment plant. The neighbors to this facility and site need to be informed of such a project. We request that Planning fully determines the exact system of sewage disposal before the project can be moved

13 Los Angeles County Assessor

forward.
An earlier failed development project proposed for the same general area as the subject site required installation of a sewage treatment plant specifically because of the adverse conditions stated herein.

According to the National Pollutant Discharge Elimination System, an NPDWS permit is required whenever a facility discharges pollutants into a body of water. This includes surface waters such as streams, creeks, lakes and wetlands. Untreated effluent materials leaching into the ground water applies to this standard. In addition, discharge from the vehicles that drive over the stream will cause discharge into the streambed. Two "creeks" (one is Bouquet Canyon creek) traverse the subject site. The water table in Leona Valley is very high and has been confirmed to be at a depth of ten feet, or less.

Valley Vineyard, LLC Response and Comment:
(This response also covers LVTC's comments on paragraphs c., d. and e.)

Alternative sewer treatment systems are being fully investigated by Valley Vineyards, LLC, and a final decision on which treatment alternative will ultimately be employed has not yet been made. The alternatives being considered are: 1) a small localized "package" sewer treatment facility, which serves just the homes in Valley Vineyards, providing reclaimed water to support the agricultural elements of the project; 2) individual lot treatment facilities, which could provide reclaimed water on a lot by lot basis; or 3) "enhanced" septic tank systems with leach fields or pits located on each lot.

Existing government regulations govern the installation of these systems to insure that none of the calamitous consequences speculated upon by the LVTC will materialize. Existing regulations would preclude adverse impacts upon storm run-off, groundwater, nearby streams and so forth. Regulations govern proximity to and impact upon drainage courses and ground water, construction methods and materials, and so forth. The county health department, county building and safety department and the California Regional Water Quality Control Boards, among others, are all involved in this issue. Numerous plan checks and inspections by these agencies are a normal part of the review process. All will meet local and state codes that protect the health and safety of the Valley Vineyards residents as well as the surrounding community.

PROPOSED MITIGATION MEASURE: Prior to Tentative Map Approval, submit a report demonstrating the feasibility of installing a private sewage disposal system(s) if such is proposed.

LVTC incorrectly states that Bouquet Canyon Creek traverses Valley Vineyards. Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards. Bouquet Canyon Creek is nowhere near Valley Vineyards. The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small unnamed, northeast flowing tributary into the Armagosa Creek.

If the answer is yes, is the project site located in an area having known septic tank proposing on-site systems located in close proximity to a drainage course?

Planning's Response – No.

Leona Valley Town Council Comment:

This should not be "No" it should be "Yes". The Bouquet Creek runs through the property. The unnamed creek on Lost Valley Ranch Road is proximate to the site. Therefore, the property is located in close proximity to a drainage course.

Valley Vineyard, LLC Response and Comment:
See (b) above

c. Could the project's associated construction activities significantly impact the quality of groundwater and/or storm water runoff to the storm water conveyance system and/or receiving water bodies?
Planning's Response – No.

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. According to the USGS Study of the Sleepy Valley Quadrangle, the water table in Leona Valley is ten feet deep or less. This is further documented in the book California Fault. The construction activities of Valley Vineyards will impact the quality of the groundwater and/or storm water run-off. According to the National Pollutant Discharge Elimination System, an NPDWS permit is required whenever a facility discharges pollutants into a body of water. This includes surface waters such as streams, creeks, lakes and wetlands. Untreated effluent materials leaching into the ground water applies to this standard.

Valley Vineyard, LLC Response and Comment:
See (b) above

d. Could the project's post-development activities potentially degrade the quality of storm water runoff and/or could post-development non-storm water discharges contribute potential pollutants to the storm water conveyance system and/or receiving bodies?

Planning's Response – No.

Leona Valley Town Council Comment:
Unless the Septic Systems are completely redesigned LVTC believes Planning's response needs to be "Yes" not "No". The USGS has determined that Leona Valley has a high water table and two blue line streams traverse this site. The proposed 121 septic tanks and leach fields will degrade and place pollutants in the environment.

Valley Vineyard, LLC Response and Comment:
See (b) above

e. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
It is unacceptable to allow discharge sewage in the area of this site with a high water table. In addition, State and Federal law requires a significant setback from the water way and from a waterway that discharges directly into the drinking water supply for the County of Los Angeles. Failure to install an onsite sewage treatment plant will put the existing protected creek and very high water table at risk.

Valley Vineyard, LLC Response and Comment:
See (b) above

STANDARD CODE REQUIREMENTS

☐ Industrial Waste Permit ☐ Health Code-Ordinance No. 7583, Chapter

☐ Plumbing Code-Ordinance No 2269 ☒ NPDES Permit CAS614001 Compliance (DPW

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐ Lot Size ☐ Project Design

Comments:

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, impacted by, Water Quality problems?

☐Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:

Based on the above LVTC comments, we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on or will be adversely impacted by water quality and quantity. The excessive number of septic tank systems in an area with small building pads and a high water table will result in contamination of the subsurface water, which is utilized for drinking and agricultural purposes. Therefore, the installation of an on-site sewage treatment plant is necessary.

Sufficient water resources must be obtained, including improvements of water pipes to service this site, without an adverse impact to the community via water rate increases. California Water Service has historically charged the community for upgrades in service. Leona Valley has the second highest water rate in the State of California. The current water resources are insufficient to service the community and an additional 121 water meters to be serviced by the same system can result in dire consequences.

Valley Vineyard, LLC Response and Comment:

California Water Services Company is regulated by the California Public Utilities Commission and could not have committed to providing domestic water to Valley Vineyards if water was unavailable, as alleged by the LVTC.

Contrary to the fears expressed by LVTC, Calc Water is prohibited by the PUC from increasing water rates for existing users based on any costs associated with serving the Valley Vineyards site.

According to Cal Water, their rates are not as high as the LVTC suggests.

The impacts on ground water and drainage courses speculated upon by the LVTC could not occur given the strict oversight of septic systems by state and county government agencies. If a sewer treatment facility was proposed for this site rather than septic systems, existing controls would mitigate any impacts on ground water.

RESOURCES – 2. Air Quality

a. Will the proposed project exceed the State's criteria for regional significance (generally (a) 500 dwelling units for residential users or (b) 40 gross acres, 650,000 square feet of floor area or 1,000 employees for non-residential uses)?
Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

b. Is the proposal considered a sensitive use (schools, hospitals, parks) and located near a freeway or heavy industrial use?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

c. Will the project increase local emissions to a significant extent due to increased traffic congestion or use of a parking structure or exceed AQMD thresholds of potential significance per Screening Tables of the CEQA Air Quality Handbook?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

d. Will the project generate or is the site in close proximity to sources that create obnoxious odors, dust, and/or hazardous emissions?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

e. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Planning's Response – No

Leona Valley Town Council Comment:

No LVTC comments at this time

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

f. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

g. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standard (including releasing emission which exceed quantitative thresholds for ozone precursors)?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

h. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

STANDARD MITIGATION MEASURES
☐Health and Safety Code – Section 40506

☐**OTHER CONSIDERATIONS/MITIGATIONs**
☐Project Design ☐Air Quality Report

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be adversely impacted by, air quality?
☐Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:
None

Valley Vineyard, LLC Response and Comment:

Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

RESOURCES – 3. Biota

a. Is the project site located within Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resource (ESHA, etc.), or is the site relatively undisturbed and natural?
Planning's Response – No

Leona Valley Town Council Comment:
The site is relatively undisturbed and natural. Therefore, the Leona Valley Town Council disagrees with the Planning Department's response of "no".
According to the Antelope Valley Areawide General Plan, the Portal Ridge area (foothills) is identified as S.E.A. #58. This position, at the intersection of three major geographical regions has produced the most diverse and unique flora found in the County. The area contains ten distinct plant communities, representing the transition between desert foothill and mountain environments. The diversity of the area is further enhanced by the presence of northern species, some of which are rare in the County, reaching their southern limit here. This area is very valuable because it possesses such a concentrated variety of vegetation types.[1]

The boundaries of the Portal Ridge area are large. The subject property is located in the Portal Ridge region, as is all of Leona Valley and the western edge of the Ritter Ranch Development project. The property is adjacent to the Ritter Ridge area (SEA #56), which has ninety-seven resident vertebrate species, recorded. These include twenty-five small mammals, fifty-three birds and nineteen reptiles. The area is also known as an important refuge for migratory birds.

The Draft of the County of Los Angeles General Plan proposes large portions of Portal Ridge, Leona Valley and Ritter Ridge as part of the San Andreas Rift Significant Ecological Area. This covers the north facing slopes of the Angeles National Forest and surrounds Amargosa Creek and a large portion of its watershed located in Leona Valley. A study completed by UCLA already identifies this region as a Significant Ecological Area.

Based on information specifically contained in the Antelope Valley Areawide General Plan, the pre-existing Ritter Ridge SEA, the Portal Ridge (foothills) Significant Ecological Area, UCLA determination of a Leona Valley Significant Ecological Area and the proposed San Andreas Rift Significant Ecological Area, it is our belief that the subject property is located within a Significant Ecologically area, or minimally, is an SEA buffer.

Valley Vineyard, LLC Response and Comment:
LVTC's speculation about wildlife and vegetation on the Valley Vineyards site is inaccurate and refuted by expert documentation. Extensive studies by professional biologists dispute their comments. In addition to the wetlands analysis[14] and biological survey[15] already submitted to the county, at the request of Valley Vineyards, (due to the concerns expressed by LVTC), additional directed research was commissioned. Their conclusions, attached here, to provides additional assurances that LVTC's concerns have been addressed.[16]

LVTC is incorrect when they state: "the subject property is located within a SEA or minimally, is an SEA buffer." Extensive research into county records indicates that it is

14 PCR Services Corporation, Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California, August, 2006

15 PCR Services Corporation, Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California, August 15, 2006

16 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, September 7, 2007

not located within any SEA. LVTC erroneously reaches their conclusion by mentioning the existence of one or more SEAs in other areas of the county, or by reference to an unidentified "study" completed by UCLA, and reference to the draft preliminary general plan. The Valley Vineyards property is not within an SEA. The biological and wetlands surveys, discussed in detail herein, prepared for this site by professionals, indicate that the statements by the LVTC are incorrect. The "project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it not relatively undisturbed and natural."[17]

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

b. Will grading, fire clearance, or flood related improvements remove substantial natural habitat areas?

Planning's Response – Yes, 50% of the site will be graded

Leona Valley Town Council Comment:
A majority of the natural vegetation will be removed from the site. The developer is planning on the infill of grape vines on the slope areas of this property. While this type of improvement supports the agricultural intent of the community, it could degrade the natural habitat that currently exists. The developer reported that there would be an installation of a small bridge. If flooding is to be controlled on an off site, there will be a further change of the natural habitat of this location.

There is a conflict with State law and the proposed wine grapes that are to be grown on the site. State of California Law requires all homeowners association to be non-profit entities. Therefore, the homeowner's association may not engage in wine-producing activities through the growing of grapes.

Valley Vineyard, LLC Response and Comment:
As quoted by one of the commissioned professionals "The undeveloped land contains numerous access roads for off-road vehicle use and for use a firebreaks. A majority of the project is devoid of natural vegetation as grazing or other form of vegetation removal has occurred over the years. There are sporadic pockets of natural vegetation found within the subject property"[18]

As shown in the Investigation of Jurisdictional Wetlands prepared for Valley Vineyards, development will have no impact on the unnamed channel near the southeast corner of the property ("Drainage Area B") and very slight impact on the secondary unnamed channel which runs adjacent to the 87th Street Road West / Lost Valley Ranch Road connection (Drainage Area A").

Management of onsite agricultural operations (avocados, oranges, grape vineyards, etc.) by homeowners' associations is not uncommon and hardly illegal. Whether the vineyard

17 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, September 7, 2007

18 Kunzman and Associates: TTM 066952 - VALLEY VINEYARDS TRAFFIC IMPACT ANALYSIS , by: Frank Lee, Carl Ballard, and William Kunzman, P.E. July 31, 2007

operations proposed for Valley Vineyards would be managed by the Valley Vineyards Homeowners' Association or by a separate legal entity, it would be done in compliance with all applicable government regulations.

c. Is a major drainage course, as identified on USGS quad sheets by a dashed line, located on the project site?

Planning's Response – Yes, *the project site supports two unnamed drainages.*

Leona Valley Town Council Comment:
The Bouquet Canyon Creek traverses the subject site. This is a tributary fed by the Amargosa creek. The Lost Valley Ranch Road Creek also traverses the site.

Valley Vineyard, LLC Response and Comment:
(**NOTE**: Planning's Response on the Initial Study is cut off and incomplete.)

LVTC incorrectly states that the wetland that skirts the southeast corner of Valley Vineyards is "Bouquet Canyon Creek." Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards. The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small, unnamed, northeast flowing tributary into the Armagosa Creek. This creek – referred to in the Wetlands Analysis as "Drainage Area B" – skirts the extreme southeast corner of the property.

Valley Vineyards has been designed to keep all homes and grading completely away from this channel in order to not impact it in any way.

The unnamed drainage course (erroneously referred Lost Valley Ranch Road Creek) has only one adverse environmental consequences of this development, an overcrossing, where a small portion the wetlands will be impacted, however this overcrossing was purposely located southeast of the terminus of the "blue line" stream so as to avoid major impact. Otherwise, the proposed site plan intentionally avoids the channel completely. This unnamed channel, and its value as an environmental resource, will actually be improved by this development. This area has been adversely impacted over the years by residents using the adjacent illegal dirt road which has been created across Valley Vineyards property and very slight impact on the secondary unnamed channel which runs adjacent to the 87th Street Road West / Lost Valley Ranch Road connection.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

d. Does the project site contain a major riparian or other sensitive habitat (e.g. coastal sage scrub, oak woodland, sycamore riparian, woodland, wetland, etc.)?

Planning's Response – Yes, *two riparian corridors will be largely untouched. The existing wetlands area near the southern.*

Leona Valley Town Council Comment:

Yes, numerous species of locally unusual or rare plants are located in the vicinity. Additional sensitive habitat includes: the Hoary Bowlesia; Schott's Sedge; Utah Miner's lettuce; Kellogg's tarplant; Weston's Barestem Buckwheat; Fluffweed; California Sunflower; Woodland Star; Parish's Broad-leaved Lupine; Snakeheads; Antelope Bush; Sierra Mint; Checker Bloom; Horned Pondweed (known to be located in the shaded Riparian Woodland in Bouquet Canyon).

Valley Vineyard, LLC Response and Comment:
(**NOTE**: Planning's Response on the Initial Study is cut off and incomplete.)

LVTC comments are incorrect and without foundation when they state: "numerous species of locally unusual or rare plants are located in the vicinity." This statement is contrary to the expert biological surveys conducted on the Valley Vineyards site. The mentioned "Shaded Riparian Woodlands of Bouquet Canyon" are to be found many miles from Valley Vineyards.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

e. Does the project site contain oak or other unique native trees (specify kinds of trees)?

Planning's Response – No.

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

f. Is the project site habitat for any known sensitive species (federal or state listed endangered, etc.)?

Planning's Response – Yes. Site has potential to support both raptor and songbird nest.

Leona Valley Town Council Comment:
Yes. The Bouquet Canyon location is known for specific endangered species such as the unarmored three-spine stickleback fish, the red-legged frog, the San Diego Horned Lizard, the highly imperiled Long Billed Curlew, the Tri-Colored Blackbird (California Species of Interest), the endangered Southwest Willow Flycatcher, the Mountain Plover (Species of Concern), the endangered Amargosa Vole, the threatened burrowing owl, the endangered Kangaroo Rat, the endangered Mojave ground squirrel as well as numerous plant species. Property owners on Bouquet Canyon Road have been restricted from grading/moving soil even during flood conditions and access loss because of the protected species located in this area.

The site and improvements are specifically bound by State and Federal requirements that have not been involved in this process at this time. CEQA guidelines address this on the State of California website:

"When a project has the potential to substantially degrade the quality of the environment, substantially reduce the habit of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the

number of restrict the range of endangered, rare or threatened species, or eliminate important examples of the major period of California history or prehistory."

We believe this requirement would apply to the critical habitat location of the "red-legged frog", which has been identified as the San Francisquito-Amargosa Creek Regions, including Bouquet Canyon Eastern area. In addition, the wetted portions of Bouquet Canyon, Elizabeth Lake Canyon and San Francisquito Canyon are home to the endangered "unarmored threespine stickleback fish". The Bouquet Canyon creek crosses the subject site.

Valley Vineyard, LLC Response and Comment:
Plant and animal species speculated upon by LVTC do not exist on site, according to professionally prepared surveys. For example, the biological survey prepared by licensed biologists for this site states: "The Site is within the critical habitat area for the California red-legged frog however suitable habitat for this species does not occur within the site." In the supplemental response prepared by PCR and attached hereto[19], they elaborate: the site "does not support suitable habitat for the California red-legged frog or any other aquatic sensitive species such as the unarmored threespine stickleback."

LVTC incorrectly states that the wetland that skirts the southeast corner of Valley Vineyards is "Bouquet Canyon Creek." Bouquet Canyon Creek begins approximately two (2) miles west of Valley Vineyards and flows west, away from Valley Vineyards. The wetland LVTC incorrectly refers to as being Bouquet Canyon Creek is a small, unnamed, northeast flowing tributary into the Armagosa Creek. This creek – referred to in the Wetlands Analysis as "Drainage Area B" – skirts the extreme southeast corner of the property. Valley Vineyards has been designed to keep all homes and grading completely away from this channel in order to not impact it in any way.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600+ of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

g. Other factors (e.g., wildlife corridor, adjacent open space linkage)?

Planning's Response – No.

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. Years of observation support the fact that this is a wildlife corridor with access to the Angeles National Forest, streams and ponds. Species including indigenous coyotes, egrets, red foxes, great blue heron, roadrunners, red tailed-hawks, eagles (nesting area), bobcats, mountain lions, great horned owls, ducks, squirrels, deer, grizzly bears and many other species have been observed traversing this site. Leona Valley School has had lockdowns in the past specifically because bears have been in the vicinity.

Valley Vineyard, LLC Response and Comment:
According to PCR, movement on "local" scale occurs throughout the surrounding vicinity as well as within the site itself. From a regional perspective, the site does not lie within

19 PCR Services Corporation, Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California, September 7, 2007

any linkages as proposed by the South Coast Wildlands Project Missing Linkages Report.20 The residences to the north of the site inhibit north-south movement of wildlife through the study area. However, due to its proximity to the Angeles National Forest to the west and open space to the east and south, the site has the potential to support larger mammal species that require larger home range areas and dispersal distances or dense vegetative cover (e.g., mountain lion and bobcat). Therefore, while the project may be linked to a regional open space/habitat system, it in an of itself does not represent a movement corridor that connects large blocks of habitat through surrounding areas that are otherwise 'hostile' and not conducive to wildlife movement."[21]

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐Lot Size ☐ Project Design ☐Oak Tree Permit ☐ ERB/SEATAC Review

Comments:

CONCLUSION Considering the above information, could the project have a significant impact (individually or cumulatively) on, **biotic** resources?

☐Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Planning's Response –*Breeding bird survey, biological monitor, native landscaping, night lighting conditions required, remove all Eucalyptus trees*

Leona Valley Town Council Comment:

"Dark skies" are a desired non-urban feature of the character of Leona Valley. So much so, the Community included restrictions on lighting in its community standards district (CSD). Leona Valley currently has only 3 streetlights (required by L.A. County Public Works) and has no desire to alter this characteristic with urban lighting standards. Valley Vineyards would undoubtedly increase the number of streetlights and exterior lighting to create nighttime light pollution and the end of "dark skies" in Leona Valley.

There are no Eucalyptus trees in the vicinity.

Valley Vineyard, LLC Response and Comment:

NOTE: There is no "Planning's Response" as quoted by LVTC. LVTC apparently copied and pasted this from some other document.

Leona Valley Town Council Comment:

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on biotic resources. This is based upon the riparian location, numerous endangered species in this ecologically sensitive location as well as being located in the foothills of Significant Ecological Area #58, contiguous to the Ritter Ridge Significant Ecological Area and is in the area of the proposed San Andreas Rift Zone Significant Ecological Area.

Valley Vineyard, LLC Response and Comment:

The Valley Vineyards property is not within an SEA. The biological and wetlands surveys, discussed in detail herein, prepared for this site by professionals, indicate that the

20 Penrod, K., R. Hunter, and M. Merrifield. 2001. Missing Linkages: Restoring Connectivity to the California Landscape, Conference Proceedings. Co-sponsored by California Wilderness Coalition, The Nature Conservancy, U.S. Geological Survey, Center for Reproduction of Endangered Species, and California State Parks.

21 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, September 7, 2007

statements by the LVTC are incorrect. The "project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it not relatively undisturbed and natural."[22]

22 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, September 7, 2007

RESOURCES – 4. Archaeological/Historical/Paleontological

a. Is the project site in or near an area containing known archaeological resources or containing features (drainage course, spring, knoll, rock outcroppings, or oak trees) that indicate potential archaeological sensitivity?

Planning's Response – Yes, *The project site supports two unnamed drainages. The drainage systems are comprised of natural, unlined channels with earthen banks and sandy streambeds.*

Leona Valley Town Council Comment:
The project is in an area known for significant archaeological resources. Numerous burial grounds and early implements have been found in and around this Valley. 107th Street West is the location of a blue line street and there are several ponds throughout the community. The area has "major" drainage and natural water sources, making this an ideal location for archaeological resources.

Valley Vineyard, LLC Response and Comment:
(This response covers LVTC's comments on paragraphs b., c., d., e. and f.)

LVTC's comments are without foundation in that they are derived from older generalized research done on entire regions, or reports done for other non-contiguous properties, and they do not consider the factual, site specific work that has been done on Valley Vineyards.

Valley Vineyards, LLC commissioned preparation of an archaeological, paleontological and cultural/historical record search of the property.[23] This report was submitted as a part of the Initial Study Questionnaire and fully addresses the concerns of the LVTC.

- The paleontological records search results indicated that no fossil localities have been identified within the boundaries of Valley Vineyards.
- The cultural resources record search did not indicate any known Native American culture resources in Valley Vineyards.
- The archaeological records search revealed at least two prior site specific surveys and concluded that there were no artifacts on the site. Due to the age of the prior archaeological surveys, this report recommended an onsite inspection for archaeological resources.

Subsequently, as requested by the county (in advance of the request by LVTC), Valley Vineyards, LLC commissioned the preparation of a Phase 1 Archaeological Study of the site. Preparation of this second report involved a thorough onsite walkover of the entire property.[24] This report has also been submitted to the county.

The results of the Phase 1 Archaeological study indicated that:

1) At least two (2) prior reports – Dr. Clement Meighan (1987) and Gwen Romani (2000) – have been conducted on the subject site, each of "which failed to yield evidence of prehistoric or historic land use;" and
2) That "no prehistoric or historic archaeological resources were encountered" in Valley Vineyards, and

23 PCR Services Corporation, Cultural Resource Record Search Report for the Bouquet Canyon Project, September 08, 2006.

24 Historical Environmental Archaeological Research Team, Robert J. Wlodarski, Principal Investigator, A Phase 1 Archaeological Study for TTM 066952 Located in Bouquet Canyon, Leona Valley, Los Angeles County, California, May, 2007

3) That "any improvements within [Valley Vineyards] will have no adverse impacts on known cultural resources."

Standard conditions of approval for Valley Vineyards will require onsite monitoring of grading activities to insure that if any archaeological, paleontological or cultural/historical resources are uncovered, that they be dealt with in accordance with existing regulations.

PROPOSED MITIGATION MEASURE: Onsite monitoring of grading activities will be required to insure that if any archaeological, paleontological or cultural/historical resources are uncovered, they will be dealt with in accordance with existing regulations.

b. Does the project site contain rock formations indicating potential paleontological resources?

Planning's Response – No

Leona Valley Town Council Comment:
The subject site does not contain rock formations, however, there are rock formations in the surrounding area.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

c. Does the project site contain known historic structures or sites?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

d. Would the project cause a substantial adverse change in the significance of a historical or archaeological resource as defined in 15064.5?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council firmly disagrees with the County of Los Angeles Planning Department response of "no".

On December 11, 1989, R.W. Robinson, a licensed Archaeologist, completed a Cultural Resource Investigation for another tentative tract map (subdivision never came into fruition) of three hundred acres with Elizabeth Lake Road forming the southern margin. The project site included the entire northwest quarter of Section 15, lying north of Elizabeth Lake Road, a portion of the northeast quarter of Section 22, and a part of the southeast quarter of Section 16, lying between Elizabeth Lake Road and Godde Hill Road. A copy of this report is provided for your review.

R.W. Robinson stated, "Significant cultural resources have long been known to exist (in) Leona Valley and the general area of the project site. Leona Valley offers more water than most of the rest of the Antelope Valley as well as a greater variety and concentration of food resources. Cultural resources should be expected to occur in greater concentration in this area."

Several archaeological sites were discussed in the report. CA-Lan-951 is located eastern of the 300-acre site that was the study of this report. The site had a surface scatter of artifacts including projectile points, chipping "west", milling tools, burned bone and at lease one soapstone ornament. Of greater significance is site CA-Lan-767. The site, recorded in 1976 (two miles east on Elizabeth Lake Road) contained several human burials. The site consisted entirely of a buried cemetery. Within a three to four mile radius of the project site, many dozens of cultural resource investigations have taken place and many dozens of archaeological sites have been recorded. "This record search clearly indicates that the area of the project site is culturally sensitive, and that archaeological resources are very likely to occur on the property."

During the survey, four archaeological sites were located and recorded on the project site. These sites were given the temporary designation as AVC-260, AVC-261, AVC-262, AVC-263. Artifacts found are identified as follows:

AVC 260 The site consists of a scatter of stone flakes and fragmentary milling stones;

- *4 rhyolite flakes*
- *1 jasper flake*
- *3 fragmentary schist "metates" (grinding slabs)*
- *1 fragmentary andesite "mano" (grinding stone)*
- *1 complete granite mano*

AVC 261:Small surface scatter of artifacts

- *9 rhyolite flakes*
- *1 chalcedony flake*
- *2 quartz flakes*
- *2 colored silicate flakes*
- *3 Obsidian flakes*
- *1 granite mano*
- *1 obsidian projectile point or drilling implement*

AVC 262: Surface scatter of lesser density

- *10 rhyolite flakes*
- *2 colored silicate flakes*
- *1 large thyolite core*
- *1 schist metate fragment*
- *1 schist mano fragment*
- *1 piece of possibly modified soapstone*

AVC 263: Surface artifacts thinly scattered

- *2 small rhyolite cores*
- *9 rhyolite flakes*
- *5 quartz flakes*
- *4 chalcedony flakes*
- *1 chert flake*
- *1 obsidian flake*

The exploration did not include any subsurface investigations and the likelihood of subsurface

material was considered high. One of the recommendations in the report states, "Due to the existence of four prehistoric archaeological sites on Valley Vineyards site, and the relatively close proximity to subsurface archaeological remains including human burials, it will be imperative that close monitoring by qualified archaeologists take place in all cases where ground is to be disturbed within 300 meters of the Amargosa Drainage."

A tributary of the Amargosa Drainage crosses the subject site and Lost Valley Ranch Road, which is also contiguous to the site, is a blue line stream. Therefore, it is highly likely that the conditions found at Godde Hill Road and Elizabeth Lake Road exist at the subject site. Additionally, the Ritter Ranch property, located east of Bouquet Canyon Road, has already revealed hundreds of prehistoric remains and implements, particularly during the re-alignment of Elizabeth Lake Road.

Every archeological survey of this area has produced artifacts and/or burial grounds indicating the likelihood of a strong presence of Shoshone-speaking Native American and early man habitation.

Under the California Environmental Quality Act, Title 14, Chapter 3, Article 5, Section 15064.5 indicates that a project may not have a substantial adverse change (such as grading for a subdivision) in the significance of an historical resource. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The CEQA process applies to archeological sites.

When an initial study identifies the existence of, or the probably likelihood of early man or Native American human remains within the project, a lead agency shall work with the appropriate native Americans as identified by the Native American Heritage Commission.

Valley Vineyard, LLC Response and Comment:
Please see (a) above. **Note:** The foundation of LVTC's statements in the paragraphs above are based on a report that has absolutely no relationship with the subject property, and therefore the conclusions drawn are factually in error.

e. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Planning's Response – No

Leona Valley Town Council Comment:
The site is comprised of a small knoll. It is unknown if there could be a unique paleontological source.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

f. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council would like to address the relocation of any potential archeological finds for this site. We wish for the items to be placed in the care of the West Antelope Valley Historical Society, to be utilized in the future Leona Heritage Park.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

MITIGATION MEASURES/OTHER CONSIDERATIONS
☐ Lot Size ☐ Project Design ☐ Phase 1 Archaeology Report
Comments:

CONCLUSION
Considering the above information, could the project leave a significant impact (individually or cumulatively) on **archaeological, historical**, or **paleontological** resources?
☐ Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the assessment by the County that the project has a less than significant impact on archaeological, historical or paleontological resources. Artifacts found in Leona Valley suggest that the area has a rich history in Native American and early man culture that could potentially be destroyed upon grading of this site. This is a "Potentially significant" cultural resource. According to the Cultural Resources Investigation completed by R.W. Robinson on December 11, 1989:
"Significant cultural resources have long been known to exist (in) Leona Valley and the general area of the project site. Leona Valley offers more water than most of the rest of the Antelope Valley as well as a greater variety and concentration of food resources. Cultural resources should be expected to occur in greater concentration in this area."
A Phase 1 Archaeology Report must be completed. Furthermore, we request that any artifacts remain in the possession of the West Antelope Valley Historical Society for future permanent display in Leona Valley.

Valley Vineyard, LLC Response and Comment:
Please see (a) above.

LVTC's comments are without foundation in that they are derived from older generalized research done on entire regions, or reports done for other non-contiguous properties, and they do not consider the factual, site specific work that has been done on Valley Vineyards.

RESOURCES – 5. Mineral Resources

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Planning's Response – No

Leona Valley Town Council Comment:
We do not believe a mineral resource study has been completed.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

b. Would the project result in the loss of availability of a locally important mineral resource discovery site delineated on a local general plan, specific plan or other land use plan?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

c. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
No response required.

MITIGATION MEASURES OTHER CONSIDERATIONS
☐Lot Size ☐ Project Design
Comments:

CONCLUSION
Considering the above information, could the project leave a significant impact (individually or cumulatively) on **mineral** resources?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:
None

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

RESOURCES – 6. Agriculture Resources

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?

Planning's Response – Yes

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this response. This site has historically been utilized for grazing land, although not in recent years. The Leona Valley/Bouquet Canyon region has had a moderate expansion of farmland/agricultural uses over the last decade with the addition of multiple vineyards and orchards.

Valley Vineyard, LLC Response and Comment:
As stated in the Phase One Archaeological Study "The undeveloped land contains numerous access roads for off-road vehicle use and for use as firebreaks. A majority of the project is devoid of natural vegetation as grazing or other form of vegetation removal has occurred over the years." [25]

Valley Vineyards development would **increase** the number of acres of agricultural uses in Leona Valley by nearly two-thirds. Currently there are only approximately 150 acres currently in active agricultural use in Leona Valley, including approximately 60 acres planted in cherries, 28 acres in grapes vines, 10 acres in Asian pears, 10 acres in Arkansas black apples, 20 acres in hay, 5 acres in vegetables, 10 acres in lilacs, and 2 acres in Christmas trees.[26] Valley Vineyards, LLC plans on devoting approximately 100 acres of the site to an agricultural element - viticulture.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Planning's Response – No

Leona Valley Town Council Comment:
The potential growing of grape vines for profit by the homeowners association appears to be in conflict with California State law which indicates homeowners associations are to be non-profit entities and cannot engage in profitable operations (including contracting the operation).

Valley Vineyard, LLC Response and Comment:
Management of onsite agricultural operations (avocados, oranges, grape vineyards, etc.) by homeowners' associations is not uncommon and hardly illegal. Whether the vineyard operations proposed for this site would be managed by the Homeowners' Association or by a separate legal entity, it would be done in compliance with all applicable government regulations and would not conflict with existing zoning for agricultural uses, or a Williamson Act contract.

c. Would the project involve other changes in the existing environment that due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

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25 Historical Environmental Archaeological Research Team, Robert J. Wlodarski, Principal Investigator, A Phase 1 Archaeological Study for TTM 066952 Located in Bouquet Canyon, Leona Valley, Los Angeles County, California, May, 2007

26 David Reynolds, owner of Leona Valley Vineyards, August 22, 2007

Planning's Response – Yes. Site within a grazing land designation

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this response.

Valley Vineyard, LLC Response and Comment:
The site is currently vacant and unused except for an occasional trespassing equestrian rider or off-road vehicle user. Valley Vineyards, LLC plans on using approximately 100 acres of the site for viticulture. There are approximately 150 acres currently in active agricultural use in Leona Valley, including approximately 60 acres planted in cherries, 28 acres in grapes, 10 acres in Asian pears, 10 acres in Arkansas black apples, 20 acres in hay, 5 acres in vegetables, 10 acres in lilacs, and 2 acres in Christmas trees.[27] Thus, the Valley Vineyards plantings would increase by two-thirds the number of acres of agricultural uses in Leona Valley.

Additionally, Valley Vineyards, LLC plans on constructing and dedicating approximately 1-mile of improved equestrian trails to the county master trail system.

d. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
No LVTC comments at this time.

Valley Vineyard, LLC Response and Comment:
No response needed

MITIGATION MEASURES/OTHER CONSIDERATIONS
☐Lot Size ☐ Project Design
Comments: Site is vacant, undeveloped and is not used as farmland.

CONCLUSION
Considering the above information, could the project leave a significant impact (individually or cumulatively) on **agriculture** resources?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:
None

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

27 David Reynolds, owner of Leona Valley Vineyards, August 22, 2007

RESOURCES – 7. Visual Qualities

a. Is the project site substantially visible from or will it obstruct views along a scenic highway (as shown on the Scenic Highway Element), or is it located within a scenic corridor or will it otherwise impact the viewshed?

Planning's Response – No

Leona Valley Town Council Comment:
In another report for a project on Bouquet Canyon Road, the County of Los Angeles identified Bouquet Canyon Road as a second priority site. According to Norman Hickling, Deputy to Supervisor Michael D. Antonovich, the County of Los Angeles has proposed making Bouquet Canyon Road a Scenic Highway.

The January 25, 1993 General Plan for the City of Palmdale, Environmental Resources section indicates that Elizabeth Lake Road, Godde Hill Road and Bouquet Canyon Road are all designated scenic streets or highways. While the west side of Bouquet Canyon is not the jurisdiction of the city of Palmdale, it is our assertion that Bouquet Canyon Road is in fact, a scenic corridor and is now proposed to have this permanent designation by the County of Los Angeles. The city of Palmdale identifies Bouquet Canyon Road specifically as a road "well known for its tree-lined canyon and winding stream."

In a pre-1920 map of the region, the Automobile Club of Southern California provided travelers with a guide map for the area and specifically featured Bouquet Canyon Road as a scenic route. Today, weekend cyclists, runners, and motorcyclists continue to utilize Bouquet Canyon as a primary recreation and scenic route, which has direct access to the Angeles National Forest. Therefore, it is our firm assertion that Bouquet Canyon Road is in fact, a scenic roadway and has been considered for nearly one hundred years as a scenic corridor.

Valley Vineyard, LLC Response and Comment:
Bouquet Canyon Road is not an adopted Scenic Highway. It is listed in the Draft Preliminary General Plan as a proposed Scenic Highway. Nevertheless, the Valley Vineyards development will be entirely consistent with Scenic Highway standards should Bouquet Canyon Road be adopted as a Scenic Highway. The Scenic Highway designation is not intended to impede the use of property within scenic corridors, but is aimed at promoting orderly and harmonious land uses that will not endanger irreplaceable scenic resources. Valley Vineyards complies with all aspects:[28]

- Appearance: There will be no signage. Utility lines will be undergrounded. Extensive landscaping (vineyards) will be placed along visible slopes. Architectural controls will be contained in the CC&Rs. Agriculture and open space uses will be emphasized.
- Location: Low densities, innovative contour grading and large setbacks from bouquet Canyon road will insure view preservation.
- Minimal Physical Alteration: Strict adherence to the Hillside Management regulations will insure a sensitively graded site, with the major ridgeline preserved. Creating vineyards along Bouquet Canyon road will assure a scenic southern entry into Leona Valley.
- Recreation and Cultural Heritage: The county's adopted hiking and equestrian trails in this area will be implemented. Vineyards on the project site will enhance

28 Los Angeles County Draft Preliminary General Plan Technical Appendix, pg 300-308

Leona Valley's reputation and future as an agricultural community. The project will add approximately 1-mile of equestrian trails to the county's master trail system

b. Is the project substantially visible from or will it obstruct views from a regional riding or hiking trail?

Planning's Response – Yes

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this assessment.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards will provide an important link in the county's adopted trail system by building approximately 1-mile of equestrian trails. Presently, equestrians and hikers trespass over the site. Incorporated into the Valley Vineyards plan are approximately 1 mile of trails that will legitimize this use. Also see "ridgeline" comments under section HAZARDS – 1 Geotechnical, paragraph e, above.

c. Is the project site located in an undeveloped or undisturbed area that contains unique aesthetic features?

Planning's Response – No

Leona Valley Town Council Comment:
The project is located in an undeveloped section of Leona Valley. According to the Los Angeles County Assessor, within parcel area 3206 (subject parcel area) there are very few improved residential properties within the bounds of Leona Valley. Parcel area 3206 contains 51 single-family homes with a Leona Valley address. The balance are dedicated primarily to pasture, open space, orchards and forestry land. Therefore, the site is located in a largely undeveloped area.

Valley Vineyard, LLC Response and Comment:
Three residential streets abut the property – two county maintained public streets and one private dirt road. One heavily used road, albeit illegal, bisects the property. There are 75 lots and approximately 43 homes within 1,000' of Valley Vineyards[29]. This is not a "largely undeveloped area" as LVTC states.

d. Is the proposed use out-of-character in comparison to adjacent uses because of height, bulk, or other features?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. The development is not of like character or density when compared to the surrounding area. There are no urban subdivisions in Leona Valley and construction of new homes has historically been infill in nature, in accordance with the Antelope Valley Areawide General Plan.

In order to be in character with the community, the project should be of a lesser density. Within Assessor's Parcel Area 3206 (subject parcel area) for those homes within the bounds of Leona Valley, the median lot size is 5.25-acres. The highest residential density area in Leona Valley contains one home per 4.68-acres. There are no tract homes in Leona Valley. Therefore, we

29 Los Angles County Assessor

believe that the development is out of character for the community.

Residential building sites within the development are to have building pads in the range of 10,000 to 31,000-square feet. This is also out of character for the community. Generally, sites in Leona Valley have level land area greater than 50% of the gross lot size.

Valley Vineyard, LLC Response and Comment:

LVTC statements on lot sizes and density misrepresent their community. According to the Los Angeles County Assessor, there are 530 lots within the Leona Valley district boundaries. 168 of these lots are 1.5 acres **or less** in size, and another 61 lots are 1.5 to **less than** 2.5 acres. **A total of 229 lots in Leona Valley (42% of the total) are less than 2.5 acres.** Leona Valley's median lot size is 2.48 acres, not the 5.25 acres stated by LVTC.

LVTC is also incorrect when they state: "The highest residential density area in Leona Valley contains one home per 4.68 acres." There are many areas in Leona Valley where densities exceed 1 unit per 4.68 acres. For example, the area within 1000' of the intersection of Elizabeth Lake Road and 90th Street – an area of 226 acres or over a third of a square mile – has 63 lots that average 1.67 acres in size. Another example is the 300 acres just north of Valley Vineyards, wherein lots average 2.67 acres[30].

The Supplemental Zoning for this area – the Leona Valley Community Standards District regulations – contains a number of restrictions aimed at protecting the community, ALL of which Valley Vineyards has complied within in the design of its plans.

The intent of the Leona Valley Community Standards District is said to be to "protect the community's unique appeal, including its rural agricultural character." Valley Vineyards design is consistent with all aspects of the districts requirements and should therefore be considered consistent with the character to adjacent uses. Further, Valley Vineyards will increase by approximately two thirds the number of agricultural acres in Leona Valley.

"Design Considerations" of the Leona Valley Community Standards District include preserving natural contours, native vegetation and incorporating new landscaping materials that will integrate the development into the surrounding area. Contour grading of the property, leaving half the site ungraded and 70% of the site as open space, and planting vineyards on approximately 100 acres of the site will be consistent with these considerations.

Fencing requirements of the Leona Valley Community Standards District mandate open, non-view-obscuring fences. Valley Vineyards will comply with these requirements.

The Leona Valley Community Standards District regulations discuss limiting lighting on new developments. Valley Vineyards will comply with those requirements.

Street Improvements are also discussed in the Leona Valley Community Standards District regulations. Valley Vineyards will comply with those requirements, where they do not conflict with county fire and public works requirements.

30 This second area is the mapped area shown in "OTHER FACTORS – 1. General. b."

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with the existing Leona Valley Community Standards District regulations.

LVTC's contention that Valley Vineyards "tract" homes will be "out of character for [sic] the community" is not based on fact but only on conjecture – house plans have not been prepared. The 121 homes within Valley Vineyards will consist of many different floor plans, elevations, orientations, material and color combinations. Some lots may be sold to custom home builders. It is quite conceivable that, given the above differences, no two homes in Valley Vineyards would look the same.

e. Is the project likely to create substantial sun shadow, light or glare problems?

Planning's Response – No

Leona Valley Town Council Comment:
The property is subject to rural lighting standards.

Valley Vineyard, LLC Response and Comment:
The Leona Valley Community Standards District regulations discuss limiting lighting on new developments.[31] Valley Vineyards will comply with those requirements.

PROPOSED MITIGATION MEASURE: Public street lighting shall be prohibited except where necessary to comply with safety lighting standards and lighting on private parcels shall be designed to prevent off-site illumination.

f. Other factors (e.g., grading or landform alteration)?

Planning's Response – No

Leona Valley Town Council Comment:
The plan for the subdivision calls for 50% grading which results in an alteration of the topographical features of the property. Therefore, this response should have been "yes".

Valley Vineyard, LLC Response and Comment:
The Hillside Management regulations have been strictly respected in the design of this development. The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact.

Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that houses will not intrude into the ridgeline. Clearly the sensitive, contour grading proposed for Valley Vineyards will not impact the predominant ridgeline on the site.

The site will not be "mass graded;" the entire property will not be cut or filled to create building sites. Rather, grading will be limited to only about 50% of the property. In order to fully implement contour grading of the site, graded slopes will be less steep than 2:1 and/or engineered to have undulating slopes that mimic the natural topography.

PROPOSED MITIGATION MEASURE: Valley Vineyards is subject to the Hillside

31 Chapter 22.44.122C.4.

Management regulations contained in Chapter 22.56.215. Therefore this project must comply with this ordinance.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with the existing Leona Valley Community Standards District regulations.

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐ Lot Size ☐ Project Design ☐ Visual Report ☐ Compatible Use

Comments: All utilities shall be placed underground to enhance visual qualities.

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **scenic** qualities?

☐ Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:

A full analysis of the degradation of visual qualities cannot be determined at this time. The plan calls for the installation of underground utilities, which will assist in the protection of the view-scape.

Valley Vineyard, LLC Response and Comment:

LVTC is incorrect in its conclusion, as many studies, research, and efforts have been undertaken to identify potential problems and ensure the visual qualities of the site are maintained or enhanced.

SERVICES – 1. Traffic/Access

a. Does the project contain 25 dwelling units, or more and is it located in an area with known congestion problems (roadway or intersections)?

Planning's Response – No

Leona Valley Town Council Comment:

Normal daily traffic patterns on 87th Street West currently experience no congestion problems. However, during events that require emergency response, 87th Street can become congested with fire, police, forestry, and animal control vehicles and personnel, plus evacuees and livestock. These past events have been successfully managed with the current population of the south side and the projected infill / lower density growth as stated in the Antelope Valley Areawide General Plan. Increased traffic from the Project's population, particularly in the event of an emergency situation, needs to be studied to create a safe and expedient route.

Based on the last 6 years of data, Bouquet Canyon Road has a mileage death rate of 13.4 deaths per 100 million miles in the 6.4 miles between Elizabeth Lake and Spunky Canyon as compared with the 1.25 statewide mileage death rate in California in 2005. While congestion problems are not apparent, the road has a higher than typical death rate due to events not related specifically to congestion.

Bouquet Canyon Road cannot sustain a ten-year capital storm according to the County of Los Angeles.

According to Chapter 21.24.400, Division of Land Adjacent to Existing Roads: If the advisory agency finds that the proposed division of land abuts an existing road which has improvements insufficient for the general use of the lot owners in the division of land and local neighborhood and drainage needs, it may disapprove the design of the division unless the subdivider provides improvements or agrees to improve such road in the same standards required of roads within all divisions of land by Chapter 21.32.

Valley Vineyard, LLC Response and Comment:

A complete traffic analysis, prepared by a licensed traffic engineer, has been prepared. As required by the county, the report measured: 1) Existing Traffic Conditions, 2) Project Traffic conditions, 3) Existing Plus Ambient Growth Traffic Conditions, and 4) Existing Plus Ambient Growth Plus Project Traffic Conditions. The conclusions and reconditions of the engineer have been incorporated into the design of the development. The conclusion of the traffic engineer is that:

1. study intersections are projected to operate at Level of Service A [32] during the peak hours for Existing Plus Ambient Growth traffic conditions
2. study intersections are projected to operate at Level of Service A during the peak hours for Existing Plus Ambient Growth Plus Project traffic conditions
3. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 without project traffic conditions
4. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 with project traffic conditions

[32] "Level of Service" is used to describe the quality of traffic flow. Level of Service categories range from "A" to "F." Levels of Service "A" to "C" operate quite well. Level of Service "A" is the best, most free flowing of all conditions. Level of Service "C" is typically the standard to which rural roadways are designed.

This traffic analysis concludes: "The project traffic does **not** significantly impact the study area intersections. Therefore, no traffic mitigation measures are necessary.[33]

PROPOSED MITIGATION MEASURE

Follow recommendations contained in the Traffic Impact Analysis.

b. Will the project result in any hazardous traffic conditions?

Planning's Response – No

Leona Valley Town Council Comment:

It is the opinion of the LVTC that the County's response of "No" is incorrect; this should be a "Yes" disposition.

a. Bouquet Canyon Road is a winding, scenic rural roadway that is used by daily commuters and weekend pleasure drivers. The proposed Project entrance site on Bouquet Canyon Road is at the two-lane straightaway that currently experiences high rates of speed and dangerous passing. Project residents stopped on Bouquet Canyon Road to turn into the Project, or entering Bouquet Canyon Road from the Project, can create serious hazards for themselves and other motorists. For the safety and welfare of residents and commuters, a comprehensive traffic flow and roadway condition study needs to be done before plot plan can be approved.

b. Also, Bouquet Canyon is not considered an "all-weather" roadway and can – and has been closed to traffic for months during repairs after storm events. Preventative measures for debris, water, and mud runoff from the site onto Bouquet Canyon Road need to be provided.

c. The Project has only two routes into and out of the site: Bouquet Canyon Road and 87th St West. The 87th Street entrance will be gated and keyed for Project residents only. 87th Street is a 24' street that winds through Leona Valley exiting at 90th and Elizabeth Lake Road. It is the only roadway to service Lost Valley Ranch Road, 87th Street, 86th Street, Vientos, and East Leona Avenue. 90th and Elizabeth Lake Road is the only point at which the entire south side of Leona Valley can exit or enter.

d. 87th Street West and the eastern section of Leona Avenue are dedicated forty-foot wide streets, however, are improved to a narrower width of 24 to 30 feet in most locations. The Antelope Valley Areawide General Plan allows for paving of 87th Street West to a width of twenty-four feet. Area homeowners should not be required to make widening improvements to the roadway to accommodate Valley Vineyards. Furthermore, topographical features of the right of way may prevent further road improvements. Ingress/egress is clearly inadequate in this location during firestorms. The turn around for fire trucks and equipment is often difficult when multiple engines are on the scene, particularly when residents are evacuating livestock/equine. It is our understanding that the developer has considered some improvements to a small portion of the unpaved Lost Valley Ranch Road. 87th Street West and Leona Avenue have not been planned nor have they been studied for roadway safety, Public Works and Antelope Valley Areawide General Plan compliance, particularly in emergency situations.

Valley Vineyard, LLC Response and Comment:

As determined by the licensed traffic engineer in the above referenced Traffic Impact Analysis, impacted intersections operate at Level of Service A during the peak hours for

33 Kunzman and Associates: TTM 066952 - VALLEY VINEYARDS TRAFFIC IMPACT ANALYSIS , by: Frank Lee, Carl Ballard, and William Kunzman, P.E. July 31, 2007

existing traffic conditions and will continue to do so in the future both with or without the Valley Vineyards development.

According to Public Works, the inadequacy of Bouquet Canyon Road near the main entry into Valley Vineyards is only because silt has built up on the east side (city of Palmdale / Ritter Ranch side) of Bouquet Canyon Road. According to Public Works, minor clean-out work along the east side of Bouquet Canyon Road would remedy any potential for periodic flooding.[34]

Standard design requirements of both the county department of public works and the fire department will mandate that 87th Street be an "all weather roadway," as defined by current code. By doing this, Valley Vineyards, LLC will be improving access to those on Lost Valley Ranch Road and the entire community of Leona Valley, as compared with the present condition.

LVTC states how the dirt road that traverses this property (87th Street West) has been washed out by prior storms. Standard design requirements of both the county department of public works and the fire department will mandate that this road be an "all weather roadway," as defined by current code. By doing this, Valley Vineyards, LLC will be improving access to those on Lost Valley Ranch Road and the entire community of Leona Valley, as compared with the present condition.

PROPOSED MITIGATION MEASURE
Valley Vineyards will follow recommendations contained in the Traffic Impact Analysis.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

c. Will the project result in parking problems with a subsequent impact on traffic conditions?

Planning's Response – Maybe

Leona Valley Town Council Comment:
Because of the narrow width of the roadway, it is unlikely that parking will be available along 87th Street West.

Valley Vineyard, LLC Response and Comment:
This project will neither cause nor contribute to any parking problems. All Valley Vineyards streets will be constructed to a width to allow on-street parking. All homes will have driveways deep enough to allow off-street parking. All homes will have at least three garage spaces. There will be no need for anyone from Valley Vineyards to park on the existing streets outside of Valley Vineyards.

d. Will inadequate access during an emergency (other than fire hazards) result in problems for emergency vehicles or residents/employees in the area?

Planning's Response – No

Leona Valley Town Council Comment:

34 Jeff Harkins, LA County Public Works, August 30, 2007

The Leona Valley Town Council disagrees with this response. Properties located on 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road have experienced wash outs, large boulders in the roadway, and difficulty negotiating evacuation of family and livestock during firestorm or flooding conditions. Bouquet Canyon Road has a history of failure and cannot withstand a ten-year capital storm. The majority of the residents in Leona Valley exit from 90th Street West at Leona Avenue. Secondary roadways such as these have delayed removal in mudflow and snow conditions. Therefore, traffic increase causing further congestion can result in less than safe conditions. It is recommended that the exit in the area of 87th Street West, 86th Street West, Vientos Drive and Lost Valley Ranch Road be removed and relocated.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards will have two access points, as required by county health and safety regulations. Additionally, Valley Vineyards will create a much needed second emergency access point for the entire Leona Valley community. Valley Vineyards will aid in making Leona Valley a much safer area than currently exists.

e. Will the congestion management program (CMP) Transportation Impact Analysis thresholds of 50 peak hour vehicles added by project traffic to a CMP highway system intersection or 150 peak hour trips added by project traffic to a mainline freeway link be exceeded?

Planning's Response – Maybe

Leona Valley Town Council Comment:
Since there will be 121 homes in Valley Vineyards, it is likely that there will be an increase in traffic with the potential of more than 150 peak hour trips.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC believes that the correct determination by the Impact Analysis Section should be **"NO"** based on the recently prepared Traffic Impact Analysis. This traffic analysis, prepared by a licensed traffic engineer, measured: 1) Existing Traffic Conditions, 2) Project Traffic, 3) Existing Plus Ambient Growth Traffic Conditions, and 4) Existing Plus Ambient Growth Plus Project Traffic Conditions.

A complete traffic analysis, prepared by a licensed traffic engineer, has been prepared. As required by the county, the report measured: 1) Existing Traffic Conditions, 2) Project Traffic conditions, 3) Existing Plus Ambient Growth Traffic Conditions, and 4) Existing Plus Ambient Growth Plus Project Traffic Conditions. The conclusions and reconditions of the engineer have been incorporated into the design of the development. The conclusion of the traffic engineer is that:

1. study intersections are projected to operate at Level of Service A [35] during the peak hours for Existing Plus Ambient Growth traffic conditions
2. study intersections are projected to operate at Level of Service A during the peak hours for Existing Plus Ambient Growth Plus Project traffic conditions
3. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 without project traffic conditions

[35] "Level of Service" is used to describe the quality of traffic flow. Level of Service categories range from "A" to "F." Levels of Service "A" to "C" operate quite well. Level of Service "A" is the best, most free flowing of all conditions. Level of Service "C" is typically the standard to which rural roadways are designed.

4. study intersections are projected to operate at Level of Service A during the peak hours for year 2009 with project traffic conditions

The conclusion of the traffic engineer is that "The project traffic does not significantly impact the study area intersections, nor does it exceed the thresholds of 50 peak hour vehicles added by project traffic to a CMP highway system intersection or 150 peak hour trips added by project traffic to a mainline freeway link.[36]

PROPOSED MITIGATION MEASURE

Valley Vineyards will follow recommendations contained in the Traffic Impact Analysis.

f. Would the project conflict with adopted policies, plans, or program supporting alternative transportation (e.g., bus, turnouts, bicycle racks)?

Planning's Response – No

Leona Valley Town Council Comment:

None

Valley Vineyard, LLC Response and Comment:

Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

g. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:

Currently under construction and abutting Bouquet Canyon Road, is the City of Palmdale's 7,200-unit housing development, which has ingress/egress access off and onto said roadway via Elizabeth Lake Road. The first release of homes is scheduled for next year. Traffic studies fail to address the change in traffic patterns on Bouquet Canyon Road that these 7,200-units can cause. This roadway has the potential to become a major alternate throughway with direct access to the Santa Clarita Valley including the Valencia Industrial Center, a major employment support for the area. In addition, recent traffic studies in this area fail to address the accidents that occur during snow season. Bouquet Canyon has no CHP/Sheriff support during this time (no CHP/Sheriff in area with four wheel drive) and accidents in this location during snowfall remain unreported. Residents have reported dozens of accidents with cars sliding into ditches on a daily basis during snow season. Traffic studies have not addressed this issue, as they failed to factor in the unique characteristics of this mountain and canyon location.

Valley Vineyard, LLC Response and Comment:

LVTC is misinformed. The State Legislature requires that a Traffic Impact Analysis be prepared for new development and that the analysis is prepared to monitor and fix traffic problems caused by the new development. If the new development adds traffic to an overcrowded facility, then the new project has to mitigate the traffic impact so that the facility operates at a level that is no worse than before the project traffic was added. All impacts created by the 7,200-unit housing development mentioned by LVTC were

[36] Kunzman and Associates: TTM 066952 - VALLEY VINEYARDS TRAFFIC IMPACT ANALYSIS , by: Frank Lee, Carl Ballard, and William Kunzman, P.E. July 31, 2007

determined as part of the approval process and appropriate mitigation measures where (or will be) followed as that project is developed.

The impacts of the new Valley Vineyards development are discussed in the above-mentioned Traffic Impact Analysis and all recommendations have been incorporated in the design of the project.

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐ Project Design ☐ Traffic Report ☐ Consultation with Traffic & lighting Division

Comments:

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **traffic/access** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:

Base on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on traffic/access factors. Ingress and egress at the area of 87th Street West could result in dire consequences during a firestorm or other emergency event. The road is suited for the current population but is not inadequate nor meant to support a large increase in traffic.

Discussion, Traffic/Roadways

Bouquet Canyon Road entrance/exit sites

- *The County of Los Angeles Department of Public Works recently determined that Bouquet Canyon Road is not an "all weather" road. It is subject to failure in a 10-year capital storm. This roadway failed adjacent to the subject site in 2005 and was closed for several months. There were also several failures in the 1980s, 1995 and 1998, indicating that the "primary" access to this site is not secure or safe. As such, 87th Street West, a small rural street will become the primary ingress/egress route.*
- *The access area at Bouquet Canyon Road needs to be widened to accommodate left & right turn lanes.*
- *Driveways into current homes along Bouquet Canyon Road near these sites need to be studied and upgraded for safety purposes due to the increase in traffic and change in traffic patterns and usage in this area.*
- *Cumulative impact on Bouquet Canyon Road – Traffic study needed, including projected traffic impact from approved developments in Palmdale & Lancaster as non-Leona Valley commuters use Bouquet Canyon as an alternative to the (14) Antelope Valley Freeway.*
- *It is not likely that Bouquet Canyon Road would be widened or improved as it winds through Angeles National Forest, parallels a Blue Line creek and is a valuable wetland habitat.*
- *A recent study found the death rate on this particular 7 mile section of Bouquet Canyon Road is already over 1000% higher than the State average for comparable roads.*
- *Bouquet Canyon Road is subject to closure during winter flooding and snow conditions. Snow is not cleared regularly. Ingress/egress will be inadequate during winter storm and firestorm conditions. This can and will result in 87th Street West becoming the primary ingress/egress to and from the site.*

87th Street West & Leona Avenue

- *90th Street West (a limited secondary roadway) and Elizabeth Lake Road is the only access into and out of the south side of Leona Valley where ¾ of the population currently reside and where the project plans to use to route their residents out of the development. Particularly when Bouquet Canyon is closed, this intersection is insufficient to handle the additional traffic the project would generate and could present a serious safety issue. There is no other egress for those residents who exit at 90th Street West and Leona Avenue.*
- *The developer has indicated that the primary ingress/egress will be Bouquet Canyon Road. This is unlikely since Leona Valley School is located at the corner of 90th Street West and Leona Avenue, which is the preferred access via 87th Street West. In addition, the commercial district in Leona Valley is located at 90th Street West and Elizabeth Lake Road. The shortest route to this location is via 87th Street West.*
- *87th Street West is a 24' secondary roadway that services the south side residents. There are possibly two parcels that are yet to be developed. Therefore, expansion of these roadways to 40' or more to accommodate the project's commuters, would be unlikely. Furthermore, an expansion of the 87th Street West beyond a paved area of twenty-four feet wide would be in violation of the Antelope Valley Areawide General Plan. The tract map provided to Regional Planning fails to adequately provide a comprehensive overview of the project, its planned access roads, and impact on the community's current traffic system.*

Lost Valley Ranch Road:

- *This is a private non-County maintained one-lane dirt road, which provides access to the homes in this canyon part of Leona Valley. If the developer improves a small portion by the project, what of the remaining segment of road*
- *Lost Valley Ranch Road is also the location of a blue-line creek with regular flooding and road loss requiring four-wheel drive access during winter conditions. At times, four-wheel drive access is not even possible. The addition of a gated development will put an undue hazard, particularly during firestorm, flood & snow conditions on this difficult access area. Lost Valley Ranch Road has been relocated four times in the last thirty years due to the expansion of the blue line creek. The blue line creek that traverses Lost Valley Ranch Road reaches the subject site and floods properties and the roadway along 86th Street West & 87th Street West. The project design fails to address the uncontrolled stream on Lost Valley Ranch Road.*

Gated Urban Development

- *The project calls for a gated urban development within an established rural community. This is out of character for Leona Valley and segregates a large section of the community within the bounds of the community. Therefore, the Leona Valley Town Council requests that all of the roads in the development be public with access to all members of the community. This will further facilitate better ingress/egress to the south end of Leona Valley during a firestorm, snow storm or flood hazard conditions.*

Valley Vineyard, LLC Response and Comment:

The professionally prepared Traffic Impact Analysis, discussed above, was prepared in accordance with requirements set down by the state legislature and adopted by the county and shows none of the dire consequences speculated upon by LVTC.

All roads will be designed in accordance with county standards, including turn lanes, acceleration/deceleration lanes, gated entries, and so forth. These improvements are designed to facilitate safe access into and out of Valley Vineyards and to minimize the

possibility of accidents.

The design of the subdivision, with two access points, is in accordance with all health and safety requirements.

Leona Valley is currently unsafe because residents only have one access point into or out of their community. Valley Vineyards will provide Leona Valley with a badly needed second emergency access route, making the community safer for its residents than it presently is.

Paving of the dirt road that connects 87th Street West and Lost Valley Ranch Road -- what is now an illegal crossing of the Valley Vineyards property – will help maintain the quality of the adjacent channel, not damage it. Currently silt and mud enter this channel, along with off-road vehicles. After construction of the adjacent roadway, the current conditions will not occur.

Gating the entries into Valley Vineyards is an important means of mitigating the traffic impacts on the community that the LVTC fears. If Valley Vineyards was not gated, vehicles that would normally travel north on Bouquet Canyon Road and then west on Elizabeth Lake Road, would, instead "cut through" Valley Vineyards and then drive through 87th Street West to Leona Avenue. This "short cut" would have significant consequences for all the homes on these two streets, including the homes within Valley Vineyards. For LVTC to state that the gates should be removed contradicts their concerns mentioned elsewhere in their responses.

SERVICES – 2. Sewage Disposal

a. If served by a community sewage system, could the project create capacity problems at the treatment plant?
Planning's Response – No

Leona Valley Town Council Comment:
There is no sewage treatment plant in this area. The developer may be planning a sewage treatment system specifically on this site.

Valley Vineyard, LLC Response and Comment:
A final determination has not yet been made for the community sewage system. The options are: 1) a small localized "package" sewer treatment facility which serves just the homes in Valley Vineyards, providing reclaimed water to support the agricultural elements of the project; 2) individual lot treatment facilities, which could provide reclaimed water on a lot by lot basis; or 3) "enhanced" septic tanks with leach fields or pits located on each lot. Different agencies regulate each option. For example the county Public Works Department would be involved if sewer treatment facility was constructed, while the County Health Department and the Regional Water Quality Control Board would be involved if individual lot treatment or enhanced septic tanks were selected. In any case, existing regulations and testing requirements would make it impossible for any alternative to have adverse consequences for the community. All will meet local and state codes that protect the health and safety of the Valley Vineyards residents as well as the surrounding community.

PROPOSED MITIGATION MEASURE: Prior to Tentative Map Approval, submit a report demonstrating the feasibility of installing a private sewage disposal system(s) if such is the selected method of sewer treatment for Valley Vineyards.

b. Could the project create capacity problems in the sewer lines serving the project site?

Planning's Response – No

Leona Valley Town Council Comment:
The area is not serviced by public sewers.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

c. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
Not Applicable

Valley Vineyard, LLC Response and Comment:
No response needed.

STANDARD MITIGATION MEASURES
☐ Sanitary Sewers and Industrial Waste – Ordinance No. 6130

☐ Plumbing Code – Ordinance No. 2269
Comments:

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **sewage disposal** facilities?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:
None

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

SERVICES – 3. Education

a. Could the project create capacity problems at the district level?

Planning's Response – Yes

Leona Valley Town Council Comment:
Leona Valley Elementary School is currently at full capacity and is slated to accept additional students from the City of Palmdale's Ritter Ranch (Sun Cal) up to the 500th home, and will be accepting students from the Ana Verde housing development also in Palmdale. Therefore, this elementary school is beyond capacity without the addition of significant capital improvements. There are an insufficient number of schools in the area to support the population base without the addition of significant infrastructure.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC has received letters from all affected school districts indicating that they will serve the development. The Antelope Valley Union High School District letter indicates the site is within their district boundaries and that the subdivision will be served by the Quartz High School (Grades 9-12). The Westside Union School District letter states that the site is within their boundaries and the subdivision will be served by their Leona Valley School (Grades K-8).

As provided by law, this development will be required to mitigate impacts on school facilities by paying fees to the districts prior to issuance of building permits. Home sizes have not yet been determined for this development, however based on and estimated average square foot per home of 4,000 square feet and current school fee rates, these rates could generate approximately $2,000,000 in funds for the districts.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of school fees prior to issuance of building permits.

b. Could the project create capacity problems at individual schools that will serve the project site?

Planning's Response – Yes

Leona Valley Town Council Comment:
Leona Valley Elementary School is already at full capacity and cannot accept additional students without substantial expansion of the facility and grounds.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards LLC agrees that more homes could create capacity problems, however it should be noted that closing down Leona Valley Elementary School because of a LACK of students has been a periodic subject of conversation in the community.

It is the responsibility of the school districts, to state the level of capacity of their schools and to what degree expansion of facilities or grounds may be necessary.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of school fees prior to issuance of building permits.

c. Could the project create student transportation problems?

Planning's Response – Yes

Leona Valley Town Council Comment:
LVTC concurs.

Valley Vineyard, LLC Response and Comment:
The Will-Serve letter from the Antelope Valley Union High School District states: "School bus transportation is available to students who reside more than three miles from each comprehensive high school site. To assist with the operation costs of this program, a transportation fee for 2006-07 is assessed at $75.00 per rider per semester; or $150 per year."

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of school fees prior to issuance of building permits.

d. Could the project create substantial library impacts due to increased population and demand?

Planning's Response – Maybe

Leona Valley Town Council Comment:
LVTC concurs.

Valley Vineyard, LLC Response and Comment:
Library Facilities Mitigation Fees of approximately $750 per unit are required. At that rate, this would amount to over $90,000 in library mitigation fees.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall pay Library Facilities Mitigation Fee prior to issuance of building permits.

e. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
There are no plans to build an additional school or expand the existing school in Leona Valley. The District is also at full capacity with 7,200 homes pending at Ritter Ranch and additional homes in Ana Verde. Both projects directly impact the Leona Valley School.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

MITIGATION MEASURES/OTHER CONSIDERATIONS
☐ Site dedication ☐ Government Code Section 65995 ☐ Library Facilities Mitigation Fee
Comments: Mitigation through School Fee

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **educational** facilities/services?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:

The Leona Valley Town Council disagrees with the response "less than significant", particularly since the Planning Department has three "yes" answers and one "maybe" that would suggest an immediate and serious problem.
The community is serviced by one school, which educates kindergarten through eighth grade students. According to the Westside Union School District, Leona Valley School provides education for approximately 161 students and is at full capacity. Leona Valley Elementary is already bound by a pre-existing settlement agreement to accept students from the Ritter Ranch/SunCal development in the Palmdale City limits, up until the 500th home is constructed. In addition, our elementary school will be accepting students on a mandatory basis from the new Ana Verde development. Therefore, our elementary school is beyond full capacity. Mitigation through school fees will not be sufficient to expand the existing elementary school or buy additional school property in the area.

Valley Vineyard, LLC Response and Comment:

Valley Vineyards, LLC has received letters from all affected school districts indicating that they will serve the development. The Antelope Valley Union High School District letter indicates the site is within their district boundaries and that the subdivision will be served by the Quartz High School (Grades 9-12). The Westside Union School District letter states that the site is within their boundaries and the subdivision will be served by their Leona Valley School (Grades K-8).

As provided by law, this development will be required to mitigate impacts on school facilities, libraries, parks, fire departments, etc., by paying fees to various government agencies. Estimated fees to all of these facilities could easily be $3,000,000 or more.

SERVICES – 4. Fire/Sheriff Services

a. Could the project create staffing or response time problems at the fire station or sheriff's substation serving the project site?

Planning's Response – Maybe

Leona Valley Town Council Comment:
The LVTC disagrees with the response of "Maybe" The nearest staffed fire station is in Quartz Hill, Palmdale and Lake Hughes. Leona Valley Fire Station 140 is a call (volunteer) fire station and staffing is intermittent. There have been fierce firestorms in this area in recent years and a substantial added population will create a tremendous burden on this community that already has limited resources.
A Sheriff's sub-station does not service this location. The property is serviced by the Palmdale Sheriff's station, which is approximately twelve miles from the subject site. The response time has consistently been in excess of thirty minutes to hours based on actual calls to the Bouquet Canyon region. There is one assigned Sheriff in the area, which services the communities of Leona Valley/Bouquet Canyon, Green Valley, Lake Hughes, Elizabeth Lake and Three Points. This means that the police officer that services this area could be as far as twenty miles away in a mountain area.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards is located within one of the three zones where the Fire Department's developer fee program for funding new fire stations is in effect. The county requires Fire Mitigation Fees to be paid at time of building permits for the Valley Vineyards project. Based on current fees ($0.7151 / square foot, including garage space) and estimated sizes of the Valley Vineyard homes, close to $400,000 will be paid to the county in fire mitigation fees.

The County Fire Department's 5-Year Plan includes a new station in the Ritter Ranch development approximately 3 line of sight miles southeast of Valley Vineyards.

The fire Department's requirements for construction, access, water mains, fire flows and hydrants are addressed by the Fire Department during the subdivision map review stage. Valley Vineyards has been reviewed by the Fire Department and conditions have been set for the development. The project must strictly adhere to the requirements of the Fire Department.

The statutory responsibilities of the Fire Department include erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archeological and culture resources, and the county's oak tree ordinance. The areas germane to these statutory responsibilities have been addressed.

PROPOSED MITIGATION MEASURE: Fire Mitigation Fees will be paid prior to building permits.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with all aspects of the Fire Code.

b. Are there any special fire or law enforcement problems associated with the project or the general area?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this answer. The Leona Valley/Lakes region is generally underserved by law enforcement.
Because this is a Very High Fire Severity Area with only a volunteer fire station and limited reliable water resources, this is considered to be a Potentially significant problem.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

c. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:
The County Planning Department indicates the project is 1.25 miles from Fire Station 140, which is accurate. However, this is not a staffed fire station. It is 100% volunteer. The nearest staffed fire station which services Leona Valley is located at 5030 West Avenue L-14, Quartz Hill 93536. This is nine miles from the subject site. The driving route is via Godde Hill Road, a mountainous and winding access.

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire).

Note that only one (1) mile of the nine (9) mile route cited by the LVTC, is through "mountainous and winding" Godde Pass.

The City of Palmdale contracts with Los Angeles County for fire services. Conditions of approval of the adjacent Ritter Ranch development in Palmdale require the construction of one new fire station, and emergency responses from this station would not stop at the city boundary. At this time the exact location of this new Ritter Ranch station is not known, however its presence in Ritter Ranch will obviously benefit all of Leona Valley.

PROPOSED MITIGATION MEASURE: Access shall comply with Title 21 (County of Los Angeles Subdivision Code) and Section 902 of the Fire Code, which requires all weather access. All weather access may require paving.

PROPOSED MITIGATION MEASURE: Where driveways extend further than 300 feet and are of single access design, turnarounds suitable for fire protection equipment use shall be provided and shown on the final map. Turnarounds shall be designed, constructed and maintained to insure their integrity for Fire Department use. Where topography dictates, turnarounds shall be provided for driveways that extend over 150 feet in length.

PROPOSED MITIGATION MEASURE: All street widths and lengths shall meet the approval of the Fire Department.

PROPOSED MITIGATION MEASURE: Fire hydrant locations shall be approved by and meet the design standards of the Fire Department.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with all aspects of the Fire Code.

MITIGATION MEASURES/OTHER CONSIDERATIONS

☐ Fire Mitigation Fee Planning's Response –
Comments:

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **fire/sheriff** services?

☐ Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:

Because of the lack of adequate and reliable water supply and because the Leona Valley Fire Station is a 100% volunteer call department with intermittent response to calls in a high fire severity area, we believe Valley Vineyards has a Potentially significant impact until these issues are resolved. The addition of 121 propane tanks in a concentrated area can have an adverse impact during firestorm or earthquake events.

Valley Vineyard, LLC Response and Comment:

See above response (HAZARDS – 3. d. Fire).

SERVICES – 5. Utilities/Other Services

a. Is the project site in an area known to have an inadequate public water supply to meet domestic needs or to have an inadequate ground water supply and proposes water wells?

Planning's Response – Maybe

Leona Valley Town Council Comment:
Planning's response is inadequate and should state, "Yes". According to officials from the California Water Service Company at the August 2004 Leona Valley Town Council meeting, Leona Valley currently has an inadequate water supply to service the needs of the existing population base. The water company specifically stated that the wells in Leona Valley produce only 80 acre feet of water per year, while the community uses approximately 365 acre feet per year. The shortfall is obtained from Antelope Valley East Kern Water Agency (AVEK), which is an interruptible source and has been shut off for days to weeks at a time. AVEK water is agricultural water. It is also interruptible if an inadequate allotment is made to our area by authorities or in the event of an earthquake, accident or unforeseen shutdown.
Yet, California Water Service issued a will-serve letter for the project's additional 121 units. Given the company's earlier dire predictions about water availability for current residents in Leona Valley, the company appears to be contradictory in its estimation of water availability and flawed in its assessment. If the water supply in Leona Valley is inadequate to sustain the current community, how can California Water Service claim to be able to provide for an additional 21% increase in housing units?
The water situation in Leona Valley must undergo a thorough study to determine whether water wells have adequate supply and tanks have adequate storage to ensure that the entire population base (old and new) will have a safe and reliable water supply. Potential negative impact to the nearby well water users (along Bouquet Canyon Road, Lost Valley Ranch Road, Lonesome Valley Road, 86th Street West, 87th Street West, Godde Hill Road, Elizabeth Lake Road and Vientos Drive) also need to be studied and addressed.
When the developer's representative made a presentation to the Leona Valley Town Council, he indicated that the developer was considering the addition of new wells, which may or may not be located in the community, in order to allow construction on this site. If a well is improved and/or constructed outside the boundaries of Leona Valley, it will not serve Leona Valley and will not meet the immediate needs of what California Water Service considers a dire situation.

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire).

b. Is the project site in an area known to have an inadequate water supply and/or pressure to meet fire fighting needs?

Planning's Response – Maybe

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the response "maybe". The answer should be "yes". In 1994, there was a fire at the location of 107th Street West at the southwest end of Leona Valley. Shortly after the fire started, the fire hydrants went "dry" and air support was necessary to battle this devastating blaze. This is not because of inadequate water pressure alone, but because the water wells in Leona Valley went dry.

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire).

According to California Water Services Company,[37] fire hydrants went dry because of an electrical outage caused by the fire. With no power, the pumps stopped pumping and the hydrants went dry. The wells, according to Cal Water, did not go dry as stated by LVTC.

Valley Vineyards, LLC is currently working with Cal Water to comply with the requirements of the will-serve letter. Cal Water indicates that providing water facilities on the subject property might enhance their ability to serve the entire community, not just the subject property.

c. Could the project create problems with providing utility services, such as electricity, gas, or propane?

Planning's Response – Maybe

Leona Valley Town Council Comment:
Leona Valley will need an upgrade in infrastructure to support such a large development. Many of the water lines date back to the mid-1940s and there have been breaks in the lines on 87th Street West. Because Leona Valley has the second highest water rate in the State of California and because Leona Valley is responsible for infrastructure improvements of the pipes through rate hikes, a new housing development could result in the need to upgrade this system. This will put an additional financial strain on homeowners who are already suffering from recent exorbitant rate increases.

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire).

Cal Water is forbidden by the California Public Utilities Commission from burdening existing users with the costs of new developments. Also, Cal Water cannot rely on new development to pay for the cost to maintain existing facilities that do not serve the new development. Cal Water is responsible for existing water infrastructure. The condition of existing facilities in Leona Valley is a matter totally independent of Valley Vineyards.

Cal Water disputes LVTC's claims about their rates being the second highest in the state.

Valley Vineyards, LLC is currently working with Cal Water to comply with the requirements of the will-serve letter. Cal Water indicates that providing water facilities on the subject property might enhance their ability to serve the entire community, not just the subject property.

d. Are there any other known service problem areas (e.g., solid waste)?

Planning's Response – No

Leona Valley Town Council Comment:
Natural disasters have stopped trash haulers and propane deliveries to homes for up to 3 weeks. Fires, ice storms have shut down electricity for up to 1 week. There is a long-range shortage of landfill capacity in the Antelope Valley region.

Valley Vineyard, LLC Response and Comment:

37 Chris Whitley, Manager, Antelope Valley District, August 20, 2007

Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services or facilities (e.g., fire protection, police protection, schools, parks, roads)?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the response "no". The response should be "yes". There will be significant impacts on the community as a whole, because there will be a substantial increase in the population base with no provisions to update/upgrade or expand the current infrastructure without incurring environmental and cost impacts.

Valley Vineyard, LLC Response and Comment:
LVTC is mistaken when they state that there are "no provisions to update/upgrade or expand the current infrastructure." Local government can and does require mitigation fees for the improvements attributable to new development. As previously stated, Valley Vineyards will be responsible for payment of millions of dollars of school fees, park fees, library fees, fire fees, etc.

Fire hydrants added to Valley Vineyards, especially those along 87th Street West, will benefit adjacent owners.

Valley Vineyards will also be responsible for improving 87th Street West as it traverses the property, thus improving access for emergency vehicles and well as those living on 87th Street.

Emergency access through Valley Vineyards will improve public safety for the entire community by providing a second emergency access point for the 383 lots in Leona Valley that now must rely totally on 90th Street for their ingress/egress.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of mitigation fees

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

PROPOSED MITIGATION MEASURE: Fire hydrant locations shall be approved by and meet the design standards of the Fire Department.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with all aspects of the Fire Code.

f. Other factors?

Planning's Response –No

Leona Valley Town Council Comment:

- *California Water Service obtains water for Leona Valley from one area well and from the Antelope Valley East Kern Water Agency (AVEK). AVEK water is considered a secondary water source and the developer must provide a primary water source. If on-site wells were used, these wells would draw down water from wells west of site. Water in Leona Valley is not from an aquifer – pockets of water are contained along San Andreas faults & fissures and are subject to cumulative usage, drawdown, and recharge.*
- *The developer indicated that he might install a few wells in the area of the development to service the project. Wells along Lost Valley Ranch Road (contiguous to the development) regularly go dry in the summer and are subject to having water "trucked" to the homes, particularly during draught years. This higher density project will compete with the pre-existing developed sites for water that has already proven insufficient to service the existing population.*
- *In 2004, the AVEK water line to Leona Valley was disrupted for days. This is a secondary water source to the primary California Water Service supply. AVEK has indicated that their supply can stop "at will" and they are not obligated to supply water to Leona Valley. 30% of Leona Valley's water is from local wells (70% from AVEK, which can be stopped at will), which are now inadequate to permanently supply this Valley. Leona Valley has three water wells maintained by California Water Service. One well has high fluoride levels; the second well is dry; and the third well is insufficient to supply our community. The community will be charged for any expansion to the existing water system. Water rates in Leona Valley are currently the second highest in California. An expansion of 121 homes will put an undue stress on an over-taxed water system*
- *As of 2004, Leona Valley used one acre foot of water per day; on average only 80 acre feet is pumped from our active water well, when approximately 365 acre feet are needed to service this community in one year. A further expansion of the population base will have an unmitigatable negative impact to the Leona Valley infrastructure.*
- *Introduction of water to the project for household and landscaping usage, and wastewater from leach fields will impact water quality and quantity. County Department of Health Services and the County Engineer needs to conduct a hydrological study to determine the effects and identify possible mitigation.*
- *Before a tentative tract map and density allowance is determined, water service and resources (absent the assistance and supplement of AVEK) must be proven as there are currently dangerously inadequate water resources in Leona Valley.*

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire, and RESOURCES – Water Quality. a.)

RESOURCES – 1 Water Quality

STANDARD MITIGATION MEASURES
☐Plumbing Code – Ordinance No. 2269 ☐ Water Code – Ordinance No. 7834

OTHER CONSIDERATIONS
Comments: –California Water Service Company has agreed to provide water services letter dated April 12, 2007. Southern California Edison's letter dated April 16, 2007 indicates that service will be available for project site

Leona Valley Town Council Comment:
(See Services 5, a.)

Valley Vineyard, LLC Response and Comment:
See above response (HAZARDS – 3. d. Fire, and RESOURCES – Water Quality. a.)

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **utilities** services?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:

The Leona Valley Town Council disagrees with the Planning Department. We believe the impact of Valley Vineyards is Potentially significant and could produce dire consequences if not rectified prior to approval.

- *Improvements to infrastructure are necessary to the water delivery system, which are passed onto the ratepayers.*
- *Leona Valley has insufficient water to supply the community, except when supplemented by AVEK, an interruptible water source.*
- *Local water wells that supply water to metered customers went dry during the 1994 firestorm.*
- *Bouquet Canyon Road cannot withstand a ten year capital storm as determined by the Department of Public Works*
- *87th Street West & Leona Avenue are narrow streets and are unlikely able to accommodate the additional traffic*
- *Leona Valley Elementary School is at full capacity with pre-existing agreements to take students from Ana Verde and Ritter Ranch (SunCal).*
- *There is no permanently staffed fire station in Leona Valley*
- Underground utilities are included in the plan and are necessary to protect the viewscape of this scenic location.

Valley Vineyard, LLC Response and Comment:

As stated previously,

- Cal Water cannot burden existing customers with costs to serve new development.
- The dual provider system is the common, normal way of serving residential customers throughout the county and state.
- Wells did not go dry. The fire knocked out electrical service to the pumps.
- Bouquet Canyon Road near the Valley Vineyards entry floods during heavy rains only because of an accumulation of silt on the east side of the roadway. According to Public Works, this could be cleaned out very easily.
- By design, over 90% of the traffic will access this site from Bouquet Canyon Road, not the streets mentioned.
- Gating of the private streets within Valley Vineyards will mitigate the possibility that drivers will take a "short cut" through the development and thence through existing streets in Leona Valley.
- The affected school districts have sent letters indicating they will serve Valley Vineyards.
- The fire department has reviewed Valley Vineyards, provided recommendations concerning the interior layout (which have been incorporated into the plan) and has indicated they can serve the project.

OTHER FACTORS – 1. General

a. Will the project result in an inefficient use of energy resources?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council does not have sufficient information to comment on the energy resources for Valley Vineyards.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

b. Will the project result in a major change in the patterns, scale, or character of the general area or community?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this answer. According to Dataquick, as of July 2007 there are 520 single-family homes in Leona Valley, all of custom construction. There are no subdivisions within the bounds of this Valley. The estimated population of this rural community is 1,846 residents. With an average household containing 3.18 residents, the proposed project will result in a population increase of over 20% to our Valley.
A number of factors in the Leona Valley area suggest that it would be desirable to limit development to mimic the present low-density character of the area. Not only is low density an important element of the visual environment, and thus of community identity, but it is also essential in preserving the present lifestyle of Leona Valley residents. It is also instructed by the Antelope Valley Areawide General Plan for a development to mimic the character, density and identity of a non-urban community. In addition, natural features of the area indicate that maintenance of the existing density character would be in the best interest of public health and safety.

- *Agricultural & equestrian oriented*
- *The pattern of land development and parcel sizes in Leona Valley as generally followed the land use and zoning plans established in 1960.*
- *Individual quality custom homes sited in harmony with natural land formations and contours*
- *Antelope Valley Areawide General Plan identifies Leona Valley as a low density, designated rural community*
- *Community Standards District exists to preserve and promote current community rural character and opportunities*

Tract 066952

- *Urban tract development*
- *Gated community (a separate community within a community)*
- *Homeowners Association*
- *Urban amenities required*

Conflicts
Target market – urban homeowners

- *Require urban infrastructure and amenities not required or desired in Leona Valley*
- *Culture conflict between urban and rural lifestyles*
- *Leona Valley promotes and provides opportunities for raising & keeping of livestock and*

equine and agricultural endeavors, i.e., U-Pick fruit orchards, vineyards, and lilac production.

- *Leona Valley historically is a cohesive community of like lifestyles that are non-urban & agriculture-oriented. Insertion of a gated urban development with it's own Covenants, Codes & Restrictions (CC & R's), Homeowner Association, and urban demands for expanded infrastructure is not compatible with the current community*
- *Growth in Leona Valley is generally 2 to 3 new homes a year and of an in-fill nature, has been easily assimilated into the community and the County's ability to adequately support. Assuming all 121 tract homes would sell, it would suddenly increase Leona Valley's population by over 20% and overburden its current ability to support.*

The policies pertaining to designated rural communities as contained in the Antelope Valley Areawide General Plan (page IV-13) specifically states,
"Where further development does occur, it should be of an "in fill" nature, consistent with the existing community character and service levels, and in no event should exceed the densities specified on the Antelope Valley Wide General Plan Land Use Policy Map."
The Project is in conflict with the density of the existing homes and development in Leona Valley. Furthermore, it will put an undue burden on the school, water resources, police/fire support and other infrastructure of this rural community.

The following is an aerial photograph of the proposed urban development in contrast to the highest density area of Leona Valley. The highest density area of Leona Valley contains approximately one home per 4.68-acres. The proposed urban development has nearly double the density, even though it is in a hillside management area.

<u>Valley Vineyard, LLC Response and Comment:</u>

- Lots in Valley Vineyards range from 1½ acres to over ten acres.
- 168 lots in Leona Valley, or <u>over one-third of the total lots in Leona Valley are one and one-half acres or less in size.</u>[38] Another 61 lots are from 1.5 to less than 2.5

38 Los Angeles County Assessor

acres. Over 42% of Leona Valley lots are less than 2.5 acres in size. Leona Valley's median lot size is 2.48 acres, not the 5.25 acres stated by LVTC.

- According to U.S. Census data, the population of Leona Valley was 1,250 in the year 2000[39]. Assuming LVTC's statement that the population in 2007 is 1,800 is correct, the population of Leona Valley has increased 44% in the last seven years, for an average increase of 6.3% per year. Using conservative rates of absorption, the Valley Vineyards project is anticipated to increase the valley's population at only 4.6% per year. This is well within the normal growth rates for Leona Valley
- LVTC is also incorrect when they state: "The highest residential density area in Leona Valley contains one home per 4.68-acres." There are many areas in Leona Valley where densities exceed 1 unit per 4.68 acres. For example, the area within 1000' of the intersection of Elizabeth Lake Road and 90th Street – an area of 226 acres or over a third of a square mile – has 63 lots that average 1.67 acres in size. Another example is the 300 acres just north of Valley Vineyards, wherein lots average 2.67 acres[40].
- Referencing the LVTC exhibit, it is worthy to note that the only access point to Elizabeth Lake Road – the main escape route for the valley in case of fire/disaster – is via 90th Street West. Fully 90% of the community must use this one point of ingress/egress. If there were a natural disaster in Leona Valley that demanded a massive evacuation of the community, 383 lots (with 276 homes) now have only one way out.[41] Development of Valley Vineyards will create a badly needed second emergency access route for the community.

c. Will the project result in a significant reduction in the amount of agricultural land?

Planning's Response – Yes

Leona Valley Town Council Comment:
The project will result in a significant reduction of agricultural land. Because of the very small building pad sizes (10,000-31,000 square feet), the likely buyers in this urban development will not have sufficient space to support the continued trend of expanding the agricultural identity of this rural community.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards will have approximately 100 acres of vineyards on the property. There are approximately 150 acres currently in active agricultural use in Leona Valley. Thus, the Valley Vineyards plantings would increase by two thirds the number of acres of agricultural uses in Leona Valley.

PROPOSED MITIGATION MEASURE: In accordance with Section 22.56.215.J.1.a. Valley Vineyards shall have at least 70 percent open space.

PROPOSED MITIGATION MEASURE: Prior to approval of the TTM, provide an open space exhibit map.

PROPOSED MITIGATION MEASURE: Prior to the issuance of any grading permit, submit and obtain the approval of a landscape plan for agriculture/ viticulture areas,

39 Census Tract 9012.06 (Blocks 1000, 1073); Census Tract 9012.07 (Blocks 1017, 1019, 1021, 1023, 1024, 1031, 1033-38, 1042); Census Tract 9102.06 (Blocks 1016, 1028, 1029, 1048, 1053, 1054, 1059)

40 This second area is the mapped area shown in "OTHER FACTORS – 1. General. b."

41 Los Angles County Assessor

riding and hiking trails, areas adjacent to streets and highways and other landscaped areas.

d. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
Hillside Management
According to the Antelope Valley Areawide General Plan, the Hillside Management Area Policy is designed to protect the health and safety of the public from hazards typically associated with hillside areas and to preserve natural resources and scenic values commonly occurring in these environs. Wildfires, floods, mudslides, erosion and landslides are typical hazards confronting hillside properties. Leona Valley is a Class IV Fire Hazard area and is subject to regular firestorm activity. In addition, the area is subject to flooding, mudflow, erosion and high ground water conditions. The plan as proposed does not appear to be in compliance with the Hillside Management ordinance for the Antelope Valley Areawide General Plan based on the non-urban designation. The project's plot plan fails to indicate what portions of the sites are dedicated to "open space" or "conservation" easements, thereby indicating a larger than actual total land area for each site. The effective lot size (net of restricted areas) of each parcel is reflected by the building pad sizes, which vary from 10,000 to 31,000-square feet. Therefore, it does appear that most of the sites are sub-standard in comparison to the County of Los Angeles Hillside Ordinance for Non-Urban areas. In addition, properties in the Leona Valley Community Standards District have a minimum lot size requirement of 2½ acres, assuming no undue restrictions exist such as slope, hazards, conservation considerations or biotic resources.
Plotting Density & Impacts
Plotting density for an urban housing tract on vacant land that contains 25 – 50% slope inclines is premature without first conducting thorough applicable studies.
Factors impacting this property:
1. San Andreas Rift Zone
2. High Fire Severity Hazard Zone
3. Abuts and contributes to Blue line creek
4. Wildlife corridor and habitat
5. Likely archaeological site
6. Floodwater and debris drainage course
7. Contributes to water table which feeds wells for Leona Valley's primary source of water
8. Roadways undersized to safely and efficiently handle increase in traffic
9. Slope instability after 50% of site is graded and natural landforms altered
10. LA County's Hillside Management ordinance
11. Identification of property in Significant Ecological Area
12. Leona Valley Community Standards District
13. No urban infrastructure to support this urban housing development

Therefore:
Footprint for lots needs to be selected on an individual basis AFTER the above results are completed and applied. While one County code may allow for building of X number of units per acre, any one of the above factors may negate that feasibility. It would be more efficient and result in a far better project, if the above factors are first addressed and then, based on those results, the plot plan is developed.

<u>Valley Vineyard, LLC Response and Comment:</u>

Valley Vineyards fully complies with all county ordinances and regulations. Each of the above items was thoroughly and professionally evaluated prior to designing Valley Vineyards as is evidenced by the numerous reports and studies submitted as part of the application.

STANDARD MITIGATION MEASURES

☐ State Administrative Code, Title 24, Part 5, T-20 (Energy Conservation)

OTHER CONSIDERATIONS

☐Lot Size ☐ Project Design ☐ Compatible Use

Comments:

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to any of the above factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:

The Leona Valley Town Council disagrees with the Planning Department's assessment that Valley Vineyards will have a less than significant impact. We believe the population increase, combined with the change in character of the community will cumulatively have a major impact on Leona Valley as a whole. We believe the Hillside Management Ordinance has been misapplied. Contrary to the requirement of the Antelope Valley Areawide General Plan for rural communities, this urban development is not "in-fill" in nature. The type of sites, the small building pads and the gated orientation isolate Valley Vineyards in terms of character in contrast to the rest of Leona Valley.

Leona Valley is a unique rural residential area located on the north-facing slope of the Angeles National Forest and is comprised of ranches, cherry orchards, pear and apple farms, lilac production, as well as vineyards. Its topography is level to rolling and land elevations generally range from 3,200 to 3,600 feet. Leona Valley is dedicated to the expansion of farming and equestrian uses in accordance with the Antelope Valley Areawide General Plan, which establishes agricultural activities as a priority land use over adjacent, potentially incompatible development, discouraging the conversion of agricultural land to other uses. This urban development, in its current form, is incompatible with the community.

Previously Stated Conflicts

- *Target market – urban homeowners*
- *Require urban infrastructure and amenities not required or desired in Leona Valley*
- *Culture conflict between urban and non-urban lifestyles*
- *Leona Valley promotes and provides opportunities for raising & keeping of livestock and equine and agricultural endeavors, i.e., U-Pick fruit orchards, vineyards, and lilac production.*
- *Leona Valley historically is a cohesive community of like lifestyles that are non-urban & agriculture-oriented. Insertion of a gated urban development with it's own Covenants, Codes & Restrictions (CC & R's), Homeowner Association, and urban demands for expanded infrastructure is not compatible with the current community*
- *Growth in Leona Valley is generally 2 to 3 new homes a year and of an in-fill nature, has been easily assimilated into the community and the County's ability to adequately support. Assuming all 121 tract homes would sell, it would suddenly increase Leona Valley's population by over 20% and overburden its current ability to support.*

The Leona Valley Improvement Association (LVIA) has served the community since the 1940s. LVIA's Community Center, includes the community building, a horse arena, and the Leona

Heritage Park. All community events are held here – meetings, BBQ's, and socials. LVIA publishes the town newsletter, sponsors the Community Queen contest and stages an annual Cherry Parade. The addition of a private urban homeowner's association within such a small community will negate the value and authority of LVIA and set the two associations at odds with each other since both have such greatly differing viewpoints and goals for the community.
The Antelope Valley Areawide General Plan has specific provisions for Non-Urban Residential Developments exceeding one dwelling unit per five acres. As identified on page V1-25 of said plan, the project can be approved to substantial compliance subject to the following conditions:
(a) The proposed development will not adversely affect local environmental quality or degrade significant natural resources such as sensitive habitat areas, riparian woodlands and scenic vistas. LVTC: Leona Valley is part of a Significant Ecological Area and is known for its riparian location, scenic vistas and diverse habitat.
(b) The proposed use will not be detrimental to public health and safety because of hazardous or special conditions. LVTC: The proposed use will be detrimental to the public health and safety due to inadequate water resources in this high fire severity location.
(c) The proposed use will not substantially contribute to the deterioration of air or water quality. LVTC: Leona Valley already has a proven shortage of water and the water resources are insufficient to support the existing population base.
(d) The proposed use, individually or in combination with other existing and proposed use patterns, will not require extension of urban services and facilities. LVTC: The development proposes an urban type gated subdivision. The density of the development is in conflict with the surrounding area.
(e) The proposed use is conveniently accessible by paved road, and will not individually or in combination with other existing and proposed use patterns, overburden existing non-urban roadways. LVTC: According to the Antelope Valley Areawide General Plan, secondary roads such as 87th Street West are to be developed to 24 feet in width, in compliance with a non-urban roadway standard. Bouquet Canyon Road cannot withstand a ten-year capital storm. The introduction of 121 homes will overburden the existing non-urban roadways, particularly, the eastern section of Leona Avenue, 90th Street West and 87th Street West.
(f) The proposed use is served by water supplies and distribution facilities of sufficient capacity to meet anticipated domestic and fire protection needs. LVTC: The water supply in Leona Valley is insufficient in capacity to meet domestic and fire protection needs, without the introduction of a new subdivision. The proposed use is compatible with the character of the surrounding development patterns. LVTC: The proposed subdivision is out of character with the surrounding development patterns and community character. Development in Leona Valley has been historically just a few homes a year. There has never been a subdivision in the boundaries of Leona Valley. The proposed development is comprised of tract homes in a subdivision. The existing layout of Leona Valley is consistent with a rural community in which no two homes are alike. The residential set back for the existing homes in Leona Valley are significant. Valley Vineyards tract map indicates homes are far closer than what currently exists in this community. The existing layout of the Valley accommodates the raising of farm animals. The proposed urban subdivision, due to hillside management and clustering applications will not accommodate this type of use and has small building pad sizes, which vary from 10,000 to 31,000-square feet. This is inconsistent with surrounding development patterns. The typical lot size of developed residences within the APN 3206 (which surround this development) is over 4½ acres with blended uses dedicated to a variety of agricultural and equestrian activities. The development in its current configuration is gated and caters to an urban type occupant while Leona Valley is culturally a rural and cohesive community. The gated urban development is isolated from the rest of Leona Valley and creates a sub-community within a community. Based on these factors, we believe the proposed development is not compatible in character to the surrounding development patterns of the community.

Valley Vineyard, LLC Response and Comment:

The following is in response to the various LVTC comments:

- Population: According to U.S. Census data, the population of Leona Valley was 1,250 in the year 2000[42]. Assuming LVTC's statement that the population in 2007 is 1,800 is correct, the population of Leona Valley has increased 44% in the last seven years, for an average increase of 6.3% per year. Using conservative rates of absorption, the Valley Vineyards project is anticipated to increase the valley's population at only 4.6% per year. This is well within the normal growth rates for Leona Valley
- Character: LVTC's contention that Valley Vineyards change the character for is not based on fact but only on conjecture. The 121 homes within Valley Vineyards will consist of many different floor plans, elevations, orientations, material and color combinations. Some lots may be sold to custom home builders. It is quite conceivable that, given the above differences, no two homes in Valley Vineyards would look the same.
- Hillside Management Ordinance: The Hillside Management regulations have been strictly adhered to in the design of this development. The major east-west ridgeline across the center of the site, which is highly visible from off the property, will not be graded, leaving this scenic natural feature intact. Not only will the ridge itself not be graded, but also the residential pads below the ridge have been designed so that houses will not intrude into the ridgeline. Clearly the sensitive, contour grading proposed for Valley Vineyards will not impact the predominant ridgeline on the site.
- Types of Sites: Valley Vineyards lot sizes range from 1.5 acres to 10.0 acres and home site sizes range from 8,903 to 39,000 sf. In contrast, 168 lots in Leona Valley, or over one-third of the total lots in Leona Valley are one and one-half acres or less in size. Another 61 lots are from 1.5 to less than 2.5 acres.[43] Over 42% of the lots in Leona Valley are less than 2.5 acres in size. Leona Valley's median lot size is 2.48 acres, not the 5.25 acres stated by LVTC. There are many areas in Leona Valley where densities are higher than the Valley Vineyards development.
- SEA: The site is not within a SEA, SEA Buffer or Coast Sensitive Environmental Resource.
- Appeal: The intent of the Leona Valley Community Standards District is to "protect the community's unique appeal, including its rural agricultural character." Valley Vineyards design is consistent with all aspects of the district's requirements. Leona Valley will increase by approximately two thirds the number of agricultural acres in Leona Valley.
- Traffic: The project traffic does not significantly impact the area intersections.
- General Plan: Not only does the project comply with the specifics of the existing General Plan, it serves as a model for the Conservation & Open Space Element of the proposed County General Plan
- Gating: This is an important means of mitigating the traffic impacts on the community. If Valley Vineyards was not gated, the impact on 87th and Leona Avenue, including the homes within Valley Vineyards, would be significant.
- Lot sizes: LVTC statements on lot sizes and density misrepresent their community. According to the Los Angeles County Assessor, there are 530 lots

42 Census Tract 9012.06 (Blocks 1000, 1073); Census Tract 9012.07 (Blocks 1017, 1019, 1021, 1023, 1024, 1031, 1033-38, 1042); Census Tract 9102.06 (Blocks 1016, 1028, 1029, 1048, 1053, 1054, 1059)

43 Los Angeles County Assessor

within the Leona Valley district boundaries. 168 of these lots are 1.5 acres **or less** in size, and another 61 lots are from 1.5 to less than 2.5 acres. Leona Valley's median lot size is 2.48 acres, not the 5.25 acres stated by LVTC. Valley Vineyards average lot size is 2.44 acres.

- Agriculture: Valley Vineyards development would **increase** the number of acres of agricultural uses in Leona Valley by nearly two-thirds. Currently there are only approximately 150 acres currently in active agricultural use in Leona Valley, including approximately 60 acres planted in cherries, 28 acres in grapes vines, 10 acres in Asian pears, 10 acres in Arkansas black apples, 20 acres in hay, 5 acres in vegetables, 10 acres in lilacs, and 2 acres in Christmas trees. Valley Vineyards, LLC plans on devoting approximately 100 acres of the site to an agricultural element - viticulture.
- Trails: Valley Vineyards, LLC will construct and dedicate approximately 1-mile of improved equestrian trails to the county master trail system.

OTHER FACTORS – 2. Environmental Safety

a. Are any hazardous materials used, transported, produced, handled, or stored on-site?

Planning's Response – No

Leona Valley Town Council Comment:
None

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

b. Are any pressurized tanks to be used or any hazardous wastes stored on-site?

Planning's Response – No

Leona Valley Town Council Comment:
The project calls for the use of propane tanks. There were be 121 pressurized propane tanks on this site. Therefore, the Planning Department response is in error.

Valley Vineyard, LLC Response and Comment:
Yes there will be propane tanks on the property, all of which will be installed in accordance with all government codes. It is the understanding of Valley Vineyards, LLC that all homes in Leona Valley are on propane.

PROPOSED MITIGATION MEASURE: The subdivision shall conform to the design standards and policies of Public Works.

c. Are any residential units, schools, or hospitals located within 500 feet and potentially adversely affected?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council Agrees with this response.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

d. Have there been previous uses that indicate residual soil toxicity of the site or is the site located within two miles downstream of a known groundwater contamination source within the same watershed?

Planning's Response – No

Leona Valley Town Council Comment:
We are unaware of ground water contamination. The Department of Fish and Game has been actively protecting the sensitive eco system related to the Bouquet Canyon Creek, which crosses this site.

Valley Vineyard, LLC Response and Comment:
It should be noted that: 1) the reference to Bouquet Canyon Creek is inaccurate as stated above and 2) this un-named tributary which flows into the Armargosa Creek does

not "cross" the property. See above comments regarding Drainage Channel A and Drainage Channel B.

e. Would the project create a significant hazard to the public or the environment involving the accidental release of hazardous materials into the environment?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this answer.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

f. Would the project emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this answer.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

g. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this answer.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

h. Would the project result in a safety hazard for people in a project area located within an airport land use plan, within two miles of a public or public use airport, or within the vicinity of a private airstrip?

Planning's Response – No input

Leona Valley Town Council Comment:
The Leona Valley Town Council agrees with this answer.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

i. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this answer. There is a potential to block traffic on 87th Street West due to the excessive influx of traffic from the development.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards will neither impair nor interfere with emergency access. Rather, Valley Vineyards will **improve** emergency response times and **improve** emergency evacuation possibilities for the entire community by providing a much needed second emergency access route for the community. Valley Vineyards will actually improve fire safety for the entire community of Leona Valley.

At present, the only access point to Elizabeth Lake Road – the main escape route for the valley in case of fire – is via 90th Street West. If there were a wildfire in Leona Valley that demanded a massive evacuation of the community, over 160 lots now have only one way out. Development of Valley Vineyards will create a second emergency access route for the community.

Fire, police and ambulance services will also be able to access Leona Valley via Valley Vineyards, thus shortening emergency response times.

PROPOSED MITIGATION MEASURE
Follow recommendations contained n the Traffic Impact Analysis.

PROPOSED MITIGATION MEASURE: Adhere to all aspects of the fire code.

j. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
None.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

MITIGATION MEASURES/OTHER CONSIDERATIONS
☐ Toxic Clean-up Plan
Comments:

CONCLUSION
Considering the above information, could the project have a significant impact relative to public safety.
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:
None.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

OTHER FACTORS – 3. Land Use

a. Can the project be found to be inconsistent with the plan designation(s) of the subject property?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the Planning Departments Response. Its primary purpose is to segregate uses that are thought to be incompatible; in practice, zoning is used as a permitting system to prevent new development from harming existing residents or businesses. Zoning is commonly controlled by local governments such as counties or municipalities. Zoning commonly includes regulation of the kinds of activities which will be acceptable on particular lots (such as open space, residential, agricultural, commercial or industrial), the densities at which those activities can be performed (from low-density housing such as single family homes to high-density such as high-rise apartment buildings), the height of buildings, the amount of space structures may occupy, the location of a building on the lot (setbacks), the proportions of the types of space on a lot (for example, how much landscaped space and how much paved space), and how much parking must be provided.
The policies pertaining to designated rural communities as contained in the Antelope Valley Areawide General Plan (page IV-13) specifically states,
"Where further development does occur, it should be of an "in fill" nature, consistent with the existing community character and service levels, and in no event should exceed the densities specified on the Antelope Valley Areawide General Plan Land Use Policy Map."
The project is in conflict with the density of the existing homes and development in Leona Valley. Furthermore, it will put an undue burden on the school, water resources, police/fire support and other infrastructure of this rural community.
Hillside Management
According to the Antelope Valley Areawide General Plan, the Hillside Management Area Policy is designed to protect the health and safety of the public from hazards typically associated with hillside areas and to preserve natural resources and scenic values commonly occurring in these environs. Wildfires, floods, mudslides, erosion and landslides are typical hazards confronting hillside properties. Leona Valley is a Class IV Fire Hazard area and is subject to regular firestorm activity. In addition, the area is subject to flooding, mudflow, erosion and high ground water conditions. The plan as proposed does not appear to be in compliance with the Hillside Management ordinance for the Antelope Valley Areawide General Plan based on the non-urban designation. The plot plan fails to indicate what portions of the sites are dedicated to "open space" or "conservation" easements, thereby indicating a larger than actual total land area for each site. The effective lot size (net of restricted areas) of each parcel is not indicated. Therefore, it does appear that most of the sites are sub-standard in comparison the County of Los Angeles Hillside Ordinance for Non-Urban areas. In addition, properties in the Leona Valley Community Standards District have a minimum lot size requirement of 2½ acres, assuming no undue restrictions such as slope, conservation considerations or biotic resources.

The Calculation of Thresholds in Non-urban Hillside Management Areas.
Builder's Density Calculation:

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY	Minimum Or Natural Area Required
0-25% 133.2 Acres	0.5 DU/AC*** 66.6	0.5/DU/AC*** 66.6	---- (?)
25-50% 143.2 Acres	1 DU/10 AC 14.3	1 DU/2 AC 71.6	70%

50% 16 Acres	N/A	1 DU/20 AC 0.8 AC	70%
Totals:	80.9, SAY 80 DU	139.0, SAY 139	

****Exceeds Maximum Density in Land Use Classification*;

Calculation Based Upon County of Los Angeles General Plan, Hillside Management Draft

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY	Minimum Or Natural Area Required
0-25% 133.2 Acres		1/DU/1 AC*** 133	70%
25-50% 143.2 Acres		1 DU/10 AC 14	70%
50% 16 Acres		1 DU/20 AC	70%
Totals:		146/DU	
High Fire Severity Zone	Discount by 25%	110/DU	
Seismic Hazard as Per USGS**	Discount by 25%	73 DU	

*Plan Requires Rounding Down to the Nearest Whole Number
**Major Earthquake Shaking Potential, San Andreas/Leona Valley Rift Zone; Liquefaction Zone;
***Exceeds Land Use Classification

Calculation Based Upon County of Los Angeles General Plan, Hillside Management Significant Ecological Area

% SLOPE	LOW DENSITY THRESHOLD	MAXIMUM DENSITY*	Minimum Or Natural Area Required
0-25% 133.2 Acres	1 DU/5 AC 26.64	1 DU/2.5 AC 53.28	70%
25-50% 143.2 Acres	1 DU/10 AC 14.3	1 DU/2.5 AC 57.28	70%
50% 16 Acres	1 DU/20 AC .80	1 DU/20 AC .80	70%
Totals:	41.74	107.36	

*As per Community Plan

Clustering, Page VI-2, Antelope Valley Areawide General Plan
The developer has indicated that the clustering rule applies to this development. Page V1-2 indicates that densities in the Antelope Valley should be considered "average" densities for the total proposed development to promote clustering. Clustering is defined as a rearrangement of units allowed within a single land use classification on a project site. When this option is utilized, the open space should be classified by the County as non-buildable area. This classification has not yet been applied. Furthermore, 70% of the project is its entirety is required for open space or natural area, which has not been applied to this development, even though the clustering rule has been applied. The open space or natural area if calculated at 70% of the total gross land area is 204.68 acres, leaving 87.72 acres for residential development with clustering up to 1.5 acres of

land. This will allow for fifty-eight single-family residences with the application of the clustering rule on the entire development. A suitable open space maintenance agreement shall be required for the life of the development.

Conditional Use Permit in Hillside Management & SEA's *in Non-Urban Hillside Management Areas, with residential uses exceeding the low-density threshold.*

Plotting Density & Impacts
Plotting density for an urban housing tract on vacant land that contains 25 – 50% slope inclines is premature without first conducting thorough applicable studies.
Factors impacting this property:
1.) San Andreas Rift Zone 2.) High Fire Severity Hazard Zone 3.) Abuts and contributes to Blue line creek 4.) Wildlife corridor and habitat 5.) Likely archaeological site 6.) Floodwater and debris drainage course 7.) Contributes to water table which feeds wells for Leona Valley's primary source of water 8.) Roadways undersized to safely and efficiently handle increase in traffic 9.) Slope instability after 50% of site is graded and natural landforms altered 10.) LA County's Hillside Management ordinance 11.) Identification of property in Significant Ecological Area 12.) Leona Valley Community Standards District 13.) No urban infrastructure to support this urban housing development
Therefore:
Footprint for lots needs to be selected on an individual basis AFTER the above results are completed and applied. While one County code may allow for building of X number of units per acre, any one of the above factors may negate that feasibility. It would be more efficient and result in a far better project, if the above factors are first addressed and then, based on those results, the plot plan is developed. Many of the guidelines in the Antelope Valley Areawide General Plan and the Hillside Management Ordinance are open for interpretation and as such, require more intensive study by a neutral experienced party.

Valley Vineyard, LLC Response and Comment:
LVTC is correct when it recognizes that Conditional Use Permits are required in Hillside Management Areas when the residential uses exceed the low-density threshold. LVTC is also correct when they recognize that the site is within a Hillside Management Area. LVTC is further correct when they recognize that a CUP is required when the number of units exceeds the low density threshold. It is for all of these reasons that submitted application – and environmental documentation – covers the CUP as well as the TTM.

The charts and other statements presented by LVTC that contend the project is not in compliance with the Hillside Management regulations are completely inaccurate. Density studies were conducted by a licensed civil engineer. In addition, a detailed aerial survey was conducted to ensure actual/existing contours were accounted for in the final calculations. All this material was included with the submittal of the TTM.

The governing documents applicable to this property include the adopted Antelope Valley Areawide General Plan, the Zoning Code and the Hillside Management regulations. Primary zoning is A-2-2. Supplemental zoning is the Leona Valley Community Standards District regulations. This development complies with all the above.

The Leona Valley Community Standards District regulations clearly state that the minimum lot size LVTC quotes above (2.5 acres) is not applicable in areas governed by the Hillside Management regulations, which Valley Vineyards is.

The LVTC states that 70% open space is required (which is true) by quoting from Section 22.56.215.J.1.a. of the Hillside Management regulations. That same section of these regulations (Section 22.56.215.J.1.d.ii) clearly states that the number of units allowed shall be the maximum number of units permitted subject to subsection E of these regulations. That subsection E calculation results in a total maximum of 139 units. Valley Vineyards is only 121 lots.

The Valley Vineyards property is not within an SEA. The biological and wetlands surveys, prepared for this site by professionals and discussed in detail herein, indicate that the statements by the LVTC are incorrect. The "project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it not relatively undisturbed and natural."[44]

LVTC misunderstands open space definitions and requirements. Open space may include a number of uses including but not limited to landscaped areas, greenbelts, private yard areas if restricted from construction, riding and hiking trails, and contour graded slopes (22.56.215.J.1.a.). The submitted plan meets these requirements.

Over 100 acres of the site (over one third of Valley Vineyards) is being dedicated to viticulture.

PROPOSED MITIGATION MEASURE: Valley Vineyards is subject to the Hillside Management regulations contained in Chapter 22.56.215. Therefore this project must comply with this ordinance.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with the Leona Valley Community Standards District regulations.

b. Can the project be found to be inconsistent with the zoning designation of the subject property?

Planning's Response – No

Leona Valley Town Council Comment:
Based upon the above analysis, the project is found to be inconsistent with the zoning designation as well as the policy of the Antelope Valley Areawide General Plan to permit developments of an "infill" nature within a rural community.

Valley Vineyard, LLC Response and Comment:
The Valley Vineyards plan is in 100% compliance with all adopted codes, regulations and ordinances of both the county and state agencies.

c. Can the project be found to be inconsistent with the following applicable land use criteria:

Planning's Response – No

Leona Valley Town Council Comment:
Yes.

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44 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, August 30, 2007

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

Hillside Management Criteria?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the Planning Department's Response.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

SEA Conformance Criteria?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with the Planning Department's Response. While the mapping program for the County of Los Angeles does not indicate the property is located in a Significant Ecological Area, this is contrary to the Antelope Valley Areawide General Plan.

Valley Vineyard, LLC Response and Comment:
The Valley Vineyards property is not within an SEA. The biological and wetlands surveys, prepared for this site by professionals and discussed in detail herein, indicate that the statements by the LVTC are incorrect. The "project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it not relatively undisturbed and natural."[45]

Other?

Planning's Response – No input

Leona Valley Town Council Comment:
Reserved.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

d. Would the project physically divide an established community?

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. The developer plans on gating this urban development at ingress/egress points and establish a homeowners association specifically for that project's inhabitants. There are no other gated housing developments in Leona Valley.

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45 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, August 30, 2007

This development will isolate itself from the rest of the community.

Valley Vineyard, LLC Response and Comment:

The primary reason behind incorporating gates into Valley Vineyards was to limit the number of cars that might adversely impact the existing community. If the gates were not in place, vehicles could and would use Valley Vineyards' streets as a short cut into and out of the homes in the southeast portion of Leona Valley. This would have a significant negative impact on 87th Street West, the eastern end of Leona Avenue and prospective residents of Valley Vineyards. Verification of this is to be found in the traffic study, where due to the gates it is anticipated that 90% of all traffic will enter or leave via Bouquet Canyon Road.

Gates will not "isolate" the residents of Valley Vineyards from the rest of the community. Residents will still be able to interact with everyone else in the community, just as those who are separated by distance from the main town center.

As stated above, these gates will be accessible by emergency vehicles for sheriff, fire, and ambulance. This will also be true for emergency calls elsewhere in Leona Valley if the sheriff/fire personnel answering the call elect to use Valley Vineyards streets as a short cut. In case of an emergency evacuation of the community the gates would be opened so the entire community could exit Leona Valley through Valley Vineyards. Valley Vineyards will provide a much needed second emergency access route.

e. Other factors?

Planning's Response – No input

Leona Valley Town Council Comment:

The Leona Valley Town Council believes that the clustering rule has been misapplied; and that the standards of the Leona Valley Community Standards District and the area specific restrictions by the Antelope Valley Areawide General Plan has not been applied.

Valley Vineyard, LLC Response and Comment:

The Valley Vineyards plan is in 100% compliance with all adopted codes, regulations and ordinances of the county.

☐ **MITIGATION MEASURES/OTHER CONSIDERATIONS**

Comments:

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **land use** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:

The Leona Valley Town Council disagrees with this response. Because Valley Vineyards will represent a 20% increase in population; and because we believe the planning and zoning codes have not been properly applied, we propose that a density analysis be conducted independently (not by the developer or the developer consultant) with a density determination completed after an environmental impact report is completed. The density analysis shall include the standards of the

Antelope Valley Areawide General Plan, the County of Los Angeles Hillside Management Ordinance (including the Draft interpretation) in conjunction with the Leona Valley Community Standards District. Considering the bio-diversity of this location, the calculations made must consider the area resources and must not put the existing population at risk.

Valley Vineyard, LLC Response and Comment:

The Valley Vineyards plan is in 100% compliance with all adopted codes, regulations and ordinances of the county.

OTHER FACTORS – 4. Population/Housing/Employment/Recreation

a. Could the project cumulatively exceed official regional or local population projections?

Planning's Response – No

Leona Valley Town Council Comment:
Yes. Leona Valley has had very little population growth over the last two decades. The current population is just over 1,800 residents based on 3.18 persons per household. With the addition of 121 homes (121 x 3.18=373/projected increase) there is a projected population increase of over 20%. This far exceeds any increase in population for Leona Valley in decades.

Valley Vineyard, LLC Response and Comment:
According to U.S. Census data, the population of Leona Valley was 1,250 in the year 2000[46]. Assuming LVTC's statement that the population in 2007 is 1,800 is correct, the population of Leona Valley has increased 44% in the last seven years, for an average increase of 6.3% per year. Using conservative rates of absorption, the Valley Vineyards project is anticipated to increase the valley's population at only 4.6% per year. This is well within the normal growth rates for Leona Valley

b. Could the project induce substantial direct or indirect growth in an area (e.g., through projects in an undeveloped area or extension of major infrastructure)/

Planning's Response – No

Leona Valley Town Council Comment:
The Leona Valley Town Council disagrees with this response. There will be a dramatic increase in population, which will require an extension of major infrastructure, as it currently does not exist in this community.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards will not "require an extension of major infrastructure."

c. Could the project displace existing housing, especially affordable housing?

Planning's Response – No

Leona Valley Town Council Comment:
No.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

d. Could the project result in substantial job/housing imbalance or substantial increase in Vehicle Miles Traveled (VMT)?

Planning's Response – Maybe

Leona Valley Town Council Comment:
A large portion of the population of the Antelope Valley is a commuter population. This urban

46 Census Tract 9012.06 (Blocks 1000, 1073); Census Tract 9012.07 (Blocks 1017, 1019, 1021, 1023, 1024, 1031, 1033-38, 1042); Census Tract 9102.06 (Blocks 1016, 1028, 1029, 1048, 1053, 1054, 1059)

development could result in an increase of commuters to relocate to this area.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

PROPOSED MITIGATION MEASURE
Follow recommendations contained n the Traffic Impact Analysis.

e. Could the project require new or expanded recreational facilities for future residents?

Planning's Response – Maybe

Leona Valley Town Council Comment:
There are currently no County parks or municipal recreation services in Leona Valley. New recreational facilities would likely be required as part of an urban amenity.

Valley Vineyard, LLC Response and Comment:
The county subdivision ordinance requires the payment of park fees. The fees attributable to Valley Vineyards have been estimated by the county to be approximately $44,000.

Additionally, Valley Vineyards, LLC will construct and dedicate approximately 1-mile of improved equestrian trails to the county master trail system.

PROPOSED MITIGATION MEASURE: Valley vineyards will pay park fees.

f. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Planning's Response – No

Leona Valley Town Council Comment:
No.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination.

g. Other factors?

Planning's Response – No

Leona Valley Town Council Comment:
Leona Valley lacks the infrastructure to support an urban development. There are no parks, libraries or other infrastructure to support this type of development.

Valley Vineyard, LLC Response and Comment:
Local government can and does require mitigation fees for the improvements attributable to new development. As previously stated, Valley Vineyards will be responsible for payment of school fees, park fees, library fees and fire fees.

Fire hydrants added to Valley Vineyards, especially those along 87th Street West, will benefit adjacent owners.

Valley Vineyards will also be responsible for improving 87th Street West as it traverses the property, thus improving access for those living on 87th Street and who now must trespass on a dirt road over Valley Vineyards.

Emergency access through Valley Vineyards will improve public safety for the entire community by providing a second emergency access point for the 383 lots in Leona Valley that now rely totally on 90th Street for their access.

PROPOSED MITIGATION MEASURE: Valley Vineyards shall be responsible for payment of mitigation fees

☐ **MITIGATION MEASURES/OTHER CONSIDERATIONS**
Comments:

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to population, housing, employment, or recreational factors?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

Leona Valley Town Council Comment:
Disagrees with the assessment "less than significant". We believe that an increase in population of over 20% represents significant impact on the community.

Valley Vineyard, LLC Response and Comment:
With a projected absorption rate of two homes per month in Valley Vineyards, it will take five years for the 121 homes to be occupied, which is an increase of 4.6% per year. This is well within the normal growth rates for Leona Valley.

MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plan or animal, or eliminate important examples of the major periods of California history or prehistory?

Planning's Response – Maybe, *site has potential to support both raptor and songbird nest.*

Leona Valley Town Council Comment:
There are numerous threatened, endangered and species of interest located in Leona Valley. A summary is as follows:

- *Mojave Ground Squirrel (threatened)*
- *The Unarmored Threespine Stickleback Fish (endangered)*
- *Red Legged Frog (endangered)*
- *Least Bell's Vireo (endangered, limited to region)*
- *Kangaroo Rat (endangered)*
- *Southwest Willow Flycatcher (endangered)*
- *Tri-Colored Blackbird (species of interest)*
- *Long Billed Curlew (highly imperiled)*
- *California Horned Lizard*
- *California Spotted Owl (species of interest)*
- *Desert Tortoise (endangered)*
- *Golden Eagle (nesting region)*
- *Southwestern Pond Turtle (threatened)*
- *Burrowing Owl (threatened)*

The significant ecological area that is part of the overlay for Leona Valley states there are specific State and Federally endangered or threatened species that are indigenous to this area including rare vascular plants as well as sensitive bird and reptile species. According to the proposed SEA, these communities include: Joshua tree woodland, valley oak woodland, native grassland, wildflower field southern cottonwood-willow riparian forest, freshwater marsh, alkali marsh, alluvial wash and southern willow scrub. The Draft General Plan reports sensitive species to include, but are not limited to: Nevin's barberry, short-joint beavertail, Pierson's morning glory, alkali mariposa lily, California red legged frog, southwestern pond turtle, California horned lizard, coast patch-nosed snake, two-striped garter snake, Merlin, prairie falcon, mountain plover, burrowing owl, California spotted owl, southwestern willow flycatcher, California Condor, Mojave ground squirrel, and the southern Grasshopper mouse.
While nearly all of the species identified by the Draft plan have been known to be located in this community and live on or around the subject site, the California condor that resided in Leona Valley has been captured and relocated out of the area.

<u>Valley Vineyard, LLC Response and Comment:</u>
The Valley Vineyards property is not within an SEA. The biological and wetlands surveys, prepared for this site by professionals and discussed in detail above, indicate that the statements by the LVTC are incorrect. The "project site is not within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resources [Environmentally Sensitive Habitat Area (ESHA), etc.], and it not relatively undisturbed and natural."[47]

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47 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, August 30, 2007

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

b. Does the project have possible environmental effects that are individually limited but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Planning's Response – No

Leona Valley Town Council Comment:
There are no other urban subdivisions in Leona Valley. The low-density non-urban nature of this community has created an environment where wildlife and residents generally live in harmony. This includes open fencing, large pasture areas and the expansion of agricultural farming in the community. The proposed development is to be gated and is of much higher density than the remainder of Leona Valley, which will have an adverse impact on the wildlife that share this region.
In peak years, Leona Valley has never had the construction of more than six homes in one year. The introduction of 121 homes with a 20% grown to the population base, will put an undue stress on the infrastructure of the community. There have been no past projects of this scale in Leona Valley.

Valley Vineyard, LLC Response and Comment:
Valley Vineyards, LLC concurs with the Impact Analysis Section's determination, and believes that the LVTC is misinformed.

Over 70% of Valley Vineyards will be open space, in accordance with the Hillside Management regulations. Lots in Valley Vineyards range from one and one-half acres to over ten acres. Conversely, one hundred fifty lots in Leona Valley, or nearly one-third of the total number of lots in Leona Valley are one and one-half acres or less in size.[48]

In the past 60 years, 6 or more homes have been built in Leona Valley in 28 separate years.[49]

According to U.S. Census data, the population of Leona Valley was 1,250 in the year 2000[50]. Assuming LVTC's statement that the population in 2007 is 1,800 is correct, the population of Leona Valley has increased 44% in the last seven years, for an average increase of 6.3% per year. Using conservative rates of absorption, the Valley Vineyards project is anticipated to increase the valley's population at only 4.6% per year. This is well within the normal growth rates for Leona Valley

PROPOSED MITIGATION MEASURE: Valley Vineyards is subject to the Hillside Management regulations contained in Chapter 22.56.215. Therefore this project must

48 Los Angeles County Assessor

49 Lawyers Title review of "Year Built" information for the 382 homes in Leona Valley.

50 Census Tract 9012.06 (Blocks 1000, 1073); Census Tract 9012.07 (Blocks 1017, 1019, 1021, 1023, 1024, 1031, 1033-38, 1042); Census Tract 9102.06 (Blocks 1016, 1028, 1029, 1048, 1053, 1054, 1059)

comply with this ordinance.

PROPOSED MITIGATION MEASURE: Valley Vineyards will comply with the Leona Valley Community Standards District regulations.

c. Will the environmental effects of the project cause substantial adverse effects on human beings, either directly or indirectly?

Planning's Response – No

Leona Valley Town Council Comment:
The Planning Department has indicated "Yes" and "Maybe" responses in Hazard – 1. Geotechnical, 2. Flood, 3. Fire. 4. Resources. 5 Agricultural. 6 Education. The LVTC finds it unreasonable that this item would be "Maybe" with so many "Yes" and "Maybe" responses from the County. This item should be "Yes".
There are significant issues pertaining to geology, flood, fire protection and water quality. There is a pre-existing insufficient water supply in Leona Valley and the additional metering of 121 homes could result in severe shortages, the necessity to truck in water (contrary to the County requirements) and could result in losses of lives and property during firestorm events.
If the developer were to add additional wells in this community, the proposed extraction may be excessive and could harm the water supply of family farms and private residences that are already on water wells in the same community. There is inadequate fire protection.

Valley Vineyard, LLC Response and Comment:
Geology, flood, fire and water issues have been addressed in great detail throughout this response. Issues and mitigations necessary are identified in detail. The Impact Analysis Section correctly based its determination on these reports, studies and research, professionally prepared and specific to the subject property, rather than general, unsubstantiated speculations.

Specifically, Valley Vineyards will improve the safety of the entire Leona Valley community by improving emergency access by fire and sheriff vehicles and by providing a badly needed second emergency access route out of the community in case a mass evacuation is required.

CONCLUSION
Considering the above information, could the project have a significant impact (individually or cumulatively) on the environment?
☐ Potentially significant ☒ Less than significant with project mitigation ☐ Less than significant/No impact

Leona Valley Town Council Comment:
Based on the above LVTC comments we believe the project leaves a "Potentially significant" impact (individually or cumulatively) on the environment.

Because the United States Forest Service and the Department of Fish and Game have made an aggressive effort to protect the Bouquet Canyon Creek and Lost Valley Ranch Creek, then there is clearly a Potentially significant impact if these agencies have deemed the creeks to be sensitive and worth protecting. Property owners on Bouquet Canyon Road, 86th Street West and 87th Street West have been restricted from clearing their sites of mudflow and debris, even to provide safe access, because of the environmental sensitivity of this creek and known endangered species that occupy this location.

The site is comprised primarily of a foraging range of native grassland with a nearby water source offering excellent interconnectivity of all of the species that inhabit this biologically diverse region. The site and Leona Valley are a major wildlife linkage to the Ritter Ridge (held by the Santa Monica Mountains Conservancy), the Angeles National Forest and the Sierra Pelonas.

Leona Valley has a severe water shortage with little possibility of correction in the near future. While steps are being taken by the Town Council to help correct this situation, it will be many years before any plans are funded or implemented, if ever. The addition of 121 single-family residences in a community that is short approximately 285 acre feet of water per year can be devastating, particularly during draught conditions. The approval of such a large urban development under these circumstances because of the purveyor's premature and unsubstantiated issuance of a "will serve" letter will put the community at significant risk.

Valley Vineyard, LLC Response and Comment:

There are no "known endangered species that occupy this location". LVTC's speculations are inaccurate and refuted by expert documentation. Extensive studies by professional biologists dispute their comments. In addition to the wetlands analysis[51] and biological survey[52] already submitted to the county, at the request of Valley Vineyards (due to the concerns expressed by LVTC), additional directed research was commissioned. Their conclusions, attached here, to provides additional assurances that LVTC's concerns have been addressed.[53]

Valley Vineyards is not "comprised primarily of a foraging range of native grassland." Valley Vineyards currently supports 92.4 acres of non-native grassland, 10.8 acre of ruderal areas, and 3.3 acres of disturbed areas. These disturbed areas are highly degraded.[54] "The undeveloped land contains numerous access roads for off-road vehicle use and for use as firebreaks. A majority of the project is devoid of natural vegetation as grazing or other form of vegetation removal has occurred over the years. There are sporadic pockets of natural vegetation found within the subject property"[55]

The will-serve letter from California Water Services Company is for the subject property, not for all of Leona Valley. The will-serve letter does not allow for the subject property to use other existing sources of water. The will-serve requires Valley Vineyards to install facilities to provide "additional" groundwater as needed to serve the development. This is standard procedure for Cal Water.

PROPOSED MITIGATION MEASURE: Permits from the California Department of Fish & Game (in accordance with Section 1600 of the Fish & Game Code), from the U.S. Army Corps of Engineers (in accordance with the Clean Water Act) and the California Regional Water Quality Control Board (in accordance with Section 404 of the Clean Water Act) must be obtained if applicable to the site.

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51 PCR Services Corporation, Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California, August, 2006

52 PCR Services Corporation, Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angles County, California, August 15, 2006

53 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, August 30, 2007

54 PCR Services Corporation, Responses To Comments From Leona Valley Town Council Regarding Biological Resources Within The Draft Initial Study For The 292.49-Acre Bouquet Canyon Project Site (Tr0066952), Unincorporated Los Angeles County, California, August 30, 2007

55 Kunzman and Associates: TTM 066952 - VALLEY VINEYARDS TRAFFIC IMPACT ANALYSIS , by: Frank Lee, Carl Ballard, and William Kunzman, P.E. July 31, 2007

PROPOSED MITIGATION MEASURE: Valley Vineyards, LLC is currently working with Cal Water to comply with the requirements of the will-serve letter. Wells and storage facilities may be required. Cal Water indicates that providing additional wells and or storage facilities on the subject property might enhance their ability to serve the entire community, not just the subject property.

GENERAL ASSUMPTIONS AND LIMITING CONDITIONS

1. *The Leona Valley Town Council, its community committee and volunteers have prepared a response to the Initial Study and Impact Analysis Matrix by the County of Los Angeles Department of Regional Planning Project Number TR0066952; RENVT200700035 also known as Assessor's Parcel Numbers 3206-003-007, & 001 & 008. This response, and its precursor document, the April 16, 2007 letter issued to the County of Los Angeles Department of Regional Planning, is subject to the following general assumptions and limiting conditions:*
2. *Care has been taken to obtain all information from reliable sources. The authors cannot guarantee or be responsible for the accuracy of this information.*
3. *That maps, photographs and exhibits included herein are for illustration only as an aid in visualizing matters discussed within the response. They should not be considered as surveys or relied upon for any other purpose, nor should they be removed from, reproduced or used apart from this response.*
4. *That no opinion is expressed as to the impact, if any, of subsurface oil, gas or mineral rights or whether the property is subject to surface entry for the exploration or removal of such materials except as is expressly stated. That no opinion is intended to be expressed for matters that require legal expertise or specialized investigation or knowledge.*
5. *That the Leona Valley Town Council, its volunteers and Development Committee assumes that there are no hidden or unapparent conditions of the property, subsoil or structures. We assume no responsibility for such conditions, or for engineering, which might be required to discover such factors.*
6. *The Americans with Disabilities Act ("ADA") became effective January 26, 1992. We have not made a specific compliance survey and analysis of this property to determine whether or not it is in conformity with the various detailed requirements of the ADA. It is possible that a compliance survey of the property/project, together with a detailed analysis of the requirements of the ADA, could reveal that the property is not in compliance with one or more of the requirements of the Act.*
7. *Possession of this response thereof does not imply right of publication, not use for any purpose by any other than the person to whom it is addressed, without the written consent of the authors.*
8. *No part of this response is to be used in any other context except in the response itself.*
9. *The writers of this response have no specialized expertise in the fields of biology, geology, drainage, environmental impact, land use planning, zoning, roadways, trends, populations studies, hydrology, archeology or other elements related to Valley Vineyards. We have relied upon private and outside technical reports and studies related to these issues and assume said reports are accurate and reliable. Because of the significant impact on the community and because of the specific lack of professional expertise in these areas, and because of the public's concern over the impact of Valley Vineyards, it is requested that the associated recommended studies, including an environmental impact report, be completed for the purpose of Valley Vineyards.*

EXHIBIT LIST

1. Leona Valley Species & Wildlife Corridor
2. Leona Valley High Fire Severity Zone
3. Leona Valley Flood & Road Hazard Conditions

SUPPORTING DOCUMENTATION

1. County of Los Angeles Department of Public Works Storm Report January 11, 2005
2. County of Los Angeles Department of Public Works Storm Recovery Report February 24, 2005
3. County of Los Angeles Department of Public Works Recovery Report Status Update March 7, 2005
4. Bouquet Canyon Fault
5. Earthquake Shaking Severity Map
6. Fault Rupture Hazard Zones in California
7. Sleepy Valley Quadrangle
8. San Andreas Rift Zone
9. Excerpt, California Fault, Thurston Clark ©1996
10. Minutes to Special Town Meeting on Water Shortage, August 11, 2004
11. R.W. Robinson, Cultural Resource Investigation (Leona Valley), December 11, 1989
12. Automobile Club of Southern California Bouquet Canyon Circa 1920 Road Map
13. Palmdale Planning Department, Bouquet Canyon Scenic Roadway
14. Antelope Valley Area Wide Plan
15. County of Los Angeles Hillside Ordinance Draft
16. Biological Resources Assessment, Newhall Water District (Santa Clara River Project)
17. U.C. Santa Barbara, Prioritizing Sites Along the Santa Clara River for Conservation of Threatened & Endangered Species
18. The Status & Distribution of Unarmored Threespine Stickleback Fish in the Angeles National Forest
19. Parasite Analysis of Native & Non-Native Fish in the Angeles National Forest
20. West Mojave Habitat
21. Vermillion Flycatcher
22. State of California Department of Fish & Game, Distribution, Reproductive Success and Impact of Nest Parasitism of Brown Headed Cowbirds on Least Bell's Vireos
23. Critical Habitat Units for the California Red-Legged Frog
24. Red Legged Frog Territory Map
25. Bureau of Land Management, West Mojave Reptiles, Amphibians & Fish
26. Bureau of Land Management, West Mojave Birds
27. Bureau of Land Management, West Mojave Mammals
28. Bureau of Land Management, West Mojave Plants
29. Lauren Development (re: subject site) Response to the Antelope Pardee Transmission Lines
30. Santa Clarita Signal Newspaper, Indians in Leona Valley
31. Santa Clara Watershed, Description
32. Santa Clara Watershed, Birds
33. Santa Clara Watershed, Habitat
34. Bureau of Land Management, Sierra Pelona

Subject: Agreement to Appear - Town council Meeting of April 9, 2007
From: "John L. Allday" <johna@laurendevelopment.com>
Date: Mon, 02 Apr 2007 13:52:21 -0700
To: Rich Thomas <Rrych@cs.com>, Bill Elliott <William.Elliott@lmco.com>, Alexis Upton-Knittle <AUK9@earthlink.net>, Robert Wood <robertwood8401@sbcgolbal.net>, Larry Tyler <tccprez@adelphia.net>
CC: "Norman L. Hinkling" <NHickling@lacbos.org>, Hunt Braly <huntb@hackerbraly.com>
BCC: "Bill Ford (work)" <billf@laurendevelopment.com>

Town Council Members:

Attached is our letter accepting your invitation to present our plan to the council and community on April 9th. I mentioned at the meeting of March 12th that we might not be ready with all our exhibits by the first meeting of April, however if you would like us to make a presentation on that date, we will do so.

Thank you.

John Allday
818-575-9983 x 2 (office)
805-432-3125 (cell)

LAUREN
DEVELOPMENT INC.

April 2, 2007

Leona Valley Town Council
P.O. Box 795
Leona Valley, CA 93551

RE: TTM 066952

Dear Town Council Members:

Thank you for the invitation to appear before your council on April 9, 2007. Although that is sooner than we wished to make our initial presentation to your group, we will meet your request if you desire.

The material sent you by the county is for a Tentative Tract Map and Use Permit. No General Plan Amendment or Zone Change is needed because our plan is consistent with the existing General Plan (Antelope Valley Areawide General Plan designation of N-1), Primary Zoning (A-2-2) and the Secondary Zoning (Leona Valley Community Standards District). A Use Permit is required because the project is subject to the Hillside Management Regulations, with which our plan is also consistent. We did not stop at just being consistent with the above regulations; By attending your town council meetings for the last year and discussing our plan with residents, we have learned of numerous community desires and have included many things in the plan to accommodate those desires. We are anxious to share those with you.

Do not be alarmed if you hear we have shown our plan to community members before the April 9th meeting. Over the last year we have promised some of our neighbors that we would show them the plan before it was shown to the entire community, and we will be honoring that commitment.

Very truly yours,

Valley Vineyards, LLC
By: Lauren Development, Inc.
It's Operating Manager

John L. Allday
Vice President

cc:
Rich Thomas, LVTC President, by email to Rrych@cs.com
Bill Elliott, LVTC Vice President / Treasurer by email to William.Elliott@lmco.com
Alexis Upton-Knittle, LVTC Secretary, by email to AUK9@earthlink.net
Robert Wood, LVTC Member at Large by email to robertwood8401@sbcgolbal.net
Larry Tyler, LVTC Member at Large, by email to tccprez@adelphia.net
Norman L. Hinkling, by email to NHickling@lacbos.org
Hunt Braly, by email to huntb@hackerbraly.com

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