

Disney | ABC Studios at The Ranch

Final Environmental Impact Report



SCH No. 2010011010
County Project No. TR071216-(5)
Plan Amendment No. 200900010
Zone Change No. 200900012
Vesting Tentative Tract Map No. 071216
Conditional Use Permit No. 200900126
Oak Tree Permit No. 200900041
Parking Permit No. 201000002
Environmental Review No. 200900112

Lead Agency:
County of Los Angeles
Department of Regional Planning
Impact Analysis Section
320 West Temple Street, Room 1362
Los Angeles, California 90012

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I. Introduction



I. INTRODUCTION

A. PURPOSE

As described in Section 15089 of the Guidelines for the California Environmental Quality Act (CEQA Guidelines), a lead agency must prepare a Final Environmental Impact Report (Final EIR) before approving a project. This Final EIR for the Disney | ABC Studios at The Ranch Project (Project) has been prepared in accordance with Section 15132 of the CEQA Guidelines. As required by that section, this Final EIR consists of the following: the May 2012 Draft EIR for the Project (EIR Volumes I through IX, incorporated herein by reference); corrections, clarifications, and additions to the Draft EIR; copies of the comment letters received and a transcript of the oral testimony regarding the Project and/or the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; responses to all comments received; a Mitigation Monitoring and Reporting Program (MMRP); and other information added for clarification by the lead agency, each described further below.

B. ENVIRONMENTAL REVIEW PROCESS

As defined in CEQA Guidelines Section 15050, the County of Los Angeles is the Lead Agency responsible for preparing the EIR for the Project. The County determined that preparation of an EIR was required for the Project after conducting preliminary review and preparing an Initial Study for the Project, dated January 4, 2010, in accordance with CEQA Guidelines Sections 15060 and 15063. In compliance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) was issued on January 7, 2010, to the State Clearinghouse, various public agencies, and other interested parties for the required 30-day review and comment period. Additionally, a Scoping Meeting was held on January 21, 2010, at the William S. Hart Museum and Park to facilitate public review and comment on the Project. All NOP comments relating to the EIR were reviewed and the issues raised in those comments were considered in the preparation of the Draft EIR. The NOP including the Initial Study, the NOP comments received by the County, and the Scoping Meeting comments are contained in Appendix A of the Draft EIR.

The Draft EIR was circulated for a 45-day public review period as required by CEQA from May 4, 2012, to June 18, 2012. During that review period, a public hearing was held by the County of Los Angeles Hearing Examiner on June 4, 2012, at William S. Hart Museum and Park and public testimony was taken.

C. CONTENTS OF THE FINAL EIR

This Final EIR is organized into five main sections, as follows:

Section I. Introduction—This section provides an overview of the Final EIR.

Section II. Corrections, Clarifications, and Additions to the Draft EIR—This section consists of revisions that have been made to the Draft EIR based on comments received from public agencies and the general public and other items requiring updating, clarification, and/or correction.

Section III. Responses to Written Comments—This section presents matrices of public agencies and interested parties that commented on the Draft EIR and the issues raised in those comments. A copy of each comment letter (or email) is provided, followed by each individual comment and a corresponding response.

Section IV. Responses to Oral Testimony—This section presents a matrix of the persons who spoke regarding the Project and/or Draft EIR at the Hearing Examiner public hearing on June 4, 2012 and the issues raised in those comments. A copy of the hearing transcript is provided, followed by each individual comment and a corresponding response.

Section V. Mitigation Monitoring and Reporting Program—This section provides the full MMRP for the Project and reflects any revisions provided in Section II, Corrections, Clarifications, and Additions to the Draft EIR. The MMRP lists all of the proposed Project Design Features (PDFs) and Mitigation Measures (MMs) by environmental issue and identifies the action required, mitigation timing, responsible party, and monitoring agency or party responsible for ensuring each Project Design Feature and Mitigation Measure is implemented.

In addition, as discussed in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, the following appendices have been added to the Draft EIR and are appended to this Final EIR:

- Appendix E.3—Pyrotechnics Worksheets
- Appendix N—Economic & Fiscal Impact Analysis

II. Corrections, Clarifications, and Additions to the Draft EIR



II. CORRECTIONS, CLARIFICATIONS, AND ADDITIONS TO THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Disney | ABC Studios at The Ranch Project (Project). Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from implementation of the Project. The changes to the Draft EIR are indicated below under the appropriate Draft EIR section heading. Deletions are shown with ~~strikethrough~~ and additions are shown with underline.

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Table of Contents, page xi, revise the title of Tables V.K.2-1 and V.K.2-2 as follows:

Table V.K.2-1: Existing and Proposed County Fire Department Stations ~~Located in~~ Serving the Project Vicinity

Table V.K.2-2: Fire and Paramedic Response Data for ~~2009~~ 2011

II. EXECUTIVE SUMMARY

Section II, Executive Summary, page II-2, add the following at the end of the first partial paragraph (continued from the previous page):

The Project would allow for continued operation and maintenance of the existing filming ranch and associated outdoor sets on 195 acres of the Ranch with the remaining 637 acres used as a filming backdrop, by incorporating the existing Conditional Use Permit (CUP) that allows filming uses at the Ranch into the proposed CUP for the Project, as discussed further in Section IV, Project Description, of this Draft EIR. As indicated in the Exhibit "A" Map provided as Figure IV-17 in Section IV, Project Description, of this Draft EIR, the proposed CUP would apply to the entire 890-acre Ranch, as does the existing CUP, with the 195 acres of existing filming ranch and associated outdoor sets continuing to be operated as it has been for over 30 years. The

analysis provided within this Draft EIR distinguishes between those areas where new development and uses are proposed that would result in physical changes in the environment (i.e., the Development Area, the Water Tank Area, the Trail Area, the Potential Mobile Home Relocation Areas, and the Conditional Parking Areas, which with the Off-Site Infrastructure Improvement Areas are typically referred to herein as the Project site) and those areas of the Ranch where existing and ongoing film production and intermittent agricultural and oil production uses would continue unchanged (generally referred to herein as the Ranch or the remainder of the Ranch).

Section II, Executive Summary, page II-2, revise the first sentence of the last partial paragraph as follows:

Under the Soundstage Option, the southern portion of the Development Area (south of Placerita Creek and west of the existing Los Angeles Department of Water and Power [LADWP] transmission line corridor) would contain eight soundstages, four mills, and four production offices in the center of the development; writers/producers bungalows and a commissary/amenity building to the north of the soundstages; and a warehouse and a central utility plant along the southern boundary of the Development Area near Placerita Canyon Road.

Section II, Executive Summary, page II-8, delete the third bullet at the bottom of the page:

- ~~• Traffic, Access, and Parking: Cumulative construction traffic impacts would be significant and unavoidable to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3).~~

Section II, Executive Summary, pages II-40 to II-41, revise the first reference to the “California Department of Fish and Game” to “California Department of Fish and Wildlife” as shown below, and revise all subsequent references in this section and throughout the Draft EIR to reflect the new name of the agency effective as of January 1, 2013. Also revise all references to the “CDFG” to “CDFW” throughout the Draft EIR.¹

The results of the surveys, including graphics showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the County of Los Angeles Department of Regional Planning and ~~California Department of Fish and Game~~ California Department

¹ Note, however, that the name of the California Fish and Game Code has not changed.

of Fish and Wildlife within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

Section II, Executive Summary, page II-62, under the headings **J. TRAFFIC, ACCESS, AND PARKING**, *Traffic*, Construction, delete the following impact conclusion listed in the last column entitled Resulting Level of Significance:

~~Significant and Unavoidable
(cumulative impacts)~~

Section II, Executive Summary, page II-63, under the headings **J. TRAFFIC, ACCESS, AND PARKING**, *Traffic*, Construction, delete the following text provided in the first column entitled Environmental Impact Summary:

~~Cumulative construction traffic impacts would be significant and unavoidable to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3).~~

Section II, Executive Summary, page II-9 to page II-100, revise the following Project Design Features (PDFs) and Mitigation Measures (MMs) in Table II-1 in the column titled "Project Design Features and Mitigation Measures" as shown in the table excerpt beginning on page II-4.²

² The table herein only lists those PDFs and MMs with changes. A complete and final list of all of the Project's PDFs and MMs is provided in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR.

**Table II-1 (excerpt)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance**

Project Design Features and Mitigation Measures
A. GEOTECHNICAL HAZARDS
PDF A-1: The Applicant shall implement During construction and operation of the Project, appropriate erosion control and drainage devices shall be implemented as specified in the Project's Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.
PDF A-2: Excavation and grading activities shall be scheduled during dry weather periods to the extent feasible. If grading occurs during the rainy season (October 15 through April 1), diversion dikes and channels shall be constructed to channel runoff around the site. Channels shall be lined with grass, jute mesh or berms to reduce runoff velocity appropriate erosion control measures shall be implemented in accordance with the approved Wet Weather Erosion Control Plan.
MM A-3: Prior to issuance of a grading permit, the Applicant shall submit a grading plan to the Soils Section of the County of Los Angeles Department of Public Works for verification of compliance with County codes and policies.
B. FLOOD HAZARDS
PDF B-3: In compliance with County of Los Angeles Department of Public Works requirements, a variety of construction and operational best management practices shall be specified in the Project's Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan and implemented to allow infiltration and treat stormwater runoff, including the following: during construction.
In compliance with County of Los Angeles Department of Public Works requirements, a variety of operational best management practices shall be depicted in the Project's Standard Urban Stormwater Mitigation Plan, specified on improvement plans, and constructed to allow infiltration and treat stormwater runoff.
<ul style="list-style-type: none"> • Cut and fill slopes shall be constructed no steeper than 1:2 (vertical:horizontal) unless steeper slopes are approved at specific locations by the County of Los Angeles Department of Public Works. All slopes shall be stabilized in accordance with Los Angeles County Standard Erosion Control Policy. • Design Pollution Prevention best management practices, such as concentrated flow conveyance systems, protection/velocity dissipation devices, and slope surface protection, shall be employed. • New slopes shall be treated with erosion control materials such as native grasses, jute mesh, and soil stabilizers upon completion of grading. • Retaining walls shall be incorporated into the Project's design to reduce the steepness of slopes and/or to shorten slopes. • Existing slopes shall be disturbed only when necessary. • Cut and fill areas shall be minimized to reduce slope lengths. • Benches or terraces shall be provided on high cut and fill slopes to reduce the concentration of flows. • Slopes shall be rounded and shaped to reduce concentrated flows. • Hard surfaces (slope paving) shall be constructed beneath the proposed permanent single-span bridge as a slope stabilization feature; buried soil cement shall be used along the creek banks to allow revegetation of the stabilized slopes. The bridge shall be designed to limit work within flowing streams and minimize construction impacts to surface waters. The proposed bridge shall span Placerita Creek, with no bridge footings or other permanent impermeable surfaces within areas of the creek subject to the jurisdiction of the U.S. Army Corps of Engineers. • The Project shall contain two drainage line outlets with headwalls or flared end sections with rock slope protection, as required by the County of Los Angeles Department of Public Works. These devices generally shall be located along the Placerita Creek embankments to maintain historic drainage patterns. The final number of outlets and proposed improvements (e.g., headwalls or flared end sections with rock slope protection) shall be determined in the final Hydrology and Hydraulics Study approved by the County of Los

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<p>Angeles Department of Public Works for the final Project design.</p> <ul style="list-style-type: none"> • Downspout Connection—The proposed building downspouts shall direct stormwater to the streets and storm drain system, which shall discharge into the on-site detention basins that would have infiltration capacity (thus stormwater loads during precipitation events). • Vegetated Swales—These engineered densely vegetated depressions shall be implemented where appropriate to retain and filter the first flush of runoff from impervious surfaces such as parking lots or streets. • Riparian Buffers—The existing riparian buffer adjacent to Placerita Creek shall be expanded as part of the Project after stabilization of the fill pad slopes. • Concentrated flow conveyance systems—Other new conveyance systems shall include curb and gutter, a storm drain system, catch basins, manholes, asphalt-lined dikes, detention basin surface ponds, underground detention/infiltration chamber devices, and debris basins. • Routine non-structural source control best management practices shall include the following: <ul style="list-style-type: none"> — Educational materials for Property Owners, Tenants and Occupants regarding stormwater protection and pollution prevention; — Activity Restrictions; — Spill Contingency Plans; — Employee Training Programs regarding stormwater protection and pollution prevention; — Road Sweeping; and — Catch Basin Inspections. • Routine structural source control best management practices shall include the following: <ul style="list-style-type: none"> — Landscape Planning and Design; — Roof Runoff Controls; — Efficient Irrigation; — Protection of Slopes and Channels; — Storm Drain Signage; — Inlet Trash Racks; — Energy Dissipators; and — Trash Storage Areas and Litter Control. • Erosion Control—Measures shall be employed to prevent the movement of soil by wind or water during construction and might include watering and erecting physical barriers to the movement of soil particles.
<p>C. NOISE</p>
<p>PDF C-2: To expedite soil export activities, a second work shift from approximately 7:00 or 8:00 P.M. to approximately 2:00 or 3:00 A.M. may occur <u>if appropriate permits/exemptions are granted</u>. Activities scheduled during this night shift shall be limited to loading trucks with soil and hauling and Applicant shall ensure no noise disturbance at any residential property line <u>would occur</u> due to these hauling night shift activities. The Applicant shall obtain an exemption from the County Engineer, as applicable, before any soil export activities can occur for the second work shift.</p>
<p>MM C-5: The booster pump station associated with the water infrastructure improvements shall be designed and constructed such that noise levels at the nearest residential receptor do not exceed the City of Santa Clarita’s ambient noise limits of 55 dBA during nighttime hours (between 10:00 P.M. and 7:00 A.M.) and 65 dBA during daytime hours (between the 7:00 A.M. and 10:00 P.M.) or the lowest measured ambient noise level.</p>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<p>MM C-6: For construction of segments of the proposed off-site utility lines located within the jurisdiction of the County of Los Angeles or the City of Santa Clarita, construction shall be permitted from 7:00 A.M. to 7:00 P.M. Monday through Friday and 8:00 A.M. to 6:00 P.M. on Saturday. For applicable segments under Caltrans' jurisdiction, construction hours shall be from 11:00 P.M. to 5:00 A.M. Monday through Friday.</p>
<p>D. WATER QUALITY</p>
<p>PDF D-1: The Applicant shall prepare and implement a Stormwater Pollution Prevention Plan in compliance with the National Pollutant Discharge Elimination System Construction General Permit prior to and during construction activities.</p>
<p>PDF D-2: The Applicant shall prepare and implement a Standard Urban Stormwater Mitigation Plan to address water quality issues during ongoing operation of the Project, consistent with the approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR.</p>
<p>PDF D-4: The following best management practices shall also be implemented as part of the Project's Standard Urban Stormwater Mitigation Plan:</p> <ul style="list-style-type: none"> • Treatment Control best management practices—In accordance with National Pollutant Discharge Elimination System requirements, the following treatment control best management practices shall be implemented to infiltrate or treat the first 0.75 inch of stormwater runoff from the first flush storm event: <ul style="list-style-type: none"> — Vegetated swales—Vegetated swales shall be used to remove pollutants, reduce stormwater volumes and flow velocity, and convey stormwater runoff. — Detention basins—Detention basins shall serve as the main treatment control best management practice for the Project. They shall be designed to manage the increase in stormwater runoff and to detain and slowly release the design volume of urban runoff, allowing particles and associated pollutants to settle and be removed. These detention basins shall be composed of a vegetated aboveground portion and an underground detention system. The vegetated portions shall allow infiltration, and turf management in the basin shall ensure that pesticides would not contribute to water pollution. The surface detention system overflow outlet shall drain to Placerita Creek, while the underground detention systems shall capture and detain stormwater flows and provide first flush mitigation before either infiltrating back into the local groundwater basin or draining via outlets to Placerita Creek. Energy dissipaters shall be required to minimize erosion. Cleanup shall be conducted semiannually, especially during and after major rainfall events. The Applicant and/or its successor or assignee shall be responsible for cleanup and documenting maintenance. • Operation and maintenance requirements for best management practices—In order to minimize the potential for pollutants to enter receiving waters in stormwater runoff following Project construction, the following best management practices shall be implemented to separate stormwater from potential pollutants: <ul style="list-style-type: none"> — Parking lot and roadway cleaning—Parking lots and internal roadways shall be routinely maintained to effectively minimize nuisances and to keep internal roads and parking lots in safe condition. Cleaning shall include vacuuming or sweeping of all parking lots, and internal roadways. — Parking lot runoff—Parking lot drainage points shall be equipped with oil/water separators which would be maintained according to manufacturers' specifications. — Landscape planning—Landscaping, buffers, and other vegetated areas shall require weekly maintenance to control optimum height and prevent drain blockage. Pesticide and fertilizer use shall occur in accordance with product instructions and be applied by a certified applicator. — Irrigation system—Maintenance of the irrigation system(s) within the Project site shall comply with County requirements regarding water conservation. Systems shall be periodically inspected to address overspray, broken sprinklers, or other system failures. — Trash storage areas—Trash areas shall be paved with impervious surfaces and designed to prevent

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<p>runoff from percolating. Trash storage areas shall be maintained routinely to effectively minimize nuisances.</p> <p>Roof runoff control—Roof drain downspouts shall drain to concrete gutters or shall be directly connected to the proposed on-site underground drain pipe system.</p> <p>Storm drain inspection—All storm drain facilities, including catch basins, pipes, drain inlets, and channels, shall be inspected and cleaned just prior to the rainy season.</p> <p>Detention basins—Cleanup and inspection shall occur before, during, and after major rainfall events. Basins shall be serviced semiannually or following an extreme storm. Service shall include cleaning the basins and maintaining the outlet structures.</p> <ul style="list-style-type: none"> • Other reasonable Best management practices—The Applicant shall implement other good housekeeping and storage measures, as needed, to keep pollutants out of stormwater, as outlined in the Standard Urban Stormwater Mitigation Plan.
<p>MM D-1: Prior to the issuance of any building permit/installation of any on-site wastewater treatment system, the Applicant shall submit a feasibility report in conformance with the requirements outlined in the County of Los Angeles Department of Public Health’s guidelines <u>“A Professional Guide to Requirements and Procedures for Onsite Wastewater Treatment System (OWTS) Guidelines”</u> to the Environmental Health section of the County of Los Angeles Department of Public Health for review and approval and demonstrate that the Potential Mobile Home Relocation Areas are capable of supporting the installation of an on-site wastewater treatment system.</p>
<p>E.1 AIR RESOURCES—AIR QUALITY</p>
<p>MM E.1-4: After mass rough grading of the Project site is completed, construction activity shall utilize electricity from power poles on or adjacent to the Ranch rather than temporary diesel power generators and/or gasoline power generators when electricity with adequate circuit capacity is available from power poles in proximity to construction areas.</p>
<p>MM E.1-5: The selected contractor shall use a mix of equipment that includes Tier 3 or Tier 4 equipment for off-road construction equipment, as defined by the United States Environmental Protection Agency, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. Verification documentation shall be provided to the County of Los Angeles Department of Regional Planning upon request within five business days. During Project construction, all internal combustion engines/construction equipment operating on the Project site shall meet United States Environmental Protection Agency Certified Tier 3 emissions standards or higher, according to the following:</p> <ul style="list-style-type: none"> • <u>Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations.</u> • <u>Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations.</u> • <u>A copy of each unit’s certified tier specification, Best Available Control Technologies documentation, and California Air Resources Board or South Coast Air Quality Management District operating permit shall be provided at the time of mobilization of each applicable unit of equipment.</u>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<ul style="list-style-type: none"> Encourage construction contractors to apply for South Coast Air Quality Management District “SOON” funds. Incentives could be provided for those construction contractors who apply for “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. (More information on this program can be found at the following website: www.aqmd.gov/tao/Implementation/SOONProgram.htm.)
<p>MM E.1-9: During soil export activities, the selected contractor shall provide remote dispatch for haul trucks to minimize queuing on Placerita Canyon Road immediately adjacent to the site.</p>
<p>MM E.1-10: During soil export activities, the selected contractor shall use diesel haul trucks that meet the United States Environmental Protection Agency’s 2007 model year emissions requirements for nitrogen oxides (NO_x).</p>
<p>E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE</p>
<p>PDF E.2-1: The Project shall comply with the County’s Green Building ordinance Low Impact Development ordinance, and Drought-Tolerant Landscaping ordinance.</p> <p>The Project shall comply with the County’s Low Impact Development ordinance.</p> <p>The Project shall comply with the County’s Drought-Tolerant Landscaping ordinance.</p>
<p>PDF E.2-2: The Project shall comply with the 2010 or latest edition of the California Green Building Standards Code, as applicable, which contains requirements for construction site selection, stormwater control during construction, construction solid waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation.</p>
<p>F. BIOLOGICAL RESOURCES</p>
<p>MM F-1: The Project shall implement the requirements of the final approved Habitat Mitigation and Monitoring Program, consistent with the preliminary Habitat Mitigation and Monitoring Program contained in Appendix F.11 of the Draft EIR, to mitigate impacts to U.S. Army Corps of Engineers/Regional Water Quality Control Board “waters of the U.S./waters of the State” and California Department of Fish and Game <u>California Department of Fish and Wildlife</u> jurisdictional streambeds. As part of the Habitat Mitigation and Monitoring Program, which shall restore and expand the riparian habitat along Placerita Creek following temporary impacts to stabilize the fill pad slopes, the Project shall mitigate for the impact to the southern willow scrub community and the mixed willow riparian woodland in the Development Area at a minimum of a 1:1 mitigation-to-impact ratio.</p> <p>The Habitat Mitigation and Monitoring Program restoration efforts shall include the grading and recontouring of the existing fill pad slopes along Placerita Creek within the Development Area and the revegetation with native riparian species by planting and seeding. The Habitat Mitigation and Monitoring Program shall identify appropriate mitigation objectives, performance standards, planting and monitoring/reporting requirements to ensure successful restoration and enhancement of the mitigation area. The Habitat Mitigation and Monitoring Program shall also contain contingency measures identifying corrective actions required in the event that the performance standards are not met. A minimum of 4.04 acres of riparian habitat shall be established, restored, enhanced, and/or preserved, resulting in a net gain in California Department of Fish and Game <u>California Department of Fish and Wildlife</u> jurisdictional area. Maintenance (i.e., weeding, pest control, irrigation system maintenance, trash removal, etc.) and monitoring of the mitigation area shall be conducted for <u>a minimum of five years</u> or and until such time as the Habitat Mitigation and Monitoring Program performance standards are achieved to ensure success of the plan. The final Habitat Mitigation and Monitoring Program shall be submitted to and approved by the County of Los Angeles Department of Regional Planning, the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Game <u>California Department of Fish and Wildlife</u>, in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code 1602 and supporting regulations, prior to issuance of a grading permit.</p>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<p>MM F-2: Project construction-related activities likely to have the potential of disturbing suitable bird nesting habitat shall be prohibited from February 1 through August 31, unless a biological monitor acceptable to the Director of the County of Los Angeles Department of Regional Planning surveys the project area prior to disturbance to confirm that disturbance to habitat will not result in the failure of active nests on-site or immediately adjacent to the area of disturbance. Disturbance shall be defined as any activity that physically removes and/or damages vegetation or habitat, any action that may cause disruption of nesting behavior such as noise exceeding 90 dB from equipment, or direct artificial night lighting. Surveys shall be conducted on the subject property within 500 feet of disturbance areas no earlier than three days prior to the commencement of disturbance. If ground disturbance activities are delayed, then additional pre-disturbance surveys shall be conducted such that no more than three days will have elapsed between the survey and ground disturbance activities. The Applicant or the Project's Construction Manager shall provide the biologist with plans detailing the extent of proposed ground disturbance prior to the survey effort.</p> <p>If active nests are found, clearing and construction shall be postponed or halted within a buffer area established by the biological monitor that is suitable to the particular location of the nest (typically 300 feet for most birds and 500 feet for raptors) and acceptable to the Director of the County of Los Angeles Department of Regional Planning, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second <u>any further</u> attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with highly visible construction fencing, and construction personnel shall be instructed on the sensitivity of nest areas. Occupied nests within the buffer established by the biological monitor and adjacent to the construction site shall also be avoided to ensure nesting success. A qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. The results of the surveys, including graphics showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the County of Los Angeles Department of Regional Planning and California Department of Fish and Game <u>California Department of Fish and Wildlife</u> within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p> <p><u>If any state or federally listed bird species (e.g., coastal California gnatcatcher, southwestern willow flycatcher) are detected during the course of pre-construction nesting bird surveys, all construction-related activity shall be postponed, and the Applicant shall consult with appropriate agencies (California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) and obtain any necessary take permits prior to the commencement of any construction-related activity. If any state or federally listed species are detected within the limits of construction during construction that were not detected during the pre-construction nesting bird surveys, construction-related activity shall cease, and the Applicant shall consult with appropriate agencies and obtain any necessary take permit before resuming any work. In addition to any take permit conditions that may be required by California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service, mitigation of occupied coastal California gnatcatcher habitat shall be provided at a minimum of 3:1 mitigation-to-impact ratio. Proof of habitat mitigation in keeping with the 3:1 requirement shall be provided to the County of Los Angeles before any construction-related activity can commence or resume.</u></p>
<p>MM F-3: The Project shall implement the requirements of the approved Oak Tree and Woodland Mitigation and Monitoring Program to mitigate impacts to oak trees protected under the Los Angeles County Oak Tree Ordinance and impacts to oak woodlands protected under California Public Resources Code 21083.4. As part of the Oak Tree and Woodland Mitigation and Monitoring Program, which shall restore and expand existing oak woodlands on the project site, the Project shall mitigate for the impact to oak woodlands with at least a 2.4 acre to 1 acre mitigation-to-impact ratio.</p> <p>The Project's Oak Tree and Woodland Mitigation and Monitoring Program shall include the following components:</p>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
<ul style="list-style-type: none"> • Planting of at least 1,600 oak trees within or adjacent to existing oak woodlands on the Ranch shall be completed prior to the issuance of a building permit; • Minimization of impacts by avoiding approximately 95 percent of the oak trees and oak woodlands on the Ranch; • Restoration of fire-damaged oak woodlands through oak tree seedling planting; • Enhancement of oak woodland regeneration through oak seedling planting in areas with limited natural recruitment; • Increased habitat connectivity through oak tree planting in areas between existing woodlands and along Placerita Creek, <u>excluding reaches within proposed Los Angeles County Flood Control District easement limits;</u> • Planting of native understory species within oak woodland restoration areas in order to provide a more complete suite of oak woodland values apart from those provided by trees alone; and • Implementation of a seven-year monitoring, documentation, and reporting program. <p>In addition, prior to the issuance of a building permit, the Applicant shall record a use restriction which shall run with the land in perpetuity over the planted mitigation areas in which oak woodland planting, restoration, and enhancement occurs to protect these areas for purposes of oak woodland conservation, restoration and enhancement. The use restriction shall recognize the Applicant's ability to allow filming within these areas, provided the oaks are protected. The use restriction language shall be submitted to the County of Los Angeles Department of Regional Planning for review and approval prior to recordation with the Los Angeles County Registrar-Recorder/County Clerk.</p>
<p>MM F-9: <u>The Applicant shall submit the Project landscape plan to the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, and Los Angeles County Department of Public Works, as required, for review and approval prior to issuance of a building permit. The landscape plan shall show the size, type and location of all plants and watering facilities, consistent with the County's established codes and procedures. Where feasible, native plants shall be used for landscaping. The landscape plan shall also specify the type and location of eight 8-foot high decorative fencing to be installed along those portions of the Project site perimeter visible to the public along SR-14 and Placerita Canyon Road. The Project shall comply with all requirements of the approved landscape plan, and landscaping shall be installed upon completion of each major phase of Project development.</u></p>
<p>MM F-10: <u>Prior to, but within one year of, the commencement of Project construction, protocol surveys for the coastal California gnatcatcher (<i>Polioptila californica californica</i>) shall be conducted within the areas proposed for construction and designated as Critical Habitat by biologist(s) holding federal permits to conduct gnatcatcher surveys in accordance with the U.S. Fish and Wildlife Service's Coastal California Gnatcatcher Presence/Absence Survey Guidelines. The results of the surveys shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review. (Refer to MM F-2 regarding pre-construction nesting bird surveys, agency consultation, and necessary take permits should any state or federally listed bird species, including coastal California gnatcatcher, be detected.)</u></p>
<p>MM F-11: <u>Prior to the issuance of a grading permit, the Applicant shall record a use restriction which shall run with the land in perpetuity over 3.18 acres of other coastal sage scrub that is suitable for coastal California gnatcatcher within the Ranch south of Placerita Canyon Road located within designated critical habitat for the coastal California gnatcatcher for purposes of preservation/conservation. The precise location of the use restriction area shall be determined in consultation with the California Department of Fish and Wildlife. The use restriction shall recognize the ability of those holding oil and other subsurface rights in the property to continue existing subsurface oil extraction operations under the use restriction area. The use restriction language shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review and approval prior to recordation with the Los</u></p>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
Angeles County Registrar-Recorder/County Clerk.
G. CULTURAL AND PALEONTOLOGICAL RESOURCES
MM G-4: In the event archaeological resources are encountered during Project construction, all ground-disturbing activities within the vicinity of the find shall cease and a qualified archaeologist shall be notified of the find. The archaeologist shall record all recovered archaeological resources on the appropriate California Department of Parks and Recreation Site Forms to be filed with the California Historical Resources Information System–South Central Coastal Information Center, evaluate the significance of the find, and if significant, determine and implement the appropriate mitigation in accordance with the U.S. Secretary of the Interior and California Office of Historic Preservation guidelines, including but not limited to a Phase III data recovery and associated documentation. The archaeologist shall prepare a final report about the find to be filed with the Applicant, the County of Los Angeles Department of Regional Planning, and the California Historical Resources Information System–South Central Coastal Information Center, as required by the California Office of Historic Preservation. The report shall include documentation of the resources recovered, a full evaluation of the eligibility with respect to the California Register of Historical Resources, and treatment of the resources recovered. In the event of a find, archaeological and Native American monitoring shall be provided thereafter for any ground-disturbing activities in <u>within the area boundary of the find</u> archaeological site.
I. VISUAL QUALITIES
PDF I-2: A vegetation barrier heavily planted with trees and shrubs shall be introduced along portions of Placerita Canyon Road and State Route 14 adjacent to the Development Area, <u>as well as the northern portion of the site to screen the electrical substation from State Route 14.</u>
PDF I-3: The proposed water tank shall be painted a neutral color that is predominant in the surrounding area so as to blend with the surrounding landscape. The water tank color shall be submitted to the County of Los Angeles Department of Regional Planning for approval prior to issuance of a building permit. In addition, the area disturbed during construction immediately surrounding the water tank’s ring road and fencing shall be revegetated with native plants, upon <u>completion of tank construction.</u> A <u>landscape plan shall be submitted for approval of plant selection(s) from the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, Newhall County Water District, and California Department of Fish and Game California Department of Fish and Wildlife.</u>
MM I-2: The Applicant shall submit detailed lighting plans including fixture types and locations to the County of Los Angeles Department of Regional Planning <u>and County of Los Angeles Department of Public Works for review and approval consistent with the County’s established codes and procedures prior to issuance of a building permit.</u>
MM I-3: To ensure minimal light trespass on sensitive habitat within Placerita Creek, bridges shall be lit by low focused light located on the side walls or railings and aimed at the road. The lighting along the creek-side of Project buildings shall be located primarily on outdoor decks/balconies and consist of surface-mounted fixtures facing down with full light cutoff to confine light to the <u>decks/balconies</u> and prevent spillover of light onto habitat areas. Lighting in these areas shall be consistent with the approved lighting plan.
J. TRAFFIC, ACCESS, AND PARKING
PDF J-1: To <u>The Project Applicant shall prepare and implement a Transportation Demand Management program to encourage the use of alternative modes of transportation, and reduce vehicular traffic on the Project shall incorporate street and freeway system during the most congested time periods of the day. The Transportation Demand Management program shall be submitted to County of Los Angeles Department of Regional Planning and County of Los Angeles Department of Public Works for review and approval and shall include implementation of several Transportation Demand Management strategies, which shall</u>

**Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance**

Project Design Features and Mitigation Measures
<p>include, but shall not be limited to, the following features:</p> <ul style="list-style-type: none"> • The provision of information on transportation alternatives <u>including establishment of a Transportation Information Center</u> (transit schedules, maps, <u>bulletin board/kiosk and/or intranet</u>, etc.); • A <u>rideshare/vanpool/carpool matching program for Disney and ABC employees</u>; • Preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles; • Preferred parking for carpool/vanpool vehicles; • Video conferencing facilities within the Project; • On-site secure, bicycle storage areas; and • Non-dedicated walkways, bicycle access, and paved surfaces throughout the Development Area to minimize use of automobiles and trucks traveling throughout the Development Area. • <u>Alternative work schedules</u>; • <u>An Emergency Ride Home Program, which may include taxi vouchers and/or the availability of on-site vehicle(s) for Disney and ABC employees who are registered transit users</u>; • <u>Discounted Disney/ABC employee transit passes</u>; • <u>Designation of a Transportation Demand Management program coordinator to oversee program implementation; and</u> • <u>Financial mechanisms and/or programs to provide for the implementation of the Transportation Demand Management program.</u>
<p>MM J-2: The Applicant shall obtain the required permits for truck haul routes from the County of Los Angeles Department of Public Works and/or any other public agency, <u>as applicable</u>, prior to the issuance of a grading permit for the Project.</p>
<p>MM J-4: Prior to issuance of a grading permit, Applicant shall document and submit all required information and/or material pertaining to the pavement of County roadways along the Project haul route, including the formula for calculating the Project's fair share of any repair and/or reconstruction of County roadways along the Project haul route, to the satisfaction of the County of Los Angeles Department of Public Works.</p> <p>The Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of County roadways along the Project haul route attributable to the Project as agreed to by the County of Los Angeles Department of Public Works. A bond (amount to be reasonably determined by the County of Los Angeles Department of Public Works once a specific haul route is designated) shall also be put in place to cover any structural impacts to the roadways along the haul route attributable to the Project's truck trips during hauling.</p> <p><u>The Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of County roadways along the Project haul route attributable to the Project as agreed to by the County of Los Angeles Department of Public Works.</u> The timing of any necessary repairs and/or reconstruction of County Roadways by the Applicant shall be determined by the County of Los Angeles Department of Public Works.</p>
<p>MM J-5: <u>Sierra Highway/SR-14 Southbound Ramps:</u> Prior to issuance of the first certificate of occupancy, the Project Applicant shall install a traffic signal at this intersection with protected left-turn phasing for southbound Sierra Highway. Northbound Sierra Highway shall be widened to provide a separate right-turn only lane onto the SR-14 southbound on-ramp. These improvements shall be the sole responsibility of the Project. Detailed striping/signing and traffic signal plans shall be submitted to the County of Los Angeles Department of Public Works <u>and Caltrans</u> for review and approval prior to implementation.</p>
<p>MM J-6: <u>Sierra Highway/Placerita Canyon Road:</u> Prior to issuance of the first certificate of occupancy, the Project Applicant shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway, facilitating traffic flow to the SR-14 southbound on-ramp. These</p>

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
improvements shall be the sole responsibility of the Project. A detailed striping/signing plan shall be submitted to the County of Los Angeles Department of Public Works <u>and Caltrans</u> for review and approval prior to implementation.
MM J-8: <u>Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramps:</u> The Project shall provide a direct entrance, if approved by Caltrans, to the Development Area from the SR-14 northbound off-ramp to allow immediate access to the Project. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional through and left-turn lane, and one right-turn lane). <u>The eastbound lanes on Placerita Canyon Road shall also be restriped to provide one through lane and one dedicated right-turn lane for the SR-14 northbound on-ramp. Eastbound to northbound left-turns shall be prohibited, and southbound movement out of the Development Area shall be limited to right-turns only. These improvements shall be the sole responsibility of the Project.</u>
MM J-9: <u>Sierra Highway/SR-14 Southbound Ramps:</u> Prior to issuance <u>recordation of the first certificate of occupancy final map</u> , the Project Applicant shall pay its pro rata share (20.9 percent) of the cost for the widening of southbound Sierra Highway to provide a second left-turn only lane onto the SR-14 southbound on-ramp.
MM J-10: <u>Sierra Highway/Placerita Canyon Road:</u> Prior to issuance <u>recordation of the first certificate of occupancy final map</u> , the Project Applicant shall pay its pro rata share (16.2 percent) of the cost for the widening of <u>the Sierra Highway northbound approach to provide a separate right-turn only lane onto eastbound Placerita Canyon Road, as well as the widening of the Sierra Highway southbound approach to provide a separate right-turn only lane onto westbound Placerita Canyon Road.</u>
MM J-12: <u>The Applicant shall comply with all applicable Caltrans rules and regulations and obtain all necessary approvals from Caltrans, potentially including but not limited to: synchronization of the street signals at Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramp and Sierra Highway/Placerita Canyon Road; and implementation of an approved soil sampling workplan.</u>
K.2 PUBLIC SERVICES—FIRE PROTECTION
PDF K.2-3: The Applicant shall submit a fire exhibit that depicts detailed design requirements to the County of Los Angeles Fire Department for review and approval prior to the recordation of the final map or the approval <u>issuance</u> of a building permit.
L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY
PDF L.1-3: The Project shall incorporate water conservation features that shall reduce the Project's landscaping water demand by at least 50 percent <u>from business as usual (i.e., without water conservation measures in place).</u>
L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE
PDF L.3-3: The Applicant shall ensure that the construction contractor shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as required per the Los Angeles County Code and demonstrated to the County of Los Angeles Department of Public Works prior to issuance of demolition or construction permits.
L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY
PDF L.4-2: As part of the Project, the proposed soundstages, production offices, and the administration building shall comply with the County's Green Building ordinance and achieve Leadership in Energy and Environmental Design (LEED™) Silver Certification <u>or equivalent</u> . The commissary shall comply with the County's Green Building ordinance and achieve LEED™ Certification <u>or equivalent</u> . The writers/producers bungalows shall comply with the County's Green Building ordinance. While the mills and the warehouse are exempt from County Code Sections 22.52.2130.C.1 and 22.52.2130.D regarding energy conservation and third party rating systems, they shall comply with the other applicable sections of the County's Green

Table II-1 (excerpt) (Continued)
Summary of Environmental Impacts, Project Design Features, Mitigation Measures, and Resulting Levels of Significance

Project Design Features and Mitigation Measures
Building ordinance and achieve equivalency of LEED™ Certification. The substation and central utility plant would be exempt from the County's Green Building ordinance.
M. ENVIRONMENTAL SAFETY/FIRE HAZARDS
MM M-1: If previously unidentified soil contamination is observed by sight or smell or indicated by testing by a qualified professional using a portable volatile organic compound analyzer during excavation and grading activities, excavation and grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented, as contained in the South Coast Air Quality Management District's Rule 1166, to make the area suitable for grading activities to resume. <u>In the event contamination is found, the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable.</u> The contaminated soil shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in accordance with all applicable federal, State, and local laws and regulations.
MM M-2: During grading for construction of the proposed water tank and associated water line in the southwest corner of the Ranch and construction in the westernmost portion of the Development Area containing abandoned oil wells, a qualified professional shall observe by sight or smell and test using a portable volatile organic compound analyzer the surrounding soil for the presence of potential contaminants. <u>In the event contamination is found, grading and excavation in the area shall be temporarily halted and the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable.</u> Any soil found to be contaminated shall be excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in full compliance with all applicable federal, State, and local laws and regulations, including the South Coast Air Quality Management District's Rule 1166 <u>before grading and excavation can resume in the contaminated area.</u>
MM M-3: Prior to the issuance of any grading permit, a qualified professional shall conduct soil testing for pesticides, petroleum hydrocarbons, and vapors in the following areas where agricultural operations and oil production activities have occurred but testing has not been previously conducted: the portion of the Development Area located east of the southern fill pad, the Water Tank Area, and the Conditional Parking Areas, if developed. <u>In the event contamination is found, the Applicant shall notify the Los Angeles County Fire Department and/or the California Department of Toxic Substances Control, as applicable.</u> Any soil found to be contaminated shall be evaluated, managed, treated or disposed in full compliance with all applicable federal, State, and local laws and regulations prior to construction in the affected area.
MM M-7: Prior to issuance of a grading permit, the Applicant shall submit documentation to the County of Los Angeles Fire Department <u>Department of Public Works</u> to verify that all oil wells within 200 feet of Project buildings or structures have been properly abandoned according to required standards. If the wells were not abandoned properly, as determined by the California Department of Conservation Division of Oil, Gas and Geothermal Resources, the wells shall be re-abandoned in accordance with the requirements of the California Department of Conservation Division of Oil, Gas and Geothermal Resources.

III. ENVIRONMENTAL SETTING

Section III, Environmental Setting, page III-1, revise footnote 1 as follows:

As discussed further in Section IV, Project Description, the analysis provided within this Draft EIR distinguishes between those areas where new development and uses are proposed that

would result in physical changes in the environment (i.e., the Development Area, the Water Tank Area, the Trail Area, the Potential Mobile Home Relocation Areas, and the Conditional Parking Areas, which with the Off-Site Infrastructure Improvement Areas are typically referred to herein as the Project site) and those areas of the Ranch where existing and ongoing film production and intermittent agricultural and oil production uses would continue unchanged (generally referred to herein as the Ranch or the remainder of the Ranch). Refer to Figures IV-4 and IV-5 in Section IV, Project Description, for a depiction of each of the Project site areas within the Ranch and outside of the Ranch, respectively.

Section III, Environmental Setting, page III-30, revise the first paragraph under the heading d. Energy as follows:

Southern California Edison (SCE) provides electrical service to portions of Los Angeles County, including the Ranch. SCE ~~generates~~ provides electricity generated from a variety of sources, most owned by third parties, including hydropower, coal, nuclear sources, and, more recently, renewable resources such as wind. Currently, SCE delivers over 90,000 gigawatt-hours (GWh) across its entire service area to approximately 4.8 million customers. The Ranch is presently served by SCE's ~~Pardee substation~~ 66/16 kV Newhall Substation, located in Newhall, which is part of SCE's Saugus 66 kV Subtransmission System. Electricity is presently supplied to the few existing permanent structures on the Ranch through the SCE 16 kV distribution system. There are existing ~~which includes~~ 66 kV overhead lines that connect to existing power poles along Placerita Canyon Road and Sierra Highway, which is the proposed source of the new substation proposed for the Ranch. In addition to lighting, electricity is used to supply all on-site space heating, water heating, cooking, and air conditioning. External generators power all temporary filming sets, structures, and filming activities conducted at the Ranch.

IV. PROJECT DESCRIPTION

Section IV, Project Description, page IV-1, revise the first paragraph as follows to create two paragraphs:

The Project, Disney | ABC Studios at The Ranch, is proposed within an approximately 58-acre Development Area in the westernmost portion of Golden Oak Ranch (the Ranch), with additional Project elements proposed within areas referred to herein as the Water Tank Area, the Trail Area, the Potential Mobile Home Relocation Areas, and the Conditional Parking Areas, all located within the Ranch, and the Off-Site Infrastructure Improvement Areas.¹ Collectively these areas are referred to as the Project site. The Project would allow for continued operation and maintenance of the existing

filming ranch and associated outdoor sets on 195 acres of the Ranch with the remaining 637 acres used as a filming backdrop, by incorporating the existing Conditional Use Permit (CUP) that allows filming uses at the Ranch into the proposed CUP for the Project. As indicated in the Exhibit "A" Map provided as Figure IV-17 on page IV-55 later in this section, the proposed CUP would apply to the entire 890-acre Ranch, as does the existing CUP, with the 195 acres of existing filming ranch and associated outdoor sets continuing to be operated as it has been for over 30 years. The analysis provided within this Draft EIR distinguishes between those areas where new development and uses are proposed that would result in physical changes in the environment (i.e., the Development Area, the Water Tank Area, the Trail Area, the Potential Mobile Home Relocation Areas, and the Conditional Parking Areas, which with the Off-Site Infrastructure Improvement Areas are typically referred to herein as the Project site) and those areas of the Ranch where existing and ongoing film production and intermittent agricultural and oil production uses would continue unchanged (generally referred to herein as the Ranch or the remainder of the Ranch).

¹ *The Ranch areas of the Project site are depicted in Figure IV-4 on page IV-11. The Project areas located outside of the Ranch are depicted in Figure IV-5 on page IV-13.*

The 890-acre Ranch is located in the unincorporated Santa Clarita Valley area of Los Angeles County (County), immediately east of State Route 14 (SR-14).² Placerita Canyon Road, a secondary highway, runs through the southern portion of the Ranch in an east-west direction. Other major roadways in the Ranch vicinity include Sierra Highway, Newhall Avenue, and Interstate 5 (I-5). Primary access to the Ranch is along Placerita Canyon Road. The location of the Ranch (including the Development Area) from both a regional and local perspective is depicted in Figure IV-1 on page IV-2.³ The existing conditions throughout the Project site are described in Section III, Environmental Setting, of this Draft EIR.

² *The western portion of the 890-acre Ranch includes an approximately 30-acre, 330-foot strip of land that traverses the Ranch in a generally northwest to southeast direction and is owned by the City of Los Angeles Department of Water and Power (referred to as the LADWP transmission corridor). The southwest corner of the Ranch also includes two smaller LADWP corridors totaling approximately 4 acres. The Applicant holds an easement from LADWP to access and use the land within the LADWP transmission corridor.*

³ *During the planning process for the Project, certain Project changes have required revisions to the Development Area boundary. While the Draft EIR evaluates the most current Project characteristics, some of the technical reports appended to this Draft EIR and approved by the County prior to the revisions to the Development Area may reflect a different Development Area boundary. As indicated in a cover letter included with each*

relevant report, the revisions to the Development Area do not affect the analysis or conclusions contained therein.

Section IV, Project Description, page IV-40, revise the first paragraph as follows:

Power from the substation would be distributed underground through four 16 kV feeder circuits to the various buildings on-site. This distribution would occur entirely underground through a dedicated network of ductbanks and manholes. This distribution would occur entirely underground through a dedicated network of ductbanks and manholes. Telecommunications fiber optic cable would need to be constructed into the new substation to connect relays installed for the protection of electrical power lines and equipment to operate properly under electrical fault conditions.

Section IV, Project Description, page IV-54, revise the second full bullet item as follows:

- A parking permit to authorize tandem parking, use of shared off-lot parking, and an exemption from paving and striping requirements for surplus parking within the conditional parking lots ~~unless~~ if parking within the LADWP transmission corridor is later revoked by LADWP.

V.A. GEOTECHNICAL HAZARDS

Section V.A, Geotechnical Hazards, page V.A-37, revise PDF A-1 and PDF A-2 as follows:

PDF A-1: ~~During construction and operation of the Project, The Applicant shall implement~~ appropriate erosion control and drainage devices ~~shall be implemented~~ as specified in the Project's Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.

PDF A-2: Excavation and grading activities shall be scheduled during dry weather periods to the extent feasible. If grading occurs during the rainy season (October 15 through April 1), ~~diversion dikes and channels shall be constructed to channel runoff around the site. Channels shall be lined with grass, jute mesh or berms to reduce runoff velocity~~ appropriate erosion control measures shall be implemented in accordance with the approved Wet Weather Erosion Control Plan.

Section V.A, Geotechnical Hazards, page V.A-38, revise MM A-3 as follows:

MM A-3: Prior to issuance of a grading permit, the Applicant shall submit a grading plan to the ~~Soils Section of the County of Los Angeles~~ Department of Public Works for verification of compliance with County codes and policies.

V.B. FLOOD HAZARDS

Section V.B, Flood Hazards, page V.B-17, revise the short paragraph at the bottom of the page as follows:

In compliance with regulatory agencies' and LACDPW requirements, a variety of construction and operational BMPs would be implemented to both allow infiltration and treat stormwater runoff. The following Project design features, or equivalent, would be implemented, as appropriate based on the Final Hydrology and Hydraulics Study approved by LACDPW for the final Project design, to comply with regulatory and LACDPW requirements:

Section V.B, Flood Hazards, pages V.B-34 to V.B-36, revise PDF B-3 as follows:

PDF B-3: In compliance with County of Los Angeles Department of Public Works requirements, a variety of construction ~~and operational~~ best management practices shall be specified in the Project's Stormwater Pollution Prevention Plan ~~and Standard Urban Stormwater Mitigation Plan~~ and implemented ~~to allow infiltration and treat stormwater runoff~~, including the following: during construction.

In compliance with County of Los Angeles Department of Public Works requirements, a variety of operational best management practices shall be depicted in the Project's Standard Urban Stormwater Mitigation Plan, specified on improvement plans, and constructed to allow infiltration and treat stormwater runoff.

- ~~• Cut and fill slopes shall be constructed no steeper than 1:2 (vertical:horizontal) unless steeper slopes are approved at specific locations by the County of Los Angeles Department of Public Works. All slopes shall be stabilized in accordance with Los Angeles County Standard Erosion Control Policy.~~
- ~~• Design Pollution Prevention best management practices, such as concentrated flow conveyance systems, protection/velocity dissipation devices, and slope surface protection, shall be employed.~~

- ~~New slopes shall be treated with erosion control materials such as native grasses, jute mesh, and soil stabilizers upon completion of grading.~~
- ~~Retaining walls shall be incorporated into the Project's design to reduce the steepness of slopes and/or to shorten slopes.~~
- ~~Existing slopes shall be disturbed only when necessary.~~
- ~~Cut and fill areas shall be minimized to reduce slope lengths.~~
- ~~Benches or terraces shall be provided on high cut and fill slopes to reduce the concentration of flows.~~
- ~~Slopes shall be rounded and shaped to reduce concentrated flows.~~
- ~~Hard surfaces (slope paving) shall be constructed beneath the proposed permanent single span bridge as a slope stabilization feature; buried soil cement shall be used along the creek banks to allow revegetation of the stabilized slopes. The bridge shall be designed to limit work within flowing streams and minimize construction impacts to surface waters. The proposed bridge shall span Placerita Creek, with no bridge footings or other permanent impermeable surfaces within areas of the creek subject to the jurisdiction of the U.S. Army Corps of Engineers.~~
- ~~The Project shall contain two drainage line outlets with headwalls or flared end sections with rock slope protection, as required by the County of Los Angeles Department of Public Works. These devices generally shall be located along the Placerita Creek embankments to maintain historic drainage patterns. The final number of outlets and proposed improvements (e.g., headwalls or flared end sections with rock slope protection) shall be determined in the final Hydrology and Hydraulics Study approved by the County of Los Angeles Department of Public Works for the final Project design.~~
- ~~Downspout Connection—The proposed building downspouts shall direct stormwater to the streets and storm drain system, which shall discharge into the on-site detention basins that would have infiltration capacity (thus stormwater loads during precipitation events).~~

- ~~Vegetated Swales—These engineered densely vegetated depressions shall be implemented where appropriate to retain and filter the first flush of runoff from impervious surfaces such as parking lots or streets.~~
- ~~Riparian Buffers—The existing riparian buffer adjacent to Placerita Creek shall be expanded as part of the Project after stabilization of the fill pad slopes.~~
- ~~Concentrated flow conveyance systems—Other new conveyance systems shall include curb and gutter, a storm drain system, catch basins, manholes, asphalt-lined dikes, detention basin surface ponds, underground detention/infiltration chamber devices, and debris basins.~~
- ~~Routine non-structural source control best management practices shall include the following:~~
 - ~~Educational materials for Property Owners, Tenants and Occupants regarding stormwater protection and pollution prevention;~~
 - ~~Activity Restrictions;~~
 - ~~Spill Contingency Plans;~~
 - ~~Employee Training Programs regarding stormwater protection and pollution prevention;~~
 - ~~Road Sweeping; and~~
 - ~~Catch Basin Inspections.~~
- ~~Routine structural source control best management practices shall include the following:~~
 - ~~Landscape Planning and Design;~~
 - ~~Roof Runoff Controls;~~
 - ~~Efficient Irrigation;~~
 - ~~Protection of Slopes and Channels;~~
 - ~~Storm Drain Signage;~~
 - ~~Inlet Trash Racks;~~

~~—Energy Dissipators; and~~

~~—Trash Storage Areas and Litter Control.~~

- ~~• Erosion Control Measures shall be employed to prevent the movement of soil by wind or water during construction and might include watering and erecting physical barriers to the movement of soil particles.~~

V.C. NOISE

Section V.C, Noise, page V.C-27, revise the first sentence of the second full paragraph as follows:

As part of the Project, a public multi-use trail, referred to as the Placerita Canyon Connector Trail, would be constructed south of Placerita Canyon Road (south of the Development Area) in an area referred to as the Trail Area.

Section V.C, Noise, page V.C-48, revise PDF C-2 as follows:

PDF C-2: To expedite soil export activities, a second work shift from approximately 7:00 or 8:00 P.M. to approximately 2:00 or 3:00 A.M. may occur if appropriate permits/exemptions are granted. Activities scheduled during this night shift shall be limited to loading trucks with soil and hauling and Applicant shall ensure no noise disturbance at any residential property line would occur due to these hauling night shift activities. ~~The Applicant shall obtain an exemption from the County Engineer, as applicable, before any soil export activities can occur for the second work shift.~~

Section V.C, Noise, page V.C-49, revise MM C-5 and MM C-6 as follows:

MM C-5: The booster pump station associated with the water infrastructure improvements shall be designed and constructed such that noise levels at the nearest residential receptor do not exceed the City of Santa Clarita's ambient noise limits of 55 dBA during nighttime hours (between 10:00 P.M. and 7:00 A.M.) and 65 dBA during daytime hours (between ~~the~~ 7:00 A.M. and 10:00 P.M.) or the lowest measured ambient noise level.

MM C-6: For construction of segments of the proposed off-site utility lines located within the jurisdiction of the County of Los Angeles or the City of Santa Clarita, construction shall be permitted from

7:00 A.M. to 7:00 P.M. Monday through Friday and 8:00 A.M. to 6:00 P.M. on Saturday. For applicable segments under Caltrans' jurisdiction, construction hours shall be from 11:00 P.M. to 5:00 A.M. Monday through Friday.

V.D. WATER QUALITY

Section V.D, Water Quality, page V.D-21, following the first bullet list, revise the introductory sentence before the second bullet list as follows:

~~All of the~~ The following BMPs, or equivalent, would also be implemented as part of the Project's SUSMP:

Section V.D, Water Quality, page V.D-23, following the first bullet list, revise the introductory sentence near the bottom of the page before the next bullet list as follows:

In addition, in accordance with County's LID Manual, the following LID BMPs, or equivalent, would promote infiltration and would complement, or be a part of, the SUSMP BMPs listed above:

Section V.D, Water Quality, page V.D-29, revise the first sentence of the second full paragraph as follows:

In addition, prior to the issuance of any building permit and installation of the new septic tank, the Applicant would submit a feasibility report in conformance with the requirements outlined in the ~~"Onsite Wastewater Treatment System (OWTS) Guidelines"~~ "A Professional Guide to Requirements and Procedures for Onsite Wastewater Treatment Systems (OWTS)" of the County of Los Angeles Department of Public Health (LACDPH) and demonstrate to the satisfaction of the Environmental Health section of LACDPH that the Potential Mobile Home Relocation Areas are capable of supporting a new septic tank.

Section V.D, Water Quality, page V.D-30, revise PDF D-1 and PDF D-2 as follows:

PDF D-1: The Applicant shall prepare and implement a Stormwater Pollution Prevention Plan in compliance with the National Pollutant Discharge Elimination System Construction General Permit ~~prior to and during construction activities.~~

PDF D-2: The Applicant shall ~~prepare and~~ implement a Standard Urban Stormwater Mitigation Plan to address water quality issues during ongoing operation of the Project, consistent with the

approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR.

Section V.D, Water Quality, pages V.D-30 to V.D-32, remove PDF D-4 as shown below:

~~PDF D-4: The following best management practices shall also be implemented as part of the Project's Standard Urban Stormwater Mitigation Plan:~~

- ~~• Treatment Control best management practices—In accordance with National Pollutant Discharge Elimination System requirements, the following treatment control best management practices shall be implemented to infiltrate or treat the first 0.75 inch of stormwater runoff from the first flush storm event:~~

~~—Vegetated swales—Vegetated swales shall be used to remove pollutants, reduce stormwater volumes and flow velocity, and convey stormwater runoff.~~

~~—Detention basins—Detention basins shall serve as the main treatment control best management practice for the Project. They shall be designed to manage the increase in stormwater runoff and to detain and slowly release the design volume of urban runoff, allowing particles and associated pollutants to settle and be removed. These detention basins shall be composed of a vegetated aboveground portion and an underground detention system. The vegetated portions shall allow infiltration, and turf management in the basin shall ensure that pesticides would not contribute to water pollution. The surface detention system overflow outlet shall drain to Placerita Creek, while the underground detention systems shall capture and detain stormwater flows and provide first flush mitigation before either infiltrating back into the local groundwater basin or draining via outlets to Placerita Creek. Energy dissipaters shall be required to minimize erosion. Cleanup shall be conducted semiannually, especially during and after major rainfall events. The Applicant and/or its successor or assignee shall be responsible for cleanup and documenting maintenance.~~

- ~~• Operation and maintenance requirements for best management practices—In order to minimize the potential~~

~~for pollutants to enter receiving waters in stormwater runoff following Project construction, the following best management practices shall be implemented to separate stormwater from potential pollutants:~~

~~— Parking lot and roadway cleaning—Parking lots and internal roadways shall be routinely maintained to effectively minimize nuisances and to keep internal roads and parking lots in safe condition. Cleaning shall include vacuuming or sweeping of all parking lots, and internal roadways.~~

~~— Parking lot runoff—Parking lot drainage points shall be equipped with oil/water separators which would be maintained according to manufacturers' specifications.~~

~~— Landscape planning—Landscaping, buffers, and other vegetated areas shall require weekly maintenance to control optimum height and prevent drain blockage. Pesticide and fertilizer use shall occur in accordance with product instructions and be applied by a certified applicator.~~

~~— Irrigation system—Maintenance of the irrigation system(s) within the Project site shall comply with County requirements regarding water conservation. Systems shall be periodically inspected to address overspray, broken sprinklers, or other system failures.~~

~~— Trash storage areas—Trash areas shall be paved with impervious surfaces and designed to prevent runoff from percolating. Trash storage areas shall be maintained routinely to effectively minimize nuisances.~~

~~— Roof runoff control—Roof drain downspouts shall drain to concrete gutters or shall be directly connected to the proposed on-site underground drain pipe system.~~

~~— Storm drain inspection—All storm drain facilities, including catch basins, pipes, drain inlets, and channels, shall be inspected and cleaned just prior to the rainy season.~~

~~— Detention basins—Cleanup and inspection shall occur before, during, and after major rainfall events. Basins shall be serviced semiannually or following an extreme~~

~~storm. Service shall include cleaning the basins and maintaining the outlet structures.~~

- ~~• Other reasonable Best management practices—The Applicant shall implement other good housekeeping and storage measures, as needed, to keep pollutants out of stormwater, as outlined in the Standard Urban Stormwater Mitigation Plan.~~

Section V.D, Water Quality, page V.D-32, revise MM D-1 as follows:

- MM D-1:** Prior to the issuance of any building permit/installation of any on-site wastewater treatment system, the Applicant shall submit a feasibility report in conformance with the requirements outlined in the County of Los Angeles Department of Public Health's guidelines "A Professional Guide to Requirements and Procedures for Onsite Wastewater Treatment System (OWTS) Guidelines" to the Environmental Health section of the County of Los Angeles Department of Public Health for review and approval and demonstrate that the Potential Mobile Home Relocation Areas are capable of supporting the installation of an on-site wastewater treatment system.

V.E.1. AIR RESOURCES—AIR QUALITY

Section V.E.1, Air Resources—Air Quality, page V.E.1-1, add the following sentence at the end of the first paragraph under the heading 1. Introduction:

Calculation worksheets for emissions associated with Project-related pyrotechnics are provided in Appendix E.3 of this Draft EIR.

Section V.E.1, Air Resources—Air Quality, page V.E.1-61, revise MM E.1-4 and MM E.1-5 as follows:

- MM E.1-4:** After ~~mass rough~~ grading of the Project site is completed, construction activity shall utilize electricity from power poles on or adjacent to the Ranch rather than temporary diesel power generators and/or gasoline power generators when electricity with adequate circuit capacity is available from power poles in proximity to construction areas.
- MM E.1-5:** ~~The selected contractor shall use a mix of equipment that includes Tier 3 or Tier 4 equipment for off-road construction equipment, as defined by the United States Environmental~~

Protection Agency, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. Verification documentation shall be provided to the County of Los Angeles Department of Regional Planning upon request within five business days. During Project construction, all internal combustion engines/ construction equipment operating on the Project site shall meet United States Environmental Protection Agency Certified Tier 3 emissions standards or higher, according to the following:

- Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations.
- A copy of each unit's certified tier specification, Best Available Control Technologies documentation, and California Air Resources Board or South Coast Air Quality Management District operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for South Coast Air Quality Management District "SOON" funds. Incentives could be provided for those construction contractors who apply for "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. (More information on

this program can be found at the following website:
www.aqmd.gov/tao/Implementation/SOONProgram.htm.)

Section V.E.1, Air Resources—Air Quality, page V.E.1-61, insert the following measures at the end of the list of Mitigation Measures:

MM E.1-9: During soil export activities, the selected contractor shall provide remote dispatch for haul trucks to minimize queuing on Placerita Canyon Road immediately adjacent to the site.

MM E.1-10: During soil export activities, the selected contractor shall use diesel haul trucks that meet the United States Environmental Protection Agency’s 2007 model year emissions requirements for nitrogen oxides (NO_x).

V.E.2. AIR RESOURCES—GLOBAL CLIMATE CHANGE

Section V.E.2, Air Resources—Global Climate Change, page V.E.2-35, revise the third sentence of the first full paragraph as follows:

The Project’s GHG emissions reduction of ~~34~~17 percent compared to the “business-as-usual” scenario constitutes an equivalent or larger break from “business-as-usual” than has been determined by CARB to be necessary to meet AB 32’s goals (approximately 16 percent for 2020).

Section V.E.2, Air Resources—Global Climate Change, page V.E.2-37, revise PDF E.2-1 and PDF E.2-2 as follows:

PDF E.2-1: The Project shall comply with the County’s Green Building ordinance ~~Low Impact Development ordinance, and Drought-Tolerant Landscaping ordinance.~~

The Project shall comply with the County’s Low Impact Development ordinance.

The Project shall comply with the County’s Drought-Tolerant Landscaping ordinance.

PDF E.2-2: The Project shall comply with the 2010 or latest edition of the California Green Building Standards Code, as applicable, which contains requirements for construction site selection, stormwater control during construction, construction solid waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation.

V.F. BIOLOGICAL RESOURCES

Section V.F, Biological Resources, page V.F-6, revise the first reference to the “California Department of Fish and Game” to “California Department of Fish and Wildlife” as shown below, and revise all subsequent references in this section and throughout the Draft EIR to reflect the new name of the agency effective as of January 1, 2013. Also revise all references to the “CDFG” to “CDFW” throughout the Draft EIR.³

~~The California Department of Fish and Game (CDFG)~~ California Department of Fish and Wildlife (CDFW) implements CNPPA and CESA, and its Wildlife and Habitat Data Analysis Branch maintains the California Natural Diversity Database (CNDDDB), a computerized inventory of information on the general location and status of California’s rarest plants, animals, and natural communities.

Section V.F, Biological Resources, page V.F-91, revise the second paragraph of MM F-1 as follows:

The Habitat Mitigation and Monitoring Program restoration efforts shall include the grading and recontouring of the existing fill pad slopes along Placerita Creek within the Development Area and the revegetation with native riparian species by planting and seeding. The Habitat Mitigation and Monitoring Program shall identify appropriate mitigation objectives, performance standards, planting and monitoring/reporting requirements to ensure successful restoration and enhancement of the mitigation area. The Habitat Mitigation and Monitoring Program shall also contain contingency measures identifying corrective actions required in the event that the performance standards are not met. A minimum of 4.04 acres of riparian habitat shall be established, restored, enhanced, and/or preserved, resulting in a net gain in ~~California Department of Fish and Game~~ California Department of Fish and Wildlife jurisdictional area. Maintenance (i.e., weeding, pest control, irrigation system maintenance, trash removal, etc.) and monitoring of the mitigation area shall be conducted for a minimum of five years ~~or and~~ until such time as the Habitat Mitigation and Monitoring Program performance standards are achieved to ensure success of the plan. The final Habitat Mitigation and Monitoring Program shall be submitted to and approved by the County of Los Angeles Department of Regional Planning, the U.S. Army Corps of Engineers, the Regional

³ Note, however, that the name of the California Fish and Game Code has not changed.

Water Quality Control Board, and the ~~California Department of Fish and Game~~ California Department of Fish and Wildlife, in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code 1602 and supporting regulations, prior to issuance of a grading permit.

Section V.F, Biological Resources, pages V.F-91 to V.F-92, revise MM F-2 as follows:

MM F-2: Project construction-related activities likely to have the potential of disturbing suitable bird nesting habitat shall be prohibited from February 1 through August 31, unless a biological monitor acceptable to the Director of the County of Los Angeles Department of Regional Planning surveys the project area prior to disturbance to confirm that disturbance to habitat will not result in the failure of active nests on-site or immediately adjacent to the area of disturbance. Disturbance shall be defined as any activity that physically removes and/or damages vegetation or habitat, any action that may cause disruption of nesting behavior such as noise exceeding 90 dB from equipment, or direct artificial night lighting. Surveys shall be conducted on the subject property within 500 feet of disturbance areas no earlier than three days prior to the commencement of disturbance. If ground disturbance activities are delayed, then additional pre-disturbance surveys shall be conducted such that no more than three days will have elapsed between the survey and ground disturbance activities. The Applicant or the Project's Construction Manager shall provide the biologist with plans detailing the extent of proposed ground disturbance prior to the survey effort.

If active nests are found, clearing and construction shall be postponed or halted within a buffer area established by the biological monitor that is suitable to the particular location of the nest (typically 300 feet for most birds and 500 feet for raptors) and acceptable to the Director of the County of Los Angeles Department of Regional Planning, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of ~~a second~~ any further attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with highly visible construction fencing, and construction personnel shall be instructed on the sensitivity of nest areas. Occupied nests within the buffer established by the biological monitor and adjacent to the construction site shall also be avoided to ensure nesting success. A qualified biologist shall serve as a construction monitor during those periods when

construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. The results of the surveys, including graphics showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the County of Los Angeles Department of Regional Planning and ~~California Department of Fish and Game~~ California Department of Fish and Wildlife within 14 days of completion of the pre-construction surveys ~~or construction monitoring~~ to document compliance with applicable state and federal laws pertaining to the protection of native birds.

If any state or federally listed bird species (e.g., coastal California gnatcatcher, southwestern willow flycatcher) are detected during the course of pre-construction nesting bird surveys, all construction-related activity shall be postponed, and the Applicant shall consult with appropriate agencies (California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) and obtain any necessary take permits prior to the commencement of any construction-related activity. If any state or federally listed species are detected within the limits of construction during construction that were not detected during the pre-construction nesting bird surveys, construction-related activity shall cease, and the Applicant shall consult with appropriate agencies and obtain any necessary take permit before resuming any work. In addition to any take permit conditions that may be required by California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service, mitigation of occupied coastal California gnatcatcher habitat shall be provided at a minimum of 3:1 mitigation-to-impact ratio. Proof of habitat mitigation in keeping with the 3:1 requirement shall be provided to the County of Los Angeles before any construction-related activity can commence or resume.

Section V.F, Biological Resources, pages V.F-92 to V.F-93, revise the fifth bullet in MM F-3 as follows:

- Increased habitat connectivity through oak tree planting in areas between existing woodlands and along Placerita Creek, excluding reaches within proposed Los Angeles County Flood Control District easement limits;

Section V.F, Biological Resources, pages V.F-94 to V.F-95, revise MM F-9 as follows:

MM F-9: The Applicant shall submit the Project landscape plan to the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, and Los Angeles County Department of Public Works, as required, for review and approval prior to issuance of a building permit. The landscape plan shall show the size, type and location of all plants and watering facilities, consistent with the County's established codes and procedures. Where feasible, native plants shall be used for landscaping. The landscape plan shall also specify the type and location of eight 8-foot high decorative fencing to be installed along those portions of the Project site perimeter visible to the public along SR-14 and Placerita Canyon Road. The Project shall comply with all requirements of the approved landscape plan, and landscaping shall be installed upon completion of each major phase of Project development.

Section V.F, Biological Resources, page V.F-95, insert the following measures at the end of the list of Mitigation Measures:

MM F-10: Prior to, but within one year of, the commencement of Project construction, protocol surveys for the coastal California gnatcatcher (*Polioptila californica californica*) shall be conducted within the areas proposed for construction and designated as Critical Habitat by biologist(s) holding federal permits to conduct gnatcatcher surveys in accordance with the U.S. Fish and Wildlife Service's Coastal California Gnatcatcher Presence/Absence Survey Guidelines. The results of the surveys shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review. (Refer to MM F-2 regarding pre-construction nesting bird surveys, agency consultation, and necessary take permits should any state or federally listed bird species, including coastal California gnatcatcher, be detected.)

MM F-11: Prior to the issuance of a grading permit, the Applicant shall record a use restriction which shall run with the land in perpetuity over 3.18 acres of other coastal sage scrub that is suitable for coastal California gnatcatcher within the Ranch south of Placerita Canyon Road located within designated critical habitat for the coastal California gnatcatcher for purposes of preservation/conservation. The precise location of the use restriction area shall be determined in consultation with the California Department of Fish and Wildlife. The use restriction shall recognize the ability of those holding oil and other subsurface rights in the property to continue existing subsurface oil extraction operations under the use restriction

area. The use restriction language shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review and approval prior to recordation with the Los Angeles County Registrar-Recorder/County Clerk.

V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES

Section V.G, Cultural and Paleontological Resources, page V.G-40, revise the last sentence of MM G-4 as follows:

In the event of a find, archaeological and Native American monitoring shall be provided thereafter for any ground-disturbing activities ~~in~~ within the ~~area~~ boundary of the ~~find~~ archaeological site.

V.I. VISUAL QUALITIES

Section V.I, Visual Qualities, page V.I-48, revise PDF I-2 as follows:

PDF I-2: A vegetation barrier heavily planted with trees and shrubs shall be introduced along portions of Placerita Canyon Road and State Route 14 adjacent to the Development Area, as well as the northern portion of the site to screen the electrical substation from State Route 14.

Section V.I, Visual Qualities, page V.I-49, revise PDF I-3 as follows:

PDF I-3: The proposed water tank shall be painted a neutral color that is predominant in the surrounding area so as to blend with the surrounding landscape. The water tank color shall be submitted to the County of Los Angeles Department of Regional Planning for approval prior to issuance of a building permit. In addition, the area disturbed during construction immediately surrounding the water tank's ring road and fencing shall be revegetated with native plants, upon completion of tank construction. A landscape plan shall be submitted for approval of plant selection(s) from the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, Newhall County Water District, and ~~California Department of Fish and Game~~ California Department of Fish and Wildlife.

Section V.I, Visual Qualities, page V.I-49, revise MM I-2 and MM I-3 as follows:

- MM I-2:** The Applicant shall submit detailed lighting plans including fixture types and locations to the County of Los Angeles Department of Regional Planning and County of Los Angeles Department of Public Works for review and approval consistent with the County's established codes and procedures prior to issuance of a building permit.
- MM I-3:** To ensure minimal light trespass on sensitive habitat within Placerita Creek, bridges shall be lit by low focused light located on the side walls or railings and aimed at the road. The lighting along the creek-side of Project buildings shall be located primarily on outdoor decks/balconies and consist of surface-mounted fixtures facing down with full light cutoff to confine light to the decks/balconies and prevent spillover of light onto habitat areas. Lighting in these areas shall be consistent with the approved lighting plan.

V.J. TRAFFIC, ACCESS, AND PARKING

Section V.J, Traffic, Access, and Parking, page V.J-39, revise Table V.J-6 as shown on page II-34.

Section V.J, Traffic, Access, and Parking, page V.J-41, revise Table V.J-8 as shown on page II-35.

Section V.J, Traffic, Access, and Parking, page V.J-55, revise the paragraph under the heading a. Construction, as follows:

Cumulative construction traffic impacts would occur if construction traffic from the Related Projects would impact the same roadways, intersections, or access points as the Project. Of the 14 identified Related Projects, ~~only one, Related Project No. 3 (the Kellstrom Project), located at the southwest corner of Sierra Highway and Placerita Canyon Road, is in close proximity to the Project and~~ none would have the potential to affect all four study intersections. Four ~~additional~~ projects (Related Project Nos. 1, 2, 4, and 8) are located approximately one freeway interchange away on SR-14 from the Development Area, while most remaining Related Projects are dispersed throughout the area and do not have direct access to SR-14. Each of these developments would draw upon a construction workforce from all parts of the County. The majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours, consistent with the permitted construction hours of the local jurisdictions and typical construction work hours, thereby minimizing trips during the A.M. and

**Table V.J-6
Caltrans Intersection Analysis—Soundstage and Studio Office Options**

No.	Intersection	Peak Hour	Existing Conditions		Future without Project Conditions		Future with Project Conditions		Future with Project with Mitigation Conditions		Future with Project with Mitigation with Cumulative Mitigation Conditions	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Soundstage Option												
1.	Sierra Highway & SR 14 SB Ramps ^{a, b}	A.M.	*	F	*	F	*	F	14.6	B	13.1	B
		P.M.	*	F	*	F	*	F	13.1	B	9.4	A
2.	Sierra Highway & Placerita Canyon Road	A.M.	14.6	B	20.3	C	21.4	C	17.2	B	17.3 17.0	B
		P.M.	9.0	A	16.9	B	29.1	C	14.6	B	13.7	B
3.	SR 14 NB Off-Ramp & Placerita Canyon Road ^{b, c}	A.M.	9.4	A	13.8	B	13.8	B	13.8 13.9	B	13.8 13.9	B
		P.M.	9.5	A	11.0	B	24.0 24.2	C	24.0 24.2	C	24.0 24.2	C
Studio Office Option												
1.	Sierra Highway & SR 14 SB Ramps ^{a, b}	A.M.	*	F	*	F	*	F	14.6	B	13.1	B
		P.M.	*	F	*	F	*	F	13.1	B	9.4	A
2.	Sierra Highway & Placerita Canyon Road	A.M.	14.6	B	20.3	C	21.4	C	17.2	B	17.3 17.0	B
		P.M.	9.0	A	16.9	B	29.9	C	14.7	B	13.8	B
3.	SR 14 NB Off-Ramp & Placerita Canyon Road ^{b, c}	A.M.	9.4	A	13.8	B	13.7 13.8	B	13.7 13.9	B	13.7 13.9	B
		P.M.	9.5	A	11.0	B	24.2 24.3	C	24.2 24.3	C	24.2 24.3	C
<p>*Denotes oversaturated conditions. Delay cannot be calculated.</p> <p>^a Intersection is signalized as part of Project mitigation.</p> <p>^b Intersection is controlled by stop signs on minor approach.</p> <p>^c Intersection is signalized as part of Project design feature.</p> <p>Source: Gibson Transportation Consulting, Inc., May 2010.</p>												

**Table V.J-8
Caltrans Off-Ramp Analysis—Soundstage and Studio Office Options**

No.	Intersection	Ramp Description	Vehicle Storage Capacity (Car Lengths)	Peak Hour	Existing Conditions		Future without Project Conditions		Future with Project Conditions		Future with Project with Mitigation Conditions		Future with Project with Mitigation with Cumulative Mitigation Conditions	
					95th Percentile Vehicle Queue Length	Exceeds Capacity?	95th Percentile Vehicle Queue Length	Exceeds Capacity?	95th Percentile Vehicle Queue Length	Exceeds Capacity?	95th Percentile Vehicle Queue Length	Exceeds Capacity?	95th Percentile Vehicle Queue Length	Exceeds Capacity?
Soundstage Option														
1.	Sierra Highway & SR-14 SB Ramps	SR-14 Southbound Off-Ramp to Sierra Highway												
		Left-Turn Lane	52	A.M.	7	No	19	No	23	No	13	No	12	No
			52	P.M.	3	No	—	—	—	—	11	No	10	No
		Right-Turn Lane	52	A.M.	0	No	0	No	0	No	1	No	1	No
			52	P.M.	0	No	0	No	1	No	1	No	No	
		Ramp	18	A.M.	0	No	0	No	0	No	0	No	0	No
			18	P.M.	0	No	0	No	0	No	0	No	0	No
3.	SR-14 NB Off-Ramp & Placerita Canyon Road	SR-14 Northbound Off-Ramp to Placerita Canyon Road												
		Left-Turn Lane	29	A.M.	1	No	4	No	8	No	8	No	8	No
			29	P.M.	1	No	2	No	7	No	7	No	7	No
		Shared Left-Through Lane	29	A.M.	—	—	—	—	8	No	8	No	8	No
			29	P.M.	—	—	—	—	7	No	7	No	7	No
		Right-Turn Lane	29	A.M.	1	No	1	No	7-8	No	7	No	7	No
			29	P.M.	1	No	1	No	7	No	7	No	7	No
		Ramp	23	A.M.	0	No	0	No	0	No	0	No	0	No
			23	P.M.	0	No	0	No	0	No	0	No	No	
Studio Office Option														
1.	Sierra Highway & SR-14 SB Ramps	SR-14 Southbound Off-Ramp to Sierra Highway												
		Left-Turn Lane	52	A.M.	7	No	19	No	23	No	13	No	12	No
			52	P.M.	3	No	—	—	—	—	11	No	10	No
		Right-Turn Lane	52	A.M.	0	No	0	No	0	No	1	No	1	No
			52	P.M.	0	No	0	No	1	No	1	No	No	
		Ramp	18	A.M.	0	No	0	No	0	No	0	No	0	No
			18	P.M.	0	No	0	No	0	No	0	No	0	No
3.	SR-14 NB Off-Ramp & Placerita Canyon Road	SR-14 Northbound Off-Ramp to Placerita Canyon Road												
		Left-Turn Lane	29	A.M.	1	No	4	No	8	No	8	No	8	No
			29	P.M.	1	No	2	No	7	No	7	No	7	No
		Shared Left-Through Lane	29	A.M.	—	—	—	—	8	No	8	No	8	No
			29	P.M.	—	—	—	—	7	No	7	No	7	No
		Right-Turn Lane	29	A.M.	1	No	1	No	7-8	No	7	No	7	No
			29	P.M.	1	No	1	No	7	No	7	No	7	No
		Ramp	23	A.M.	0	No	0	No	0	No	0	No	0	No
			23	P.M.	0	No	0	No	0	No	0	No	No	

Source: Gibson Transportation Consulting, Inc., May 2010.

P.M. peak traffic periods. In addition, the haul truck routes for the Related Projects would be approved by LACDPW, Caltrans, and/or the City according to the location of each individual construction site. Each jurisdiction's review process would take into consideration the potential for overlapping construction projects and would attempt to balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. ~~However, to the extent that haul trips associated with construction of the Kellstrom Project coincide with soil export trips generated by the Project, such cumulative impacts could be potentially significant. Short of delaying earthwork activities for one of the projects so as to avoid any overlap, no feasible mitigation measures exist to eliminate this impact. Cumulative construction traffic impacts would therefore be less than significant and unavoidable to the extent that haul trips associated with the two projects coincide.~~

Section V.J, Traffic, Access, and Parking, pages V.J-58 to V.J-59, revise PDF J-1 as follows:

PDF J-1: ~~To~~ The Project Applicant shall prepare and implement a Transportation Demand Management program to encourage the use of alternative modes of transportation, and reduce vehicular traffic on the Project shall incorporate street and freeway system during the most congested time periods of the day. The Transportation Demand Management program shall be submitted to County of Los Angeles Department of Regional Planning and County of Los Angeles Department of Public Works for review and approval and shall include implementation of several Transportation Demand Management strategies, which shall include, but shall not be limited to, the following features:

- The provision of information on transportation alternatives including establishment of a Transportation Information Center (transit schedules, maps, bulletin board/kiosk and/or intranet, etc.);
- A rideshare/vanpool/carpool matching program for Disney and ABC employees;
- Preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles;
- Preferred parking for carpool/vanpool vehicles;
- Video conferencing facilities within the Project;

- On-site secure, bicycle storage areas; ~~and~~
- ~~Non-dedicated walkways, bicycle access, and paved surfaces throughout the Development Area to minimize use of automobiles and trucks traveling throughout the Development Area.~~
- Alternative work schedules;
- An Emergency Ride Home Program, which may include taxi vouchers and/or the availability of on-site vehicle(s) for Disney and ABC employees who are registered transit users;
- Discounted Disney/ABC employee transit passes;
- Designation of a Transportation Demand Management program coordinator to oversee program implementation; and
- Financial mechanisms and/or programs to provide for the implementation of the Transportation Demand Management program.

Section V.J, Traffic, Access, and Parking, page V.J-60, revise MM J-2 as follows:

MM J-2: The Applicant shall obtain the required permits for truck haul routes from the County of Los Angeles Department of Public Works and/or any other public agency, as applicable, prior to the issuance of a grading permit for the Project.

Section V.J, Traffic, Access, and Parking, page V.J-60 to page V.J-61, revise MM J-4 as follows:

MM J-4: Prior to issuance of a grading permit, Applicant shall document and submit all required information and/or material pertaining to the pavement of County roadways along the Project haul route, including the formula for calculating the Project's fair share of any repair and/or reconstruction of County roadways along the Project haul route, to the satisfaction of the County of Los Angeles Department of Public Works.

~~The Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of County roadways along the Project haul route attributable to the Project as agreed to by the County of Los Angeles Department of Public Works. A~~

bond (amount to be reasonably determined by the County of Los Angeles Department of Public Works once a specific haul route is designated) shall ~~also~~ be put in place to cover any structural impacts to the roadways along the haul route attributable to the Project's truck trips during hauling.

The Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of County roadways along the Project haul route attributable to the Project as agreed to by the County of Los Angeles Department of Public Works. The timing of any necessary repairs and/or reconstruction of County Roadways by the Applicant shall be determined by the County of Los Angeles Department of Public Works.

Section V.J, Traffic, Access, and Parking, page V.J-61, revise MM J-5 and MM J-6 as follows:

MM J-5: Sierra Highway/SR-14 Southbound Ramps: Prior to issuance of the first certificate of occupancy, the Project Applicant shall install a traffic signal at this intersection with protected left-turn phasing for southbound Sierra Highway. Northbound Sierra Highway shall be widened to provide a separate right-turn only lane onto the SR-14 southbound on-ramp. These improvements shall be the sole responsibility of the Project. Detailed striping/signing and traffic signal plans shall be submitted to the County of Los Angeles Department of Public Works and Caltrans for review and approval prior to implementation.

MM J-6: Sierra Highway/Placerita Canyon Road: Prior to issuance of the first certificate of occupancy, the Project Applicant shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway, facilitating traffic flow to the SR-14 southbound on-ramp. These improvements shall be the sole responsibility of the Project. A detailed striping/signing plan shall be submitted to the County of Los Angeles Department of Public Works and Caltrans for review and approval prior to implementation.

Section V.J, Traffic, Access, and Parking, page V.J-62, revise MM J-8, MM J-9, and MM J-10 as follows:

MM J-8: Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramps: The Project shall provide a direct entrance, if approved by Caltrans, to the Development Area from the SR-14 northbound off-ramp to allow immediate access

to the Project. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional through and left-turn lane, and one right-turn lane). The eastbound lanes on Placerita Canyon Road shall also be restriped to provide one through lane and one dedicated right-turn lane for the SR-14 northbound on-ramp. Eastbound to northbound left-turns shall be prohibited, and southbound movement out of the Development Area shall be limited to right-turns only. These improvements shall be the sole responsibility of the Project.

MM J-9: Sierra Highway/SR-14 Southbound Ramps: Prior to issuance recordation of the first certificate of occupancy final map, the Project Applicant shall pay its pro rata share (20.9 percent) of the cost for the widening of southbound Sierra Highway to provide a second left-turn only lane onto the SR-14 southbound on-ramp.

MM J-10: Sierra Highway/Placerita Canyon Road: Prior to issuance recordation of the first certificate of occupancy final map, the Project Applicant shall pay its pro rata share (16.2 percent) of the cost for the widening of the Sierra Highway northbound approach to provide a separate right-turn only lane onto eastbound Placerita Canyon Road, as well as the widening of the Sierra Highway southbound approach to provide a separate right-turn only lane onto westbound Placerita Canyon Road.

Section V.J, Traffic, Access, and Parking, page V.J-62, insert the following measure at the end of the list of Mitigation Measures:

MM J-12: The Applicant shall comply with all applicable Caltrans rules and regulations and obtain all necessary approvals from Caltrans, potentially including but not limited to: synchronization of the street signals at Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramp and Sierra Highway/Placerita Canyon Road; and implementation of an approved soil sampling workplan.

Section V.J, Traffic, Access, and Parking, page V.J-63, delete the last sentence of the paragraph continued from the previous page, as follows:

~~Nonetheless, cumulative construction traffic impacts would be significant and unavoidable to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3).~~

Section V.J, Traffic, Access, and Parking, page V.J-70, revise Table V.J-19 as shown on page II-41.

Section V.J, Traffic, Access, and Parking, page V.J-73, revise Table V.J-20 as shown on page II-42.

V.K.2. PUBLIC SERVICES—FIRE PROTECTION

Section V.K.2, Public Services—Fire Protection, revise the four paragraphs beginning with the second paragraph under Subsection 2.a(1) at the bottom of page V.K.2-1 and ending near the top of page V.K.2-6 as follows:⁴

As shown in Figure V.K.2-1 on page V.K.2-2, ~~three~~ four existing County Fire Department stations are located within the vicinity of the Ranch. Fire Station No. 123 is located at 26321 North Sand Canyon Road, approximately 4.2 miles east of the Ranch (~~approximately 4.7 miles from the Development Area~~).² ~~Fire Station No. 123 and is currently~~ is currently the jurisdictional (~~“first in”~~ 1st-due) station for ~~the Development Area and the Ranch~~.³ Fire Station No. 104 is located at 26201 Golden Valley Road, approximately 2.9 miles northwest of the Ranch, and would be designated as the 1st-due station for the Development Area (Fire Station No. 123 would continue to be the 1st-due station for the remainder of the Ranch). Fire Station No. 73 is located at 24875 North Railroad Avenue (previously North San Fernando Road), approximately 3.4 miles west of the Development Area, and is the ~~“second in”~~ 2nd-due station for the Development Area and the remainder of the Ranch. Fire Station No. ~~404~~ 107 is located at ~~26201 Golden Valley Road~~ 18239 West Soledad Canyon, approximately ~~2.9~~ 4.0 miles ~~northwest~~ northeast of the Development Area, and is the ~~“third in”~~ 3rd-due station for the Development Area and the remainder of the Ranch. Table V.K.2-1 on page V.K.2-4 summarizes the location, response distance, staffing, and equipment of these stations.²

Fire Station No. 104 is currently in a temporary location and is scheduled to be relocated to a permanent location at 26901 Golden Valley Road, slightly farther north of its current location. Fire Station No. 104 should be operational at its permanent location by 2013. In addition, a new fire station, Fire Station No. 150, is planned at 19190 Golden Valley Road just

⁴ The footnotes associated with the revised text provided below are presented at the end of the four paragraphs. All subsequent footnotes in Section V.K.2, Public Services—Fire Protection, of the Draft EIR shall be renumbered as appropriate based on the revisions herein.

**Table V.J-19
Existing Plus Ambient Growth Plus Project with Mitigation Plus Related Projects, with Cumulative Mitigation (Soundstage Option, 2020)
Intersection Peak-Hour Levels of Service**

No.	Intersection	Peak Hour	Existing plus Ambient Growth Conditions		Existing plus Ambient Growth plus Project with Mitigation plus Related Projects Conditions				Existing plus Ambient Growth plus Project with Mitigation plus Related Projects with Cumulative Mitigation Conditions			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Significant Impact?
1.	Sierra Highway & SR 14 SB Ramps ^a	A.M.	0.870	D	0.906	E	0.036	Yes	0.734	C	-0.136	No
		P.M.	0.900	D	1.002	F	0.102	Yes	0.917	E	0.017	No
2.	Sierra Highway & Placerita Canyon Road	A.M.	0.744	C	0.760	C	0.016	No	0.760 0.725	C	0.016	No
		P.M.	0.848	D	0.922	E	0.074	Yes	0.861	D	0.013	No
3.	SR 14 NB Off-Ramp & Placerita Canyon Road ^a	A.M.	0.265	A	0.385	A	0.120	No	0.385	A	0.120	No
		P.M.	0.241	A	0.373	A	0.132	No	0.373	A	0.132	No
4.	Current Ranch main entrance & Placerita Canyon Road ^a	A.M.	0.261	A	0.398	A	0.137	No	0.398	A	0.137	No
		P.M.	0.249	A	0.349	A	0.100	No	0.349	A	0.100	No

^a Intersection is signalized as part of Project mitigations.
Source: Gibson Transportation Consulting, Inc., May 2010.

**Table V.J-20
Existing Plus Ambient Growth Plus Project With Mitigation Plus Related Projects, With Cumulative Mitigation (Studio Office Option, 2020)
Intersection Peak-Hour Levels of Service**

No.	Intersection	Peak Hour	Existing plus Ambient Growth Conditions		Existing plus Ambient Growth plus Project with Mitigation plus Related Projects Conditions				Existing plus Ambient Growth plus Project with Mitigation plus Related Projects with Cumulative Mitigation Conditions			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Significant Impact?
1.	Sierra Highway & SR 14 SB Ramps ^a	A.M.	0.870	D	0.907	E	0.037	Yes	0.735	C	-0.135	No
		P.M.	0.900	D	1.002	F	0.102	Yes	0.917	E	0.017	No
2.	Sierra Highway & Placerita Canyon Road	A.M.	0.744	C	0.760	C	0.016	No	0.760 0.725	C	0.016	No
		P.M.	0.848	D	0.923	E	0.075	Yes	0.862	D	0.014	No
3.	SR 14 NB Off-Ramp & Placerita Canyon Road ^a	A.M.	0.265	A	0.387	A	0.122	No	0.387	A	0.122	No
		P.M.	0.241	A	0.378	A	0.137	No	0.378	A	0.137	No
4.	Current Ranch main entrance & Placerita Canyon Road ^a	A.M.	0.261	A	0.403	A	0.142	No	0.403	A	0.142	No
		P.M.	0.249	A	0.353	A	0.104	No	0.353	A	0.104	No

^a Intersection is signalized as part of Project mitigations.
Source: Gibson Transportation Consulting, Inc., May 2010.

east of SR-14, approximately 1.3 miles northeast of the Development Area (~~approximately 1.7 miles to the proposed driveway~~), and is expected to become operational in 2012. Once operational, Fire Station No. 150 would replace Fire Station Nos. 104 and 123 as the jurisdictional stations for the Development Area and the remainder of the Ranch, respectively. It is anticipated that Fire Station No. 150 would be equipped with a four-person quint (combination engine/ladder truck apparatus) at minimum, a three-person engine company, and a two-person paramedic squad, as shown in Table V.K.2-1. ~~Once Fire Station No. 150 is operational, the staffing and equipment of Fire Station No. 104 would change to a four-person engine company and a five-person hazmat squad (creating a hazmat taskforce).~~⁴ Specific staffing configurations will be finalized by October 2012.³

Fire Station No. 104 is currently in a temporary location and is scheduled to be relocated to a permanent location at 26901 Golden Valley Road, slightly farther north of its current location. Fire Station No. 104 should be operational at its permanent location by 2013. In addition, a new fire station, Fire Station No. 150, is planned at 19190 Golden Valley Road just east of SR-14, approximately 1.3 miles northeast of the Development Area (~~approximately 1.7 miles to the proposed driveway~~), and is expected to become operational in 2012. Once operational, Fire Station No. 150 would replace Fire Station Nos. 104 and 123 as the jurisdictional stations for the Development Area and the remainder of the Ranch, respectively. It is anticipated that Fire Station No. 150 would be equipped with a four-person quint (combination engine/ladder truck apparatus) at minimum, a three-person engine company, and a two-person paramedic squad, as shown in Table V.K.2-1. ~~Once Fire Station No. 150 is operational, the staffing and equipment of Fire Station No. 104 would change to a four-person engine company and a five-person hazmat squad (creating a hazmat taskforce).~~⁴ Specific staffing configurations will be finalized by October 2012.³

Table V.K.2-2 on page V.K.2-5 lists the number of responses during 2011 for the three existing County Fire Department stations ~~closest to the Ranch during 2009~~ that would serve the Development Area, as well as average response times. Fire Station No. ~~123-104~~ 104 had ~~371-432~~ 432 total responses in ~~2009-2011~~ 2011, consisting of ~~115-20~~ 20 fire-related responses, ~~207-332~~ 332 emergency medical service (EMS) responses, and ~~49-80~~ 80 other responses.⁵⁴ Fire Station No. 73 had ~~1,937-1,939~~ 1,939 total responses in ~~2009-2011~~ 2011, consisting of ~~70-59~~ 59 fire-related responses, ~~1,524-1,548~~ 1,548 EMS responses, and ~~343-332~~ 332 other responses.⁶⁵ Fire Station No. ~~104-107~~ 107 had ~~208-2,957~~ 2,957 total responses in ~~2009-2011~~ 2011, consisting of ~~5-76~~ 76 fire-related responses, ~~161-2,459~~ 2,459 EMS responses, and ~~42-422~~ 422 other responses.^{7,8} Among the three fire stations,

there were a total of ~~approximately 2,516~~ 5,328 responses in ~~2009~~ 2011, with fire-related responses comprising approximately ~~8~~ 3 percent of calls, EMS responses comprising approximately ~~75~~ 81 percent, and other responses comprising approximately ~~17~~ 16 percent.⁶

According to the County Fire Department, the Ranch is located in a suburban area. For suburban areas, the County Fire Department has response time goals of 8 minutes for the first arriving unit and 12 minutes for an advanced life support (paramedic) unit. The average response times for each of the stations are listed in Table V.K.2-2. As shown, based on ~~2009~~ 2011 data the average response time for Fire Station No. 123 is ~~9:50~~ minutes for fire responses, ~~7~~ minutes for EMS responses, and ~~8:41~~ minutes for other responses. The average response time for Fire Station No. 104 is ~~5:56~~ 6:03 minutes for fire responses, ~~5:49~~ 6:20 minutes for EMS responses, and ~~5:34~~ 6:02 minutes for other responses.⁹⁷ The average response time for Fire Station No. 73 is ~~5:29~~ 5:32 minutes for fire responses, ~~5:04~~ 4:53 minutes for EMS responses, and ~~5:32~~ 5:05 minutes for other responses.⁴⁰⁸ The average response time for Fire Station No. 107 is 5:22 minutes for fire responses, 5:15 minutes for EMS responses, and 5:28 minutes for other responses. These response times meet Department goals. ~~Fire Station No. 123 is estimated to have a response time of 8 minutes based on actual driving time, which is within County Fire Department guidelines.⁴⁴ Based on the distance to the Development Area, the jurisdictional station (Fire Station No. 104) is estimated to have a response time of approximately 10 minutes, which is longer than the Department's effective level of service; however, once Fire Station No. 150, once completed is operational (2012), it is anticipated expected to have an estimated response time to the Development Area and the Ranch of less than 5 minutes, which would also be within County Fire Department guidelines.⁴²⁹~~

² ~~Distance citations are approximate driving distances to the nearest portion of the Development Area, except as otherwise noted.~~

³ ~~Written correspondence, Captain Mark Whaling, Fire Station No. 123, Los Angeles County Fire Department, October 26, 2010. Confirmed via phone communication with Chief Debbie Aguirre, Los Angeles County Fire Department Planning Division, December 13, 2011.~~

² ~~Written correspondence, Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.~~

⁴ ~~Phone communication and e-mail correspondence, Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department Planning Division, March 18 and 30, 2010.~~

³ ~~Written correspondence, Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.~~

⁵ ~~E-mail communication, Captain Mark Whaling, Fire Station No. 123, Los Angeles County Fire Department, December 31, 2010.~~

⁴ In 2010, Fire Station No. 104 had 453 total responses, consisting of 21 fire-related responses, 356 EMS responses, and 76 other responses. Source: Chief John R. Todd, Forestry Division, Prevention Services Bureau, September 14, 2011.

⁶⁵ In 2010, Fire Station No. 73 had 1,993 total responses, consisting of 76 fire-related responses, 1,511 EMS responses, and 406 other responses. Source: Chief John R. Todd, Forestry Division, Prevention Services Bureau, September 14, 2011.

⁶ Written correspondence, Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.

~~⁷ Written communication, Chief John R. Todd, Forestry Division, Prevention Services Bureau, March 5, 2010.~~

~~⁸ In 2010, Fire Station No. 104 had 453 total responses, consisting of 21 fire-related responses, 356 EMS responses, and 76 other responses. Source: Chief John R. Todd, Forestry Division, Prevention Services Bureau, September 14, 2011.~~

⁹² Based on 2010 data, the average response time for Fire Station No. 104 is 5:58 minutes for fire responses, 6:07 minutes for EMS responses, and 6:09 minutes for other responses. Source: Chief John R. Todd, Forestry Division, Prevention Services Bureau, September 14, 2011.

¹⁰⁸ Based on 2010 data, the average response time for Fire Station No. 73 is 5:28 minutes for fire responses, 5:03 minutes for EMS responses, and 5:21 minutes for other responses. Source: Chief John R. Todd, Forestry Division, Prevention Services Bureau, September 14, 2011.

~~¹¹ E-mail correspondence, Chief Debbie Aguirre, Planning Division, Los Angeles County Fire Department, April 7, 2011.~~

~~¹² E-mail correspondence, Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department Planning Division, March 18, 2010.~~

⁹ Written correspondence, Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.

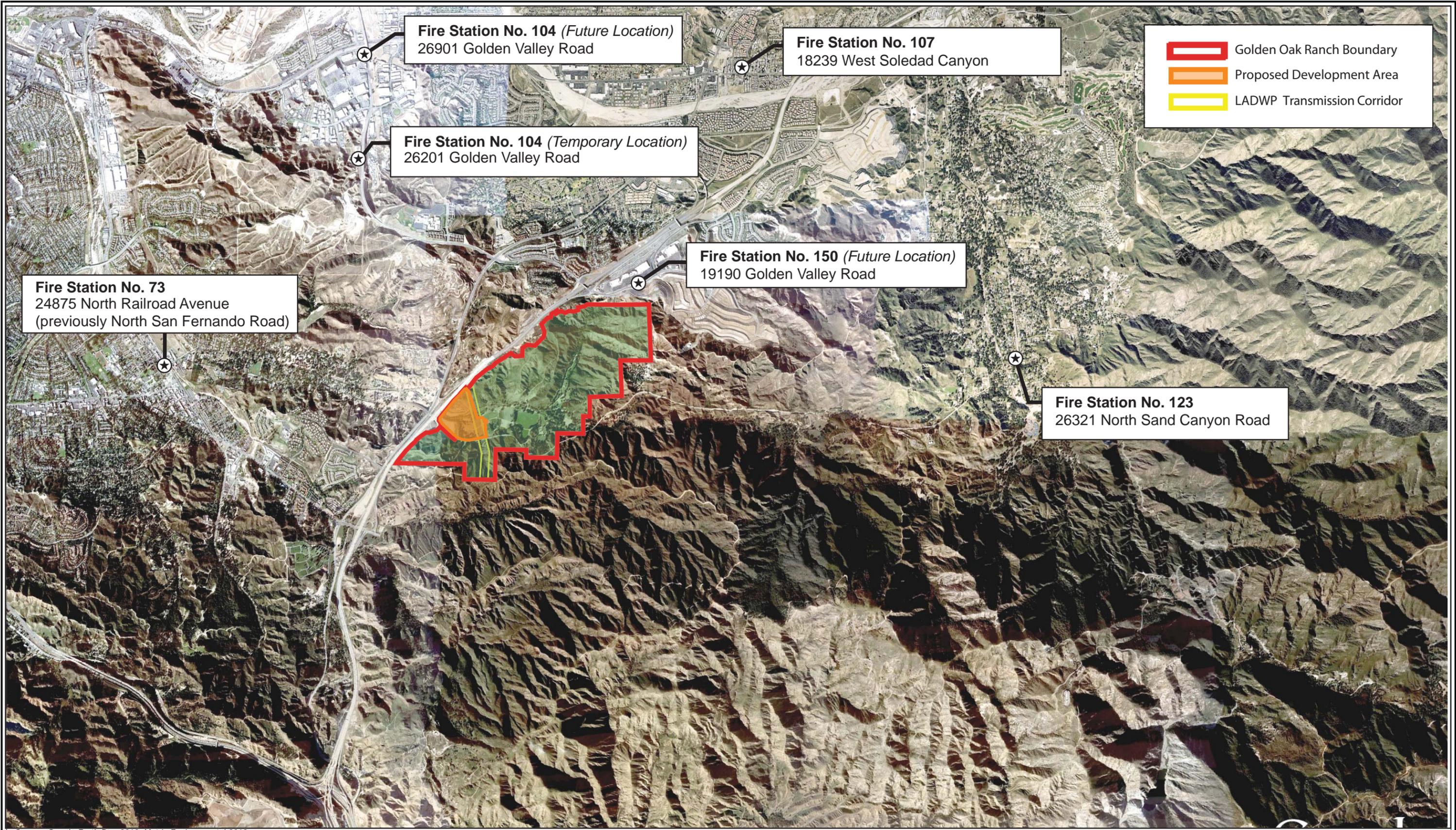
Section V.K.2, Public Services—Fire Protection, page V.K.2-2, replace Figure V.K.2-1 with Figure V.K.2-1 (REVISED) provided on page II-46 of this Final EIR.

Section V.K.2, Public Services—Fire Protection, page V.K.2-4, revise Table V.K.2-1 as shown on page II-47 of this Final EIR.

Section V.K.2, Public Services—Fire Protection, page V.K.2-5, revise Table V.K.2-2 as shown on page II-48 of this Final EIR.

Section V.K.2, Public Services—Fire Protection, page V.K.2-7, revise the third sentence in the second paragraph under Subsection 2.a(2) as follows:

Fire Station Nos. 123, 104, and 73, and 107 are located approximately 4.7 miles, 2.9 miles, and 3.4 miles, and 4.0 from the Development Area, respectively.



Source: Google Earth Pro, 2010; Matrix Environmental 2012.

Disney | ABC Studios at The Ranch



Figure V.K.2-1 (REVISED)
Existing and Proposed Fire Stations Within the Project Vicinity

**Table V.K.2-1
Existing and Proposed County Fire Department Stations Located in Serving the Project Vicinity**

Station No.	Location	Distance from Development Area ^a	24-Hour Staffing	Equipment
Existing				
Fire Station No. 123^b	26321 North Sand Canyon Road	4.7 miles	3	• Engine Company
Fire Station No. 104 (temporary)	26201 Golden Valley Road	2.9 miles	4	• Four-Person Quint
Fire Station No. 73 ^b	24875 North Railroad Avenue	3.4 miles	6	• Four-Person Engine Company • Two-Person Paramedic Squad
<u>Fire Station No. 107^b</u>	<u>18239 West Soledad Canyon</u>	<u>4.0 miles</u>	<u>6</u>	• <u>Three-Person Engine Company</u> • <u>Two-Person Paramedic Squad</u>
Proposed				
Fire Station No. 150^c (2012)	19190 Golden Valley Road	1.3 miles	9 4	• Four-Person Quint • Three-Person Engine Company • Two-Person Paramedic Squad (minimum staffing; actual staffing will be determined by October 2012)
Fire Station No. 104 ^d (permanent in 2013)	26901 Golden Valley Road	3.8 miles	9 4	• <u>Four-Person Engine Company Quint</u> • <u>Five-Person Hazmat Squad (actual staffing will be determined by October 2012)</u>
<p>^a <u>Distances cited are approximate driving distances from each fire station to the proposed Development Area Ranch entrance on Placerita Canyon Road across from the SR-14 northbound off-ramp, except for Fire Station No. 123, which is measured to the existing Ranch main entrance further to the east.</u></p> <p>^b <u>No changes in the location, staffing, or equipment are anticipated for these stations.</u></p> <p>^c <u>Proposed Fire Station No. 150 is expected to be operational in 2012.</u></p> <p>^d <u>Land has been acquired for permanent Fire Station No. 104, but construction has not yet begun.</u></p> <p>Source: <u>Written communication, Chief John R. Todd, Forestry Division Prevention Services Bureau, March 5, 2010; e-mail correspondence, Loretta Bagwell, Planning Analyst, Los Angeles County Fire Department Planning Division, March 30, 2010; e-mail correspondence, Captain Mark Whaling, Fire Station No. 123, Los Angeles County Fire Department, December 31, 2010 Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.</u></p>				

**Table V.K.2-2
Fire and Paramedic Response Data for ~~2009~~ 2011**

Fire Stations Serving the Ranch	Annual Number of Responses^a	Average Response Time
Fire Station No. 123^b Fire Responses Emergency Medical Service Responses Other ^c Total Station Responses	 415 (31%) 207 (56%) 49 (13%) 371	 9:50 minutes 7:00 minutes 8:41 minutes
Fire Station No. 104 Fire Responses Emergency Medical Service Responses Other ^c Total Station Responses	 5 (3%) 20 (5%) 461 (77%) 332 (76%) 42 (20%) 80 (19%) 208 432	 5:56 6:03 minutes 5:49 6:20 minutes 5:34 6:02 minutes
Fire Station No. 73 Fire Responses Emergency Medical Service Responses Other ^c Total Station Responses	 70 (3%) 59 (3%) 1,524 (79%) 1,548 (80%) 343 (18%) 332 (17%) 1,937 1,939	 5:29 5:32 minutes 5:04 4:53 minutes 5:32 5:05 minutes
Fire Station No. 107 Fire Responses Emergency Medical Service Responses Other ^c Total Station Responses	 76 (3%) 2,459 (83%) 422 (14%) 2,957	 5:22 minutes 5:15 minutes 5:28 minutes
Total Responses	2,516 5,328	
<p>^a Annual number of responses occurring during 2009-2011. Percentages represent percent of total responses per station.</p> <p>^b Note that Fire Station No. 123 has a jurisdiction of 13 square miles, which encompasses both suburban and rural areas. Average response times can be dramatically impacted by a handful of rural area calls.</p> <p>^c "Other" refers to false alarms, smoke scares, vehicle accidents, good intent, service calls, and miscellaneous incidents of this type.</p> <p>Source: Written communication, Chief John R. Todd, Forestry Division Prevention Services Bureau, March 5, 2010; e-mail communication, Captain Mark Whaling, Fire Station No. 123, Los Angeles County Fire Department, December 31, 2010; e-mail communication, Chief Debbie Aguirre, Planning Division, Los Angeles County Fire Department, January 12, 2011; Frank Vidales, Acting Chief, Los Angeles County Fire Department Forestry Division, Prevention Services Bureau, June 4, 2012.</p>		

Section V.K.2, Public Services—Fire Protection, within Subsection 3.d beginning on page V.K.2-19, replace all remaining references to “Fire Station No. 123” with “Fire Station No. 104.” In addition, on page V.K.2-20 revise the first sentence in the first paragraph under Subsection 3.d(1)(b)(ii)(A) as follows:

The Development Area is located approximately 4.7-2.9 miles from the current temporary location of Fire Station No. ~~123~~ 104 (3.8 miles from the

future permanent location), outside of the County Fire Department's maximum target response distance of 1.5 miles from a fire station.

Section V.K.2, Public Services—Fire Protection, page V.K.2-25, revise PDF K.2-3 as follows:

PDF K.2-3: The Applicant shall submit a fire exhibit that depicts detailed design requirements to the County of Los Angeles Fire Department for review and approval prior to the recordation of the final map or ~~the approval~~ issuance of a building permit.

V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY

Section V.L.1, Utilities and Service Systems—Water Supply, page V.L.1-37, revise PDF L.1-3 as follows:

PDF L.1-3: The Project shall incorporate water conservation features that shall reduce the Project's landscaping water demand by at least 50 percent from business as usual (i.e., without water conservation measures in place).

V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE

Section V.L.3, Utilities and Service Systems—Solid Waste, page V.L.3-23, revise PDF L.3-3 as follows:

PDF L.3-3: The Applicant shall ensure that the construction contractor shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as required per the Los Angeles County Code ~~and demonstrated to the County of Los Angeles Department of Public Works prior to issuance of demolition or construction permits.~~

V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY

Section V.L.4, Utilities and Service Systems—Energy, page V.L.4-22, revise PDF L.4-2 as follows:

PDF L.4-2: As part of the Project, the proposed soundstages, production offices, and the administration building shall comply with the County's Green Building ordinance and achieve Leadership in Energy and Environmental Design (LEED™) Silver Certification or equivalent. The commissary shall comply with the County's

Green Building ordinance and achieve LEED™ Certification or equivalent. The writers/producers bungalows shall comply with the County's Green Building ordinance. While the mills and the warehouse are exempt from County Code Sections 22.52.2130.C.1 and 22.52.2130.D regarding energy conservation and third party rating systems, they shall comply with the other applicable sections of the County's Green Building ordinance and achieve equivalency of LEED™ Certification. The substation and central utility plant would be exempt from the County's Green Building ordinance.

V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS

Section V.M, Environmental Safety/Fire Hazards, page V.M-39, revise MM M-1, MM M-2, and MM M-3 as follows:

MM M-1: If previously unidentified soil contamination is observed by sight or smell or indicated by testing by a qualified professional using a portable volatile organic compound analyzer during excavation and grading activities, excavation and grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented, as contained in the South Coast Air Quality Management District's Rule 1166, to make the area suitable for grading activities to resume. In the event contamination is found, the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable. The contaminated soil shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in accordance with all applicable federal, State, and local laws and regulations.

MM M-2: During grading for construction of the proposed water tank and associated water line in the southwest corner of the Ranch and construction in the westernmost portion of the Development Area containing abandoned oil wells, a qualified professional shall observe by sight or smell and test using a portable volatile organic compound analyzer the surrounding soil for the presence of potential contaminants. In the event contamination is found, grading and excavation in the area shall be temporarily halted and the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable. Any soil found to be contaminated shall

be excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in full compliance with all applicable federal, State, and local laws and regulations, including the South Coast Air Quality Management District's Rule 1166 before grading and excavation can resume in the contaminated area.

MM M-3: Prior to the issuance of any grading permit, a qualified professional shall conduct soil testing for pesticides, petroleum hydrocarbons, and vapors in the following areas where agricultural operations and oil production activities have occurred but testing has not been previously conducted: the portion of the Development Area located east of the southern fill pad, the Water Tank Area, and the Conditional Parking Areas, if developed. In the event contamination is found, the Applicant shall notify the Los Angeles County Fire Department and/or the California Department of Toxic Substances Control, as applicable. Any soil found to be contaminated shall be evaluated, managed, treated or disposed in full compliance with all applicable federal, State, and local laws and regulations prior to construction in the affected area.

Section V.M, Environmental Safety/Fire Hazards, page V.M-40, revise MM M-7 as follows:

MM M-7: Prior to issuance of a grading permit, the Applicant shall submit documentation to the County of Los Angeles ~~Fire~~ Department of Public Works to verify that all oil wells within 200 feet of Project buildings or structures have been properly abandoned according to required standards. If the wells were not abandoned properly, as determined by the California Department of Conservation Division of Oil, Gas and Geothermal Resources, the wells shall be re-abandoned in accordance with the requirements of the California Department of Conservation Division of Oil, Gas and Geothermal Resources.

V.N. LAND USE

Section V.N, Land Use, page V.N-1, add the following footnote at the end of the first paragraph under heading 2. ENVIRONMENTAL SETTING, a. Existing Conditions, (1) Project Site, and renumber all subsequent footnotes accordingly:

² The Project would allow for continued operation and maintenance of the existing filming ranch and associated outdoor sets on 195 acres of the Ranch with the remaining

637 acres used as a filming backdrop, by incorporating the existing Conditional Use Permit (CUP) that allows filming uses at the Ranch into the proposed CUP for the Project, as discussed further in Section IV, Project Description, of this Draft EIR. As indicated in the Exhibit "A" Map provided as Figure IV-17 in Section IV, Project Description, of this Draft EIR, the proposed CUP would apply to the entire 890-acre Ranch, as does the existing CUP, with the 195 acres of existing filming ranch and associated outdoor sets continuing to be operated as it has been for over 30 years. The analysis provided within this Draft EIR distinguishes between those areas where new development and uses are proposed that would result in physical changes in the environment (i.e., the Development Area, the Water Tank Area, the Trail Area, the Potential Mobile Home Relocation Areas, and the Conditional Parking Areas, which with the Off-Site Infrastructure Improvement Areas are typically referred to herein as the Project site) and those areas of the Ranch where existing and ongoing film production and intermittent agricultural and oil production uses would continue unchanged (generally referred to herein as the Ranch or the remainder of the Ranch).

VI. PROJECT ALTERNATIVES

Section VI, Project Alternatives, page VI-2, delete the last sentence of the second paragraph, as follows:

~~Finally, as discussed in Section V.J, Traffic, Access, and Parking, cumulative construction traffic impacts would be significant and unavoidable to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3).~~

Section VI, Project Alternatives, page VI-20, delete the last sentence of the first paragraph under the heading j. Traffic, Access, and Parking, as follows:

~~Furthermore, the Project's significant and unavoidable cumulative construction traffic impact, which would only occur to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3), would be avoided under Alternative 1 since no haul truck trips would occur under the Alternative.~~

Section VI, Project Alternatives, page VI-37, delete the last two sentences of the first paragraph under the heading j. Traffic, Access, and Parking, as follows:

~~Furthermore, the Project's significant and unavoidable cumulative construction traffic impacts, which would only occur to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3), would be reduced under Alternative 2 since fewer haul truck trips would occur under the Alternative. However, to the extent such trips coincide with Related Project No. 3, cumulative construction traffic~~

~~impacts associated with Alternative 2 would still be significant and unavoidable.~~

Section VI, Project Alternatives, page VI-56, delete the last two sentences of the paragraph continued from the previous page, as follows:

~~Additionally, the Project's significant and unavoidable cumulative construction traffic impacts, which would only occur to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3), would be reduced under Alternative 3 since fewer haul truck trips would occur under the Alternative.¹⁰ However, to the extent such trips coincide with Related Project No. 3, cumulative construction traffic impacts associated with Alternative 3 would still be significant and unavoidable.~~

~~¹⁰ As previously indicated, although it is estimated that both the Project and Alternative 3 would involve approximately 350,000 cubic yards of soil export, the Project analysis was conservatively based on the export of 500,000 cubic yards; therefore, for purposes of this analysis, the Alternative would result in a reduced level of export and associated haul truck trips.~~

Section VI, Project Alternatives, page VI-74, delete the last sentence of the first paragraph under the heading j. Traffic, Access, and Parking, as follows:

~~Furthermore, the Project's significant and unavoidable cumulative construction traffic impacts, which would only occur to the extent that haul trips associated with the Project coincide with those of the Kellstrom Project (Related Project No. 3), would be avoided under Alternative 4 since few haul truck trips would occur for the limited soil import anticipated under the Alternative.~~

Section VI, Project Alternatives, page VI-84, revise the last sentence of the paragraph continued from the previous page, as follows:

Specifically, the significant short-term impacts associated with regional construction air emissions and off-site construction noise would remain, as would cumulative operational mobile noise and ~~cumulative construction traffic impacts.~~

VII. OTHER ENVIRONMENTAL CONSIDERATIONS

Section VII, Other Environmental Considerations, page VII-2, delete the following subsection in its entirety:

~~3. Traffic, Access, and Parking~~

~~As analyzed in Section V.J, Traffic, Access, and Parking, to the extent that haul trips associated with construction of the Kellstrom Project (Related Project No. 3) coincide with soil export trips generated by the Project, such cumulative impacts could be potentially significant. Short of delaying earthwork activities for one of the projects so as to avoid any overlap, no feasible mitigation measures exist to eliminate this impact. Cumulative construction traffic impacts would therefore be significant and unavoidable to the extent that haul trips associated with the two projects coincide.~~

Section VII, Other Environmental Considerations, page VII-11, revise the paragraph under the heading 5. Air Resources—Air Quality as follows:

MM E.1-1 through MM ~~E.1-8~~ E.1-10 pertain to Project construction and generally include standard measures, such as use of properly tuned and maintained construction equipment, maintenance of construction equipment to minimize exhaust emissions, prohibition of idling in excess of 5 minutes, phasing and scheduling of construction emissions to avoid emission peaks, limitations regarding mass grading, and use of electricity from power poles rather than temporary diesel- or gasoline-powered generators. These mitigation measures give special consideration during the contract bidding and selection process to proposals that incorporate specific equipment, filters, and catalysts and/or a commitment to use aqueous diesel or bio diesel. These mitigation measures also require use of low and non-VOC containing paints and other materials, ~~and~~ prohibit construction activities associated with the trail from occurring during the same time as grading activities within the Ranch, and provide specifications for haul trucks during soil export activities. In addition, MM E.1-7 would limit mass grading to 10 acres per day. These mitigation measures would be beneficial in reducing air quality impacts during Project construction. No adverse secondary impacts would result as a result of implementation of these mitigation measures.

Section VII, Other Environmental Considerations, page VII-13, add the following at the end of the discussion under the heading 7. Biological Resources:

MM F-10 and MM F-11 require that new protocol surveys for the coastal California gnatcatcher be conducted prior to, but within one year of, the commencement of Project construction and that a use restriction be recorded over 3.18 acres of the Ranch south of Placerita Canyon Road within designated critical habitat for the coastal California gnatcatcher. No

secondary impacts would result as a result of implementation of these mitigation measures.

APPENDICES

Appendix F.11, Habitat Mitigation and Monitoring Plan, page 59, revise Table 7 as shown below.

**Table 7
CDFG CDFW Habitat Restoration and ACOE Establishment, Restoration, and Enhancement
(Mixed Willow Riparian Woodland Container Plant Palette)
(0.27 acres)**

Scientific Name	Common Name	Size (gallon)	Spacing (feet on center)	Plants per Acre*	Quantity for 0.27 Acres*
<i>Acer macrophyllum</i>	big-leaf maple	5	30	5	1
<i>Baccharis salicifolia</i>	mulefat	1	8	102	58
<i>Leymus condensatus</i>	giant wild rye	1	6	24	7
<i>Leymus triticoides</i>	creeping wild rye	1	4	54	15
<i>Platanus racemosa</i>	Calif. sycamore	5	30	5 10	4 3
<i>Populus balsamifera</i>	Black cottonwood	4	25	6	2
<i>Populus fremontii</i>	Fremont cottonwood	1	20	44 25	3 7
<i>Quercus agrifolia</i>	east live oak	5	30	5	4
<i>Rhamnus crocea</i>	redberry	1	8	14	4
<i>Ribes speciosum</i>	fuchsia-flowered gooseberry	1	6	24 50	7 14
<i>Ribes viburnifolium</i>	Catalina perfume	4	6	24	7
<i>Salix laevigata</i>	red willow	1	15	19	5
<i>Salix lasiolepis</i>	arroyo willow	1	15	19	5
<i>Sambucus mexicana</i>	Mexican elderberry	1	25	4 8	4 2
<i>Vitis girdiana</i>	wild grape	1	6	24	7
Total				340 354	124 128

* Plant numbers are approximate and subject to adjustments to ensure adequate coverage.

Appendix F.11, Habitat Mitigation and Monitoring Plan, page 61, revise Table 11 as shown below.

**Table 11
CDFG CDFW Habitat Establishment, Restoration, and Enhancement
(Riparian Scrub Container Plant Palette)
(0.64 acre)**

Scientific Name	Common Name	Size (gallons)	Spacing (feet on center)	Plants per Acre*	Quantity for 0.64 Acres*
<i>Baccharis salicifolia</i> **	mulefat	1	8	170	109
<i>Chrysothamnus nauseosus</i>	rubber rabbit brush	1	5	87	56
<i>Eriastrum densifolium</i>	perennial eriastrum	1	3	242	155
<i>Heteromeles arbutifolia</i>	toyon	1	8	34	22
<i>Iva hayesiana</i> **	poverty weed	1	4	408	261

Table 11
CDFG CDFW Habitat Establishment, Restoration, and Enhancement
(Riparian Scrub Container Plant Palette)
(0.64 acre)

Scientific Name	Common Name	Size (gallons)	Spacing (feet on center)	Plants per Acre*	Quantity for 0.64 Acres*
<i>Leymus condensatus</i>	giant wild rye	1	6	61	39
<i>Leymus triticoides</i>	creeping wild rye	1	4	136	87
<i>Rosa californica</i>	Calif. wild rose	1	6	61	39
<i>Sambucus Mexicana</i> **	Mexican elderberry	1	15	19	12
Total				1,218	780

* Plant numbers are approximate and subject to adjustments to ensure adequate coverage.

** Locate mulefat, poverty weed, and Mexican elderberry along lower margins of the creek slopes, adjacent to the riparian areas.

Appendix F.11, Habitat Mitigation and Monitoring Plan, page 63, revise Table 15 as shown below.

Table 15
CDFG CDFW Transitional Buffer Zone (CDFG CDFW Establishment in buffer zone)
(Part of Fuel Modification Zone)
(Transitional Sage Scrub Container Plant Palette)
(2.11 acres)

Scientific Name	Common Name	Size (gallons)	Spacing (feet on center)	Plants per Acre*	Quantity for 2.11 Acres*
<i>Atriplex canescens</i> ssp. <i>canescens</i>	four-wing saltbush	1	6	121	255
<i>Baccharis salicifolia</i> **	mulefat	1	8	68	143
<i>Ceanothus crassifolius</i>	hoary-leaved ceanothus	1	8	34	72
<i>Cercocarpus betuloides</i>	mountain mahogany	1	10	22 <u>25</u>	46 <u>53</u>
<i>Heteromeles arbutifolia</i>	toyon	1	8	34	72
<i>Leymus condensatus</i>	giant wild rye	1	6	36	76
<i>Quercus agrifolia</i> *	coast live oak	15, natural form	25	44	23
<i>Quercus berberidifolia</i>	scrub oak	5, natural form	20	44	23
<i>Platanus racemosa</i> **	California sycamore	5	30	5	11
<i>Populus fremontii</i> **	Fremont cottonwood	1	20	10	21
<i>Sambucus Mexicana</i> **	Mexican elderberry	1	15	49 25	40 53
<i>Yucca whipplei</i>	our Lord's candle	1	5	122	257
Total				478 480	1,007 1,013

* Plant numbers are approximate and subject to adjustments to ensure adequate coverage.

** ~~These species to be located on the~~ Locate mulefat, California sycamore, Fremont cottonwood, and Mexican elderberry along lower margins of the creek slopes, adjacent to the riparian areas.

Appendix I, Traffic Study, page 26, add the following to the list of intersection improvements:

3. SR 14 northbound off-ramp & Placerita Canyon Road – The improvement would involve signalization of the intersection. The improvement would also entail the widening of northbound off-ramp to provide three lanes on the off-ramp: an exclusive left, a shared through/left and an exclusive right turn lane. The intersection would be reconfigured to provide one eastbound through lane and one eastbound lane onto the northbound loop on-ramp. It should be noted that the Project does not result in a significant impact at this intersection. However, the identified improvement has been proposed to improve access to the Ranch.

Appendix I, Traffic Study, page 26, revise the last sentence of the description of the improvement at Intersection No. 4 as follows:

However, the identified ~~mitigation measure~~ improvement has been proposed to improve access to the Ranch.

Appendix I, Traffic Study, page 49, revise the description of the improvement at Intersection No. 2 as follows:

2. Sierra Highway & Placerita Canyon Road – The improvement would widen the Sierra Highway northbound approach to provide a separate right-turn only lane onto eastbound Placerita Canyon Road and would widen the Sierra Highway southbound approach to provide a separate right-turn only lane onto westbound Placerita Canyon Road.

Appendix I, Traffic Study, page 61, revise Table 17 as shown on page II-58.

Appendix I, Traffic Study, page 62, revise Table 18 as shown on page II-58.

Appendix I, Traffic Study, page 94, revise Table 33 as shown on page II-59.

Appendix I, Traffic Study, page 96, revise Table 35 as shown on page II-60.

Appendix I, Traffic Study, Appendix A, revise the Intersection Lane Configurations as shown on page II-61.

Appendix K.4, Sewer Area Study, insert at the beginning of the report the updated Sewer Area Study Approval provided on page II-62.

TABLE 17
EXISTING PLUS AMBIENT GROWTH PLUS PROJECT WITH MITIGATION PLUS RELATED PROJECTS CONDITIONS WITH CUMULATIVE MITIGATION (YEAR 2020)
INTERSECTION PEAK HOUR LEVELS OF SERVICE - SOUNDSTAGES OPTION

No.	Intersection	Peak Hour	Existing plus Ambient Growth Conditions		Existing plus Ambient Growth plus Project with Mitigation plus Related Projects Conditions				Existing plus Ambient Growth plus Project with Mitigation plus Related Projects with Cumulative Mitigation Conditions			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Significant Impact?
1. [a]	Sierra Highway & SR 14 SB Ramps	A.M.	0.870	D	0.906	E	0.036	YES	0.734	C	-0.136	NO
		P.M.	0.900	D	1.002	F	0.102	YES	0.917	E	0.017	NO
2.	Sierra Highway & Placerita Canyon Road	A.M.	0.744	C	0.760	C	0.016	NO	0.760 0.725	C	-0.019	NO
		P.M.	0.848	D	0.922	E	0.074	YES	0.861	D	0.013	NO
3. [a]	SR 14 NB Off-Ramp & Placerita Canyon Road	A.M.	0.265	A	0.385	A	0.120	NO	0.385	A	0.120	NO
		P.M.	0.241	A	0.373	A	0.132	NO	0.373	A	0.132	NO
4. [a]	& Placerita Canyon Road	A.M.	0.261	A	0.398	A	0.137	NO	0.398	A	0.137	NO
		P.M.	0.249	A	0.349	A	0.100	NO	0.349	A	0.100	NO

TABLE 18
EXISTING PLUS AMBIENT GROWTH PLUS PROJECT WITH MITIGATION PLUS RELATED PROJECTS CONDITIONS WITH CUMULATIVE MITIGATION (YEAR 2020)
INTERSECTION PEAK HOUR LEVELS OF SERVICE - STUDIO OFFICE OPTION

No.	Intersection	Peak Hour	Existing plus Ambient Growth Conditions		Existing plus Ambient Growth plus Project with Mitigation plus Related Projects Conditions				Existing plus Ambient Growth plus Project with Mitigation plus Related Projects with Cumulative Mitigation Conditions			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Significant Impact?
1. [a]	Sierra Highway & SR 14 SB Ramps	A.M.	0.870	D	0.907	E	0.037	YES	0.735	C	-0.135	NO
		P.M.	0.900	D	1.002	F	0.102	YES	0.917	E	0.017	NO
2.	Sierra Highway & Placerita Canyon Road	A.M.	0.744	C	0.760	C	0.016	NO	0.760 0.725	C	-0.019	NO
		P.M.	0.848	D	0.923	E	0.075	YES	0.862	D	0.014	NO
3. [a]	SR 14 NB Off-Ramp & Placerita Canyon Road	A.M.	0.265	A	0.387	A	0.122	NO	0.387	A	0.122	NO
		P.M.	0.241	A	0.378	A	0.137	NO	0.378	A	0.137	NO
4. [a]	& Placerita Canyon Road	A.M.	0.261	A	0.403	A	0.142	NO	0.403	A	0.142	NO
		P.M.	0.249	A	0.353	A	0.104	NO	0.353	A	0.104	NO

TABLE 33
CALTRANS LOCATIONS - 2000 HCM ANALYSIS

SOUNDSTAGES OPTION												
No.	Intersection	Peak Hour	Existing Conditions		Future without Project Conditions		Future with Project Conditions		Future with Project with Mitigation Conditions		Future with Project with Mitigation with Cumulative Mitigation Conditions	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. [a], [b]	Sierra Highway & SR 14 SB Ramps	A.M.	**	F	**	F	**	F	14.6	B	13.1	B
		P.M.	**	F	**	F	**	F	13.1	B	9.4	A
2.	Sierra Highway & Placerita Canyon Road	A.M.	14.6	B	20.3	C	21.4	C	17.2	B	17.3-17.0	B
		P.M.	9.0	A	16.9	B	29.1	C	14.6	B	13.7	B
3. [b], [c]	SR 14 NB Off-Ramp & Placerita Canyon Road	A.M.	9.4	A	13.8	B	13.8	B	13.8-13.9	B	13.8-13.9	B
		P.M.	9.5	A	11.0	B	24.0-24.2	C	24.0-24.2	C	24.0-24.2	C

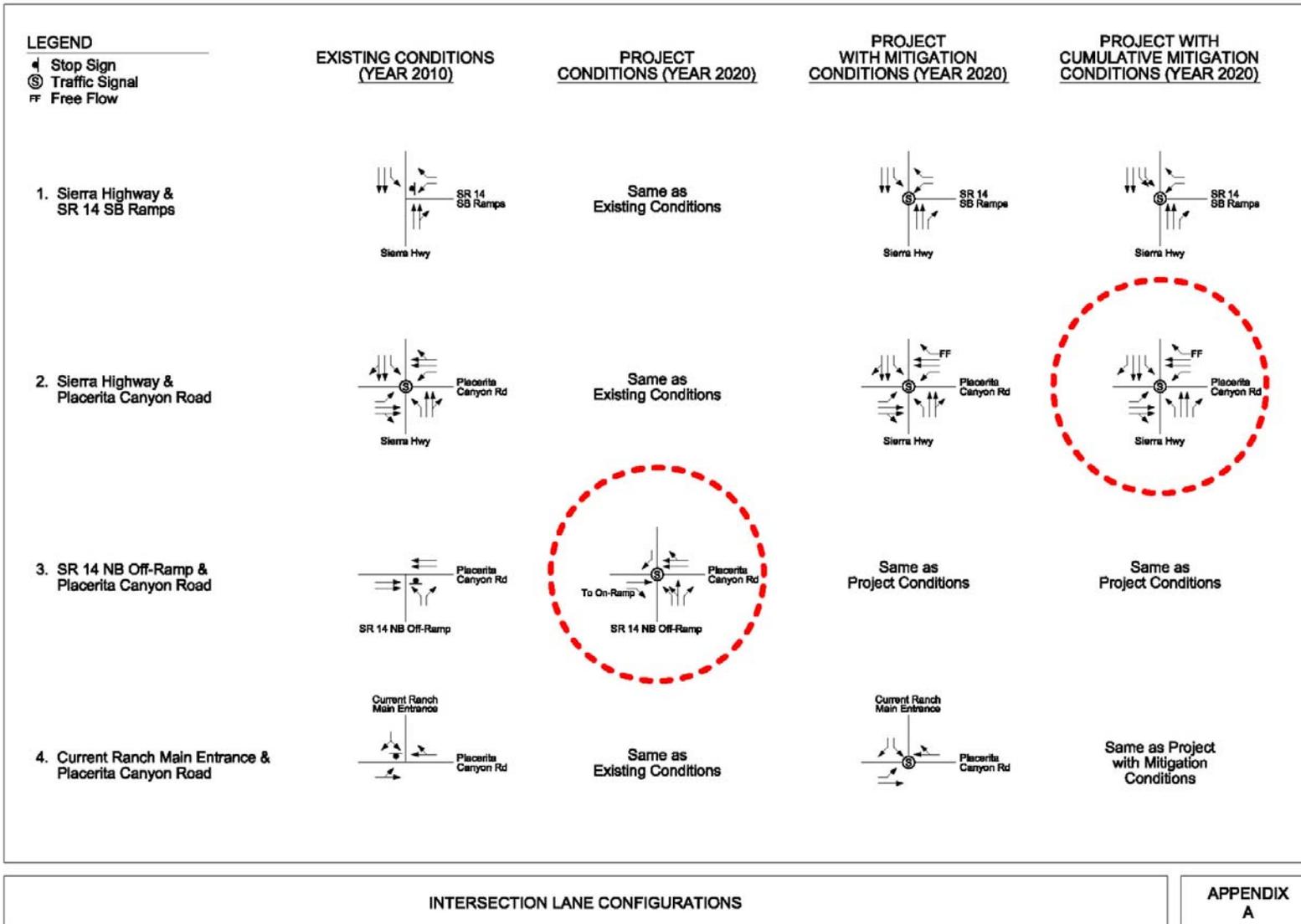
STUDIO OFFICE OPTION												
No.	Intersection	Peak Hour	Existing Conditions		Future without Project Conditions		Future with Project Conditions		Future with Project with Mitigation Conditions		Future with Project with Mitigation with Cumulative Mitigation Conditions	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. [a], [b]	Sierra Highway & SR 14 SB Ramps	A.M.	**	F	**	F	**	F	14.6	B	13.1	B
		P.M.	**	F	**	F	**	F	13.1	B	9.4	A
2.	Sierra Highway & Placerita Canyon Road	A.M.	14.6	B	20.3	C	21.4	C	17.2	B	17.3-17.0	B
		P.M.	9.0	A	16.9	B	29.9	C	14.7	B	13.8	B
3. [b], [c]	SR 14 NB Off-Ramp & Placerita Canyon Road	A.M.	9.4	A	13.8	B	13.7-13.8	B	13.7-13.9	B	13.7-13.9	B
		P.M.	9.5	A	11.0	B	24.2-24.3	C	24.2-24.3	C	24.2-24.3	F

Notes:

- ** Denotes oversaturated conditions. Delay cannot be calculated.
- [a] Intersection is signalized as part of Project mitigation.
- [b] Intersection is controlled by stop signs on minor approach.
- [c] Intersection is signalized as part of Project design feature.

TABLE 35
OFF-RAMPS EVALUATION

SOUNDSTAGES OPTION														
No.	Intersection	Ramp Description	Vehicle Storage Capacity (Car Lengths)	Peak Hour	Existing Conditions		Future without Project Conditions		Future with Project Conditions		Future with Project with Mitigation Conditions		Future with Project with Mitigation with Cumulative Mitigation Conditions	
					95 th Percentile Vehicle Queue Length	Exceeds Capacity?	95 th Percentile Vehicle Queue Length	Exceeds Capacity?	95 th Percentile Vehicle Queue Length	Exceeds Capacity?	95 th Percentile Vehicle Queue Length	Exceeds Capacity?	95 th Percentile Vehicle Queue Length	Exceeds Capacity?
1.	Sierra Highway & SR 14 SB Ramps	SR 14 Southbound Off-ramp to Sierra Highway												
		Left-turn Lane	52	A.M.	7	NO	19	NO	23	NO	13	NO	12	NO
			52	P.M.	3	NO	-	-	-	-	11	NO	10	NO
		Right-turn Lane	52	A.M.	0	NO	0	NO	0	NO	1	NO	1	NO
			52	P.M.	0	NO	0	NO	1	NO	1	NO	1	NO
3.	SR 14 NB Off-Ramp & Placerita Canyon Road	SR 14 Northbound Off-ramp to Placerita Canyon Road												
		Left-turn Lane	29	A.M.	1	NO	4	NO	8	NO	8	NO	8	NO
			29	P.M.	1	NO	2	NO	7	NO	7	NO	7	NO
		Shared Left-Through Lane	29	A.M.	-	-	-	-	8	NO	8	NO	8	NO
			29	P.M.	-	-	-	-	7	NO	7	NO	7	NO
1.	Sierra Highway & SR 14 SB Ramps	SR 14 Southbound Off-ramp to Sierra Highway												
		Left-turn Lane	52	A.M.	7	NO	19	NO	23	NO	13	NO	12	NO
			52	P.M.	3	NO	-	-	-	-	11	NO	10	NO
		Right-turn Lane	52	A.M.	0	NO	0	NO	0	NO	1	NO	1	NO
			52	P.M.	0	NO	0	NO	1	NO	1	NO	1	NO
3.	SR 14 NB Off-Ramp & Placerita Canyon Road	SR 14 Northbound Off-ramp to Placerita Canyon Road												
		Left-turn Lane	29	A.M.	1	NO	4	NO	8	NO	8	NO	8	NO
			29	P.M.	1	NO	2	NO	7	NO	7	NO	7	NO
		Shared Left-Through Lane	29	A.M.	-	-	-	-	8	NO	8	NO	8	NO
			29	P.M.	-	-	-	-	7	NO	7	NO	7	NO
1.	Sierra Highway & SR 14 SB Ramps	SR 14 Southbound Off-ramp to Sierra Highway												
		Left-turn Lane	52	A.M.	7	NO	19	NO	23	NO	13	NO	12	NO
			52	P.M.	3	NO	-	-	-	-	11	NO	10	NO
		Right-turn Lane	52	A.M.	0	NO	0	NO	0	NO	1	NO	1	NO
			52	P.M.	0	NO	0	NO	1	NO	1	NO	1	NO
3.	SR 14 NB Off-Ramp & Placerita Canyon Road	SR 14 Northbound Off-ramp to Placerita Canyon Road												
		Left-turn Lane	29	A.M.	1	NO	4	NO	8	NO	8	NO	8	NO
			29	P.M.	1	NO	2	NO	7	NO	7	NO	7	NO
		Shared Left-Through Lane	29	A.M.	-	-	-	-	8	NO	8	NO	8	NO
			29	P.M.	-	-	-	-	7	NO	7	NO	7	NO
1.	Sierra Highway & SR 14 SB Ramps	SR 14 Southbound Off-ramp to Sierra Highway												
		Left-turn Lane	52	A.M.	7	NO	19	NO	23	NO	13	NO	12	NO
			52	P.M.	3	NO	-	-	-	-	11	NO	10	NO
		Right-turn Lane	52	A.M.	0	NO	0	NO	0	NO	1	NO	1	NO
			52	P.M.	0	NO	0	NO	1	NO	1	NO	1	NO
3.	SR 14 NB Off-Ramp & Placerita Canyon Road	SR 14 Northbound Off-ramp to Placerita Canyon Road												
		Left-turn Lane	29	A.M.	1	NO	4	NO	8	NO	8	NO	8	NO
			29	P.M.	1	NO	2	NO	7	NO	7	NO	7	NO
		Shared Left-Through Lane	29	A.M.	-	-	-	-	8	NO	8	NO	8	NO
			29	P.M.	-	-	-	-	7	NO	7	NO	7	NO



INTERSECTION LANE CONFIGURATIONS

APPENDIX
A



DAVID EVANS
AND ASSOCIATES INC.

August 22, 2012

City of Santa Clarita
c/o Trolis Niebla
Development Services Department
23920 W. Valencia Blvd., Suite 302
Santa Clarita, CA 91355

Sewer Area Study Approval for Tract No. <u>71916</u>	
<input checked="" type="checkbox"/> No Upgrades Required <input type="checkbox"/> Upgrades Required (Encroachment Permit Required for work in the City's Right-of-Way)	
City of Santa Clarita Development Services Division	
Signature: 	Date: 8/28/12
Approval Expires After 2 Years	

Dear Mr. Niebla:

On November 2, 2010 DEA submitted a Sewer Area Study to the City of Santa Clarita for the Disney ABC Studios at the Ranch project. The City and County will only consider the Study valid for two years (approval was provided later in November 2010).

According to our records and current assessment of the project, the site conditions and project scope remain unchanged and therefore the Study conclusions are still valid.

Please call if we may be of additional service.

Thank you.

David Evans and Associates, Inc.

Rob Bathke, P.E.
Project Manager

The following ~~appendix is~~ appendices are hereby added to the Draft EIR and appended to this Final EIR:

- Appendix E.3—Pyrotechnics Worksheets
- Appendix N—Economic & Fiscal Impact Analysis

III. Responses to Written Comments



III. RESPONSES TO WRITTEN COMMENTS

A. INTRODUCTION

The Draft EIR for the Disney | ABC Studios at the Ranch Project was circulated on May 4, 2012, for a formal 45-day public review period ending on June 18, 2012. During that time, the County of Los Angeles Department of Regional Planning received a total of 60 individual comment letters on the Draft EIR, as summarized in Tables III-1 through III-6 on pages III-2, III-15, III-24, III-59, III-70, and III-116, respectively. The County received seven additional comment letters following the end of the public review period, as summarized in Table III-7 on page III-220. The environmental issues addressed within each comment letter, generally corresponding to the sections of the Draft EIR, are also indicated within Tables III-1 through III-7.

CEQA Guidelines Section 15088(a) states that “[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” In accordance with these requirements, this section of the Final EIR provides responses to each of the written comments received regarding the Draft EIR during the public review period. The responses are provided below in Section III.B, Responses to Comments Received Within the Formal 45-Day Review Period, of this Final EIR and are presented by comment letter, which are in turn organized alphabetically by type of commenting agency or entity: State, regional, County, and City agencies; organizations and other entities; and individuals.

Responses to comment letters received following the end of the public review period are provided in chronological order in Section III.C, Responses to Late Comments. In addition, responses to oral testimony given at the Hearing Examiner public hearing regarding the Project held on June 4, 2012, are provided in Section IV, Responses to Oral Testimony.

III. RESPONSES TO WRITTEN COMMENTS

B. RESPONSES TO COMMENTS RECEIVED WITHIN THE FORMAL 45-DAY REVIEW PERIOD

1. COMMENTS FROM STATE AGENCIES

Table III-1
Comment Matrix—State Agencies

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
1	Daniel S. Blankenship Staff Environmental Scientist California Department of Fish and Game (now called the California Department of Fish and Wildlife) P.O. Box 221480 Newhall, CA 91322-1480												X																
2	Dianna Watson IGR/CEQA Branch Chief California Department of Transportation District 7, Office of Transportation Planning IGR/CEQA Branch 100 Main Street, MS #16 Los Angeles, CA 90012																X							X					

From: Daniel Blankenship [dsblankenship@dfg.ca.gov]
Sent: Monday, June 11, 2012 4:09 PM
To: Tran, Christina
Subject: DEIR Comments for Disney / ABC Studios SCH 2010011010

Dear Ms. Tran,

The Department has reviewed the above referenced DEIR regarding potential impacts to biological resources. The Department concurs with the proposed biological mitigation measures in the DEIR with the following recommendations.

1. We recommend that a permitted biologist(s) conduct surveys according to Service protocol for the coastal California gnatcatcher to determine an updated status of the species onsite. Our records indicate that the coastal California gnatcatcher is currently expanding within its historical range and surveys conducted over 1 year ago are no longer valid to determine species presence. 1-1

2. The DEIR indicates that approximately 1.06 acres of USFWS designated critical habitat for the coastal California gnatcatcher will be permanently impacted during project implementation. The Department recommends a 3:1 ratio of preservation/conservation mitigation (approximately 3 acres) of other coastal sage scrub that is suitable for coastal California gnatcatcher and that is also in the critical habitat designation area. The property also needs to not already be protected in perpetuity. Local conservancies or mitigation banks would be a potential source for the mitigation acres. 1-2

3. The Department recommends that only local propagules be used for the oak restoration plantings and that all native species are used for the landscaping plan. 1-3

The Department appreciates the opportunity to comment on this project and acknowledges the thorough biological mitigation measures developed and included in the DEIR. The above recommendations will help evaluate potential impacts to coastal California gnatcatcher, as well as provide mitigation to the permanent loss of critical habitat. The Department's recommendations also help to ensure that the oak restoration site truly adds to the local native tree stock and that the landscaping plan helps to offset the impacts that implementation of the project may have on local habitats. 1-4

Please contact Daniel S. Blankenship at 661-644-8469 or at dsblankenship@dfg.ca.gov if you have any questions.

Daniel S. Blankenship
Staff Environmental Scientist
CA Department of Fish and Game
P.O. Box 221480
Newhall, CA 91322-1480
phone (661) 259-3750
cell (661)644-8469
dsblankenship@dfg.ca.gov

Letter No. 1

Daniel S. Blankenship
Staff Environmental Scientist
California Department of Fish and Game (now called the California Department of Fish and Wildlife)
P.O. Box 221480
Newhall, CA 91322-1480

Comment No. 1-1

The Department has reviewed the above referenced DEIR regarding potential impacts to biological resources. The Department concurs with the proposed biological mitigation measures in the DEIR with the following recommendations.

1. We recommend that a permitted biologist(s) conduct surveys according to Service protocol for the coastal California gnatcatcher to determine an updated status of the species onsite. Our records indicate that the coastal California gnatcatcher is currently expanding within its historical range and surveys conducted over 1 year ago are no longer valid to determine species presence.

Response No. 1-1

As indicated on pages V.F-35 and V.F-36 in Section V.F, Biological Resources, of the Draft EIR and discussed in more detail in the Sensitive Species Surveys (specifically, the memorandum entitled Results of Focused Coastal California Gnatcatcher Surveys), provided as Appendix F.10 of the Draft EIR, focused surveys for the coastal California gnatcatcher (*Polioptila californica californica*) were conducted between April and June 2010 in the Development Area and the Water Tank Area (which includes much of the Trail Area). No coastal California gnatcatchers were detected. The results of those surveys were confirmed during site visits in 2011 (which included a field survey of the entire Trail Area) during preparation of the Addendum to the Biological Resources Assessment (BRA Addendum), provided in Appendix F.3 of the Draft EIR. Even though much of the Water Tank Area and Trail Area are within designated critical habitat for the coastal California gnatcatcher, most of these areas provide marginally suitable habitat. Nonetheless, MM F-10 has been added to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR to require updated protocol surveys for the coastal California gnatcatcher.

Comment No. 1-2

2. The DEIR indicates that approximately 1.06 acres of USFWS designated critical habitat for the coastal California gnatcatcher will be permanently impacted during project implementation. The Department recommends a 3:1 ratio of preservation/conservation mitigation (approximately 3 acres) of other coastal sage scrub that is suitable for coastal California gnatcatcher and that is also in the critical habitat designation area. The property also needs to not already be protected in perpetuity. Local conservancies or mitigation banks would be a potential source for the mitigation acres.

Response No. 1-2

This comment refers to 1.06 acres of coastal sage scrub/chamise chaparral and disturbed coastal sage scrub/chamise chaparral located within the Water Tank Area and the Trail Area that would be permanently impacted by Project implementation, as indicated in Table V.F-3 on page V.F-64 of the Draft EIR. Most of this area lies within designated critical habitat for the coastal California gnatcatcher (see Figure V.F-12 on page V.F-37 of the Draft EIR). As noted in Section V.F, Biological Resources, of the Draft EIR, the vegetation communities in these areas of the Ranch are fragmented by the existing water tank access road and previous disturbances associated with ongoing oil drilling activities and provide marginally suitable habitat for the coastal California gnatcatcher. Nonetheless, the Applicant will preserve in perpetuity and accept a use restriction over 3.18 acres of designated critical habitat for the coastal California gnatcatcher within the Ranch south of Placerita Canyon Road. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for a new Mitigation Measure, MM F-11, regarding the proposed use restriction within designated critical habitat for the coastal California gnatcatcher.

Comment No. 1-3

3. The Department recommends that only local propagules be used for the oak restoration plantings and that all native species are used for the landscaping plan.

Response No. 1-3

As discussed on page V.F-76 in Section V.F, Biological Resources, of the Draft EIR and in more detail in the Oak Tree and Woodland Mitigation and Monitoring Plan (OTWMMP), provided as Appendix F.6 of the Draft EIR, the Project Applicant will plant at least 1,600 oak trees, with sizes ranging from acorns and seedling plantings to larger oak trees, all of which would be grown from acorns harvested on the Ranch. As also indicated,

in an effort to proactively address Project-related impacts and initiate mitigation efforts, the Ranch's natural resources staff started propagating oak trees from Ranch-harvested acorns in 2009. Field planting of 460 seedlings in one of the proposed mitigation sites commenced in November 2010 under the supervision of the County Forester. In addition, the Ranch's natural resources staff has another 2,381 seedlings on the Ranch that were propagated from Ranch-harvested acorns as well as an additional 1,837 Ranch-harvested acorns that were planted in containers during the Fall of 2011. These seedlings and acorns would ultimately be used to mitigate the Project's impacts on oaks and oak woodlands.

The Habitat Mitigation and Monitoring Program (HMMP) involves the revegetation of a portion of Placerita Creek and the reconstructed slopes within the Development Area with native plant species, as stated on page V.F-49 of the Draft EIR and described in detail in Appendix F.11 to the Draft EIR. As discussed in Section IV, Project Description of the Draft EIR, a comprehensive landscaping plan also would be implemented as part of the Project to enhance the existing natural features within the Development Area. Figure IV-10 and Figure IV-11 on pages IV-29 and IV-30, respectively, of the Draft EIR illustrate the landscaping concept for the Project under the Soundstage Option and Studio Office Option, respectively. As discussed, the landscaping plan includes drought-tolerant plant species, including native and non-native plants, for a minimum of 75 percent of total landscaping in compliance with the County's Drought Tolerant Landscaping ordinance. Other native landscape features would include: native shade trees along the existing main entrance road; a vegetation barrier (i.e., including a screening berm with native plants) along portions of Placerita Canyon Road and State Route 14 (SR-14); native plants immediately surrounding the proposed water tank's ring road and fencing; and complementary native vegetation that would be introduced in conjunction with the 1,600 oak trees to be planted throughout portions of the Ranch (consistent with existing oak tree planting practices on the Ranch).¹ Several aspects or areas of the Project's landscaping would be subject to review and approval by a variety of public agencies, including but not limited to the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, Los Angeles County Department of Public Works (LACDPW), Newhall County Water District, and California Department of Fish and Wildlife, which may have different interests. Selected plant species would include those on the *Los Angeles County Drought-Tolerant Plant List* and the County Fire Department's *Fuel Modification Plant List*, among other lists, as appropriate.

¹ *The oak mitigation plantings would occupy approximately 10.5 acres of oak woodland expansion and enhancement area.*

Comment No. 1-4

The Department appreciates the opportunity to comment on this project and acknowledges the thorough biological mitigation measures developed and included in the DEIR. The above recommendations will help evaluate potential impacts to coastal California gnatcatcher, as well as provide mitigation to the permanent loss of critical habitat. The Department's recommendations also help to ensure that the oak restoration site truly adds to the local native tree stock and that the landscaping plan helps to offset the impacts that implementation of the project may have on local habitats.

Please contact Daniel S. Blankenship at 661-644-8469 or at dsblankenship@dfg.ca.gov if you have any questions.

Response No. 1-4

This comment essentially summarizes the biological benefits associated with the CDFW's recommendations presented above. Refer to Response Nos. 1-1 through 1-3 above regarding implementation of these recommendations as part of the Project and/or as mitigation measures. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING
 IGR/CEQA BRANCH
 100 MAIN STREET, MS # 16
 LOS ANGELES, CA 90012-3606
 PHONE: (213) 897-9140
 FAX: (213) 897-1337

Letter No. 2



2012 JUN 14 PM 3: 27

*Flex your power!
 Be energy efficient!*

June 13, 2012

Ms. Christina Tran
 Los Angeles County Dept. of Regional Planning
 Special Projects Section, Room 1362
 320 West Temple Street
 Los Angeles, CA 90012

Re: Disney ABC Studios at the Ranch
 Draft EIR, VTT Map No. 071216
 Vic. LA /14 / PM 27.80 - 28.27
 SCH #2010011010, IGR No. 120507/EA

Dear Ms. Tran:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed Disney ABC Studios at the Ranch project. The proposed development consists of two options, the soundstage option and the studio office option. The soundstage option would include up to 12 soundstages, productions offices, six mills, a warehouse, an administration building. The studio office option would develop studio office uses in lieu of four soundstages, two mills, and production offices.

2-1

Based on the information contained in the DEIR, Caltrans District 7 has the following comments:

It is noted that the main entrance to the project site is proposed to be located directly across State Route 14 (SR-14) northbound off-ramp to Placerita Canyon Road. The Traffic Study acknowledges that the proposed location of the main entrance requires approval from Caltrans.

Per the traffic study dated May 2010, the studio office option would generate more vehicle trips than the soundstage option. The office option scenario is projected to generate approximately 3,477 vehicle trips daily with 410 occurring during the AM peak hour and 377 during the PM peak hour. Caltrans concurs that vehicle trips expected to utilize SR-14 would not rise to a significant level as they would be traveling in the direction that is generally not congested. Generally, SR-14 is congested through the project site in the southbound direction during the AM peak hour and project related vehicles would be traveling northbound. Project related vehicle trips are projected to contribute to congestion on I-210 east of Roxford Street during the AM peak hour (Tables V.J-10 and 11).

Caltrans acknowledges that the project would include the following improvements to State facilities to improve access to the project site and to mitigate potential transportation impacts:

2-2

- MM J-7 and 8: SR-14 Northbound off-ramp to Placerita Canyon Road. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional thru and left-turn lane, and one right turn lane).
- MM J-6: Sierra Highway/Placerita Canyon Road – The project shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway.
- MM J-9, 10, 11: The project shall pay its pro rata share of the cost for improvements to SR-14 southbound ramps to Sierra Highway, Placerita Canyon Road and Sierra Highway intersection, and applicable share to the Eastside Bridge and Major Thoroughfare District.
- The project is to include design features intended to encourage the use of alternate modes of transportation. Those design features include: A carpool matching program, preferred parking for carpool/vanpool vehicles, video conferencing facilities, and bicycle storage areas.
- Caltrans acknowledges mitigation measure J-1 (MM J-1), which states that construction traffic mitigation plan shall be submitted to Caltrans for review and approval.

2-2
(Cont.)

It is recommended that the timing of the proposed traffic signal at SR-14 northbound off-ramp/Placerita Canyon Road intersection and the existing signal at Sierra Highway and Placerita Canyon is synchronized to prevent excessive queuing on the off-ramp.

2-3

It is further recommended that the County, as the lead agency under CEQA for this project, coordinate with Caltrans and the City of Santa Clarita to secure the necessary funds to complete those improvements where this project is only contributing its pro rata share of the costs. Otherwise, those impacts should be disclosed as significant and unavoidable.

2-4

As part of the encroachment permit process for proposed work on State right-of-way, Caltrans may request additional information. Please condition the project to comply with all Caltrans' standards and requirements for completion of mitigation improvements on State facilities. Please note that Caltrans will request additional soil sampling at locations where construction work is proposed on unpaved areas within its right-of-way and a soil sampling workplan will be required.

2-5

If you have any questions regarding our comments or wish to schedule a meeting, please contact Elmer Alvarez, project coordinator at (213) 897 – 6696 or by e-mail at Elmer_Alvarez@dot.ca.gov. Please refer to internal record number 120507/EA.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

Letter No. 2

Dianna Watson
IGR/CEQA Branch Chief
California Department of Transportation
District 7, Office of Transportation Planning
IGR/CEQA Branch
100 Main Street, MS #16
Los Angeles, CA 90012-3606

Comment No. 2-1

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed Disney ABC Studios at the Ranch project. The proposed development consists of two options, the soundstage option and the studio office option. The soundstage option would include up to 12 soundstages, productions offices, six mills, a warehouse, an administration building. The studio office option would develop studio office uses in lieu of four soundstages, two mills, and production offices.

Based on the information contained in the DEIR, Caltrans District 7 has the following comments:

It is noted that the main entrance to the project site is proposed to be located directly across State Route 14 (SR-14) northbound off-ramp to Placerita Canyon Road. The Traffic Study acknowledges that the proposed location of the main entrance requires approval from Caltrans.

Per the traffic study dated May 2010, the studio office option would generate more vehicle trips than the soundstage option. The office option scenario is projected to generate approximately 3,477 vehicle trips daily with 410 occurring during the AM peak hour and 377 during the PM peak hour. Caltrans concurs that vehicle trips expected to utilize SR-14 would not rise to a significant level as they would be traveling in the direction that is generally not congested. Generally, SR-14 is congested through the project site in the southbound direction during the AM peak hour and project related vehicles would be traveling northbound. Project related vehicle trips are projected to contribute to congestion on 1-210 east of Roxford Street during the AM peak hour (Tables V.J-10 and 11).

Response No. 2-1

This comment summarizes various aspects of the Project, including the estimated level of vehicular trips evaluated in the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 2-2

Caltrans acknowledges that the project would include the following improvements to State facilities to improve access to the project site and to mitigate potential transportation impacts:

- MM J-7 and 8: SR-14 Northbound off-ramp to Placerita Canyon Road. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional thru and left-turn lane, and one right turn lane).
- MM J-6: Sierra Highway/Placerita Canyon Road – The project shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway.
- MM J-9, 10, 11: The project shall pay its pro rata share of the cost for improvements to SR-14 southbound ramps to Sierra Highway, Placerita Canyon Road and Sierra Highway intersection, and applicable share to the Eastside Bridge and Major Thoroughfare District.
- The project is to include design features intended to encourage the use of alternate modes of transportation. Those design features include: A carpool matching program, preferred parking for carpool/vanpool vehicles, video conferencing facilities, and bicycle storage areas.
- Caltrans acknowledges mitigation measure J-1 (MM J-1), which states that construction traffic mitigation plan shall be submitted to Caltrans for review and approval.

Response No. 2-2

This comment correctly summarizes several of the Project's transportation-related mitigation measures, with the following clarifications: MM J-7 involves the current Ranch main entrance at Placerita Canyon Road where a traffic signal would be installed with the eastbound approach on Placerita Canyon Road striped to provide a left-turn only lane and the southbound approach exiting the Development Area striped to provide one left-turn lane and one right-turn lane. With regard to MM J-8, in addition to the improvement described above, the eastbound lanes on Placerita Canyon Road would be restriped to

provide one through lane and one dedicated right-turn lane for the SR-14 northbound on-ramp, as indicated in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. Additionally, MM J-9 involves improvements to Sierra Highway at the SR-14 southbound ramps, not improvements to the ramps. It is also noted that MM J-10 has been amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, although the text above accurately indicates improvements that would occur at the Placerita Canyon Road and Sierra Highway intersection. A complete and final list of all of the Project's mitigation measures is provided in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR.

Comment No. 2-3

It is recommended that the timing of the proposed traffic signal at SR-14 northbound off-ramp/Placerita Canyon Road intersection and the existing signal at Sierra Highway and Placerita Canyon is synchronized to prevent excessive queuing on the off-ramp.

Response No. 2-3

In response to this comment, a new mitigation measure, MM J-12, has been proposed which requires the Project Applicant to comply with all applicable Caltrans rules and regulations and obtain all necessary approvals from Caltrans, potentially including synchronization of the street signals at Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramp and Sierra Highway/Placerita Canyon Road. This improvement would be implemented if determined necessary by Caltrans. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the full text of MM J-12.

Comment No. 2-4

It is further recommended that the County, as the lead agency under CEQA for this project, coordinate with Caltrans and the City of Santa Clarita to secure the necessary funds to complete those improvements where this project is only contributing its pro rata share of the costs. Otherwise, those impacts should be disclosed as significant and unavoidable.

Response No. 2-4

As discussed on pages V.J-67 through V.J-73 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, Mitigation Measures MM J-9 through MM J-11 (detailed on page V.J-62 of the Draft EIR and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR) would mitigate the significant cumulative impacts to two of the four study intersections that would result if all of the Related Projects were completed and operational. As these cumulative impacts would be caused

collectively by several projects, implementation of measures to mitigate the cumulative impacts would not be the sole responsibility of the Project Applicant. However, in implementing MM J-9 and J-10, if adequate County funding is not yet available for the necessary roadway improvements at Sierra Highway/SR-14 Southbound Ramps and Sierra Highway/Placerita Canyon Road, such improvements would be designed and constructed by the Applicant and included within the roadway improvement package to be submitted by the Applicant to Caltrans for approval. In accordance with LACDPW's current practices, the Applicant would be responsible for the full remaining cost of such improvements, with said funds then being credited towards the Applicant's Eastside Bridge and Major Thoroughfare District fees to be paid under MM J-11.

Regarding the comment that impacts to those intersections be disclosed as significant and unavoidable if full funding is not secured, significant impacts would only occur if all the Related Projects identified in the Project area were implemented, since ambient growth alone would not be sufficient to trigger significant impacts at Sierra Highway/SR-14 Southbound Ramps or Sierra Highway/Placerita Canyon Road (see Table V.J-19 on page V.J-70 of the Draft EIR). As such, Related Projects are required to pay their respective pro rata shares of the costs of the necessary improvements. Nonetheless, as indicated above, the Applicant would be responsible for the remaining cost of such improvements, as needed.

Comment No. 2-5

As part of the encroachment permit process for proposed work on State right-of-way, Caltrans may request additional information. Please condition the project to comply with all Caltrans' standards and requirements for completion of mitigation improvements on State facilities. Please note that Caltrans will request additional soil sampling at locations where construction work is proposed on unpaved areas within its right-of-way and a soil sampling workplan will be required.

If you have any questions regarding our comments or wish to schedule a meeting, please contact Elmer Alvarez, project coordinator at (213) 897-6696 or by e-mail at Elmer_Alvarez@dot.ca.gov. Please refer to internal record number 120507/EA.

Response No. 2-5

In response to this comment, a new mitigation measure, MM J-12, has been proposed which requires the Project Applicant to comply with all applicable Caltrans rules and regulations and obtain all necessary approvals from Caltrans, including implementation of an approved soil sampling workplan. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the full text of MM J-12. This comment is

noted for the record and will be forwarded to the decision-makers for review and consideration.

2. WRITTEN COMMENTS FROM REGIONAL AGENCIES

Table III-2
Comment Matrix—Regional Agencies

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
3	Ian MacMillan Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765-4182										X						X												



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: June 15, 2012
ctran@planning.lacounty.gov

June 15, 2012

Ms. Diana Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, room 1362
Los Angeles, CA 90012

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Disney ABC Studios at the Ranch Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (Final EIR) as appropriate.

Construction Impacts

The AQMD staff is concerned about the significant construction related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for NOx and VOC emissions during construction of the project. As a result, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following additional mitigation measures in the Draft EIR.

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Improve traffic flow by signal synchronization.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Further, the lead agency shall replace mitigation measure E.1-5 (MM E.1-5) with the following:

3-2

- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Pyrotechnics

Lastly, the Draft EIR did not discuss the potential future use of pyrotechnics at this filming location. If pyrotechnics may be used in the future, then emissions from this activity should be analyzed, disclosed, and mitigated to the extent feasible in the CEQA document. Otherwise, a condition should be included that prohibits the use of pyrotechnics at this site.

3-3

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

3-4

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

LAC120503-01
Control Number

Letter No. 3

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental
Review Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182

Comment No. 3-1

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Disney ABC Studios at the Ranch Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (Final EIR) as appropriate.

Construction Impacts

The AQMD staff is concerned about the significant construction related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for NO_x and VOC emissions during construction of the project. As a result, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following additional mitigation measures in the Draft EIR.

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Improve traffic flow by signal synchronization.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements.

Response No. 3-1

The first measure suggested in this comment is already incorporated into a mitigation measure proposed for the Project. Specifically, MM J-1 provides for traffic control (e.g., a flag person) during all phases of construction activities to improve traffic flow on public roadways. In addition, to facilitate site access for construction vehicles and minimize impacts to local traffic flows, a new Mitigation Measure, MM E.1-9, has been added to Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR, to require remote dispatch for haul trucks to minimize queuing on Placerita Canyon Road immediately adjacent to the site. With respect to signal synchronization, refer to Response No. 2-3 above and new MM J-12, also added to Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR, which would provide for the synchronization of the street signals at Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramp and Sierra Highway/Placerita Canyon Road, if deemed necessary by Caltrans. Finally, regarding diesel haul trucks, 2010 or newer diesel trucks are not generally commercially available; however, 2007 diesel trucks are readily available and would be used during soil export as required by a new Mitigation Measure, MM E.1-10, which has been added to Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR.

Comment No. 3-2

Further, the lead agency shall replace mitigation measure E.1-5 (MM E.1-5) with the following:

- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved

by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Response No. 3-2

In response to this comment, MM E.1-5 has been revised as requested. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the new text of MM E.1-5. With respect to the additional measures to reduce off-road construction equipment referenced above, many of the SCAQMD's suggested measures already have been incorporated into the Project Design Features (PDFs) and Mitigation Measures proposed for the Project, as detailed on pages V.E.1-60 and V.E.1-61 of Section V.E.1, Air Resources—Air Quality, of the Draft EIR, and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. Specifically, see PDF E.1-1 and MM E.1-1 through MM E.1-6.

Comment No. 3-3

Pyrotechnics

Lastly, the Draft EIR did not discuss the potential future use of pyrotechnics at this filming location. If pyrotechnics may be used in the future, then emissions from this activity should be analyzed, disclosed, and mitigated to the extent feasible in the CEQA document. Otherwise, a condition should be included that prohibits the use of pyrotechnics at this site.

Response No. 3-3

The potential for the use of pyrotechnics within the Project would be limited, as indoor pyrotechnic effects are not frequently employed as part of studio operations. In reviewing the use of such special effects within soundstages at other studio locations, the vast majority of soundstage pyrotechnics involve compressed air and debris, which allow for small, instantaneous detonations in order to minimize safety concerns. Where pyrotechnics are required, a “large event” within a soundstage would typically involve up to approximately 3 to 5 pounds of propane or up to approximately 2 ounces of black powder. In response to the SCAQMD’s request, pollutant emissions associated with pyrotechnic events of this nature were calculated to determine whether a significant air quality impact would result in conjunction with other Project operational emissions. Pollutant emissions from pyrotechnics would result in approximately 0.09 pound of PM₁₀ and PM_{2.5}, 0.07 pound of NO_x, 0.05 pound of CO, and less than 0.01 pound of VOC and SO_x. Please refer to Appendix E.3 (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR) for emission calculation worksheets. The pollutant emission factors for propane usage are conservatively based on the USEPA’s AP-42, Section 1.5, Liquefied Petroleum Gas Combustion, since emission factors for the detonation of propane are not available. As such, the estimation of propane emissions is overstated due to the shorter residence time of detonation. Consideration of potential pyrotechnic emissions from within the new soundstages would not change any of the significance conclusions provided in Section V.E.1, Air Resources—Air Quality, of the Draft EIR. Air quality impacts from Project operational emissions would remain less than significant, and no mitigation measures would be required.

Outdoor pyrotechnic effects would continue to occur within the Ranch as part of existing filming activities in accordance with existing permits and the County Fire Department’s permitting process. A review of existing filming activities and the use of outdoor pyrotechnic effects within the Ranch was conducted. The use of outdoor pyrotechnics within the Ranch would remain unchanged regardless of whether new development occurs in the Development Area. Per the SCAQMD’s request, these baseline emissions from ongoing outdoor pyrotechnic effects within the Ranch have been calculated and are provided in Appendix E.3. As shown in Appendix E.3, the Project would result in no increase in peak-daily emissions from this source, and no changes in incremental operational emissions or significance conclusions presented in Tables V.E.1-5 and V.E.1-6 on pages V.E.1-43 and V.E.1-44, respectively, of the Draft EIR would occur. Additional discussion of the storage, handling, and use of explosives is provided in Section V.M, Environmental Safety/Fire Hazards, of the Draft EIR.

Comment No. 3-4

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response No. 3-4

As requested in this comment, all written responses to comments were provided to the SCAQMD for review prior to publication of this Final EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

3. WRITTEN COMMENTS FROM COUNTY AGENCIES

Table III-3
Comment Matrix—County Agencies

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER		
4	Joan Rupert Section Head, Environmental and Regulatory Permitting Section County of Los Angeles Department of Parks and Recreation 510 South Vermont Avenue Los Angeles, CA 90020-1975							X					X																	
5	Frank Vidales Acting Chief, Forestry Division Prevention Services Bureau County of Los Angeles Fire Department 1320 North Eastern Avenue Los Angeles, CA 90063-3294																	X						X						
6	Gary T.K. Tse Director, Facilities Planning Bureau County of Los Angeles Sheriff's Department Headquarters 4700 Ramona Boulevard Monterey Park, CA 91754-2169																	X												
7	Adriana Raza Customer Service Specialist, Facilities Planning Department County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90601-1400																				X									



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

Russ Guiney, Director

John Wicker, Chief Deputy Director

June 18, 2012

Sent via e-mail: ctran@planning.lacounty.gov

TO: Christina Tran
Department of Regional Planning

FROM:  Joan Rupert, Section Head
Environmental and Regulatory Permitting Section

SUBJECT: **NOTICE OF COMPLETION AND AVAILABILITY
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
DISNEY/ ABC STUDIOS AT THE RANCH
STATE CLEARINGHOUSE NO. 2010011010
VESTING TENTATIVE TRACT MAP NO. TR07216
CONDITIONAL USE PERMIT RCUPT200900126
ENVIRONMENTAL NO. RENVT200900112**

The DEIR for the subject project has been reviewed for potential impacts on the facilities of this Department. The project may impact the proposed Placerita Canyon Connector Trail for which we have the following comments:

4-1

Page V.C- 27: Noise

- It is unclear whether "a public multi-use trail" refers to the proposed Placerita Canyon Connector Trail. Please clarify the trail by its name.

Page V.F- 84, Figure V.F- 22: Impacts to Jurisdictional Features (Water Tank Area and Trail Area Detail)

4-2

- As shown in our red mark-up in the attached figure from the DEIR, the proposed Placerita Canyon Connector Trail crosses two (2) drainages under the jurisdiction of the U.S. Army Corps of Engineers. The project does not propose a mechanism to convey flows across the trail and without such, there will be erosion of the trail tread in those two locations and additional maintenance. We recognize that these drainages are likely ephemeral in nature and only carry storm flows; however, even periodic flows can result in trail damage and the need for additional trail maintenance. Please indicate how flows will be conveyed across the trail and address any potential impacts to the drainage or habitat that may result from construction/installation of the conveyance mechanisms and propose mitigation for those impacts. Design of the drainage

crossings shall be consistent with the Los Angeles County Trails Manual. Please contact Lorrie Bradley for information on the Trails Manual.

4-2
(Cont.)

Page V.I- 30: Visual Qualities

4-3

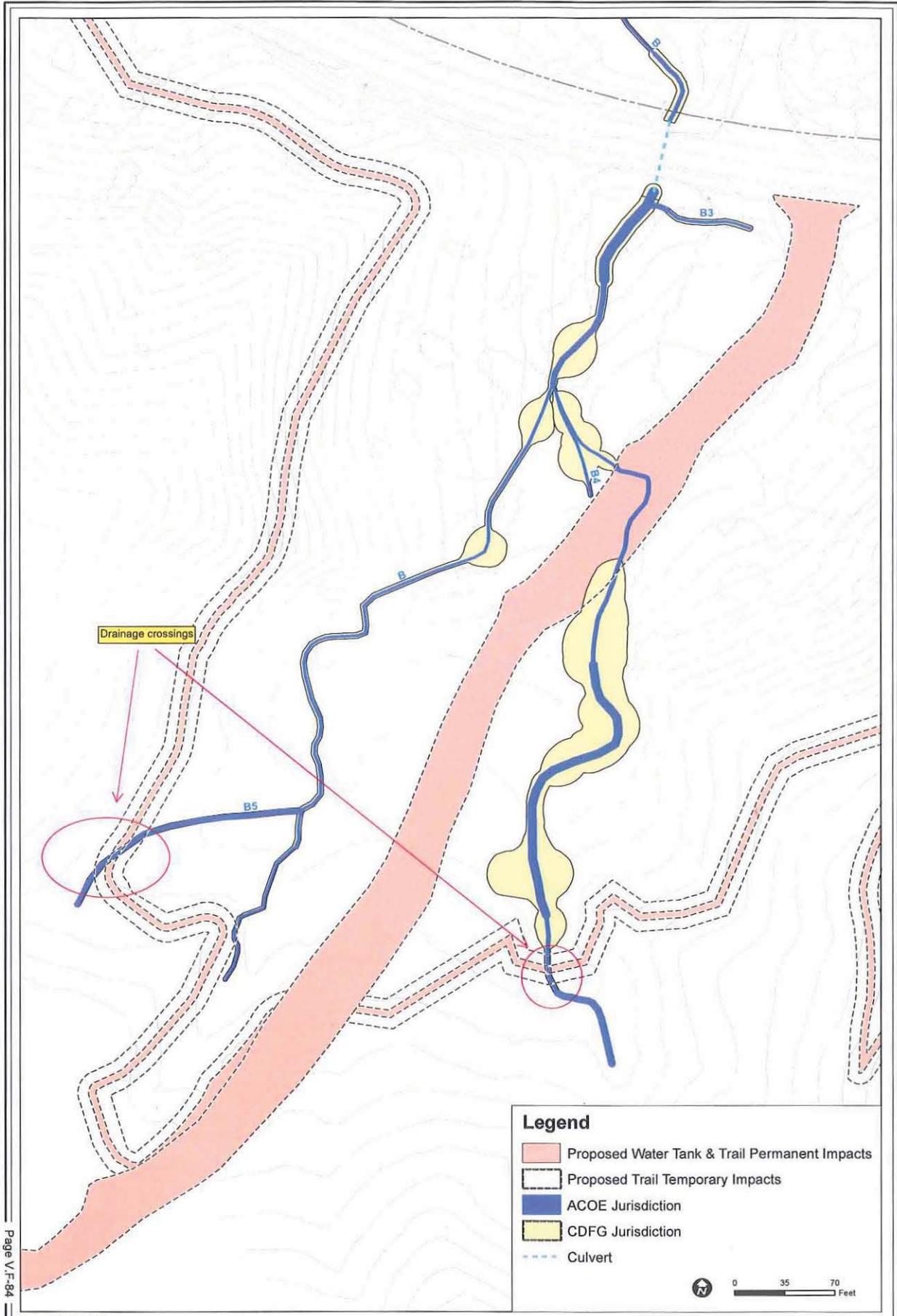
- The DEIR states that “retaining walls of up to 3 feet in height would be required to maintain trail width and stability along some segments of the trail.” Please identify and address any potential impacts to habitat due to the construction of any retaining walls that may occur outside of the 5 foot trail permanent impact area shown in Figure V.F-16 on page V.F-66 and propose mitigation measures.

Thank you for including this Department in the review of this document. If you have any trail related questions, please contact Ms. Lorrie Bradley at (213) 738-2812 or lbradley@parks.lacounty.gov. If we may be of further assistance, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

JR:JY/ Draft EIR Disney/ ABC Studios

Enclosure: Figure V.F- 22 with mark-up

c: Parks and Recreation (N. E. Garcia, K. King, J. Bok, J. Yom, L. Bradley)



Page V.F-84

Source: DUDEK, 2012.

Disney | ABC Studios at The Ranch



Figure V.F-22
Impacts to Jurisdictional Features – Water Tank Area and Trail Area Detail

Letter No. 4

Joan Rupert
Section Head, Environmental and Regulatory Permitting Section
County of Los Angeles Department of Parks and Recreation
510 South Vermont Avenue
Los Angeles, CA 90020-1975

Comment No. 4-1

The DEIR for the subject project has been reviewed for potential impacts on the facilities of this Department. The project may impact the proposed Placerita Canyon Connector Trail for which we have the following comments:

Page V.C- 27: Noise

- It is unclear whether “a public multi-use trail” refers to the proposed Placerita Canyon Connector Trail. Please clarify the trail by its name.

Response No. 4-1

As described in Section IV, Project Description, of the Draft EIR, as part of the Project, the Applicant would dedicate an easement for a proposed trail, referred to as the Placerita Canyon Connector Trail, which would be constructed as a public, multi-use trail for hiking, mountain-biking, and equestrian use. In response to this comment, the text referenced above has been revised as requested. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the new text which clarifies the discussion of the Placerita Canyon Connector Trail within Section V.C, Noise, of the Draft EIR.

Comment No. 4-2

Page V.F- 84, Figure V.F-22: Impacts to Jurisdictional Features (Water Tank Area and Trail Area Detail)

- As shown in our red mark-up in the attached figure from the DEIR [provided on page III-27 of this Final EIR], the proposed Placerita Canyon Connector Trail crosses two (2) drainages under the jurisdiction of the U.S. Army Corps of Engineers. The project does not propose a mechanism to convey flows across the trail and without such, there will be erosion of the trail tread in those two locations and additional maintenance. We recognize that these drainages are likely ephemeral in nature and only carry storm flows; however, even periodic

flows can result in trail damage and the need for additional trail maintenance. Please indicate how flows will be conveyed across the trail and address any potential impacts to the drainage or habitat that may result from construction/installation of the conveyance mechanisms and propose mitigation for those impacts. Design of the drainage crossings shall be consistent with the Los Angeles County Trails Manual. Please contact Lorrie Bradley for information on the Trails Manual.

Response No. 4-2

The initial design of the proposed Placerita Canyon Connector Trail was developed in consultation with the County Department of Parks and Recreation. As indicated on page IV-35 in Section IV, Project Description, of the Draft EIR, certain segments of the trail would consist of a narrow three-foot tread and would remain unimproved in order to avoid impacts to sensitive habitat, including ephemeral streams. Further, as indicated in Table 9 on pages 43 and 44 of the Addendum to the Biological Resources Assessment (BRA Addendum) included as Appendix F.3 to the Draft EIR, no temporary or permanent impacts to jurisdictional waters would occur within the Trail Area, and, as indicated in Footnote 2 therein, “[a]lthough the trail crosses over ephemeral tributaries, no construction activities would take place within the drainages.”

However, based on the comment above and further discussion with the Department of Parks and Recreation, the proposed trail may be required to include mechanisms such as drainage crossings to convey ephemeral flows across the trail and minimize the potential for erosion of the trail tread. The Applicant will continue to work cooperatively with the Department of Parks and Recreation to design mechanisms to convey flows in a manner that avoids impacts to jurisdictional features, as needed, and will comply with any related condition(s) of approval.

Comment No. 4-3

Page V.I- 30: Visual Qualities

- The DEIR states that “retaining walls of up to 3 feet in height would be required to maintain trail width and stability along some segments of the trail.” Please identify and address any potential impacts to habitat due to the construction of any retaining walls that may occur outside of the 5 foot trail permanent impact area shown in Figure V.F-16 on page V.F-66 and propose mitigation measures.

Thank you for including this Department in the review of this document. If you have any trail related questions, please contact Ms. Lorrie Bradley at (213) 738-2812 or lbradley@parks.lacounty.gov. If we may be of further assistance, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Response No. 4-3

As indicated on page IV-35 in Section IV, Project Description, of the Draft EIR, the proposed Placerita Canyon Connector Trail would have a varying trail tread width of 3 to 5 feet, with the narrower 3-foot tread provided in sensitive areas and along sections of the trail that traverse steep terrain. As also indicated, retaining walls of up to 3 feet in height would be required to maintain trail width and stability along some segments of the trail. Thus, generally speaking, retaining walls would only be required within steep terrain where the trail would consist of a narrow 3-foot tread. As the analysis of permanent impacts to vegetation communities (i.e., habitat) is conservatively based on a 5-foot tread for the entire length of the trail, as indicated in Figure V.F-16 on page V.F-66 in Section V.F, Biological Resources, of the Draft EIR, the identified permanent impacts to 0.52 acre of various vegetation communities (see Table V.F-3 on page V.F-64 therein) include any impacts associated with retaining walls to be constructed along the trail. With respect to temporary impacts associated with the construction of the trail and the associated retaining walls, as indicated on page V.F-13 of the Draft EIR, the analysis is conservatively based on a 20-foot-wide buffer area for the entire length of the trail (corresponding to the variable width of the 12- to 20-foot-wide easement that would be dedicated) in order to account for any vegetation impacts resulting from construction staging. Accordingly, the 1.49 acres of various vegetation communities (see Table V.F-3 on page V.F-64) include any impacts associated with construction of the retaining walls. Moreover, the majority of vegetation communities impacted within the Trail Area is not considered sensitive, and such impacts would be less than significant. While 0.05 acre of disturbed coast live oak woodland, which is considered sensitive for purposes of CEQA analysis, would be permanently impacted and 0.14 acre would be temporarily impacted, Footnote e within Table V.F-3 indicates no oak trees would be removed or encroached upon within the Trail Area, and the impacted acreage cited reflects the disturbance of vegetation between oak trees within oak woodlands. Nonetheless, mitigation for the Project's impacts to oak woodlands is provided in MM F-3, as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR. Impacts after mitigation would be less than significant.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

Letter No. 5

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

June 4, 2012

Christina Tran, Planner
Department of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Tran:

DRAFT ENVIRONMENTAL IMPACT REPORT, COUNTY PROJECT NO. TR071216-(5), VESTING TENTATIVE TRACT MAP NO. 071216, CONDITIONAL USE PERMIT NO. 200900126, DISNEY/ABC STUDIOS AT THE RANCH, TO INCLUDE 30 ACRES OF OFFSITE CITY OF LA DWP, THE SITE IS LOCATED IN THE SANTA CLARITA VALLEY (FFER #201200062) 5-1

2012 JUN 11 PM 3:53

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

We have previously reviewed this project as EIR #201100126. Our response provided the following corrections which were not incorporated into this version of the Draft EIR. In addition, we have updated the response data to 2011:

V. ENVIRONMENTAL IMPACT ANALYSIS

K.2 PUBLIC SERVICES – FIRE PROTECTION

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Fire Protection Facilities, Services and Response Times

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

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MIRADA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKESWOOD | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENDORA | IRWINDALE | LAWNDALE | PALOS VERDES ESTATES | ROSEMEAD | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAGE |
| BRADBURY | | | | | | | WHITTIER |

Fire Station No. 104 is the jurisdictional (1st-due) station for this project with Fire Stations 73 and 107 being the second and third due stations, respectively. Therefore, paragraphs two through five should be corrected as follows:

As shown in Figure V.K.2-1 on page V.K.2-2, three existing County Fire Department stations are located within the vicinity of the Ranch. Fire Station No. 104 is located at 26201 Golden Valley Road, approximately 2.9 miles northwest of the Ranch. Fire Station No. 104 is the jurisdictional (1st-due) station for the development area and the Ranch. Fire Station No. 73 is located at 24875 North Railroad Avenue (previously North San Fernando Road), approximately 3.4 miles west of the development area and is the 2nd-due station for the development area and the Ranch. Fire Station No. 107 is located at 18239 W. Soledad Canyon, approximately 4 miles northeast of the development area and is the 3rd-due station for the development area and the remainder of the Ranch. Table V.K.2-1 on page V.K.2-4 summarizes the location, response distance, staffing and equipment of these stations.

Fire station No. 104 is currently in a temporary location and is scheduled to be relocated to a permanent location (26901 Golden Valley Road), slightly farther north of its current location. Fire Station No. 104 should be operational by 2013. In addition, a new fire station, Fire Station No. 150, is planned at Golden Valley Road just east of SR-14, approximately 1.3 miles northeast of the development area. It is expected to become operational in 2012. Once operational, Fire Station No. 150 would replace Fire Station No. 104 as the jurisdictional station for the development area and the Ranch. It is anticipated that Fire Station No. 150 would be equipped with at minimum a three-person engine company. Specific staffing configurations will be finalized by October 2012.

Table V.K.2-2 on page V.K.2-5 lists the number of responses for the three existing County Fire Department stations closest to the Ranch during 2011, as well as average response times. Fire Station No. 104 had 432 total responses in 2011, consisting of 20 fire-related responses, 332 emergency medical service (EMS) responses and 80 other responses. Fire Station No. 73 had 1,939 total responses in 2011, consisting of 59 fire-related responses, 1,548 EMS responses and 332 other responses. Fire Station No. 107 had 2,957 total responses in 2011, consisting of 76 fire-related responses, 2,459 EMS responses and 422 other responses. Among the three fire stations, there were a total of 5,328 emergency responses in 2011, with fire-related responses comprising 3 percent of calls, EMS responses comprising 81 percent and other responses comprising 16 percent.

According to the County Fire Department, the Ranch is located in a suburban area. For suburban areas, the County Fire Department has response time goals of 8 minutes for the first arriving unit and 12 minutes for an advanced life support (paramedic) unit. The average response times for each of the stations are listed in Table V.K.2-2. As shown, the average response time for Fire Station No. 104 is 6:03 minutes for fire responses, 6:20 minutes for EMS responses and 6:02 minutes for other responses. The average response time for Fire Station No. 73 is 5:32 minutes for fire responses, 4:53 minutes for EMS responses and 5:05 minutes for other responses. The average response time for Fire Station 107 is 5:22 minutes for fire responses, 5:15 minutes for EMS responses and 5:28 minutes for other responses. These response times meet Department goals. Based on the distance to the Ranch, the jurisdictional station (Fire Station No. 104) is estimated to have a response time of approximately 10 minutes, which is longer than the Department's effective level of service, however, once Fire Station 150 is operational (2012) it is expected to have an estimated response time of less than 5 minutes.

Figure V.K.2-1 showing fire station locations should be updated using the information provided below in revised Table V.K.2.1.

Tables V.K.2-1 and V.K.2-2 should be revised as follows:

**Table V.K.2-1
 Existing and Proposed County Fire Department Stations Located in the Project Vicinity**

Station No.	Locations	Distance from Development Area ^a	24-Hour Staffing	Equipment
Existing				
Fire Station 104 (Temporary)	26201 Golden Valley Road	2.9 miles	4	• Four-Person Quint
Fire Station 73 ^b	24875 North Railroad Avenue	3.4 miles	6	• Four-Person Engine Company • Two-Person Paramedic Squad
Fire Station 107 ^b	18239 W. Soledad Canyon Canyon County	4.0 miles	6	• Three-Person Engine Company • Two-Person Paramedic Squad
Proposed Fire Station No. 150 should be operational in 2012 and although land has been acquired for Permanent Fire Station 104, its construction has not yet begun.				
Fire Station 150	19190 Golden Valley Road	1.3 miles	4	• Three-Person Engine (minimum staffing – actual staffing shall be determined by Oct. 2012)
Fire Station 104 (Permanent)	26901 Golden Valley Road	3.8 miles	4	• Four-Person Quint (actual staffing shall be determined by Oct. 2012)
^a Distances cited are approximate driving distances from each fire station to the Ranch entrance at Placerita Canyon Road just east of SR-14. ^b No changes in the location, staffing, or equipment are anticipated for these stations.				

**Table V.K.2-2
 Fire and Paramedic Response Data for 2011**

5-2
 (Cont.)

Fire Stations Serving the Ranch	Annual Number of Responses ^a	Average Response Time
Fire Station No. 104		
Fire Responses	20 (5%)	6:03 minutes
Emergency Medical Services Responses	332 (76%)	6:20 minutes
Other ^b	80 (19%)	6:02 minutes
Total Station Response	432	
Fire Station No. 73		
Fire Responses	59 (3%)	5:32 minutes
Emergency Medical Services Responses	1548 (80%)	4:53 minutes
Other ^b	332 (17%)	5:05 minutes
Total Station Response	1939	
Fire Station No. 107		
Fire Responses	76 (3%)	5:22 minutes
Emergency Medical Services Responses	2459 (83%)	5:15 minutes
Other ^b	422 (14%)	5:28 minutes
Total Station Response	2957	
TOTAL RESPONSES	5328	
^a Annual number of responses occurring during 2011. Percentages represent percent of total responses per station.		
^b "Other" refers to false alarms, smoke scares, good intent, service calls and other miscellaneous incidents of this type.		

(2) Emergency Access and Response Distance

5-3

Paragraph 2, sentence 3 should be corrected to state, "Fire Stations 104, 73 and 107 are located approximately 2.9 miles, 3.4 miles and 4 miles from the development area, respectively."

3. ENVIRONMENTAL IMPACTS

5-4

d. Project Impacts

(b) Operation

(i) Capability of Fire Protection and Emergency Medical Services

Paragraphs 1 through 3 should delete all references to "Fire Station No. 123" and replace them with "**Fire Station No. 104**".

(ii) Fire Response Distance, Fire Flow and Access Requirements

(A) Fire Response Distance

Paragraph 1 should delete all references to "Fire Station No. 123" and replace them with "**Fire Station No. 104**".

5-4
(Cont.)

LAND DEVELOPMENT UNIT:

5-5

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
2. The Fire Prevention Division, Land Development Unit, has no additional comments regarding this project. All our previous comments have been addressed and have not changed at this time.
3. Should any questions arise, please contact Juan Padilla of the County of Los Angeles Fire Department, Land Development Unit, at (323) 890-4243 or jpadilla@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

5-6

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

5-7

1. The review of the "Notice of Preparation" indicates that the Ranch has been used over the past decades for agriculture, oil production, motion picture and television film production, set construction in addition to storage of fuels, pesticides and other hazardous materials on-site. Based on the above information, the site uses may have contributed to soil contamination. Therefore, it is requested that the subject development seeks oversight from the State Department of Toxic Substances Control or Los Angeles County Fire Department, Health Hazardous Materials Division for assessment and mitigation of potential contamination prior to issuance of any grading permit.

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

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:ij

Letter No. 5

Frank Vidales
Acting Chief, Forestry Division
Prevention Services Bureau
County of Los Angeles Fire Department
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Comment No. 5-1

DRAFT ENVIRONMENTAL IMPACT REPORT, COUNTY PROJECT NO. TR071216-(5), VESTING TENTATIVE TRACT MAP NO. 071216, CONDITIONAL USE PERMIT NO. 200900126, DISNEY/ABC STUDIOS AT THE RANCH, TO INCLUDE 30 ACRES OF OFFSITE CITY OF LA DWP, THE SITE IS LOCATED IN THE SANTA CLARITA VALLEY (FFER #201200062)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

We have previously reviewed this project as EIR #201100126. Our response provided the following corrections which were not incorporated into this version of the Draft EIR. In addition, we have updated the response data to 2011:

V. ENVIRONMENTAL IMPACT ANALYSIS

K.2 PUBLIC SERVICES - FIRE PROTECTION

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Fire Protection Facilities, Services and Response Times

Fire Station No. 104 is the jurisdictional (1st-due) station for this project with Fire Stations 73 and 107 being the second and third due stations, respectively. Therefore, paragraphs two through five should be corrected as follows:

As shown in Figure V.K.2-1 on page V.K.2-2, three existing County Fire Department stations are located within the vicinity of the Ranch. Fire Station No. 104 is located at 26201 Golden Valley Road, approximately 2.9 miles northwest of the Ranch. Fire Station No. 104 is the jurisdictional (1st-due) station for the development area and the Ranch. Fire Station No. 73 is located at 24875 North Railroad Avenue (previously North San Fernando Road), approximately 3.4 miles west of the development area and is the 2nd-due station for the development area and the Ranch. Fire Station No. 107 is located at 18239 W. Soledad Canyon, approximately 4 miles northeast of the development area and is the 3rd-due station for the development area and the remainder of the Ranch. Table V.K.2-1 on page V.K.2-4 summarizes the location, response distance, staffing and equipment of these stations.

Fire station No. 104 is currently in a temporary location and is scheduled to be relocated to a permanent location (26901 Golden Valley Road), slightly farther north of its current location. Fire Station No. 104 should be operational by 2013. In addition, a new fire station, Fire Station No. 150, is planned at Golden Valley Road just east of SR-14, approximately 1.3 miles northeast of the development area. It is expected to become operational in 2012. Once operational, Fire Station No. 150 would replace Fire Station No. 104 as the jurisdictional station for the development area and the Ranch. It is anticipated that Fire Station No. 150 would be equipped with at minimum a three-person engine company. Specific staffing configurations will be finalized by October 2012.

Table V.K.2-2 on page V.K.2-5 lists the number of responses for the three existing County Fire Department stations closest to the Ranch during 2011, as well as average response times. Fire Station No. 104 had 432 total responses in 2011, consisting of 20 fire-related responses, 332 emergency medical service (EMS) responses and 80 other responses. Fire Station No. 73 had 1,939 total responses in 2011, consisting of 59 fire-related responses, 1,548 EMS responses and 332 other responses. Fire Station No. 107 had 2,957 total responses in 2011, consisting of 76 fire-related responses, 2,459 EMS responses and 422 other responses. Among the three fire stations, there were a total of 5,328 emergency responses in 2011, with fire-related responses comprising 3 percent of calls, EMS responses comprising 81 percent and other responses comprising 16 percent.

According to the County Fire Department, the Ranch is located in a suburban area. For suburban areas, the County Fire Department has response time goals of 8 minutes for the first arriving unit and 12 minutes for an advanced life support (paramedic) unit. The average response times for each of the stations are listed in Table V.K.2-2. As shown, the average response time for Fire Station No. 104 is 6:03 minutes for fire responses, 6:20 minutes for EMS responses and 6:02 minutes for other responses. The average response time for Fire Station No. 73 is 5:32 minutes for fire responses, 4:53 minutes for EMS responses and 5:05 minutes for other responses. The average response time for Fire

Station 107 is 5:22 minutes for fire responses, 5: 15 minutes for EMS responses and 5:28 minutes for other responses. These response times meet Department goals. Based on the distance to the Ranch, the jurisdictional station (Fire Station No. 104) is estimated to have a response time of approximately 10 minutes, which is longer than the Department’s effective level of service, however, once Fire Station 150 is operational (2012) it is expected to have an estimated response time of less than 5 minutes.

Response No. 5-1

In response to this comment, the text referenced above has been revised as requested, with minor variations provided for additional clarity and as approved by the Fire Department. Refer to Section II, Corrections, Clarifications, and Additions to the Draft, of this Final EIR for the updated text.

Comment No. 5-2

Figure V.K.2-1 showing fire station locations should be updated using the information provided below in revised **Table V.K.2.1**.

Tables V.K.2-1 and V.K.2-2 should be revised as follows:

**Table V.K.2-1
Existing and Proposed County Fire Department Stations Located in the Project Vicinity**

Station No.	Locations	Distance from Development Area^a	24-Hour Staffing	Equipment
Existing				
Fire Station 104 (Temporary)	26201 Golden Valley Road	2.9 miles	4	<ul style="list-style-type: none"> • Four-Person Quint
Fire Station 73 ^b	24875 North Railroad Avenue	3.4 miles	6	<ul style="list-style-type: none"> • Four-Person Engine Company • Two-Person Paramedic Squad
Fire Station 107 ^b	18239 W. Soledad Canyon Canyon County	4.0 miles	6	<ul style="list-style-type: none"> • Three-Person Engine Company • Two-Person Paramedic Squad
Proposed Fire Station No. 150 should be operational in 2012 and although land has been acquired for Permanent Fire Station 104, its construction has not yet begun.				

Fire Station 150	19190 Golden Valley Road	1.3 miles	4	<ul style="list-style-type: none"> Three-Person Engine (<i>minimum staffing – actual staffing shall be determined by Oct. 2012</i>)
Fire Station 104 (Permanent)	26901 Golden Valley Road	3.8 miles	4	<ul style="list-style-type: none"> Four-Person Quint (<i>actual staffing shall be determined by Oct. 2012</i>)

^a Distances cited are approximate driving distances from each fire station to the Ranch entrance at Placerita Canyon Road just east of SR-14.

^b No changes in the location, staffing, or equipment are anticipated for these stations.

**Table V.K.2-2
Fire and Paramedic Response Data for 2011**

Fire Stations Serving the Ranch	Annual Number of Responses ^a	Average Response Time
Fire Station No.104		
Fire Responses	20 (5%)	6:03 minutes
Emergency Medical Services Responses	332 (76%)	6:20 minutes
Other ^b	80 (19%)	6:02 minutes
Total Station Response	432	
Fire Station No. 73		
Fire Responses	59 (3%)	5:32 minutes
Emergency Medical Services Responses	1,548 (80%)	4:53 minutes
Other	332 (17%)	5:05 minutes
Total Station Response	1,939	
Fire Station No.107		
Fire Responses	76 (3%)	5:22 minutes
Emergency Medical Services Responses	2,459 (83%)	5:15 minutes
Other ^b	422 (14%)	5:28 minutes
Total Station Response	2,957	
TOTAL RESPONSES	5,328	

^a Annual number of responses occurring during 2011. Percentages represent percent of total responses per station.

^b "Other" refers to false alarms, smoke scares, good intent, service calls and other miscellaneous incidents of this type."

Response No. 5-2

In response to this comment, the figure and tables referenced above have been revised as requested, with minor variations provided for additional clarity and as approved by the Fire Department. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the updated information.

Comment No. 5-3

(2) Emergency Access and Response Distance

Paragraph 2, sentence 3 should be corrected to state, “Fire Stations 104, 73 and 107 are located approximately 2.9 miles, 3.4 miles and 4 miles from the development area, respectively.”

Response No. 5-3

In response to this comment, the text referenced above has been revised as requested. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the updated text.

Comment No. 5-4

3. ENVIRONMENTAL IMPACTS

d. Project Impacts

(b) Operation

(i) Capability of Fire Protection and Emergency Medical Services

Paragraphs 1 through 3 should delete all references to “Fire Station No. 123” and replace them with “**Fire Station No. 104**”.

(ii) Fire Response Distance, Fire Flow and Access Requirements

(A) Fire Response Distance

Paragraph 1 should delete all references to “Fire Station No. 123” and replace them with “**Fire Station No. 104**”.

Response No. 5-4

In response to this comment, the text referenced above has been revised as requested, with minor variations provided for additional clarity and as approved by the Fire Department. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the updated text.

Comment No. 5-5**LAND DEVELOPMENT UNIT:**

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
2. The Fire Prevention Division, Land Development Unit, has no additional comments regarding this project. All our previous comments have been addressed and have not changed at this time.
3. Should any questions arise, please contact Juan Padilla of the County of Los Angeles Fire Department, Land Development Unit, at (323) 890-4243 or jpadilla@fire.lacounty.gov.

Response No. 5-5

Project compliance with applicable code and ordinance requirements related to fire protection and safety would be ensured via implementation of the Project Design Features, specifically PDF K.2-1 through PDF K.2-9, as detailed on pages V.K.2-25 and V.K.2-26 in Section V.K.2, Public Services—Fire Protection, of the Draft EIR and as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 5-6**FORESTRY DIVISION - OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance.

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

Response No. 5-6

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 5-7

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The review of the “Notice of Preparation” indicates that the Ranch has been used over the past decades for agriculture, oil production, motion picture and television film production, set construction in addition to storage of fuels, pesticides and other hazardous materials on-site. Based on the above information, the site uses may have contributed to soil contamination. Therefore, it is requested that the subject development seeks oversight from the State Department of Toxic Substances Control or Los Angeles County Fire Department, Health Hazardous Materials Division for assessment and mitigation of potential contamination prior to issuance of any grading permit.

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

Response No. 5-7

This comment is a duplicate of the comment submitted following publication of the Notice of Preparation (NOP) for the Project, as provided in the Fire Department’s comment letter dated March 10, 2010. The comment correctly summarizes certain aspects of the Ranch as it relates to past land uses and the use of hazardous materials on-site. Mitigation Measures MM M-1 through MM M-3, detailed on page V.M-39 in Section V.M, Environmental Safety/Fire Hazards, of the Draft EIR and as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR, have been proposed to detect, evaluate, treat, or otherwise manage and dispose of any contaminated soils that may be present on-site. As detailed in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR, oversight of these Mitigation Measures would be performed by various public agencies, including the County Fire Department and potentially the California Department of Toxic Substances Control, as applicable. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



Leroy D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters
 4700 Ramona Boulevard
 Monterey Park, California 91754-2169

June 8, 2012

Christina Tran
 Impact Analysis Section
 Department of Regional Planning
 320 West Temple Street
 Los Angeles, California 90012

Dear Ms. Tran:

REVIEW COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
DISNEY/ABC STUDIOS AT THE RANCH
(COUNTY PROJECT NO. TR071216-(5); SCH NO. 2010011010)

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Environmental Impact Report (Draft EIR) for the Disney/ABC Studios at the Ranch Project (Project). The proposed Project consists of soundstages, production offices, bungalows, and other ancillary structures and infrastructure within a development area of approximately 56 acres. The proposed Project is located at 19802 Placerita Canyon Road in the unincorporated Santa Clarita Valley area of Los Angeles County.

The Draft EIR was reviewed by the Department's Santa Clarita Valley Station (see the attached correspondence, dated May 31, 2012, from Captain Paul Becker).

In summary, the proposed Project, as described in the Draft EIR, is not expected to impact the Department's resources or operations. The Department has no other comments to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process for the proposed Project. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to

6-1

Ms. Tran

-2-

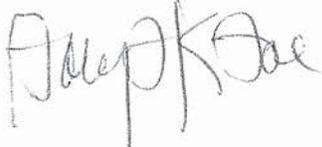
June 8, 2012

Facilities Planning Bureau Tracking No. 12-025. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

6-1
(Cont.)

Sincerely,

LEROY D. BACA, SHERIFF

A handwritten signature in black ink, appearing to read "Gary T.K. Tse". The signature is written in a cursive, somewhat stylized font.

Gary T.K. Tse, Director
Facilities Planning Bureau

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A TRADITION OF SERVICE"

DATE: May 31, 2012

OFFICE CORRESPONDENCE

FILE NO.

FROM:  PAUL BECKER, CAPTAIN
SANTA CLARITA VALLEY STATION

TO: GARY T.K. TSE, DIRECTOR
FACILITIES PLANNING BUREAU

SUBJECT: REQUEST FOR COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DISNEY ABC STUDIOS AT THE RANCH - (SCH NO. 2010011010)

We have had an opportunity to review the Draft Environmental Impact Report (DEIR) for the Disney ABC Studios at the Ranch Project (project). Santa Clarita Valley Station does not expect the proposed project, as it is described in the DEIR to have a significant impact on our ability to provide law enforcement services to the project site or remainder of our patrol area. Our assessment of the DEIR is consistent with our assessment of other environmental documents prepared for the proposed project, including the Initial Study/Notice of Preparation and Screencheck Draft Environmental Impact Report (Santa Clarita Valley Station's review comments, dated March 8, 2010 and August 2, 2011 respectively, are attached hereto).

6-2

Should you have further questions, please feel free to contact me at (661) 255-1121, or Deputy Jeffrey Jackson at (661) 255-1121 ext. 5159.

PB:JSJ:jj

RECEIVED

JUN 4 2012

FACILITIES PLANNING BUREAU
ADMINISTRATIVE SERVICES DIVISION

Letter No. 6

Gary T.K. Tse
Director, Facilities Planning Bureau
County of Los Angeles Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, CA 91754-2169

Comment No. 6-1

**REVIEW COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
DISNEY/ABC STUDIOS AT THE RANCH
(COUNTY PROJECT NO. TR071216-(5); SCH NO. 2010011010)**

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Environmental Impact Report (Draft EIR) for the Disney/ABC Studios at the Ranch Project (Project). The proposed Project consists of soundstages, production offices, bungalows, and other ancillary structures and infrastructure within a development area of approximately 56 acres. The proposed Project is located at 19802 Placerita Canyon Road in the unincorporated Santa Clarita Valley area of Los Angeles County.

The Draft EIR was reviewed by the Department's Santa Clarita Valley Station (see the attached correspondence, dated May 31, 2012, from Captain Paul Becker).

In summary, the proposed Project, as described in the Draft EIR, is not expected to impact the Department's resources or operations. The Department has no other comments to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process for the proposed Project. Should you have any questions of the Department regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012 and refer to Facilities Planning Bureau Tracking No. 12-025. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Response No. 6-1

This comment correctly summarizes certain aspects of the Project and states that the Project is not expected to impact the Sheriff Department's resources or operations.

The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 6-2

We have had an opportunity to review the Draft Environmental Impact Report (DEIR) for the Disney ABC Studios at the Ranch Project (project). Santa Clarita Valley Station does not expect the proposed project, as it is described in the DEIR to have a significant impact on our ability to provide law enforcement services to the project site or remainder of our patrol area. Our assessment of the DEIR is consistent with our assessment of other environmental documents prepared for the proposed project, including the Initial Study/Notice of Preparation and Screencheck Draft Environmental Impact Report (Santa Clarita Valley Station's review comments, dated March 8, 2010 and August 2, 2011 respectively, are attached hereto). **[Attachments not provided]**

Should you have further questions, please feel free to contact me at (661) 255-1121, or Deputy Jeffrey Jackson at (661) 255-1121 ext. 5159.

Response No. 6-2

The impact conclusions provided in Section V.K.1, Public Services—Law Enforcement, of the Draft EIR are consistent with this comment. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

June 6, 2012

Ref. File No: 2232635

Ms. Christina Tran
Impact Analysis Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

2012 JUN -7 PM 3:20

Dear Ms. Tran:

Disney/ABC Studios at the Ranch

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on May 30, 2012. We offer the following comments regarding the DEIR:

- 1. Previous comments submitted by the Districts in correspondence dated February 2, 2010 (copy enclosed) still apply to the subject project with the following additional and updated information.
2. The wastewater flow originating from the proposed project through the proposed gravity sewer line identified in the DEIR as Option 1 will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' San Fernando Road Trunk Sewer, located in the northeast side of a railroad right-of-way southeast of the intersection of San Fernando Road and Via Princessa.
3. The wastewater flow originating from the proposed project through the proposed gravity sewer line identified in the DEIR as Option 2 will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Soledad Canyon Section 3 Trunk Sewer, located in Soledad Canyon Road east of Oak Avenue. This 15-inch diameter trunk sewer has a design capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2008.
4. The Santa Clarita Valley Joint Sewerage System currently processes an average flow of 19.8 mgd.

7-1
7-2
7-3
7-4

5. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Information Center, Will Serve Program/Buildover Procedures, Obtain Will Serve Letter, and click on the appropriate link on page 2 for a copy of the Districts' average wastewater generation factors.

7-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: D. Kitt
M. Tremblay
J. Ganz



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

February 2, 2010

File No: SCV-00.04-00

Ms. Christina Tran
Impact Analysis Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Tran:

**Disney/ABC Studios at the Ranch,
Tract Map No. 071216, Conditional Use Permit No. RCUPT200900126,
Zone Change No. RZCT200900012, Plan Amendment No. RPAT200900010,
Oak Tree Permit No. ROAKT200900041, Environmental No. RENVT200900112**

7-6

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on January 11, 2010. We offer the following comments regarding sewerage service:

1. The project area is outside the jurisdictional boundaries of the Districts and will require annexation into the Santa Clarita Valley Sanitation District before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fees sheets, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Kitt at extension 2708.
2. Because of the project's location, the flow originating from the proposed project would have to be transported to the Districts' trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer. Based on the information contained in the document received, the following is a list of Districts' trunk sewers that could serve the project area.

7-7

Name	Location	Size (dia.)	Design Capacity (mgd)	Peak Flow (mgd)	Last Measured
San Fernando Road Trunk Sewer	In a right of way southeast of the intersection of San Fernando Road and Via Princessa	18"	4.3	0.4	2008
Soledad Canyon Relief Trunk Sewer	In Soledad Canyon Road between Hope Way and Goldenrod Drive	24"	14.1	6.7	2008
Soledad Canyon Trunk Sewer, Sections 1, 2, 3, & 4	In Soledad Canyon Road between Hope Way and Goldenrod Drive	18"	3.7	2.0	2008

- 3. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a design capacity of 28.1 mgd and currently processes an average flow of 20.5 mgd. 7-8
- 4. The expected average wastewater flow from the project site is 66,800 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. 7-9
- 5. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. 7-10
- 6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities. 7-11

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

c: T. Molina
D. Kitt
M. Tremblay

Letter No. 7

Adriana Raza
Customer Service Specialist, Facilities Planning Department
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400

Comment No. 7-1

Disney/ABC Studios at the Ranch

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on May 30, 2012. We offer the following comments regarding the DEIR:

1. Previous comments submitted by the Districts in correspondence dated February 2, 2010 (copy enclosed) still apply to the subject project with the following additional and updated information.

Response No. 7-1

The previous comment letter referenced in this comment is included herein and addressed below in Response Nos. 7-6 through 7-11. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-2

2. The wastewater flow originating from the proposed project through the proposed gravity sewer line identified in the DEIR as Option 1 will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' San Fernando Road Trunk Sewer, located in the northeast side of a railroad right-of-way southeast of the intersection of San Fernando Road and Via Princesa.

Response No. 7-2

As indicated in this comment and described in detail on pages V.L.2-5 through V.L.2-7 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, sanitary sewer service for the Development Area would be provided by connecting a proposed on-site wastewater system to the City of Santa Clarita's existing local wastewater collection system via the construction of a new off-site gravity flow sewer main following a proposed alignment referred to as the Oak Orchard Alignment. The Oak

Orchard Alignment is part of the City's sewer master plan and would allow an existing residential area and other existing development in the area to convert from septic tanks to a public sewer system. Consequently, the City would install the portion of the Oak Orchard Alignment within its jurisdictional limits. The new sewer main would join the City of Santa Clarita's existing local sewer system at Meadview Avenue and ultimately flow to the existing San Fernando Road Trunk Sewer maintained by the County Sanitation Districts of Los Angeles County (County Sanitation Districts). This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-3

3. The wastewater flow originating from the proposed project through the proposed gravity sewer line identified in the DEIR as Option 2 will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Soledad Canyon Section 3 Trunk Sewer, located in Soledad Canyon Road east of Oak Avenue. This 15-inch diameter trunk sewer has a design capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2008.

Response No.7-3

As discussed in footnote 16 on page IV-38 in Section IV, Project Description, of the Draft EIR, prior to publication of the Draft EIR, a second off-site sewer alignment was proposed as an alternative to the Oak Orchard Alignment. That Force Main System (not a gravity line) was evaluated in several of the technical studies prepared in conjunction with preparation of the Draft EIR. The Force Main System has been eliminated from the Project; however, discussion or depiction of it may remain in some of the technical reports provided in the appendices to the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-4

4. The Santa Clarita Valley Joint Sewerage System currently processes an average flow of 19.8 mgd.

Response No. 7-4

As indicated on page V.L.2-2 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, in 2009 the Santa Clarita Valley Joint Sewerage System (SCVJSS) treated an average daily flow of 20.5 million gallons per day (mgd) and had approximately 7.6 mgd of treatment capacity available for future development. Per the comment above, the current daily flows have declined to 19.8 mgd,

thus leaving an available treatment capacity of 8.3 mgd. As the data provided in the Draft EIR yields a more conservative analysis, correction of that data is not provided in this Final EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-5

5. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Information Center, Will Serve Program/Buildover Procedures, Obtain Will Serve Letter, and click on the appropriate link on page 2 for a copy of the Districts' average wastewater generation factors.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Response No. 7-5

As indicated in Table V.L.2-1 on page V.L.2-13 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, the wastewater generation factors used to estimate Project-related wastewater flows are based on the County Sanitation Districts' loadings for each class of land use. The complete list of factors is provided in Appendix A of the Sanitary Sewer Service Technical Report (Sewer Report) provided in Appendix K.3 of the Draft EIR, also available on the County Sanitation District's website at www.lacsd.org/civica/filebank/blobload.asp?BlobID=3531. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-6

**Disney/ABC Studios at the Ranch,
Tract Map No. 071216, Conditional Use Permit No. RCUPT200900126,
Zone Change No. RZCT200900012, Plan Amendment No. RPAT200900010,
Oak Tree Permit No. ROAKT200900041, Environmental No. RENVT200900112**

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on January 11, 2010. We offer the following comments regarding sewerage service:

1. The project area is outside the jurisdictional boundaries of the Districts and will require annexation into the Santa Clarita Valley Sanitation District before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation

Information and Processing Fees sheets, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Kitt at extension 2708.

Response No. 7-6

As indicated on page V.L.2-1 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, as part of the Project, the Development Area would be annexed into the Santa Clarita Valley Sanitation District, which is part of the County Sanitation Districts. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-7

2. Because of the project’s location, the flow originating from the proposed project would have to be transported to the Districts’ trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts’ trunk sewer. Based on the information contained in the document received, the following is a list of Districts’ trunk sewers that could serve the project area.

Name	Location	Size (dia.)	Design Capacity (mgd)	Peak Flow (mgd)	Last Measured
San Fernando Road Trunk Sewer	In a right of way southeast of the intersection of San Fernando Road and Via Princessa	18"	4.3	0.4	2008
Soledad Canyon Relief Trunk Sewer	In Soledad Canyon Road between Hope Way and Goldenrod Drive	24"	14.1	6.7	2008
Soledad Canyon Trunk Sewer, Sections 1, 2, 3, & 4	In Soledad Canyon Road between Hope Way and Goldenrod Drive	18"	3.7	2.0	2008

Response No. 7-7

Refer to Response No. 7-2 above, which includes a brief discussion of the off-site sewer main proposed as part of the Project that would connect to the San Fernando Road Trunk Sewer listed in this comment, as described in detail on pages V.L.2-5 through V.L.2-7 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the

Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-8

3. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a design capacity of 28.1 mgd and currently processes an average flow of 20.5 mgd.

Response No. 7-8

Refer to Response No. 7-4 above. This data was incorporated into the analysis provided in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-9

4. The expected average wastewater flow from the project site is 66,800 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2.

Response No. 7-9

Refer to Response No. 7-5 above. Project-related wastewater flows were calculated based on the County Sanitation Districts' loadings for each class of land use. As indicated in Table V.L.2-1 on page V.L.2-13 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, the Studio Office Option would generate an average daily wastewater flow of approximately 75,495 gallons per day (gpd); while the Soundstage Option would generate an average daily wastewater flow of approximately 66,800 gpd, as referenced in the comment. The analysis of Project impacts was conservatively based on the Studio Office Option. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-10

5. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or

operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

Response No. 7-10

As discussed on page V.L.2-3 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, the Project would be subject to the Santa Clarita Valley Sanitation District's Master Connection Fee Ordinance and Master Service Charge Ordinance and thus would be required to pay a fee for wastewater connections and services provided by the Santa Clarita Valley Sanitation District. The Project Applicant will continue to work with the County Sanitation Districts to pay all necessary fees and obtain all required approvals with respect to wastewater service. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 7-11

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Response No. 7-11

It is acknowledged that any expansion of the Santa Clarita Valley Sanitation District's wastewater conveyance and treatment facilities must be in conformance with SCAG's regional growth forecasts and that wastewater service for the Project is not guaranteed. However, as discussed in the cumulative wastewater impact analysis provided on pages V.L.2-16 and V.L.2-17 in Section V.L.2, Utilities and Service Systems—Wastewater/Sewage Disposal, of the Draft EIR, it is anticipated that the Related Projects located within the Santa Clarita Valley Sanitation District and future growth within the greater area could be accommodated by the SCVJSS given the available capacity that remains. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

4. WRITTEN COMMENTS FROM CITY AGENCIES

Table III-4
Comment Matrix—City Agencies

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
8	Robert Newman Acting Director of Community Development City of Santa Clarita 23920 Valencia Boulevard, Suite 300 Santa Clarita, CA 91355-2196				X								X			X	X				X					X			



City of
SANTA CLARITA

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196
Phone: (661) 259-2489 • FAX: (661) 259-8125
www.santa-clarita.com

June 18, 2012

Ms. Christina Tran
Special Projects Section
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, CA 90012

Dear Ms. Tran:

Subject: Review of the Proposed Disney/ABC Studios at the Ranch Project at the intersection of Placerita Canyon Road and State Route 14

The City of Santa Clarita (City) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Disney/ABC Studios at the Ranch Project (Project), located at the northeastern intersection of State Route 14 and Placerita Canyon Road immediately east and south of the City boundary. The project site is located within the City's Sphere of Influence. The proposed project consists of development of a 58-acre studio facility adjacent to the existing Golden Oak Ranch.

8-1

The City would appreciate your consideration of the following comments on the DEIR prepared for the Project:

Traffic

Modification to the Reviewing Authority on Sierra Highway (within the project area, as described in the DEIR)

It should be noted in the DEIR that Sierra Highway, while within the City limits, is under the jurisdiction of California Department of Transportation (Caltrans). It is identified as State Route 14U, with the "U" meaning the section of roadway is unrelinquished. Therefore, any improvements to Sierra Highway will require Caltrans approval and permits. Mitigation Measures J-5 and J-6 should be revised to list Caltrans as the review/approval authority for any traffic improvements along this segment of Sierra Highway.

Cumulative Projects List

8-2

Removal of Related Project #3 from List

The DEIR identifies a number of cumulative projects in the area analyzed as part of the overall analysis of the project's impacts, including traffic impacts. The inclusion of one of the projects



(Kellstrom Project - Related Project #3) was a preliminary review (One Stop) application never formally submitted to the City and should not be included in the analysis. The removal of this preliminary application from the Cumulative Project's List may change the traffic impacts related to construction.

8-2
(Cont.)

Visual

8-3

Request to Screen Electrical Substation

The project design focuses on screening the majority of the Project from State Route 14. The City would also recommend a focus on screening the proposed electrical substation on the northern portion of the site, which will be visible from State Route 14. Thus, the City recommends a mitigation measure in the DEIR to include a requirement that the electrical substation be screened from State Route 14 to the extent possible with the use of screen walls, earthen berms and landscaping.

Trails

8-4

Inclusion of Trail Connection

The Project proposes to establish a trailhead and staging area on the south side of Placerita Canyon Road. This will tie into the existing Viper trail using existing service roads. The City requests the "Trails in the Project Vicinity" Exhibit, (Figure IV-12 on page IV-34 of the DEIR) recognize a future trail connection of the Viper trail from the existing Sierra Highway/Dockweiler Road trail to the intersection of the existing Viper trail near the Disney Golden Oak Ranch boundary that is on the property immediately south of the project site. A modified copy of this Exhibit has been attached to this letter where the proposed link is highlighted in blue.

Sewer

8-5

Request to Remove Golden Valley Option

The Project proposes to utilize an existing sewer line in Placerita Canyon west of the project site in the City. The Sewer Area Study presented in Appendix K.4 is the study the City has approved. However, in the same appendix there is a reference to a sewer line option going north on Sierra Highway and tying into an existing sewer line on Golden Valley Road. The City has not reviewed and/or approved this option and would recommend this option be deleted from Appendix K.4 due to this line's existing limited capacity. The applicant shall submit all appropriate plans, specifications, and applications to obtain the permits to install and hookup to the sewer system from the City.

The DEIR has identified the proposed Placerita Canyon sewer line will encroach into the protected zones of 86 ordinance-sized oak trees within the City. It should be noted in the DEIR that as part of the sewer plan submittal to the City, the applicant shall submit an Oak Tree Permit application and receive approval prior to any work within the protected zone of any oak tree. 8-6

Land Use 8-7

Consistency with the City of Santa Clarita General Plan

On June 14, 2011, the City approved a new General Plan for the Santa Clarita Valley. As described in the DEIR, this is part of the OVOV Joint City/County General Plan and Area Plan Update. The City has designated the 58-acre Project site as Business Park in the new General Plan, and therefore, the proposed Project would be considered consistent. In addition, it should be noted the Economic Development Element of the City's General Plan included a discussion of the proposed Project and its benefits to the region.

It should be noted the City has an updated General Plan, and the designations for properties in the City are different from what is described in the Land Use Section of the DEIR. The final documents should reflect these changes.

With the City's recommendations as described in this letter, the City supports the current design of the Project. Again, the City appreciates the opportunity to comment on the Disney/ABC Studios at the Ranch Project DEIR. Should you have any questions, please contact me at (661) 255-4330.

Sincerely,



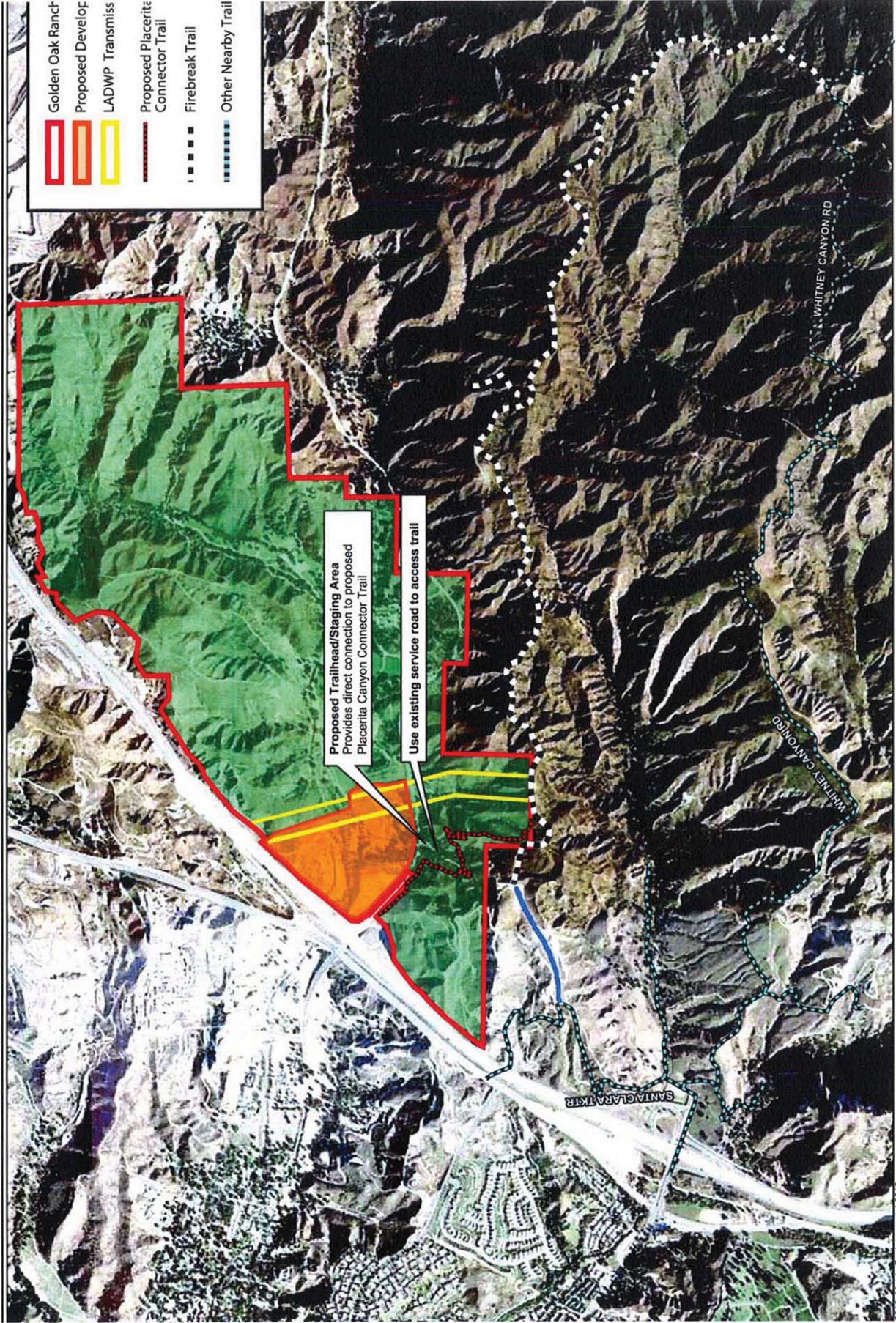
Robert Newman
Acting Director of Community Development

RN:FLF:ms

S:\CD\CURRENT\IRP\IRP FILES\Disney Ranch\ Comments 6-12 #3.doc

Attachment

cc: Santa Clarita City Council
Santa Clarita Planning Commission
Ken Puskamp, City Manager
Ken Striplin, Assistant City Manager
Rick Gould, Director of Parks, Recreation and Community Services
Adam Gilbert, Walt Disney Company
Rosalind Wayman, Senior Deputy
Edel Vizcarra, Planning Deputy



2010; Matrix Environmental 2012.  **Matrix Environmental**

 1500' 3000'
 Approximate Scale in Feet
 (Trail Alignments are Approximate)

Letter No. 8

Robert Newman
Acting Director of Community Development
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, CA 91355-2196

Comment No. 8-1

The City of Santa Clarita (City) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Disney/ABC Studios at the Ranch Project (Project), located at the northeastern intersection of State Route 14 and Placerita Canyon Road immediately east and south of the City boundary. The project site is located within the City's Sphere of Influence. The proposed project consists of development of a 58-acre studio facility adjacent to the existing Golden Oak Ranch.

The City would appreciate your consideration of the following comments on the DEIR prepared for the Project:

Traffic

Modification to the Reviewing Authority on Sierra Highway (within the project area, as described in the DEIR)

It should be noted in the DEIR that Sierra Highway, while within the City limits, is under the jurisdiction of California Department of Transportation (Caltrans). It is identified as State Route 14U, with the "U" meaning the section of roadway is unrelinquished. Therefore, any improvements to Sierra Highway will require Caltrans approval and permits. Mitigation Measures J-5 and J-6 should be revised to list Caltrans as the review/approval authority for any traffic improvements along this segment of Sierra Highway.

Response No. 8-1

This comment correctly summarizes certain aspects of the Project and specifies Sierra Highway is under the jurisdiction of Caltrans. As discussed throughout Section V.J, Traffic, Access, and Parking, of the Draft EIR and indicated in Table V.J-1 on page V.J-4 therein, two of the four study intersections (Sierra Highway/SR-14 Southbound Ramps and Sierra Highway/Placerita Canyon Road) are located along Sierra Highway and are within Caltrans' jurisdiction. Project improvements at these intersections, as well as at Placerita Canyon Road/SR-14 Northbound Off-Ramp, which is also under Caltrans' jurisdiction, will

require Caltrans approval. Consequently, as indicated in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, Mitigation Measures MM J-5 and MM J-6 have been revised to reference Caltrans review and approval. Additionally, as indicated in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR, Mitigation Measures MM J-5 and MM J-6 list Caltrans as a monitoring agency responsible for overseeing implementation of the improvements.

Comment No. 8-2

Cumulative Projects List

Removal of Related Project #3 from List

The DEIR identifies a number of cumulative projects in the area analyzed as part of the overall analysis of the project's impacts, including traffic impacts. The inclusion of one of the projects (Kellstrom Project - Related Project #3) was a preliminary review (One Stop) application never formally submitted to the City and should not be included in the analysis. The removal of this preliminary application from the Cumulative Project's List may change the traffic impacts related to construction.

Response No. 8-2

As indicated on page III-40 in Section III, Environmental Setting, of the Draft EIR, the list of 14 Related Projects evaluated in the Draft EIR was compiled based on lists of known development projects in the Project vicinity obtained from LACDPW in December 2009, the City of Santa Clarita in February 2010, and the County Department of Regional Planning in April 2011. Per the comment above, Related Project No. 3, referred to in the Draft EIR as the Kellstrom Project, is no longer proposed and can be eliminated from the Related Projects list and the associated cumulative analyses in the Draft EIR. However, in lieu of revising each of the cumulative analyses, and in particular the County-approved Transportation Study for Disney | ABC Studios at The Ranch (Traffic Study) included as Appendix I of the Draft EIR, each of the relevant analyses can be considered conservative insofar as the impacts are overstated based on inclusion of Related Project No. 3. Moreover, the significant and unavoidable cumulative construction traffic impact that was determined to occur to the extent that haul trips associated with construction of the Kellstrom Project coincide with soil export trips generated by the Project would no longer occur. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for revisions to reflect the elimination of this significant and unavoidable cumulative impact.

Comment No. 8-3**Visual***Request to Screen Electrical Substation*

The project design focuses on screening the majority of the Project from State Route 14. The City would also recommend a focus on screening the proposed electrical substation on the northern portion of the site, which will be visible from State Route 14. Thus, the City recommends a mitigation measure in the DEIR to include a requirement that the electrical substation be screened from State Route 14 to the extent possible with the use of screen walls, earthen berms and landscaping.

Response No. 8-3

In response to this comment, PDF I-2 has been revised to specify that the vegetation barrier planted with trees and shrubs would extend along portions of SR-14 adjacent to the Development Area as well as the northern portion of the site to screen views of the electrical substation. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the revised text of PDF I-2.

Comment No. 8-4**Trails***Inclusion of Trail Connection*

The Project proposes to establish a trailhead and staging area on the south side of Placerita Canyon Road. This will tie into the existing Viper trail using existing service roads. The City requests the “Trails in the Project Vicinity” Exhibit, (Figure IV-12 on page IV-34 of the DEIR) recognize a future trail connection of the Viper trail from the existing Sierra Highway/Dockweiler Road trail to the intersection of the existing Viper trail near the Disney Golden Oak Ranch boundary that is on the property immediately south of the project site. A modified copy of this Exhibit has been attached to this letter [provided on page III-63 of this Final EIR] where the proposed link is highlighted in blue.

Response No. 8-4

The City of Santa Clarita’s request to show a future trail connection between the Sierra Highway/Dockweiler Road trail and the Viper Trail is acknowledged. As a matter of clarification, the Viper Trail is an unofficial user-created trail that is not formally recognized by the County of Los Angeles Department of Parks and Recreation. The proposed

Placerita Canyon Connector Trail would connect to the County's existing Firebreak Trail, to which the City's future trail connection may also connect. However, as the proposed connection cited above would be located within the County of Los Angeles but has not yet been officially adopted by the County, the requested revision to Figure IV-12 of the Draft EIR has not been made at this time.

Comment No. 8-5

Sewer

Request to Remove Golden Valley Option

The Project proposes to utilize an existing sewer line in Placerita Canyon west of the project site in the City. The Sewer Area Study presented in Appendix K.4 is the study the City has approved. However, in the same appendix there is a reference to a sewer line option going north on Sierra Highway and tying into an existing sewer line on Golden Valley Road. The City has not reviewed and/or approved this option and would recommend this option be deleted from Appendix K.4 due to this line's existing limited capacity. The applicant shall submit all appropriate plans, specifications, and applications to obtain the permits to install and hookup to the sewer system from the City.

Response No. 8-5

The off-site sewer line now proposed as part of the Project, which would connect to existing wastewater facilities downstream within the City, is referred to as the Oak Orchard Alignment. As discussed in footnote 16 on page IV-38 in Section IV, Project Description, of the Draft EIR, prior to publication of the Draft EIR, a second off-site sewer alignment originally was proposed as an alternative to the Oak Orchard Alignment. That Force Main System was evaluated in several of the technical studies prepared in conjunction with preparation of the Draft EIR. The Force Main System has been eliminated from the Project; however, discussion or depiction of it may remain in some of the technical reports provided in the appendices to the Draft EIR. In particular, the Force Main System is addressed in the Sanitary Sewer Service Technical Report included as Appendix K.3 of the Draft EIR, but was not evaluated in any detail in the Sewer Area Study (Appendix K.4), which was approved by the City of Santa Clarita's Development Services Division. The Project Applicant will continue to work with the City to obtain all permits required for installation of the proposed sewer line via the Oak Orchard Alignment and connection to the City's sewer system.

Comment No. 8-6

The DEIR has identified the proposed Placerita Canyon sewer line will encroach into the protected zones of 86 ordinance-sized oak trees within the City. It should be noted in the DEIR that as part of the sewer plan submittal to the City, the applicant shall submit an Oak Tree Permit application and receive approval prior to any work within the protected zone of any oak tree.

Response No. 8-6

The Applicant has had ongoing discussions with the City regarding the proposed sewer line and will continue to work with the City to obtain all necessary permits and approvals. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 8-7

Land Use

Consistency with the City of Santa Clarita General Plan

On June 14, 2011, the City approved a new General Plan for the Santa Clarita Valley. As described in the DEIR, this is part of the OVOV Joint City/County General Plan and Area Plan Update. The City has designated the 58-acre Project site as Business Park in the new General Plan, and therefore, the proposed Project would be considered consistent. In addition, it should be noted the Economic Development Element of the City's General Plan included a discussion of the proposed Project and its benefits to the region.

It should be noted the City has an updated General Plan, and the designations for properties in the City are different from what is described in the Land Use Section of the DEIR. The final documents should reflect these changes.

With the City's recommendations as described in this letter, the City supports the current design of the Project. Again, the City appreciates the opportunity to comment on the Disney/ABC Studios at the Ranch Project DEIR. Should you have any questions, please contact me at (661) 255-4330.

Response No. 8-7

The land use and zoning designations for the Project site that are discussed and evaluated in the Draft EIR reflect those in effect at the time the Notice of Preparation (NOP) for the Project was published (January 7, 2010), in accordance with CEQA Guidelines

Section 15125(a). Furthermore, as the majority of the Project site (other than certain infrastructure improvements) is located within County, most of the land use and zoning designations cited are those in the County's General Plan and Area Plan. However, Section V.N, Land Use, of the Draft EIR includes discussion of the Draft 2012 Santa Clarita Valley Area Plan (which was subsequently adopted and became effective on December 27, 2012), commonly referred to as One Valley One Vision (OVOV), which is the result of a joint planning effort with the City of Santa Clarita. As discussed on page IV.N-18 of the Draft EIR, the area of the Ranch located west of the LADWP transmission corridor, which makes up the majority of the Development Area and specifically corresponds to the proposed tract map area, is designated as Office and Professional (IO) in OVOV. As also indicated on page IV.N-66, the Project would be consistent with the IO land use designation.

However, as indicated in the comment above, the City adopted an updated General Plan in June 2011 as part of the OVOV process, and the land use designations for properties located in the City are different from those mentioned in the Draft EIR. The City's new General Plan map also includes new land use designation for properties located outside the City limits but within its Sphere of Influence, including the Ranch. As stated in the comment above, the City now designates the proposed tract map area as Business Park (BP), corresponding to the County's IO designation, and the remainder of the Ranch as Non-Urban 1/Rural Residential 1 (NU1/RR1), corresponding to the County's Rural Land 20 (RL20) designation. These updated designations are acknowledged but not formally reflected in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, as the changes have no material effect on the analysis or impact conclusions presented in the Draft EIR, other than to indicate, as stated above, that the Project would be consistent with the City's new land use designations for the Ranch, thus mirroring the Project's consistency with the County's IO designation for the tract map area already discussed in the Draft EIR. As also stated in the comment, the Economic Development Element of the City's updated General Plan includes a discussion of the Project and its benefits to the region. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

5. WRITTEN COMMENTS FROM ORGANIZATIONS AND OTHER ENTITIES

Table III-5
Comment Matrix—Organizations and Other Entities

LETTER NO.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
9	Snowdy Dodson President, Los Angeles/Santa Monica Mountains Chapter California Native Plant Society 15811 Leadwell Street Van Nuys, CA 91406						X		X				X				X												
10	Rudy Ortega, Jr. Tribal Administrator Tribal Historic & Cultural Preservation Committee Fernandeño Tataviam Band of Mission Indians 601 South Brand Boulevard, Suite 102 San Fernando, CA 91340												X	X															
11	Carl Goldman Co-Owner KHTS AM-1220 Radio 27225 Camp Plenty Road, Suite 8 Santa Clarita, CA 91351	X											X																
12	Bill Allen President & CEO Los Angeles County Economic Development Corporation 444 South Flower Street, 37th Floor Los Angeles, CA 90071	X																									X		
13	Tim Crissman Chairman Old Town Newhall Association P.O. Box 221614 Newhall, CA 91322-1614	X											X			X									X				

**Table III-5 (Continued)
Comment Matrix—Organizations and Other Entities**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
14	Ron Kraus Vice President Placerita Canyon Nature Center Associates ron.kraus@placerita.org																												X
15	David Lutness Secretary of the Board Santa Clarita Organization for Planning and the Environment P.O. Box 1182 Santa Clarita, CA 91386-1182									X			X							X					X			X	
16	Ben Wong Local Public Affairs Region Director Southern California Edison Company 1000 Potrero Grande Monterey Park, CA 91754																						X						

California Native Plant Society
Los Angeles/Santa Monica Mountains Chapter
15811 Leadwell St.
Van Nuys, CA 91406
June 18, 2012

Christina Tran
Los Angeles County
Dept. of Regional Planning
Special Projects Section
ctran@planning.lacounty.gov

Re: Disney/ABC Studios at the Ranch, Vesting Tentative Tract Map No. 071216/Conditional Use Permit 200900126

Dear Ms Tran:

On behalf of the California Native Plant Society, Los Angeles/Santa Monica Mountains Chapter, I am writing to protest the plans by Golden Oak Ranch Properties (Disney) to expand its existing 890 acre film production facility in Placerita Canyon in the Santa Clarita Valley to build 12 sound stages, 6 production offices, 6 bungalows, a warehouse, a commissary, and an administration building (555,950 square feet of development). In the process, they would remove 158 oak trees (including 16 heritage oaks) and encroach upon an additional 82 oaks (3 heritage oaks). In addition to destroying native vegetation and compromising the view shed in Placerita Canyon, the project would turn a filming ranch into a huge industrial studio complex with greatly increased traffic and noise in this rural area. The proposed studio would operate 24 hours per day and employ over 1800 people and have over 2000 parking spaces. Such an operation would drastically change the environment. Even the best mitigation in the world would not restore the loss of so many oaks and their attendant plant and animal communities.

9-1

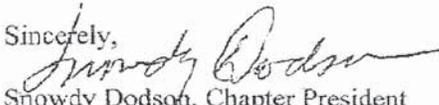
Construction of such a huge facility would result in a huge earth moving operation with 700,000 cubic yards of cut, 350,000 cubic yards of fill and 350,000 cubic yards of soil export resulting in much increased traffic and noise and disruption for the native wildlife, plants, and members of the community. No place in Placerita Canyon should be changed from agricultural to commercial manufacturing-development program zoning. Allowing such a zoning change would open the door for further industrial development in what is now essentially open space.

9-2

9-3

The California Native Plant Society (CNPS) is a non-profit organization of over 9,000 laypersons and professional botanists with 33 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them and their natural habitats through education, science, advocacy, horticulture and stewardship. We urge the County of Los Angeles Dept. of Regional Planning to consider the negative impacts of this project and not approve this zoning change.

9-4

Sincerely,

Snowdy Dodson, Chapter President
818-782-9348 email: snowdy.dodson@csun.edu

Letter No. 9

Snowy Dodson
President, Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society
15811 Leadwell Street
Van Nuys, CA 91406

Comment No. 9-1

On behalf of the California Native Plant Society, Los Angeles/Santa Monica Mountains Chapter, I am writing to protest the plans by Golden Oak Ranch Properties (Disney) to expand its existing 890 acre film production facility in Placerita Canyon in the Santa Clarita Valley to build 12 sound stages, 6 production offices, 6 bungalows, a warehouse, a commissary, and an administration building (555,950 square feet of development). In the process, they would remove 158 oak trees (including 16 heritage oaks) and encroach upon an additional 82 oaks (3 heritage oaks). In addition to destroying native vegetation and compromising the view shed in Placerita Canyon, the project would turn a filming ranch into a huge industrial studio complex with greatly increased traffic and noise in this rural area. The proposed studio would operate 24 hours per day and employ over 1800 people and have over 2000 parking spaces. Such an operation would drastically change the environment. Even the best mitigation in the world would not restore the loss of so many oaks and their attendant plant and animal communities.

Response No. 9-1

This comment begins with a statement of protest and a summary of certain elements of the Project. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment also expresses several concerns regarding the Project which are addressed below.

Biological impacts are evaluated in Section V.F, Biological Resources, of the Draft EIR. As indicated on page V.F-95 therein, with the implementation of the proposed Mitigation Measures and Project Design Features, the Project would have less than significant impacts with respect to biological resources. In particular, impacts on vegetation and jurisdictional waters within Placerita Creek and impacts to oak trees would be fully mitigated via implementation of the final approved Habitat Mitigation and Monitoring Program (HMMP) and the approved Oak Tree and Woodland Mitigation and Monitoring Plan (OTWMMP) (see Mitigation Measures MM F-1 and MM F-3, as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR).

More specifically, the Project's temporary and permanent impacts to plant communities, most of which are not considered sensitive, are summarized in Table V.F-3 on page V.F-64 in the Draft EIR. With respect to sensitive plant communities, the Project would temporarily impact 2.03 acres of mixed willow riparian woodland due to the temporary removal of vegetation (which would be later restored). The Project would permanently impact 0.08 acre of mixed willow riparian woodland within Placerita Creek and 0.75 acre of southern willow scrub associated with Sub-Tributary B1 of Placerita Creek and an upland swale, due to permanent removal of vegetation in these areas. However, with implementation of the final approved HMMP, which requires restoration and would result in the expansion of riparian habitat by 1.58 acre within Placerita Creek, impacts to these sensitive plant communities on the Ranch would be less than significant. The HMMP would also serve to mitigate impacts to streambed and associated riparian habitat under the jurisdiction of the California Department of Fish and Wildlife (CDFW), as the CDFW would require restoration of the riparian woodland within Placerita Creek so that the restored area mimics the vegetation that currently exists in the creek.

Similarly, the Project would temporarily impact 0.01 acre of coast live oak woodland and 0.14 acre of disturbed coast live oak woodland within the Ranch and would permanently impact 4.39 acres of coast live oak woodland and 0.05 acre of disturbed coast live oak woodland within the Ranch. With implementation of the approved OTWMMP, impacts to these sensitive plant communities on the Ranch would be less than significant. The removal of 158 oak trees would also be mitigated by implementation of the OTWMMP, which would require the planting of at least 1,600 oak trees, with sizes ranging from acorns and seedling plantings to larger oak trees, all of which would be grown from acorns harvested on the Ranch. Protective measures would also be implemented for all encroached oak trees, in accordance with MM F-4 and as detailed in the OTWMMP.

As discussed on page V.F-76 in Section V.F, Biological Resources, of the Draft EIR, in an effort to proactively address Project-related impacts and initiate mitigation efforts, the Ranch's natural resources staff began propagating oak trees from Ranch-harvested acorns in 2009. Field planting of 460 seedlings occurred in November 2010 under the supervision of the County Forester. Moreover, the Ranch's natural resource staff has an additional 2,381 seedlings on the Ranch that were propagated from Ranch-harvested acorns as well as an additional 1,837 Ranch-harvested acorns that were planted in containers during the Fall of 2011. These seedlings and acorns will ultimately be used to mitigate the Project's impacts on oaks and oak woodlands.

View impacts are evaluated in Section V.I, Visual Qualities, of the Draft EIR. As indicated on page V.I-38 therein, the Project would not have a substantial adverse effect on a scenic vista or substantially alter views from a public trail, and view impacts would be less than significant. More specifically, much of the Development Area is presently comprised of

two large, mostly barren fill pads created when Caltrans deposited dirt and gravel from grading during the construction of SR-14 in the early 1970s. These two fill pads visually dominate the Development Area. Long-range views in the area typically feature a rural foreground with a background of steep sloping hillsides, pockets of trees and landscaping, and from some vantages large-scale infrastructure such as LADWP's electrical transmission towers, water storage tanks, power poles, and oil pumps. With Project implementation, views of the surrounding hillsides to the north, south, east, and west would be maintained, and perimeter landscaping along SR-14 and portions of Placerita Canyon Road would largely obscure views of the new structures from the adjacent roadways. Public views would continue to feature a largely rural environment with a background of rolling hills, pockets of trees and landscaping, as well as the aforementioned infrastructure. Within the water tank area, the neutral-toned water tank would blend with the adjacent hillside to a large extent and while visible from close vantages would barely be noticeable from a distance. Equally, the substation in the northern portion of the Development Area would be screened from view through the use of site perimeter landscaping including the vegetation barrier along SR-14. Refer to Figure V.I-3 through Figure V.I-5 within the Draft EIR for visual simulations of the proposed studio development from a variety of off-site vantage points and Figure V.I-8 through Figure V.I-12 for conceptual illustrations of proposed development and associated views of the Development Area.

Land use, traffic, and noise impacts are evaluated in Section V.N, Land Use; Section V.J, Traffic, Access, and Parking; and Section V.C, Noise, of the Draft EIR. With the exception of short-term construction noise and cumulative construction noise impacts associated with the Off-Site Infrastructure Improvement Areas, all such impacts would be less than significant with mitigation. All significant and unavoidable impacts would require a Statement of Overriding Considerations by the County.

As a matter of clarification, as stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch on a daily basis. Additionally, while the proposed (primarily indoor) studio uses could operate 24 hours per day, the existing (largely outdoor) filming activities operate 24 hours per day in accordance with the existing CUP for the Ranch. Furthermore, new development would be concentrated within the 58-acre Development Area adjacent to SR-14, while less intensive existing outdoor filming uses would continue on 195 acres further east within the Ranch and 637 acres of surrounding hillsides used as a filming backdrop would be protected.

As discussed on pages V.J-51 through V.J-54 in Section V.J, Traffic, Access and Parking, of the Draft EIR, the Project would provide more parking than required by the

County Code and would use an area beneath utility lines in the LADWP transmission corridor on the eastern side of the Development Area for additional parking in order to meet demand requirements and give the Project flexibility regarding parking around the soundstages and office buildings (particularly with regards to the use of studio trailers).¹

Comment No. 9-2

Construction of such a huge facility would result in a huge earth moving operation with 700,000 cubic yards of cut, 350,000 cubic yards of fill and 350,000 cubic yards of soil export resulting in much increased traffic and noise and disruption for the native wildlife, plants, and members of the community.

Response No. 9-2

Short-term construction-related impacts associated with the Project's grading activities and particularly soil export activities are evaluated throughout the Draft EIR where appropriate, including in Section V.J, Traffic, Access, and Parking; Section V.C, Noise; and Section V.F, Biological Resources. With the exception of short-term construction noise and cumulative construction noise impacts associated with the Off-Site Infrastructure Improvement Areas, which would require a Statement of Overriding Considerations by the County, all such impacts would be less than significant with mitigation. (Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for revisions to the Draft EIR, reflecting the elimination of the significant and unavoidable cumulative construction traffic impact that was determined to occur to the extent that haul trips associated with construction of the Kellstrom Project coincide with soil export trips generated by the Project, since that related project has since been eliminated, as indicated in Comment No. 8-2 by the City of Santa Clarita.) In particular, the analysis of biological impacts includes an evaluation of potential impacts to habitat, nesting birds, and wildlife movement, as well as indirect impacts to wildlife due to noise and lighting (both during construction and operations), all of which were determined to be less than significant with mitigation.

¹ As explained on page V.J-13 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, Code parking requirements represent the minimum supply that a project needs to provide and are based on average day conditions. The demand rates represent design day conditions, which account for fluctuations in studio activities and typically represent the 10th to 20th busiest hour of the year. Such conditions are considered worst-case in terms of parking needs.

Comment No. 9-3

No place in Placerita Canyon should be changed from agricultural to commercial manufacturing-development program zoning. Allowing such a zoning change would open the door for further industrial development in what is now essentially open space.

Response No. 9-3

The Project would involve a zone change from A-2-1 (Heavy Agricultural—One Acre Minimum Required Area) to C-M-DP (Commercial Manufacturing—Development Program) within the proposed 44.28-acre tract map area. The remaining portion of the 58-acre Development Area, most of which is owned by the City of Los Angeles Department of Water and Power (LADWP), would remain zoned A-2-1. Existing zoning within the remainder of the 890-acre Ranch would also remain unchanged.

The Project includes all new development and the continuation of existing uses on the Ranch, as well as all associated off-site improvements, currently contemplated by the Applicant. The Project would retain the existing outdoor filming uses on 195 acres within the Ranch and protect 637 acres of surrounding hillsides used as a filming backdrop. No additional future use or development of the Ranch beyond the currently proposed new development, ongoing existing outdoor filming operations, the continued construction of temporary filming sets, and existing intermittent agricultural and oil drilling operations is envisioned at this time. Moreover, although not foreseen at this time, any future proposal for development would be required to obtain the appropriate permits or entitlements and undergo environmental review, as necessary. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 9-4

The California Native Plant Society (CNPS) is a non-profit organization of over 9,000 laypersons and professional botanists with 33 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them and their natural habitats through education, science, advocacy, horticulture and stewardship. We urge the County of Los Angeles Dept. of Regional Planning to consider the negative impacts of this project and not approve this zoning change.

Response No. 9-4

This comment describes the CNPS's mission and urges the County not to approve the requested zone change. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



Fernandeano Tataviam Band of Mission Indians
Tribal Historic & Cultural Preservation

*Tribal Historic & Cultural
Preservation Committee*
William Gonzalez
Chairman
Steve Ortega
Berta Pleitez

May 30, 2012

Christina Tran
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Re: DEIR, Disney | ABC Studios at The Ranch Project, CPN TR071216-(5)

Dear Ms. Tran,

We appreciate the opportunity to be able to provide comments on the proposed **Disney | ABC Studios at The Ranch Project** (Proposed Project) Draft Environmental Impact Report (DEIR). The Fernandeano Tataviam Band of Mission Indians (the Tribe) is a Native American tribal government located throughout northern Los Angeles County. The Native American Heritage Commission, the State of California trustee agency for Native American cultural resources, designated the Tribe as the local trustee agency within northern Los Angeles County by limits of its tribal historic boundaries. The Tribe fully engages, to the extent of the respected governing laws, to protect and maintain all historic, sacred and cultural sites in which the Tribe may have interest.

10-1

After careful review of the DEIR and further research of the Proposed Project, the Tribe has concluded that there is a **high concern that cultural resources might be impacted**. The known Tataviam village of Chaguayangna, (aka Tsawayung) located about 12 miles from the Proposed Project site uncovered a large stone bowl (Metate) off 126 HWY and Castaic Road during grading in 2007. Additionally during a Newhall Land & Farming development near the northeast corner of Bouquet Junction, 4 miles northwest of the Proposed Project site unearthed seven thousand pieces of Tataviam artifacts from the village of Juyungna in 2006.

10-2

In Chester King's report prepared for the Angeles Forest, *Ethnographic Overview of the Angeles National Forest, Tataviam and San Gabriel Mountain Serrano Ethnohistory*, suggests that the village of Tobimongna is likely within the Proposed Project site. The Tribe is extremely interested in consultation and on-site tribal monitoring of the Proposed Project to avoid possible detrimental impact to the village of Tobimongna and cultural resources in areas known to been used for habitation, hunting, occupational sites, religious worship and burials.

10-3

The Proposed Project DEIR seeks a City of Santa Clarita Oak Tree permit. The proposed permit indicates that there are 86 oak trees facing encroachment in which 31 are heritage oak trees. Encroachment on oak trees especially heritage oak trees have a high possibility of impacting

10-4

cultural resources. Although there are no removals of any oak trees in City of Santa Clarita, the proposed permit indicates that trenching would occur from 5 to 45 feet from the trunk of all 86 oak trees. Any proposed work near heritage oaks trees greatly concerns the Tribe.

10-4
(Cont.)

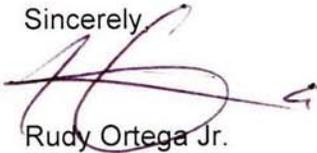
Within the Los Angeles County Oak Tree Permit the Proposed Project specifies there are 563 oak trees, with 250 oak trees in the development including 21 heritage oak trees. Of the 250 oak trees in the County permit of the Project development area 158 oak trees, including 16 heritage oak trees are planned for removal, the remaining 92 oak trees, including 5 heritage oak trees face encroachment. The proposed County permit indicates that trenching would occur from 5 to 45 feet from the trunk of all 92 oak trees, which Tribe is concern of a high possible risk of cultural resources. The removal of 158, including 16 heritage oak trees is highly problematic for The Tribe.

10-5

Oak trees where used by the historic Tataviam for a main source of food and shelter. Soil disturbance near the trunk of these oak trees and removal have a high probability of impact towards cultural deposits that may surround these oak trees. The Tribe requires cultural consultation on the Proposed Project to discuss mitigation of potential removal of oak trees of significant cultural and historic value to the Tribe. With the spread of sudden oak death in northern California oak trees, it is the utmost importance for the Tribe to protect the trees that are deeply connected to our people for our posterity.

Given the high potential for disturbance of cultural resources the Tribe requires tribal consultation to fully address all matters.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rudy Ortega Jr.', with a stylized flourish extending to the right.

Rudy Ortega Jr.
Tribal Administrator

Letter No. 10

Rudy Ortega, Jr.
Tribal Administrator
Tribal Historic & Cultural Preservation Committee
Fernandeño Tataviam Band of Mission Indians
601 South Brand Boulevard, Suite 102
San Fernando, CA 91340

Comment No. 10-1

We appreciate the opportunity to be able to provide comments on the proposed **Disney I ABC Studios at The Ranch Project** (Proposed Project) Draft Environmental Impact Report (DEIR). The Fernandeño Tataviam Band of Mission Indians (the Tribe) is a Native American tribal government located throughout northern Los Angeles County. The Native American Heritage Commission, the State of California trustee agency for Native American cultural resources, designated the Tribe as the local trustee agency within northern Los Angeles County by limits of its tribal historic boundaries. The Tribe fully engages, to the extent of the respected governing laws, to protect and maintain all historic, sacred and cultural sites in which the Tribe may have interest.

Response No. 10-1

This comment describes the role of the Fernandeño Tataviam Band of Mission Indians. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 10-2

After careful review of the DEIR and further research of the Proposed Project, the Tribe has concluded that there is a **high concern that cultural resources might be impacted**. The known Tataviam village of Chaguayangna, (aka Tsawayung) located about 12 miles from the Proposed Project site uncovered a large stone bowl (Metate) off 126 HWY and Castaic Road during grading in 2007. Additionally during a Newhall Land & Farming development near the northeast corner of Bouquet Junction, 4 miles northwest of the Proposed Project site unearthed seven thousand pieces of Tataviam artifacts from the village of Juyungna in 2006.

Response No. 10-2

Potential impacts to cultural resources are evaluated in Section V.G, Cultural and Paleontological Resources, of the Draft EIR. As discussed therein, a cultural resources

records search was conducted through the California Historical Resources Information System—South Central Coastal Information Center (CHRIS-SCCIC) and revealed 24 studies that have been conducted within a one-mile radius of the Development Area. Of the resources found in some of those studies, none would be impacted by Project activities within the Ranch as the resources are located outside of the Ranch. While the boundary of one of the former studies encompassed a limited area (less than 5 percent) of the northern portion of the Development Area, adjacent to SR-14, that study included an archaeological pedestrian survey that yielded negative results. In addition, a records search was conducted in 2004 as part of the approval of a Conditional Use Permit for outdoor filming on the Ranch, which revealed that no known cultural resources were recorded within the Development Area. Similarly, with respect to the Off-Site Infrastructure Improvement Areas, the results of a cultural resources records search through the CHRIS-SCCIC indicated that 79 studies have been conducted within a 1-mile radius of the Off-Site Infrastructure Improvement Areas; none of the associated resources would be significantly affected by the Project. In addition, the results of a Sacred Lands File Search (SLF) through the Native American Heritage Commission (NAHC) did not indicate any known Native American cultural resources within the Project site. Finally, pedestrian surveys were completed for the Project site, including the Development Area, Water Tank Area, Conditional Parking Areas, Potential Mobile Home Relocation Areas, and the Off-Site Infrastructure Improvement Areas. As discussed in detail in Appendix G.2 and Appendix G.3 of the Draft EIR, no prehistoric resources were identified during the surveys. However, the floodplain area along Placerita Creek, including within portions of the Development Area and Conditional Parking Areas, has some potential for buried site deposits due to the presence of native soils.

Accordingly, mitigation is proposed to ensure the protection and recovery of any archaeological resources, including Native American remains, potentially present on-site (see MM G-1 through MM G-5 on pages V.G-40 and V.G-41 of the Draft EIR and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR). These measures would provide for: monitoring by a qualified archaeologist of earthmoving activities within native soils in certain areas of the Project site; the cessation of earthmoving activities in the event an archaeological site or human remains are discovered and proper recovery and treatment of the find (including reinternment of remains); subsequent archaeological and Native American monitoring for any ground-disturbing activities within the boundary of the archaeological site defined for any find; and Native American monitoring for any ground-disturbing activities in the area of any Native American remains if found. As concluded on page V.G-42 of the Draft EIR, with implementation of the Mitigation Measures, potential impacts on cultural resources would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 10-3

In Chester King's report prepared for the Angeles Forest, *Ethnographic Overview of the Angeles National Forest, Tataviam and San Gabriel Mountain Serrano Ethnohistory*, suggests that the village of Tobimongna is likely within the Proposed Project site. The Tribe is extremely interested in consultation and on-site tribal monitoring of the Proposed Project to avoid possible detrimental impact to the village of Tobimongna and cultural resources in areas known to been used for habitation, hunting, occupational sites, religious worship and burials.

Response No. 10-3

As discussed on page V.G-32 of Section V.G, Cultural and Paleontological Resources, of the Draft EIR, pursuant to California Government Code Section 65352.3 (Senate Bill 18), the County has invited representatives of local Native American tribes identified by the NAHC as having traditional lands or cultural resources located within the Project vicinity, including the Fernandeano Tataviam Band of Mission Indians, to engage in formal government-to-government consultation with the County on the Project. On March 8, 2010, the Fernandeano Tataviam Band of Mission Indians accepted the County's invitation to formally consult and requested a site visit. The Project Applicant attempted to schedule a visit, but it had not occurred as of the release of the Draft EIR. However, following the release of the Draft EIR, the Project Applicant met with representatives of the Fernandeano Tataviam Band of Mission Indians (Tribe), Rudy Ortega and Pamela Villaseñor, at the Ranch on June 19, 2012. Also present was Scott Kremkau of Statistical Research, Inc., who prepared the Supplement to the Phase I Archaeological and Paleontological Resources Assessment included as Appendix G.3 to the Draft EIR. As a result of that meeting, the Applicant has agreed to continue to work with the Tribe to retain a State-recognized and Tribe-approved monitor during grading activities if cultural resources are found and to reinter any remains found on the Project site to another location to the satisfaction of both parties. These tasks are accounted for in Mitigation Measures MM G-1 through MM G-5 on pages V.G-40 and V.G-41 in Section V.G, Cultural and Paleontological Resources, of the Draft EIR and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. Specifically, MM G-4 (as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR) provides that archaeological and Native American monitoring shall be provided for any ground-disturbing activities within the boundary of the archaeological site defined for any find in the event cultural resources are encountered during Project construction. MM G-5 provides specific measures to be followed in consultation with the Most Likely Descendant designated by the NAHC in the event Project construction were to encounter Native American remains. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 10-4

The Proposed Project DEIR seeks a City of Santa Clarita Oak Tree permit. The proposed permit indicates that there are 86 oak trees facing encroachment in which 31 are heritage oak trees. Encroachment on oak trees especially heritage oak trees have [sic] a high possibility of impacting cultural resources. Although there are no removals of any oak trees in City of Santa Clarita, the proposed permit indicates that trenching would occur from 5 to 45 feet from the trunk of all 86 oak trees. Any proposed work near heritage oaks trees greatly concerns the Tribe.

Response No. 10-4

As indicated on page V.F-14 in Section V.F, Biological Resources, of the Draft EIR, the majority of the proposed off-site utility improvements would be located within existing road rights-of-way where conditions are either developed or disturbed by paved streets and/or existing residential development. A limited portion of the proposed sewer alignment runs through private property in a developed/disturbed area. More specifically, Table V.F-3 on page V.F-64 in the Draft EIR indicates that 16.13 acres of the total 17.39 acres to be disturbed during construction of the off-site utility improvements consist of disturbed/developed land (primarily road rights-of-way). This acreage includes the areas to be affected during installation of the proposed sewer line, which would pass near the 86 oak trees referenced in the comment above, as well as the areas where the proposed water line may be installed (two potential alignments) and roadway improvements are proposed, where oak trees are not present. Any cultural resources that may have been present at one time have likely been previously disturbed in conjunction with past utility installations and roadway paving activities. Nonetheless, mitigation is proposed (see MM G-4, as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR and MM G-5 on pages V.G-40 and V.G-41 in Section V.G, Cultural and Paleontological Resources, of the Draft EIR) to ensure proper procedures are followed, including notification and monitoring of ground-disturbing activities, in the event archaeological resources or human remains are encountered. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 10-5

Within the Los Angeles County Oak Tree Permit the Proposed Project specifies there are 563 oak trees, with 250 oak trees in the development including 21 heritage oak trees. Of the 250 oak trees in the County permit of the Project development area 158 oak trees, including 16 heritage oak trees are planned for removal, the remaining 92 oak trees, including 5 heritage oak trees face encroachment. The proposed County permit indicates that trenching would occur from 5 to 45 feet from the trunk of all 92 oak trees, which Tribe

[sic] is concern of a high possible risk of cultural resources. The removal of 158, including 16 heritage oak trees is highly problematic for The Tribe.

Oak trees where [sic] used by the historic Tataviam for a main source of food and shelter. Soil disturbance near the trunk of these oak trees and removal have a high probability of impact towards cultural deposits that may surround these oak trees. The Tribe requires cultural consultation on the Proposed Project to discuss mitigation of potential removal of oak trees of significant cultural and historic value to the Tribe. With the spread of sudden oak death in northern California oak trees, it is the utmost importance for the Tribe to protect the trees that are deeply connected to our people for our posterity.

Given the high potential for disturbance of cultural resources the Tribe requires tribal consultation to fully address all matters.

Response No. 10-5

Refer to Response Nos. 10-2 and 10-3 above regarding the records searches of previous cultural resources studies conducted in the Project vicinity, the pedestrian surveys conducted within the Project site, the site visit that occurred on June 19, 2012, ongoing consultation with the Tribe, and the measures in place to mitigate potential impacts on cultural resources.

As a matter of clarification, the Project would require the removal of 158 County Ordinance–protected oak trees, including 16 heritage oak trees, and encroachment upon an additional 82 oak trees, including 3 heritage oak trees, within the Ranch, while avoiding impacts to approximately 95 percent of the oak trees and oak woodlands on the Ranch. Trenching would not necessarily occur near the trees to be encroached upon. Rather, encroachment can occur as a result of a variety of activities, including pruning, grading, excavating, trenching, the parking of vehicles, placement of incompatible materials, storage of materials or equipment, etc. As stated on page 9 of the Oak Tree Report: Disney | ABC Studios at The Ranch (County Oak Tree Report), provided as Appendix F.4 of the Draft EIR, in assessing the Project's oak tree impacts, a conservative approach was taken to ensure all oak trees within the vicinity of the proposed limit of grading would be protected to the maximum extent possible. This conservative assessment used a 25-foot buffer zone outside of the limit of grading to identify those trees requiring removal or encroachment. Jurisdictional oak trees with any portion of their protected zone located within the 25-foot buffer zone were categorized for encroachment due to the presence of the either their trunk or canopy within the 25-foot buffer zone. However, if suitable actions could be taken during the construction phase of the Project to protect and avoid encroaching upon any of these trees within the 25-foot buffer zone, they would be protected and retained by measures described in Section 6.3 of the County Oak Tree Report. In addition, Mitigation Measure

MM F-4 (provided on page V.F-93 in Section V.F, Biological Resources, of the Draft EIR) would be implemented to protect the retained trees that would be encroached upon by Project construction activities. Protective measures may include avoiding the operation of heavy equipment around any retained tree, avoiding the placement or storage of construction materials within any oak tree's protected zone, and avoiding grade changes, including adding fill material, within the protected zone. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



June 8, 2012

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA. 90012

Subj: Disney/ABC Studios – County Project #TRO71216-(5)

Dear Ms. Tran:

As the owner of the only local radio station in Santa Clarita and a resident and community leader since 1990, I'd want to offer my endorsement of the new movie studio proposed by Disney and ABC. This is a giant win for our valley. My reasons for supporting the project are as follows:

11-1

- CEQA requires an extensive environmental analysis of the project and the Draft EIR prepared by Los Angeles County was far ranging in scope and detailed in its findings and mitigation measures.
- Disney has a more than 50-year history of ownership of Golden Oak Ranch, and during that time has proved to be a participating member of the community and a careful and responsible steward of the land.
- The Draft EIR includes enhancements that will be made to existing ranch resources, such as restoration of the creek running through the property, extensive tree planting and the creation of woodland habitat along creek slopes.

The leadership of Santa Clarita supports the Disney project. KHTS Radio supports the project. Our neighbors who live in Sand Canyon and Fair Oaks support the project, as do all the business leaders I speak with about it. We are all excited to have ranch become a part of our community. I believe it deserves the County's support and approval.

Thanks. If you have any further questions, please don't hesitate to call me.

Respectfully,

A handwritten signature in black ink, appearing to read 'Carl Goldman', with a stylized, cursive script.

Carl Goldman

27244 Golden Willow Way

Santa Clarita, CA. 91387

Co-owner, KHTS AM-1220 Radio

Cc: Honorable Mike Antonovich

Mr. Adam Gilbert

\

27225 Camp Plenty Road Unit #8 – Santa Clarita, CA 91351 - (661) 298-1220

Letter No. 11

Carl Goldman
Co-Owner
KHTS AM-1220 Radio
27225 Camp Plenty Road, Suite 8
Santa Clarita, CA 91351

Comment No. 11-1

As the owner of the only local radio station in Santa Clarita and a resident and community leader since 1990, I'd want to offer my endorsement of the new movie studio proposed by Disney and ABC. This is a giant win for our valley. My reasons for supporting the project are as follows:

- CEQA requires an extensive environmental analysis of the project and the Draft EIR prepared by Los Angeles County was far ranging in scope and detailed in its findings and mitigation measures.
- Disney has a more than 50-year history of ownership of Golden Oak Ranch, and during that time has proved to be a participating member of the community and a careful and responsible steward of the land.
- The Draft EIR includes enhancements that will be made to existing ranch resources, such as restoration of the creek running through the property, extensive tree planting and the creation of woodland habitat along creek slopes.

The leadership of Santa Clarita supports the Disney project. KHTS Radio supports the project. Our neighbors who live in Sand Canyon and Fair Oaks support the project, as do all the business leaders I speak with about it. We are all excited to have ranch become a part of our community. I believe it deserves the County's support and approval.

Thanks. If you have any further questions, please don't hesitate to call me.

Response No. 11-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



LOS ANGELES COUNTY ECONOMIC DEVELOPMENT CORPORATION



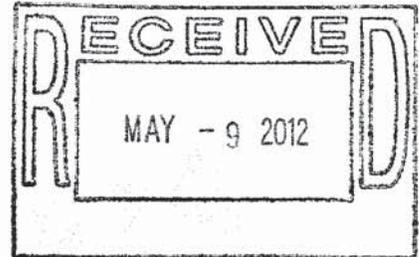
Celebrating Economic Development Leadership

Letter No. 12

May 8, 2012

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, CA 90012

Re: Disney/ABC Studios at The Ranch – SUPPORT



Dear Ms. Tran:

On behalf of the Los Angeles County Economic Development Corporation (LAEDC), an organization dedicated to promoting job growth, economic expansion and preserving the overall regional and global competitiveness of Los Angeles County, I am writing this letter to express our strong support for the Disney/ABC Studios at The Ranch project (the "Project"). The Project will not only bring new soundstages and production facilities to the Golden Oak Ranch near the City of Santa Clarita, where Walt Disney Productions began filming more than 50 years ago, but will also produce hundreds of millions of dollars in economic activity, generate millions of dollars in annual revenues for local, county and state governments, and, most important, create thousands of new one-time construction and permanent jobs in Los Angeles County.

12-1

The very considerable job and revenue impacts of the Disney/ABC Studio at The Ranch project are undeniable. During construction alone, the Project will create an estimated 3,150 jobs and generate about \$520 million in economic activity throughout the region. These jobs come at a critical time for our region's struggling "Local Real Estate, Construction and Development" industry, which is L.A. County's fourth largest locally-serving industry cluster, employing 198,600 employees in 2010, but which lost more than 75,000 jobs from its peak in 2006 due to the housing

12-2



bubble and resulting construction downturn during the economic recession.¹ Additionally, at its full build-out the Project will support more than 2,850 permanent full- and part-time jobs, generate about \$530 million in annual economic activity, and produce an estimated \$1.3 million in annual revenues for Los Angeles County and an additional \$26 million for the State of California.

12-2 (Cont.)

Even as striking as these numbers are, they only tell half the story of why this Project is so strategically important to the overall health of our county's economy. Entertainment is Los Angeles County's largest export-oriented industry cluster, employing close to 160,000 people in 2010.² Yet, our world-leading film and television production sector faces an existential threat from other states (and nations) actively pursuing, enticing, and poaching these productions out of our own backyard – and with them, many millions of dollars in lost economic activity, wages, local spending and tax revenue as well, resulting in further deterioration in the economic vitality of our region. The economic effects of competing states (e.g., New York, New Mexico and Louisiana) offering generous incentives, reduced costs, and other attractive enticements to vie for and steal our state and local film and television productions are startling. Indeed, a July 2010 Milken Institute study reported that the State of California has lost more than 36,000 jobs and \$2.4 billion in wages since 1997 due to lost film and television production.³

12-3

Unless we take decisive steps and get serious about protecting this vital industry cluster, then we will continue to hemorrhage jobs and revenue in this highly impermanent entertainment industry. Right now, there is great demand and need for additional production and soundstage spaces, which during peak production periods can have vacancies near one percent. Consequently, we must encourage long-term investments in studio infrastructure by building and/or upgrading production facilities to support and strengthen Los Angeles County's overall entertainment industry. Only by approving and accelerating the development and delivery of critical entertainment infrastructure projects such as Disney/ABC Studios at The Ranch – along with taking other critical steps like extending and expanding state film tax credits and ensuring that every city in California is film-friendly – can we effectively combat, slow, and hopefully reverse the flight of film and television productions out of Los Angeles County and California.

12-4

We hope that you will adequately consider all of the above when assessing the bona fides of the Disney/ABC Studios at The Ranch project as well as other similarly critical infrastructure projects that will position our county for economic recovery, growth, and long-term success. We look

12-5

¹ *Industry Clusters in Los Angeles County*, Los Angeles County Economic Development Corporation: Economic and Policy Analysis Group, dated: February 2012.

² *Id.*

³ *Film Flight: Lost Production and its Economic Impact on California*, Milken Institute: Kevin Klowden, Anusuya Chatterjee, and Candice Flor Hynek, dated: July 2010.



LOS ANGELES COUNTY ECONOMIC DEVELOPMENT CORPORATION



Celebrating Economic Development Leadership

forward to working with you to ensure that this project is approved, built, and operating as quickly as possible to create much-needed construction and entertainment-related jobs, grow our local, county and regional economies, and strengthen our region's leading employment sectors and thus the overall quality of life for all our residents.

12-5
(Cont.)

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Allen". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Bill Allen
President & CEO
LAEDC

Cc: Supervisor Michael D. Antonovich, County of Los Angeles
Richard J. Bruckner, Planning Director, County of Los Angeles

Letter No. 12

Bill Allen
President & CEO
Los Angeles County Economic Development Corporation
444 South Flower Street, 37th Floor
Los Angeles, CA 90071

Comment No. 12-1

On behalf of the Los Angeles County Economic Development Corporation (LAEDC), an organization dedicated to promoting job growth, economic expansion and preserving the overall regional and global competitiveness of Los Angeles County, I am writing this letter to express our strong support for the Disney/ABC Studios at The Ranch project (the “Project”). The Project will not only bring new soundstages and production facilities to the Golden Oak Ranch near the City of Santa Clarita, where Walt Disney Productions began filming more than 50 years ago, but will also produce hundreds of millions of dollars in economic activity, generate millions of dollars in annual revenues for local, county and state governments, and, most important, create thousands of new one-time construction and permanent jobs in Los Angeles County.

Response No. 12-1

This comment expresses general support for the Project and cites some of the Project’s benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 12-2

The very considerable job and revenue impacts of the Disney/ABC Studio at The Ranch project are undeniable. During construction alone, the Project will create an estimated 3,150 jobs and generate about \$520 million in economic activity throughout the region. These jobs come at a critical time for our region’s struggling “Local Real Estate, Construction and Development” industry, which is L.A. County’s fourth largest locally-serving industry cluster, employing 198,600 employees in 2010, but which lost more than 75,000 jobs from its peak in 2006 due to the housing bubble and resulting construction downturn during the economic recession.¹ Additionally, at its full build-out the Project will support more than 2,850 permanent full-and part-time jobs, generate about \$530 million in annual economic activity, and produce an estimated \$1.3 million in annual revenues for Los Angeles County and an additional \$26 million for the State of California.

¹ *Industry Clusters in Los Angeles County, Los Angeles County Economic Development Corporation: Economic and Policy Analysis Group, dated: February 2012.*

Response No. 12-2

This comment cites some of the Project's benefits. Much of the data presented in the comment is based on the economic and fiscal impact analysis, provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 12-3

Even as striking as these numbers are, they only tell half the story of why this Project is so strategically important to the overall health of our county's economy. Entertainment is Los Angeles County's largest export-oriented industry cluster, employing close to 160,000 people in 2010.² Yet, our world-leading film and television production sector faces an existential threat from other states (and nations) actively pursuing, enticing, and poaching these productions out of our own backyard – and with them, many millions of dollars in lost economic activity, wages, local spending and tax revenue as well, resulting in further deterioration in the economic vitality of our region. The economic effects of competing states (e.g., New York, New Mexico and Louisiana) offering generous incentives, reduced costs, and other attractive enticements to vie for and steal our state and local film and television productions are startling. Indeed, a July 2010 Milken Institute study reported that the State of California has lost more than 36,000 jobs and \$2.4 billion in wages since 1997 due to lost film and television production.³

² *Id.*

³ *Film Flight: Lost Production and its Economic Impact on California, Milken Institute: Kevin Klowden, Anusuya Chatterjee, and Candice Flor Hynek, dated: July 2010.*

Response No. 12-3

This comment cites the economic benefits of the filming industry and emphasizes its importance to the vitality of the local and state economy. Much of the data presented in the comment is based on the commentor's independent analysis and is not excerpted from the Draft EIR. Additional economic data regarding the Project is provided in the economic and fiscal impact analysis included as Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 12-4

Unless we take decisive steps and get serious about protecting this vital industry cluster, then we will continue to hemorrhage jobs and revenue in this highly impermanent entertainment industry. Right now, there is great demand and need for additional production and soundstage spaces, which during peak production periods can have vacancies near one percent. Consequently, we must encourage long-term investments in studio infrastructure by building and/or upgrading production facilities to support and strengthen Los Angeles County's overall entertainment industry. Only by approving and accelerating the development and delivery of critical entertainment infrastructure projects such as Disney/ABC Studios at The Ranch – along with taking other critical steps like extending and expanding state film tax credits and ensuring that every city in California is film-friendly – can we effectively combat, slow, and hopefully reverse the flight of film and television productions out of Los Angeles County and California.

Response No. 12-4

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 12-5

We hope that you will adequately consider all of the above when assessing the bona fides of the Disney/ABC Studios at The Ranch project as well as other similarly critical infrastructure projects that will position our county for economic recovery, growth, and long-term success. We look forward to working with you to ensure that this project is approved, built, and operating as quickly as possible to create much-needed construction and entertainment-related jobs, grow our local, county and regional economies, and strengthen our region's leading employment sectors and thus the overall quality of life for all our residents.

Response No. 12-5

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



June 15, 2012

Ms Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Disney/ABC Studios at the Ranch
County Project # TR071216-(5)

Dear Ms Tran

On behalf of the Old Town Newhall Association let this serve as a formal Letter of Support to the Disney/ABC Studios at the Ranch project referenced above. Having had the opportunity to review the draft EIR and get the benefit of a prior presentation of the project, we see this as a beneficial project for ongoing revitalization of Old Town Newhall as well as a major job creator for Santa Clarita in general.

13-1

The film industry has a long history in Newhall, which together with the William S. Hart Part have helped form the character of our community and established the Western Walk of Fame on our Main Street. With the loss of redevelopment in the State of California, the projects proximity to the former redevelopment district will go a long way to stimulate interest and maintain the momentum that we have gained over the past ten years. With a cash-strapped state, it is up to the private sector to be the engine of growth going forward and without projects like this we will be in a "meddle through" situation for some time. Employment opportunities are what we need and a project like this has a transforming effect on a community and will stimulate additional development and business growth on the south and east ends of our City.

The Walt Disney Company has demonstrated a degree of integrity with their stewardship of their property and they have crafted a project that will transform the most highly visible part of the ranch immediately of Highway 14 from an eyesore to an aesthetically pleasing attraction. The restoration of the Riparian Habitat and expansion of the trail system in proximity to the project as well as aggressive Oak Woodland replenishment plans will help restore previously damaged by fire and pests. Few developers demonstrate their commitment to both community and environment and we encourage you to take these aspects into consideration.

13-2

Please feel free to give me a call with any questions.

Respectfully

Tim Crissman
Chairman

DEDICATED
TO THE
PRESERVATION
OF OLD TOWN
NEWHALL

Letter No. 13

Tim Crissman
Chairman
Old Town Newhall Association
P.O. Box 221614
Newhall, CA 91322-1614

Comment No. 13-1

On behalf of the Old Town Newhall Association let this serve as a formal Letter of Support to the Disney/ABC Studios at the Ranch project referenced above. Having had the opportunity to review the draft EIR and get the benefit of a prior presentation of the project, we see this as a beneficial project for ongoing revitalization of Old Town Newhall as well as a major job creator for Santa Clarita in general.

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Response No. 13-1

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Comment No. 13-2

The Walt Disney Company has demonstrated a degree of integrity with their stewardship of their property and they have crafted a project that will transform the most highly visible part of the ranch immediately of Highway 14 from an eyesore to an aesthetically pleasing attraction. The restoration of the Riparian Habitat and expansion of the trail system in proximity to the project as well as aggressive Oak Woodland replenishment plans will help restore previously damaged by fire and pests. Few developers demonstrate their

commitment to both community and environment and we encourage you to take these aspects into consideration.

Please feel free to give me a call with any questions.

Response No. 13-2

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Ron Kraus [mailto:ronk9@earthlink.net]

Sent: Tuesday, May 29, 2012 9:34 AM

To: Tran, Christina

Subject: Request for Time Extension to Review DISNEY | ABC STUDIOS AT THE RANCH PROJECT DEIR

Christina Chan...

I am the chair of a committee of volunteers from the Placerita Canyon Nature Center Associates which is reviewing the above. We have several concerns, the main one being is that we don't have enough time to read the lengthy document and prepare our comments within the time allotted. We are all volunteers and this is a busy time with graduations, vacations, and a lot of other activities. Therefore we would like you to consider extending the deadline for comments for at least 30-days. 14-1

Thanks for your consideration of this request.

Ron Kraus

Vice President

Placerita Canyon Nature Center Associates

ron.kraus@placerita.org

661-644-2369

Website: placerita.org

Letter No. 14

Ron Kraus
Vice President
Placerita Canyon Nature Center Associates
ron.kraus@placerita.org

Comment No. 14-1

I am the chair of a committee of volunteers from the Placerita Canyon Nature Center Associates which is reviewing the above. We have several concerns, the main one being is that we don't have enough time to read the lengthy document and prepare our comments within the time allotted. We are all volunteers and this is a busy time with graduations, vacations, and a lot of other activities. Therefore we would like you to consider extending the deadline for comments for at least 30-days.

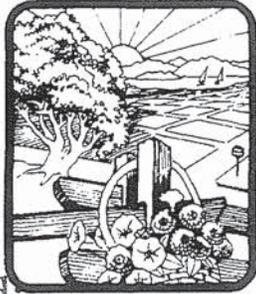
Thanks for your consideration of this request.

Response No. 14-1

In accordance with CEQA Guidelines Section 15105(a), the Draft EIR for the Project was circulated for a formal 45-day public comment period beginning on May 4, 2012, and ending on June 18, 2012. The County Department of Regional Planning indicated to all persons or entities requesting a time extension that late comments would be accepted and responded to in this Final EIR if received within 30 days following the close of the comment period (i.e., by July 18, 2012). This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

SCOPE

Santa Clarita Organization for Planning and the Environment
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



Document Received.

JUN 13 2012

This document was received by the
Department of Regional Planning

6-12-12

Christina Tran
Los Angeles County Regional Planning Dept.
320 W. Temple St.
Los Angeles, CA 90012

**Re: Request for Extension of Time to comment on the DEIR – Disney Studio Sound stage
Project in Placerita Canyon
County Project TR071216 – (5), Plan Amendment 200100010, Zone Change 20090012, VTT
071216, CUP 200900126, Oak Tree Permit, Parking Permit, etc.**

Dear Ms. Tran:

SCOPE formally requests a 30 day extension of the time to review the DEIR of this project,
because of the size of the document and the number and magnitude of the approvals requested.

15-1

Both the City of Santa Clarita and the County of Los Angeles have just completed their updated
General and Area Plans for the Santa Clarita Valley. An immediate Plan Amendment by the
County that would require increased parking permits, indicating increased commuting and traffic,
must be carefully considered. The One Valley One Vision Plan was supposed to encourage
increased density in the City Center and discourage auto-oriented sprawl development in the
surrounding green areas. If the OVOV Plan is to have standing, you ought not immediately
sweep it aside by allowing this first large project proposal before you, an intensive industrial use
in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

15-2

We object to the substitution of a hearing officer for a full hearing before the Commission on this
proposal, and request that the Commission hold a hearing. Many individuals did not attend the
June 4th hearing on the DEIR at Hart Hall because (contrary to other county projects) 1) it was
held before the community had sufficient time to begin a review of this huge project and 2), they
thought there would be a hearing before the Commissioners.

15-3

While we appreciated the County’s effort to hold a hearing on a project that will substantially
change the character of the east side canyons in Santa Clarita, we and the public need to speak
directly to the decision maker, i.e. the Commissioners. Ex parte rules rightly discourage
interaction with Commission members, so speaking to them during the hearing process is the
only time that the public has the opportunity to air their concerns and have them addressed by the
commissioners. We therefore request a public hearing before the Commission on the DEIR so

that we and other members of the public and the Commission itself have the opportunity to give input on the draft document before the final document is completed.

15-3
(Cont.)

Public Records Request

15-4

We request to review any documents that indicate if the developer (Disney/ABC Studios or any subsidiary or related company) has provided the County with funding for the Regional Planning Department for this planning process under the “Special Projects” or other similar Regional Planning programs. This is a Public Records Act Request made under the Government Statues that pertain to these matters and requires a written response within ten days.

We believe that the County has in its possession documents responsive to this request which may include but not be limited to:

- **Contracts or other agreements, letters, correspondence MOUs, or any other form of communication or agreement, with the project developer to provide funding for Regional Planning staff to work on this project**
- **All payment or other information held in a trust account or otherwise held, out of which payments are made for the planning process for this project**
- **Receipts for payments made to the account**
- **Contracts or agreements with the EIR preparer**

Jobs Analysis

15-5

Several entities, including Disney, have made claims that this project will create a substantial number of jobs. A preliminary review of the DEIR reveals no substantiation or even discussion of these claims. We ask that the County request from the developer substantiation and economic analysis of these job claims; and ascertain that these jobs are not merely transfers from Disney’s facility in Burbank, thus needlessly creating additional traffic, air pollution and GHG in the Santa Clarita Valley. This is not discussed in the DEIR.

Oak Tree Removals and Mitigation

15-6

While the project proponent has stated publicly that the 158 oaks slated to be destroyed will be replaced on a greater than County required basis, we note that oaks cannot be established in all soil types and don’t generally grow on slopes facing in certain directions. We ask that some evaluation be provided in the DEIR that guarantees sufficient and biologically adequate soil and location for any proposed mitigation plantings.

Further Spread of the Whittiker Bermite Pollution Plume

15-7

In April of 2012, yet another Valencia Water Well (well 205) was closed down due to the presence of Volatile Organic Compounds (VOCs), seeming to indicate the further westerly spread of the Whittiker Bermite pollution plume. This information was not publicly disclosed and we have only just discovered it through a public records request to the Dept. of Health Services.

While the project before you will not be supplied by Valencia Water Co., the spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire

Santa Clarita Valley will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

15-7
(Cont.)

We hope to provide you with additional comments by July 18th.

Sincerely,

A handwritten signature in cursive script that reads "David Lutness". The signature is written in black ink and is positioned above the typed name.

David Lutness
Secretary of the Board

Letter No. 15

David Lutness
Secretary of the Board
Santa Clarita Organization for Planning and the Environment
P.O. Box 1182
Santa Clarita, CA 91386-1182

Comment No. 15-1

SCOPE formally requests a 30 day extension of the time to review the DEIR of this project, because of the size of the document and the number and magnitude of the approvals requested.

Response No. 15-1

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 15-2

Both the City of Santa Clarita and the County of Los Angeles have just completed their updated General and Area Plans for the Santa Clarita Valley. An [sic] immediate Plan Amendment by the County that would require increased parking permits, indicating increased commuting and traffic, must be carefully considered. The One Valley One Vision Plan was supposed to encourage increased density in the City Center and discourage auto-oriented sprawl development in the surrounding green areas. If the OVOV Plan is to have standing, you ought not immediately sweep it aside by allowing this first large project proposal before you, an intensive industrial use in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

Response No. 15-2

The land use and zoning designations for the Project site that are discussed and evaluated in the Draft EIR reflect those in effect at the time the Notice of Preparation (NOP) for the Project was published (January 7, 2010), in accordance with CEQA Guidelines Section 15125(a). Accordingly, based on the current zoning for the site and the 1990 Santa Clarita Valley Area Plan, the Project involves discretionary approvals that include: (1) a local plan amendment to change the land use designation set forth in the 1990 Santa Clarita Valley Area Plan for the proposed tract map area from HM (Hillside Management) to C (Commercial) for approximately 20 acres and from W (Floodway/Flood Plain) to C (Commercial) for approximately 24.28 acres; and (2) a zone change to change

the zone from A-2-1 (Heavy Agricultural—One Acre Minimum Required Area) to C-M-DP (Commercial Manufacturing—Development Program) within the tract map area. The remaining portion of the 58-acre Development Area, most of which is owned by the City of Los Angeles Department of Water and Power (LADWP), would remain designated as HM (Hillside Management) and W (Floodway/Flood Plain) and zoned A-2-1. Existing zoning within the remainder of the 890-acre Ranch would also remain unchanged.

However, Section V.N, Land Use, of the Draft EIR includes discussion of the Draft 2012 Santa Clarita Valley Area Plan, commonly referred to as One Valley One Vision (OVOV), which was subsequently adopted by the County and became effective on December 27, 2012. As discussed on page IV.N-18 in Section V.N, Land Use, of the Draft EIR, the area of the Ranch located west of the LADWP transmission corridor, which makes up the majority of the Development Area and specifically corresponds to the 44.28-acre proposed tract map area (where the proposed studio development would occur), is designated as Office and Professional (IO) in OVOV. As indicated on page IV.N-66 of the Draft EIR, the Project would be consistent with the IO land use designation. Although the Project would not require a local plan amendment based on this new land use designation, the Applicant seeks one in accordance with the 1990 Area Plan, as that was in effect at the time the County deemed complete the Project's application for a vesting tentative tract map and conditional use permit on May 4, 2010.

New development must provide adequate parking in accordance with County Code requirements. All Code-required parking would be provided on the Ranch. As a matter of clarification, the Project will require a parking permit to authorize: (1) some tandem parking on-site; (2) the use of shared off-lot parking (i.e., parking spaces that serve buildings located on different legal lots within the Project site and parking proposed under the LADWP transmission line corridor); and (3) an exemption from paving and striping requirements for surplus parking within the conditional parking lots to maintain the rural character of the Ranch if parking within the LADWP transmission corridor is later revoked by LADWP. Furthermore, as discussed on page V.J-63, summarized in Table V.J-16 on page V.J-64, and geographically depicted in Figure V.J-6 on page V.J-65 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, the Project's traffic impacts at the study intersections would be less than significant following mitigation. Notably, two of the intersections (Sierra Highway/SR-14 Southbound Ramps and Sierra Highway/Placerita Canyon Road) would operate at a lower volume-to-capacity (V/C) ratio (i.e., would experience improved conditions) following implementation of the Project's mitigation measures than under Existing plus Ambient Growth Conditions (i.e., without the Project).

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 15-3

We object to the substitution of a hearing officer for a full hearing before the Commission on this proposal, and request that the Commission hold a hearing. Many individuals did not attend the June 4th hearing on the DEIR at Hart Hall because (contrary to other county projects) 1) it was held before the community had sufficient time to begin a review of this huge project and 2), they thought there would be a hearing before the Commissioners.

While we appreciated the County's effort to hold a hearing on a project that will substantially change the character of the east side canyons in Santa Clarita, we and the public need to speak directly to the decision maker, i.e. the Commissioners. Ex parte rules rightly discourage interaction with Commission members, so speaking to them during the hearing process is the only time that the public has the opportunity to air their concerns and have them addressed by the commissioners. We therefore request a public hearing before the Commission on the DEIR so that we and other members of the public and the Commission itself have the opportunity to give input on the draft document before the final document is completed.

Response No. 15-3

A public hearing was held by the County of Los Angeles Hearing Examiner on June 4, 2012, at Hart Hall within William S. Hart Museum and Park, located at 24151 Newhall Avenue, Newhall, California 91321. Notice of the hearing was provided through a variety of means pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, including: (1) signs posted at multiple locations along Placerita Canyon Road near the Ranch; (2) electronic posting on the County Department of Regional Planning website; (3) newspaper notices published in The Signal and La Opinion on May 3, 2012; and (4) notifications sent via mail and email to: (a) all persons, organizations, and agencies who requested notification or who previously commented on the Project; (b) identified stakeholders in the surrounding area such as homeowners groups, business associations, and local environmental organizations; (c) property owners located within a 1,000-foot radius of the Ranch; and (d) two local libraries. The hearing was held on Day 31 of the formal 45-day public comment period that began on May 4, 2012, and ended on June 18, 2012. The holding of a public hearing by the County Hearing Examiner at a location in proximity to a proposed project site is a recently enacted procedure for development projects within the County that is intended to provide increased opportunities for public input, particularly for those members of the public who live or work in proximity to the project or are otherwise considered stakeholders in the project area. The Disney | ABC Studios at The Ranch Project is not the first project for which this procedure has been followed. In accordance with County procedures, following publication of this Final EIR but prior to the requested approval of the Project, additional public hearings will be held by the County Regional Planning Commission and the County Board of Supervisors at which the

public will have further opportunities to provide testimony. Thus, as requested in the comment above, the public will have an opportunity to voice any concerns or otherwise provide comments to the Planning Commission prior to any action being taken regarding the Project.

Comment No. 15-4

Public Records Request

We request to review any documents that indicate if the developer (Disney/ABC Studios or any subsidiary or related company) has provided the County with funding for the Regional Planning Department for this planning process under the “Special Projects” or other similar Regional Planning programs. This is a Public Records Act Request made under the Government Statutes that pertain to these matters and requires a written response within ten days.

We believe that the County has in its possession documents responsive to this request which may include but not be limited to:

- **Contracts or other agreements, letters, correspondence MOUs, or any other form of communication or agreement, with the project developer to provide funding for Regional Planning staff to work on this project**
- **All payment or other information held in a trust account or otherwise held, out of which payments are made for the planning process for this project**
- **Receipts for payments made to the account**
- **Contracts or agreements with the EIR preparer**

Response No. 15-4

Written notification that the requested documents were available was sent by the County Department of Regional Planning to the Santa Clarita Organization for Planning and the Environment (SCOPE) on July 5, 2012. The County also responded in writing on June 14, 2012 regarding an extension to make the documents available. The records were subsequently provided for review at a meeting with SCOPE on July 16, 2012. Refer to Comment Letter No. L7 in this Final EIR for additional comments submitted by the commentor on July 17, 2012, and associated responses to those comments regarding the documentation that was provided.

Comment No. 15-5**Jobs Analysis**

Several entities, including Disney, have made claims that this project will create a substantial number of jobs. A preliminary review of the DEIR reveals no substantiation or even discussion of these claims. We ask that the County request from the developer substantiation and economic analysis of these job claims; and ascertain [sic] that these jobs are not merely transfers from Disney's facility in Burbank, thus needlessly creating additional traffic, air pollution and GHG in the Santa Clarita Valley. This is not discussed in the DEIR.

Response No. 15-5

CEQA Guidelines Section 15128 requires an EIR to contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR. An Initial Study was prepared for the Project and is provided in Appendix A of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons each topical area is or is not analyzed further in the Draft EIR. The County determined through the Initial Study that the Project would not result in potentially significant impacts with respect to employment, as detailed on page VII-18 in Section VII, Other Environmental Considerations, of the Draft EIR.

As stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch on a daily basis. An Economic & Fiscal Impact Analysis is provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR).

Comment No. 15-6**Oak Tree Removals and Mitigation**

While the project proponent has stated publicly that the 158 oaks slated to be destroyed will be replaced on a greater than County required basis, we note that oaks cannot be established in all soil types and don't generally grow on slopes facing in certain directions. We ask that some evaluation be provided in the DEIR that guarantees sufficient and biologically adequate soil and location for any proposed mitigation plantings.

Response No. 15-6

The potential oak woodland expansion and restoration areas (i.e., the locations identified for oak tree mitigation planting) are identified in Figure V.F-19 on page V.F-79 in Section V.F, Biological Resources, of the Draft EIR, as well as in Figures 2 and 3 on pages 7 and 9, respectively, in the OTWMMP included in Appendix F.6 of the Draft EIR. As discussed in both of those documents, the potential restoration and expansion planting areas are located within suitable habitat in the southeast portion of the Ranch, generally within, surrounding, or adjacent to existing oak woodland and within areas previously containing oak woodlands prior to a wildfire which destroyed oaks in some of the potential restoration and expansion planting areas. As stated on pages 1 and 2 in the OTWMMP, the non-woodland areas selected for oak restoration are adjacent to existing oak woodlands, provide connectivity between oak woodland stands, have suitable topography, and have irrigation infrastructure currently in place or in the vicinity, which is critical for providing irrigation for the establishment of mitigation oaks. Given the presence of healthy oaks and oak woodland in these areas and the prior existence of oaks in these areas, the soils are considered suitable for new oak plantings. In addition, the Applicant would ensure the survival for seven years of at least 1,144 oak trees (444 oak trees required by the Oak Tree ordinance and 700 additional mitigation trees). Furthermore, the OTWMMP was approved by the staff biologist at the County of Los Angeles Department of Regional Planning.

Comment No. 15-7**Further Spread of the Whittiker Bermite Pollution Plume**

In April of 2012, yet another Valencia Water Well (well 205) was closed down due to the presence of Volatile Organic Compounds (VOCs), seeming to indicate the further westerly spread of the Whittiker Bermite pollution plume. This information was not publicly disclosed and we have only just discovered it through a public records request to the Dept. of Health Services.

While the project before you will not be supplied by Valencia Water Co., the spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire Santa Clarita Valley will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

We hope to provide you with additional comments by July 18th.

Response No. 15-7

As correctly indicated in the comment above, water for the Project would not be supplied by the Valencia Water Company but rather would be supplied by Newhall County Water District (NCWD). As stated on page V.L.1-6 in Section V.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, water supplies for the NCWD service area are derived from several sources, including imported water, additional reliability supplies, and groundwater from the Alluvial Aquifer and the Saugus Formation. As stated on pages V.L.1-9 and V.L.1-10 therein, these two groundwater sources together comprise the East Subbasin (Basin) of the Santa Clara River Valley Groundwater Basin which serves the Santa Clarita Valley.

The Water Supply Assessment (WSA) prepared for the Project, included in Appendix K.1 of the Draft EIR, is based in part on NCWD's Urban Water Management Plan (UWMP); NCWD adopted its most recent 2010 Urban Water Management Plan (UWMP) in June 2011, which concluded there will be sufficient water supplies through 2050.² Among other things, the 2010 UWMP includes: estimates of past, current, and projected potable and recycled water use; identifies conservation and reclamation measures currently in practice; describes alternative conservation measures; and provides an urban water shortage contingency plan. If contamination of the Saugus Formation were to threaten local water supplies, as suggested in the comment above, NCWD could choose to implement its urban water shortage contingency plan, as needed, to ensure an adequate water supply to its customers. NCWD continues to work cooperatively with the other water purveyors in the Santa Clarita Valley to ensure the reliability of future water supplies, including through the evaluation of the long-term sustainability of groundwater conditions. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

² However, the WSA prepared by NCWD for the Project references information from the 2005 UWMP, as that was the plan in effect at the time of preparation of the WSA. Therefore, both the 2005 UWMP and 2010 UWMP are referenced in the Draft EIR, as appropriate.



1000 Potrero Grande
Monterey park, CA 91754

June 18, 2012

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Draft Environmental Impact Report (DEIR) for Disney/ABC Studios at the Ranch Site
State Clearinghouse No. 2010011010

Dear Ms. Tran:

SCE appreciates the opportunity to comment on the DEIR for the Disney/ABC Studios at the Ranch project. The scope of the project includes construction of a 66/16 kilovolt (kV) customer dedicated substation to be owned and operated by SCE.

16-1

SCE completed a Method of Service Study (MOS) for this project at the request of Disney/ABC studios in 2009. While a subsequent MOS study will need to be initiated in order to finalize facilities and service plans for this project, SCE is providing the below general comments on the DEIR addressing electric facilities needs for the proposed project.

Please make the following minor corrections to the DEIR:

1. On page II-3, please revise the following sentence:

“Under the Soundstage Option, the southern portion of the Development Area (south of Placerita Creek and west of the existing Los Angeles Department of Water and Power [LADWP] transmission line corridor) would contain eight soundstages, four mills, and ...”.

2. On page III-30, please revise this paragraph to state:

Southern California Edison (SCE) provides electrical service to portions of Los Angeles County, including the Ranch. SCE ~~generates~~ provides electricity generated from a variety of sources, most owned by third parties, including hydropower, coal, nuclear sources, and, more recently, renewable resources such as wind. Currently, SCE delivers

over 90,000 gigawatt-hours (GWh) across its entire service area to approximately 4.8 million customers. The Ranch is presently served by ~~SCE's Pardee substation~~ SCE's 66/16 kV Newhall Substation, located in Newhall, which is part of SCE's Saugus 66 kV Subtransmission System. Electricity is presently supplied to the few existing permanent structures on the Ranch through the SCE 16 kV distribution system~~-. There are existing which includes~~ 66 kV overhead lines that connect to existing power poles along Placerita Canyon Road and Sierra Highway~~-, which is the proposed source of the new substation being proposed for The Ranch~~. In addition to lighting, electricity is used to supply all on-site space heating, water heating, cooking, and air conditioning. External generators power all temporary filming sets, structures, and filming activities conducted at the Ranch.

3. On page IV-40, please add the following voltage information to the below sentence:

Power from the substation would be distributed underground through four 16 kV feeder circuits to the various buildings on-site.

4. In addition, on page IV-40, please add the following additional language addressing telecommunication facilities:

"Telecommunications fiber optic cable would need to be constructed into the new substation to connect relays installed for the protection of electrical power lines and equipment to operate properly under electrical fault conditions".

California Public Utilities Commission (CPUC) General Order (GO) 131-D

SCE's comment letter on the Notice of Preparation for this project dated April 4, 2010, provided information regarding the California Public Utilities Commission (CPUC) General Order (GO) 131-D process for the construction and relocation of SCE facilities operated at voltages over 50 kV, and indicated that delays in constructing these facilities may occur should SCE's scope of work not be included in the DEIR for this project (and SCE be required to pursue a separate CEQA review). Please note, as discussed earlier, Disney/ABC Studios needs to initiate a new MOS review with SCE for this project, the results of which may change the project description for SCE's facilities serving the project. Such changes may require supplemental environmental documentation in order to comply with the CPUC's GO 131-D requirements.

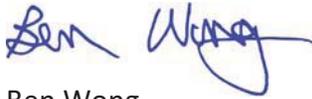
Please note, when a larger project's Final EIR includes the construction or relocation of SCE's electrical facilities as part of the overall project description, SCE may be able to proceed exempt from GO 131-D permit to construct requirements (provided the Final EIR finds no significant unavoidable environmental impacts caused by the proposed line or substation). If such a finding can be made through supplemental environmental

review as part of any refined project scope information provided by SCE, SCE would not have to undergo separate CEQA review and permitting at the CPUC.

16-2
(Cont.)

If you have any questions regarding this letter, do not hesitate to contact me at (323) 720-5292.

Sincerely,

A handwritten signature in blue ink that reads "Ben Wong". The signature is stylized and cursive.

Ben Wong
Local Public Affairs Region Director
Southern California Edison Company

Letter No. 16

Ben Wong
Local Public Affairs Region Director
Southern California Edison Company
1000 Potrero Grande
Monterey Park, CA 91754

Comment No. 16-1

SCE appreciates the opportunity to comment on the DEIR for the Disney/ABC Studios at the Ranch project. The scope of the project includes construction of a 66/16 kilovolt (kV) customer dedicated substation to be owned and operated by SCE.

SCE completed a Method of Service Study (MOS) for this project at the request of Disney/ABC studios in 2009. While a subsequent MOS study will need to be initiated in order to finalize facilities and service plans for this project, SCE is providing the below general comments on the DEIR addressing electric facilities needs for the proposed project.

Please make the following minor corrections to the DEIR:

1. On page II-3, please revise the following sentence:

“Under the Soundstage Option, the southern portion of the Development Area (south of Placerita Creek and west of the existing Los Angeles Department of Water and Power [LADWP] transmission line corridor) would contain eight soundstages, four mills, and...”.

2. On page III-30, please revise this paragraph to state:

Southern California Edison (SCE) provides electrical service to portions of Los Angeles County, including the Ranch. SCE ~~generates~~ provides electricity generated from a variety of sources, most owned by third parties, including hydropower, coal, nuclear sources, and, more recently, renewable resources such as wind. Currently, SCE delivers over 90,000 gigawatt-hours (GWh) across its entire service area to approximately 4.8 million customers. The Ranch is presently served by ~~SCE's Pardee substation~~ SCE's 66/16 kV Newhall Substation, located in Newhall, which is part of SCE's Saugus 66 kV Subtransmission System. Electricity is presently supplied to the few existing permanent structures on the Ranch through the SCE 16 kV distribution system. ~~There are existing which includes 66 kV overhead lines that connect to existing power poles along Placerita Canyon Road and~~

Sierra Highway-, which is the proposed source of the new substation being proposed for The Ranch. In addition to lighting, electricity is used to supply all on-site space heating, water heating, cooking, and air conditioning. External generators power all temporary filming sets, structures, and filming activities conducted at the Ranch.

3. On page IV-40, please add the following voltage information to the below sentence:

Power from the substation would be distributed underground through four 16 kV feeder circuits to the various buildings on-site.

4. In addition, on page IV-40, please add the following additional language addressing telecommunication facilities:

“Telecommunications fiber optic cable would need to be constructed into the new substation to connect relays installed for the protection of electrical power lines and equipment to operate properly under electrical fault conditions”.

Response No. 16-1

In response to this comment, the text referenced above has been revised as requested. Refer to Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the updated text.

Comment No. 16-2

California Public Utilities Commission (CPUC) General Order (GO) 131-D

SCE’s comment letter on the Notice of Preparation for this project dated April 4, 2010, provided information regarding the California Public Utilities Commission (CPUC) General Order (GO) 131-D process for the construction and relocation of SCE facilities operated at voltages over 50 kV, and indicated that delays in constructing these facilities may occur should SCE’s scope of work not be included in the DEIR for this project (and SCE be required to pursue a separate CEQA review). Please note, as discussed earlier, Disney/ABC Studios needs to initiate a new MOS review with SCE for this project, the results of which may change the project description for SCE’s facilities serving the project. Such changes may require supplemental environmental documentation in order to comply with the CPUC’s GO 131-D requirements.

Please note, when a larger project’s Final EIR includes the construction or relocation of SCE’s electrical facilities as part of the overall project description, SCE may be able to

proceed exempt from GO 131-D permit to construct requirements (provided the Final EIR finds no significant unavoidable environmental impacts caused by the proposed line or substation). If such a finding can be made through supplemental environmental review as part of any refined project scope information provided by SCE, SCE would not have to undergo separate CEQA review and permitting at the CPUC.

If you have any questions regarding this letter, do not hesitate to contact me at (323) 720-5292.

Response No. 16-2

A Method of Service (MOS) Study was prepared by Southern California Edison (SCE) for the Project and was used as the basis for the design of the proposed electrical substation. Prior to Project construction, a new MOS will be initiated with SCE, as required, and the Applicant will continue to work with SCE to ensure compliance with CEQA as well as applicable rules and protocols established by the California Public Utilities Commission (CPUC).

As evaluated throughout the Draft EIR, no significant impacts would occur as a result of development of the substation as currently proposed. Although it is not anticipated that any changes to the design of the substation would result in new or unforeseen significant impacts, supplemental environmental review would be undertaken, if required, to identify and mitigate any potential impacts, as appropriate.

6. WRITTEN COMMENTS FROM INDIVIDUALS

Table III-6
Comment Matrix—Individuals

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
17	Becky Adler 20828 Shine Drive Saugus, CA 91354	X				X																							
18	Raoul Biteng 26451 Marsala Drive Valencia, CA 91355-3511	X				X			X		X						X												
19	Pat and Adele Burk 24643 Kalmar Avenue Newhall, CA 91321	X																											
20	Leslee Burke 17805 Timber Branch Place Canyon Country, CA 91387	X				X							X																
21	Alexandra Clark 24439 Leonard Tree Lane, Unit 204 Santa Clarita, CA 91321-4276	X				X																						X	
22	Tim Crissman President Crissman Commercial Services, Inc. 24262 Walnut Street, Suite 1 Newhall, CA 91321-2965	X				X																						X	
23	James Crowley 20946 Alaminos Drive Saugus, CA 91350-1862																X							X			X		
24	Sharon and Douglas Davis 26759 Whispering Leaves Drive, Unit A Newhall, CA 91321-5477	X																										X	
25	George W. Dyck, DVM 24411 Chestnut Street Newhall, CA 91321	X																										X	

**Table III-6 (Continued)
Comment Matrix—Individuals**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER		
26	Jose Estrada 24217 Nottingham Court Valencia, CA 91355	X				X	X				X		X																	
27	Vicki C. Estrada 27137 Baxard Place Valencia, CA 91354-2612	X				X																						X		
28	Joseph Hawthorne 12562 Sunnyglen Drive Moorpark, CA 93021	X				X																						X		
29	Teresa Howard 20214 Fanchon Lane, Unit 142 Santa Clarita, CA 91351-5253	X				X																						X		
30	Michael Jarocki michael@lajibs.com																												X	
31	Michael Jarocki michael@lajibs.com																												X	
32	Michael Jarocki michael@lajibs.com																												X	
33	Dennis and Marjorie Junker 24303 Mornington Drive Valencia, CA 91355	X				X																						X		
34	Steven C Kassel, MFT 23560 Lyons Avenue, Suite 204 Newhall, CA 91321-5726												X																	
35	Lisa Kassner lisa@angelappliances.com												X			X	X								X			X		
36	Gary Kodel 29262 Marilyn Drive Canyon Country, CA 91387												X												X					
37	Margaret Means Lauffer 27742 Briarcliff Place Valencia, CA 91354	X				X																						X		

**Table III-6 (Continued)
Comment Matrix—Individuals**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER
49	Lief Nicolaisen 26046 Lucerne Court Valencia, CA 91355	X															X										X	
50	Adriana O'Dell chicassalon@hotmail.com	X				X																					X	
51	Eric Preven esp3800@aol.com												X													X		
52	Nayeli Aguirre Sanchez 27361 Sierra Highway, No. 120 Canyon Country, CA 91351-7433	X				X																					X	
53	Joann Sarachman Whittier, CA jsarach@yahoo.com												X															
54	Jeff Secor 21244 Placerita Canyon Newhall, CA 91321	X				X			X								X											
55	Michael Shapiro 26824 Madigan Drive Canyon Country, CA 91351	X				X			X		X						X											
56	Ian Swift Biologist	X				X							X															
57	Linda Tarnoff 21618 Oak Orchard Road Newhall, CA 91321	X				X																					X	
58	John Tenorio P.O. Box 802288 Santa Clarita, CA 91380-2288	X				X							X															
59	Jeff Towery 27077 Hidaway Avenue, Apt. 37 Canyon Country, CA 91351-4134	X				X																					X	

**Table III-6 (Continued)
Comment Matrix—Individuals**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
60	Lilia J. Vergara Paras 18014 Flynn Drive, Unit 6601 Canyon Country, CA 91387-8114	X				X																						X	

From: Becky [adler3knb@aol.com]
Sent: Wednesday, June 06, 2012 12:41 PM
To: Tran, Christina
Subject: Comments on Disney/ABC Studios Project

ATTN: Christina Tran, LA County Planning Department

REF: Project # TRO71216-(5) Disney/ABC Studios at The Ranch

Dear Ms. Tran,

As a local resident for almost 40 years who had the opportunity to tour the ranch, I would like to tell you how impressed I am with how the ranch is being managed, including their commitment to growing their own produce for local consumption. I believe that the draft EIR for this project shows the same kind of commitment that Disney and ABC Studios have to making this improvement of the Golden Oak movie ranch a win for local residents as well as their own company.

17-1

I, for one, will also welcome the new trail planned to hook up with existing hiking trails, the rehabilitation of Placerita Creek's eroding banks and restoration of oak woodlands damaged by fire, and the improvements in water and other infrastructure -- all of which will benefit the community as well as their company.

I encourage you to approve this DEIR so the project can move forward.

Sincerely,

Becky Adler
20828 Shine Dr.
Saugus, CA 91354

Letter No. 17

Becky Adler
20828 Shine Drive
Saugus, CA 91354

Comment No. 17-1

As a local resident for almost 40 years who had the opportunity to tour the ranch, I would like to tell you how impressed I am with how the ranch is being managed, including their commitment to growing their own produce for local consumption. I believe that the draft EIR for this project shows the same kind of commitment that Disney and ABC Studios have to making this improvement of the Golden Oak movie ranch a win for local residents as well as their own company.

I, for one, will also welcome the new trail planned to hook up with existing hiking trails, the rehabilitation of Placerita Creek's eroding banks and restoration of oak woodlands damaged by fire, and the improvements in water and other infrastructure -- all of which will benefit the community as well as their company.

I encourage you to approve this DEIR so the project can move forward.

Response No. 17-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Raoul Biteng [rbiteng@gmail.com]
Sent: Monday, June 04, 2012 11:41 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; Raoul Biteng
Subject: Disney/ABC Studios at the Ranch

Ms. Christina Tran
Los Angeles County Department of Regional Planning
Special Projects Section Rm. 1362
320 W. Temple St.
Los Angeles, CA 90012

SUBJECT: Disney/ABC Studios at The Ranch -- County Project #TRO71216-(5)

Ms. Tran:

Living in the Santa Clarita Valley for many years, I know there are some people who are against any type of development. They'll cite traffic, noise, and environmental impacts as to why projects should not be developed. But in the case of the Disney/ABC Studios at The Ranch project, these are not relevant.

18-1

Why? Because these issues have been more than adequately addressed in the project's Draft Environmental Impact Report. According to the DEIR, the company has plans in place to offset construction effects, such as using equipment with noise-shielding devices and turning construction vehicles off when not in use to reduce emissions. The project also plans to add stoplights and make road improvements to minimize traffic impacts.

From an environmental perspective, it looks like Disney and ABC are doing all the right things by tree planting along with creek-side and creek-bed enhancements.

I applaud the company for acting responsibly to reduce project impacts on the community. I hope you will move this project forward.

Thank you.

Raoul Biteng
26451 Marsala
Valencia, CA 91355

cc: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert

Letter No. 18

Raoul Biteng
26451 Marsala Drive
Valencia, CA 91355-3511

Comment No. 18-1

Living in the Santa Clarita Valley for many years, I know there are some people who are against any type of development. They'll cite traffic, noise, and environmental impacts as to why projects should not be developed. But in the case of the Disney/ABC Studios at The Ranch project, these are not relevant.

Why? Because these issues have been more than adequately addressed in the project's Draft Environmental Impact Report. According to the DEIR, the company has plans in place to offset construction effects, such as using equipment with noise-shielding devices and turning construction vehicles off when not in use to reduce emissions. The project also plans to add stoplights and make road improvements to minimize traffic impacts.

From an environmental perspective, it looks like Disney and ABC are doing all the right things by tree planting along with creek-side and creek-bed enhancements.

I applaud the company for acting responsibly to reduce project impacts on the community. I hope you will move this project forward.

Response No. 18-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Adele Burk [adele.burk@gmail.com]
Sent: Friday, June 08, 2012 11:14 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Comments on Disney/ABC Studios Project

ATTN: Ms. Christina Tran
Los Angeles County Planning Dept.

Re: Disney/ABC Project # TRO71216-(5)

Dear Ms. Tran,

Thanks to the County for the effort invested in this Environmental Impact Report. As a result of it, I think the issues have been carefully explored and I am writing to express my support of the Disney and ABC Studios at The Ranch project.

Growing up in Burbank and Glendale, we observed the Disney Studios actions to insure environmental preservation and pursue positive interactions with these communities.

We welcome Disney's decision to bring this opportunity to the Santa Clarita Valley as a long term benefit to the environment and quality of life in our community.

Pat and Adele Burk
20 years residents of Santa Clarita
24643 Kalmar Ave
Newhall, CA 91321

Letter No. 19

Pat and Adele Burk
24643 Kalmar Avenue
Newhall, CA 91321

Comment No. 19-1

Thanks to the County for the effort invested in this Environmental Impact Report. As a result of it, I think the issues have been carefully explored and I am writing to express my support of the Disney and ABC Studios at The Ranch project.

Growing up in Burbank and Glendale, we observed the Disney Studios actions to insure environmental preservation and pursue positive interactions with these communities.

We welcome Disney's decision to bring this opportunity to the Santa Clarita Valley as a long term benefit to the environment and quality of life in our community.

Response No. 19-1

This comment expresses general support for the Project. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Ms. CHRISTINA TRAN
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING
SPECIAL PROJECTS SECTION, ROOM 1362
320 WEST TEMPLE STREET
LOS ANGELES, CA 90012

RE: DISNEY/ABC – COUNTY PROJECT #TRO71216-(5)

DEAR Ms. TRAN:

PLEASE CONSIDER THIS BRIEF LETTER AS MY ENTHUSIASTIC ENDORSEMENT OF THE NEW STUDIO THAT DISNEY AND ABC ARE APPLYING TO CONSTRUCT AND OPERATE ON THEIR PROPERTY IN UNINCORPORATED LA COUNTY, ADJACENT TO SANTA CLARITA.

20-1

I SAW THAT THE DRAFT EIR FOR THE PROJECT DETAILS THAT DISNEY PLANS RESTORE THE UNDERSTORY OF OAK WOODLAND HABITAT ON PARTS OF THE RANCH. THIS IS SO IMPORTANT BECAUSE THE UNDERSTORY – WHICH GROWS AT THE LOWEST HEIGHT LEVEL BENEATH THE OVERHEAD TREE CANOPY – PROVIDES A FAVORABLE CLIMATE THAT WILL ALLOW MANY ANIMAL AND PLANT SPECIES TO FLOURISH.

PRESERVING AND ENHANCING HABITAT OF ALL KINDS CAN GO HAND IN HAND WITH THOUGHTFUL DEVELOPMENT AND PLANNING. I THINK THE DISNEY/ABC PROJECT DESERVES THE SUPPORT OF ALL VALLEY RESIDENTS.

VERY TRULY YOURS,



LESLEE BURKE
17805 TIMBER BRANCH PL
CANYON COUNTRY, CA 91387

CC: SUP. MICHAEL ANTONOVICH
ADAM GILBERT

Letter No. 20

Leslee Burke
17805 Timber Branch Place
Canyon Country, CA 91387

Comment No. 20-1

Please consider this brief letter as my enthusiastic endorsement of the new studio that Disney and ABC are applying to construct and operate on their property in unincorporated LA County, adjacent to Santa Clarita.

I saw that the Draft EIR for the project details that Disney plans restore the understory of oak woodland habitat on parts of the Ranch. This is so important because the understory — which grows at the lowest height level beneath the overhead tree canopy — provides a favorable climate that will allow many animal and plant species to flourish.

Preserving and enhancing habitat of all kinds can go hand in hand with thoughtful development and planning. I think the Disney/ABC project deserves the support of all Valley residents.

Response No. 20-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Alexandra [acold_clds@yahoo.com]
Sent: Wednesday, June 06, 2012 12:17 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org
Subject: Comments on Disney/ABC Studios Project

Dear Ms. Tran,

I am writing to express my support for the Disney/ ABC Studios at the Ranch project to build new soundstages and production support facilities on their property near Santa Clarita.

21-1

These new facilities can encourage more filming here in California and reduce runaway production to other locations. This project will create thousands of jobs which would be very helpful in spurring economic recovery without harming the environment.

I am also encouraged that the draft environmental impact report shows that development will only impact 58 acres near SR-14 out of the 890 acre property, with most of the rest remaining as "natural backdrop." Importantly, the project will include a number of steps to enhance the property, especially the planting of 1,600 oak trees, remediation of Placerita Creek, and a new 2 million gallon water tank that boost fire protection.

Respectfully,

Alexandra Clark
24439 Leonard Tree Ln Unit 204
Santa Clarita, CA 91321

Being considerate of others will take your children further in life than any college degree.
~Marian Wright Edelman

Letter No. 21

Alexandra Clark
24439 Leonard Tree Lane, Unit 204
Santa Clarita, CA 91321-4276

Comment No. 21-1

I am writing to express my support for the Disney/ ABC Studios at the Ranch project to build new soundstages and production support facilities on their property near Santa Clarita.

These new facilities can encourage more filming here in California and reduce runaway production to other locations. This project will create thousands of jobs which would be very helpful in spurring economic recovery without harming the environment.

I am also encouraged that the draft environmental impact report shows that development will only impact 58 acres near SR-14 out of the 890 acre property, with most of the rest remaining as “natural backdrop.” Importantly, the project will include a number of steps to enhance the property, especially the planting of 1,600 oak trees, remediation of Placerita Creek, and a new 2 million gallon water tank that boost [sic] fire protection.

Response No. 21-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Tim Crissman [tcrissman@crissmancommercial.com]
Sent: Friday, June 15, 2012 5:54 PM
To: Tran, Christina
Cc: Hon. Michael Antonovich; Adam Gilbert
Subject: Disney/ABC Studios at The Ranch -- County Project # TRO71216-(5)
Attachments: Ltr Disney Support_6.15.2012.pdf

Dear Ms. Tran

Attached please find a letter of support that has been sent to you via regular mail on behalf of The Old Town Newhall Association of which I am the Chariman of the Board.

22-1

Let this email also serve as a statement of support on my behalf as both a 33 year resident of Newhall and the President of Crissman Commercial Services, Inc., the longest established commercial real estate brokerage in Santa Clarita. I began my carrear in Real Estate here in 1983, after working for LA County Parks & Rec as a Lifeguard in Santa Clarita from 1978 until receiving my license in the winter of 1983.

22-2

I have witnessed and been party to considerable development in Santa Clarita since taking residence here in 1980, some well designed and well, not so well designed. My carrear has ranged from land acquisition for developers, to development feasibilities through construction and lease up or sale. It is due to this experience that I feel qualified to comment on how well planned and designed the Disney/ABC Studios at The Ranch project is, deserving of incredible status. But that is only part of the picture as given the four years of job loss we have witnessed, it is projects like this that create sustainable employment no matter where they are developed. With the long History Santa Clarita has played in the film industry, of which the Disney Ranch has played a big part in, I cannot think of a more appropriate location for this type of project. Old Town Newhall continues to provide the industry with considerable number of feasible locations for filming, given the character and architecture is maintains and the proximity of the project will be well served.

Ironically though, I have a degree in Natural Resource Management as well and had intended to become a fisheries biologist and environmental (Park) designer. It is through this discipline that I also have the insight and experience to comment on the project from an environmental prospective as well. In my 29 year real estate carrear I have yet to witness a developer or project that has taken into consideration the environment and sustainability like Disney has incorporated into this project. The EIR spells out these aspects and the mitigation measures it will employ will serve as a model for similar projects that would come after them, and this impressed me as much as the overall character of this project.

As a prominent business and communittee leader in Santa Clarita, I would encourage the Planning Commission to take all of the input my peers have provided in support of this project. This is something Santa Clarita will be proud of, together with the Stewardship and Partnership Disney has had within this community.

Please feel free to call me with any questions.

Respectfully

Tim Crissman

President
Crissman Commercial Services, Inc.
24262 Walnut Street, Unit 1
Newhall, CA 91321
661.295.9300 off
661.510.8145 cell
661.295.0527 fax
DRE License No. 00855176

Chairman of the Board

Letter No. 22

Tim Crissman
President
Crissman Commercial Services, Inc.
24262 Walnut Street, Suite 1
Newhall, CA 91321-2965

Comment No. 22-1

Attached please find a letter of support that has been sent to you via regular mail on behalf of The Old Town Newhall Association of which I am the Chariman [sic] of the Board.

Response No. 22-1

Please refer to Letter No. 13 for the comment letter referenced in this comment and associated responses.

Comment No. 22-2

Let this email also serve as a statement of support on my behalf as both a 33 year resident of Newhall and the President of Crissman Commercial Services, Inc., the longest established commercial real estate brokerage in Santa Clarita. I began my carrear [sic] in Real Estate here in 1983, after working for LA County Parks & Rec as a Lifeguard in Santa Clarita from 1978 until receiving my license in the winter of 1983.

I have witnessed and been party to considerable development in Santa Clarita since taking residence here in 1980, some well designed and well, not so well designed. My carrear [sic] has ranged from land acquisition for developers, to development feasibilities through construction and lease up or sale. It is due to this experience that I feel qualified to comment on how well planned and designed the Disney/ABC Studios at The Ranch project is, deserving of incredible status. But that is only part of the picture as given the four years of job loss we have witnessed, it is projects like this that create sustainable employment no matter where they are developed. With the long History [sic] Santa Clarita has played in the film industry, of which the Disney Ranch has played a big part in, I cannot think of a more appropriate location for this type of project. Old Town Newhall continues to provide the industry with considerable number of feasible locations for filming, given the character and architecture is [sic] maintains and the proximity of the project will be well served.

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As a prominent business and communittee [sic] leader in Santa Clarita, I would encourage the Planning Commission to take all of the input my peers have provided in support of this project. This is something Santa Clarita will be proud of, together with the Stewardship and Partnership Disney has had within this community.

Please feel free to call me with any questions.

Response No. 22-2

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resource of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Jim Crowley [mailto:jim2toni@sbcglobal.net]
Sent: Monday, May 07, 2012 7:20 PM
To: Tran, Christina
Subject: Disney Ranch Development

In response to the recently released Environmental Impact Report for the Disney Ranch Project in the Santa Clarita Valley, I am expressing some concerns. While the project is to be applauded for creating 3,000 local jobs I am particularly concerned about the possible hazardous traffic condition the project will generate at the intersection of Highway #14 and Placerita Cyn Rd. This could have a negative effect on student programs at neighboring Placerita Canyon Nature Center and emergency evacuation plans for the canyon if not mitigated

23-1

Currently we provide pre-school and elementary age school tours for children locally and as far North as Lancaster, as far east as East Los Angeles, along with the San Fernando Valley schools. The schools vary, public and private. The normal transportation is provided by chartered school busses (at a cost to the school, parents or PTA) but can include private parent transportation. The children are on a very tight schedule due to bus rental and school schedules. These tours occur regularly from September through June, Tuesday through Fridays. Most days the children and busses leave the nature center 12:30-1:00pm.

The ingress/egress of 3,000 employees arriving to work will have an immediate negative effect to the mentioned intersection. Depending on the timing it could affect the children's ability to participate in the complete tour especially if thousands of employees with cars and trucks show up for work at the same time busses arrive. And a sizable number of them coming and going for lunch about the time we schedule busses to leave. Currently we see many mornings where the Disney Ranch has a 'Shoot' scheduled and hundreds of cars are present in the dirt lot. Up until now this has not presented a problem at the usual arrival time of the children between 9-10:00am. However, this is without a 'developed' ranch.

My concerns are that traffic congestion be mitigated, because delays at the intersection translate into a reduction in the time the children have for a nature program and their time to visit the park.

Emergency evacuation would be another major concern if the canyon ever catches fire, which it has in the recent past. Placerita Canyon Road would be the only western exit for Disney and the visiting school children and their busses. Evacuation would include residents in the canyon, employees of the park and live animals. Placerita Canyon Road and highway #14 would no doubt, become gridlocked and a safety hazard.

23-2

I believe the restructuring of intersection of Highway #14 and Placerita Canyon Rd. must be in the discussion for this project. Perhaps some sort of a dedicated Placerita Canyon only off ramp with canyon "through lanes" could be incorporated.

Thank you for the opportunity to express my personal opinions. They do not represent those of Placerita Nature Center park management or L.A County. Currently I am a volunteer docent at the nature center.

Thank you,
James Crowley
20946 Alaminos Dr.
Saugus, CA 91350
(661) 296-3177

Letter No. 23

James Crowley
20946 Alaminos Drive
Saugus, CA 91350-1862

Comment No. 23-1

In response to the recently released Environmental Impact Report for the Disney Ranch Project in the Santa Clarita Valley, I am expressing some concerns. While the project is to be applauded for creating 3,000 local jobs I am particularly concerned about the possible hazardous traffic condition the project will generate at the intersection of Highway #14 and Placerita Cyn Rd. This could have a negative effect on student programs at neighboring Placerita Canyon Nature Center and emergency evacuation plans for the canyon if not mitigated [sic]

Currently we provide pre-school and elementary age school tours for children locally and as far North as Lancaster, as far east as East Los Angeles, along with the San Fernando Valley schools. The schools vary, public and private. The normal transportation is provided by chartered school busses (at a cost to the school, parents or PTA) but can include private parent transportation. The children are on a very tight schedule due to bus rental and school schedules. These tours occur regularly from September through June, Tuesday through Fridays. Most days the children and busses leave the nature center 12:30-1:00pm. [sic]

The ingress/egress of 3,000 employees arriving to work will have an immediate negative effect to the mentioned intersection. Depending on the timing it could affect the children's ability to participate in the complete tour especially if thousands of employees with cars and trucks show up for work at the same time busses arrive. And a sizable number of them coming and going for lunch about the time we schedule busses to leave. Currently we see many mornings where the Disney Ranch has a 'Shoot' scheduled and hundreds of cars are present in the dirt lot. Up until now this has not presented a problem at the usual arrival time of the children between 9-10:00am. However, this is without a 'developed' ranch.

My concerns are that traffic congestion be mitigated, because delays at the intersection translate into a reduction in the time the children have for a nature program and their time to visit the park.

Response No. 23-1

As discussed on page V.J-3 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, a Study Area was defined in consultation with LACDPW to ensure the Traffic Study evaluated all intersections that could potentially be significantly impacted by the Project. A total of four intersections in the vicinity of the Ranch were selected for analysis, as listed in Table V.J-1 on page V.J-4 in the Draft EIR, including: (1) Sierra Highway/SR-14 Southbound Ramps; (2) Sierra Highway/Placerita Canyon Road; (3) Placerita Canyon Road/SR-14 Northbound Off-Ramp; and (4) Placerita Canyon Road/current Ranch main entrance. The Project's operational impacts at these study intersections following the implementation of Project mitigation are discussed on page V.J-63, summarized in Table V.J-16 on page V.J-64, and geographically depicted in Figure V.J-6 on page V.J-65 in Section V.J, Traffic, Access, and Parking, of the Draft EIR. As indicated, with the proposed mitigation measures in place, impacts at the two intersections that would be significantly affected by the Project (Sierra Highway/SR-14 Southbound Ramps and Sierra Highway/Placerita Canyon Road) would be reduced to a less than significant level. In addition, these intersections would operate at a lower volume-to-capacity (V/C) ratio (i.e., would experience improved conditions) following implementation of the Project's mitigation measures than under Existing plus Ambient Growth Conditions (i.e., without the Project). Impacts at the other two intersections (Placerita Canyon Road/SR-14 Northbound Off-Ramp and Placerita Canyon Road/current Ranch main entrance) would be less than significant and would not require mitigation.

In addition, as discussed on page V.J-11 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, since three of the four study intersections (Sierra Highway/SR-14 Southbound Ramps, Sierra Highway/Placerita Canyon Road, and Placerita Canyon Road/SR-14 Northbound Off-Ramp) are under the jurisdiction of Caltrans, a Caltrans analysis was performed to determine, among other things, the average stopped delay potentially experienced per vehicle (measured in seconds) at those intersections as a result of the Project. As shown in Table V.J-6 as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, under future conditions that include development of the related projects (i.e., all known development projects in the Ranch vicinity), full operation of the Project, and implementation of all Project and cumulative mitigation, the average delay per vehicle at the study intersections would range from approximately 9 to approximately 24 seconds during the A.M. and P.M. peak hours, when traffic volumes are greatest. In addition, as discussed on page V.J-67 in Section V.J, Traffic, Access, and Parking, Project development would result in a less than significant impact on access, including impacts associated with queuing. Finally, as discussed on page V.J-50 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, at the request of LACDPW, a sight distance analysis was conducted for the three Project site access locations: the intersection at SR-14 Northbound Off-Ramp/Placerita Canyon Road, the current Ranch main entrance/Placerita Canyon Road, and the emergency access driveway

along Placerita Canyon Road. Based on the intersection characteristics and Caltrans' 2000 Highway Capacity Manual (HCM) methodology, the required sight distances at the three proposed access points would be 620 feet in either direction. As discussed in the Traffic Study and illustrated in Figures 31, 32, and 33 therein, the Development Area and access locations would be designed to provide the required sight distances. Therefore, such impacts would be less than significant.

As a matter of clarification, as stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch on a daily basis. Further, the proposed studio uses could operate 24 hours per day, similar to the existing filming activities, which are permitted 24 hours per day in accordance with the existing CUP for the Ranch. As such, vehicular trips associated with studio operations would frequently occur outside of the A.M. and P.M. peak hours, thus limiting the potential for delays or other vehicular conflicts with visitors to the Placerita Canyon Nature Center and other uses in the area. In all likelihood the commentor's reference to "3,000 employees" refers to the approximate level of direct, indirect, and induced employment anticipated to be generated both on-site and in the greater area as a result of the Project, as discussed further in the economic and fiscal impact analysis presented in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). Construction-related employment is also estimated therein; typical weekday construction hours would be from 7:00 A.M. to 3:30 P.M., and, thus, construction-worker trips to/from the Ranch would not be expected to coincide with the arrival and departure of school groups attending Placerita Canyon Nature Center.

With respect to emergency evacuation plans for Placerita Canyon, potential impacts are addressed in Section V.M, Environmental Safety/Fire Hazards, of the Draft EIR. As discussed on page V.M-33 therein, as part of the Project, an emergency response and/or evacuation plan for the proposed studio development would be submitted to the County Fire Department. The emergency response plan would include, but not be limited to, the identification of evacuation routes for vehicles and pedestrians and the locations of the nearest hospital and fire station. The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Comment No. 23-2

Emergency evacuation would be another major concern if the canyon ever catches fire, which it has in the recent past. Placerita Canyon Road would be the only western exit for Disney and the visiting school children and their busses. Evacuation would include

residents in the canyon, employees of the park and live animals. Placerita Canyon Road and highway #14 would no doubt, become gridlocked and a safety hazard.

I believe the restructuring of intersection of Highway #14 and Placerita Canyon Rd. must be in the discussion for this project. Perhaps some sort of a dedicated Placerita Canyon only off ramp with canyon “through lanes” could be incorporated.

Thank you for the opportunity to express my personal opinions. They do not represent those of Placerita Nature Center park management or L.A County. Currently I am a volunteer docent at the nature center.

Response No. 23-2

Refer to Response No. 23-1 above regarding emergency evacuation. Also refer to Mitigation Measures MM J-5 through MM J-10 on pages V.J-61 and V.J-62 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, for details regarding the intersection improvements to be implemented as part of the Project, which would include roadway widening and dedicated turn lanes where appropriate to ensure adequate traffic flows and access.

From: Sharon Davis [davis3999@att.net]
Sent: Saturday, June 02, 2012 7:10 PM
To: Tran, Christina
Subject: Disney/ABC studios project in Placerita Canyon

6/2/2012

To: Christina Tran, Los Angeles Co. Dept. of Regional Planning, Special Projects Section

From: Sharon and Douglas Davis, 26759 Whispering Leaves Dr., #A, Newhall, CA 91321

My husband and I strongly support the Disney/ABC Studios Project on the west side of Disney's Golden Oak Ranch in Placerita Canyon east of the I14. This project will bring many new jobs into the Santa Clarita Valley as well as much needed direct economic activity. 24-1

For economic reasons we believe it is important to work with the movie studios in helping them create production facilities and in making it easier for all movie and T.V. companies to continue filming in our valley.

Thank you for considering our opinions regarding this important project.

Sharon Davis

Letter No. 24

Sharon and Douglas Davis
26759 Whispering Leaves Drive, Unit A
Newhall, CA 91321-5477

Comment No. 24-1

My husband and I strongly support the Disney/ABC Studios Project on the west side of Disney's Golden Oak Ranch in Placerita Canyon east of the I14. This project will bring many new jobs into the Santa Clarita Valley as well as much needed direct economic activity.

For economic reasons we believe it is important to work with the movie studios in helping them create production facilities and in making it easier for all movie and T.V. companies to continue filming in our valley.

Thank you for considering our opinions regarding this important project.

Response No. 24-1

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Docformare@aol.com
Sent: Wednesday, June 06, 2012 1:40 PM
To: Tran, Christina
Subject: Disney

Ms. Tran:

First, let me tell you I have no business relationship or stock in Disney Corp. or its affiliates. In fact, I am probably politically opposite from most of Disney's Board of Directors. | 25-1

I do feel Disney has been a good neighbor in Santa Clarita from all aspects from environmental to fiscal. This type of non- polluting business in our area is just what we want and need. We need to do what we can to keep business in our area and state or you and I will be looking for new positions out of California as the tax base gets smaller and smaller. We are fortunate that a company like Disney chooses to stay and develop here and must do what we can to make this project happen.

Sincerely,

George W Dyck, DVM
24411 Chestnut ST
Newhall, CA 91321

Letter No. 25

George W. Dyck, DVM
24411 Chestnut Street
Newhall, CA 91321

Comment No. 25-1

First, let me tell you I have no business relationship or stock in Disney Corp. or its affiliates. In fact, I am probably politically opposite from most of Disney's Board of Directors.

I do feel Disney has been a good neighbor in Santa Clarita from all aspects from environmental to fiscal. This type of non-polluting [sic] business in our area is just what we want and need. We need to do what we can to keep business in our area and state or you and I will be looking for new positions out of California as the tax base gets smaller and smaller. We are fortunate that a company like Disney chooses to stay and develop here and must do what we can to make this project happen.

Response No. 25-1

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Jose Estrada [jmestrada1966@gmail.com]
Sent: Wednesday, June 06, 2012 11:33 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC – County Project #TRO71216-(5)

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Tran,

The proposal for a new film and production studio at Disney’s Golden Oak Ranch is a huge coup for the Santa Clarita Valley. Already, many production companies film at Disney’s ranch, as well as other area movie ranches, because they offer unique outdoor filming opportunities. Building sound stages next door to outdoor filming areas as proposed is truly a winning combination. I applaud Disney and ABC for bringing this amazing opportunity to our Valley.

26-1

And I also want to applaud the County planners who clearly put in a lot of hard work in preparing the project’s Draft EIR. The document contains extensive analysis of many important issues, including habitat, geology, air quality, and many others. With regard to air quality, the Draft EIR highlighted a mitigation program designed to reduce air emissions during construction by limiting vehicle idling time, among other measures that will be implemented.

With the DEIR’s guidelines, Disney will be building a studio and related facilities with the highest environmental standards. I hope they can start building soon!

Sincerely,

Jose Estrada
24217 Nottingham Ct.
Valencia, CA 91355

Copies: Hon. Michael Antonovich
Adam Gilbert

Letter No. 26

Jose Estrada
24217 Nottingham Court
Valencia, CA 91355

Comment No. 26-1

The proposal for a new film and production studio at Disney's Golden Oak Ranch is a huge coup for the Santa Clarita Valley. Already, many production companies film at Disney's ranch, as well as other area movie ranches, because they offer unique outdoor filming opportunities. Building sound stages next door to outdoor filming areas as proposed is truly a winning combination. I applaud Disney and ABC for bringing this amazing opportunity to our Valley.

And I also want to applaud the County planners who clearly put in a lot of hard work in preparing the project's Draft EIR. The document contains extensive analysis of many important issues, including habitat, geology, air quality, and many others. With regard to air quality, the Draft EIR highlighted a mitigation program designed to reduce air emissions during construction by limiting vehicle idling time, among other measures that will be implemented.

With the DEIR's guidelines, Disney will be building a studio and related facilities with the highest environmental standards. I hope they can start building soon!

Response No. 26-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Vicki Estrada [vicki.estrada@yahoo.com]
Sent: Wednesday, June 06, 2012 11:50 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at the Ranch

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Disney/ABC Studios at The Ranch -- County Project # TRO71216-(5)

Dear Ms. Tran,

It isn't often that a project comes along for which one can only offer praise like Disney's ABC Studios at the Ranch. Not only do I applaud the project but also the County for its fine job reviewing any potential environmental impacts.

The County did a commendable job on the Draft Environmental Impact Report, which demonstrates that the project will have a very limited impact.

I was so happy to see that the project will improve and restore Placerita Creek. Back in the 70s, Caltrans dumped a lot of freeway fill that did grave damage to the creek. This project will help stabilize those damaged slopes.

Living in the area, I've seen a lot of growth and it's great to see a project that will improve the area AND create some economic benefit as well. The Ranch project will create thousands of jobs. Our community needs that kind of investment and it will also help further Los Angeles Country's economic recovery.

I support this project and thank you for the opportunity to provide my feedback.

Sincerely,

Vicki C. Estrada
27137 Baxard Place
Valencia, CA 91354

CC: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert

27-1

Letter No. 27

Vicki C. Estrada
27137 Baxard Place
Valencia, CA 91354-2612

Comment No. 27-1

It isn't often that a project comes along for which one can only offer praise like Disney's ABC Studios at the Ranch. Not only do I applaud the project but also the County for its fine job reviewing any potential environmental impacts.

The County did a commendable job on the Draft Environmental Impact Report, which demonstrates that the project will have a very limited impact.

I was so happy to see that the project will improve and restore Placerita Creek. Back in the 70s, Caltrans dumped a lot of freeway fill that did grave damage to the creek. This project will help stabilize those damaged slopes.

Living in the area, I've seen a lot of growth and it's great to see a project that will improve the area AND create some economic benefit as well. The Ranch project will create thousands of jobs. Our community needs that kind of investment and it will also help further Los Angeles County's economic recovery.

I support this project and thank you for the opportunity to provide my feedback.

Response No. 27-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Joseph Hawthorne [2buckjoe@gmail.com]
Sent: Wednesday, June 06, 2012 2:54 PM
To: Tran, Christina; fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Fwd: Support Letter for Disney/ABC Studios at the Ranch

To: ctran@planning.lacounty.gov [Christina Tran at Planning Dept.]
CC: fifthdistrict@lacbos.org [County Supervisor Michael Antonovich
adam.gilbert@disney.com [Disney executive Adam Gilbert]

Subject: Comments on Disney/ABC Studios Project

REF: TRO71216-(5) (Disney/ABC)

Dear Ms. Tran,

I am writing to express my support for the Disney/ ABC Studios at the Ranch project to build new soundstages and production support facilities on their property near Santa Clarita.

As a crafts worker in the film industry, I am optimistic that these new facilities can help facilitate and encourage more filming here in California and reduce runaway production to other locations.

And, as someone who is concerned about the environment, I am encouraged that the draft environmental impact report shows that development will only impact 58 acres near SR-14 out of the 890 acre property, with most of the rest remaining as "natural backdrop." Importantly, the project will include a number of steps to enhance the property, especially the planting of 1,600 oak trees, remediation of Placerita Creek, and a new 2 million gallon water tank that boost fire protection.

This project will create thousands of jobs which would be very helpful in spurring economic recovery without harming the environment.

Respectfully,

Joseph Hawthorne
12562 Sunnyglen Drive
Moorpark, CA 93021

28-1

Letter No. 28

Joseph Hawthorne
12562 Sunnyglen Drive
Moorpark, CA 93021

Comment No. 28-1

I am writing to express my support for the Disney/ ABC [sic] Studios at the Ranch project to build new soundstages and production support facilities on their property near Santa Clarita.

As a crafts worker in the film industry, I am optimistic that these new facilities can help facilitate and encourage more filming here in California and reduce runaway production to other locations.

And, as someone who is concerned about the environment, I am encouraged that the draft environmental impact report shows that development will only impact 58 acres near SR-14 out of the 890 acre property, with most of the rest remaining as “natural backdrop.” Importantly, the project will include a number of steps to enhance the property, especially the planting of 1,600 oak trees, remediation of Placerita Creek, and a new 2 million gallon water tank that boost [sic] fire protection.

This project will create thousands of jobs which would be very helpful in spurring economic recovery without harming the environment.

Response No. 28-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Teresa Howard [acameraladyproduction@gmail.com]
Sent: Wednesday, June 06, 2012 12:01 PM
To: Tran, Christina
Cc: County Supervisor Michael Antonovich; Disney Executive
Subject: Comments on Disney/ABC Studios Project

June 6th, 2012

Ms. Christina Tran (ctran@planning.lacounty.gov)
Los Angeles County Department of Regional Planning

Re: Disney/ABC Studios at The Ranch -- County Project # TRO71216-(5)

Dear Ms. Tran,

I am writing to express support for the proposed expansion of ABC Disney's Golden Oaks Ranch as discussed in the draft Environmental Impact Report. 29-1

As a film industry production professional, I (and many of my associates) would welcome the opportunity to work closer to home, which this project will hopefully provide. It will create opportunities for thousands of industry workers while providing a major economic stimulus to the region.

But this project will provide other benefits as well, including the restoration of Placerita Creek, the planting of 1600 oaks, and the enhancement of a rich oak woodland habitat.

Thanks for the consideration of my letter of support for this great company's project for the Santa Clarita Valley

Sincerely,

Teresa Howard
20214 Fanchon Ln Unit 142
Santa Clarita, CA 91351

Letter No. 29

Teresa Howard
20214 Fanchon Lane, Unit 142
Santa Clarita, CA 91351-5253

Comment No. 29-1

I am writing to express support for the proposed expansion of ABC Disney's Golden Oaks Ranch as discussed in the draft Environmental Impact Report.

As a film industry production professional, I (and many of my associates) would welcome the opportunity to work closer to home, which this project will hopefully provide. It will create opportunities for thousands of industry workers while providing a major economic stimulus to the region.

But this project will provide other benefits as well, including the restoration of Placerita Creek, the planting of 1600 oaks, and the enhancement of a rich oak woodland habitat.

Thanks for the consideration of my letter of support for this great company's project for the Santa Clarita Valley [sic]

Response No. 29-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

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

From: Michael Jarocki [mailto:michael@lajibs.com]

Sent: Monday, June 04, 2012 3:27 PM

To: Tran, Christina

Subject: Disney movie ranch expansion

Christina, what date is the county planning commission planning on holding a hearing on the disney ranch expansion in santa clarita? Can you extend the comment period by 60 days? I would like to study the plan before commenting on it. Is there a draft environmental impact report available that I might see? I live in santa clarita and work in the film industry. Thank you very much. Sincerely, michael Jarocki
Sent from my Verizon Wireless 4G LTE smartphone

30-1
30-2
30-3

Letter No. 30

Michael Jarocki
Michael@lajibs.com

Comment No. 30-1

Christina, what date is the county planning commission planning on holding a hearing on the disney [sic] ranch expansion in santa clarita? [sic]

Response No. 30-1

A public hearing was held by the County of Los Angeles Hearing Examiner on June 4, 2012, at Hart Hall within William S. Hart Museum and Park, located at 24151 Newhall Avenue, Newhall, California 91321. Notice of the hearing was provided through a variety of means, including: (1) signs posted at multiple locations along Placerita Canyon Road near the Ranch; (2) electronic posting on the County Department of Regional Planning website; (3) newspaper notices published in The Signal and La Opinion on May 3, 2012; and (4) notifications sent via mail and email to: (a) all persons, organizations, and agencies who requested notification or who previously commented on the Project; (b) identified stakeholders in the surrounding area such as homeowners groups, business associations, and local environmental organizations; (c) property owners located within a 1,000-foot radius of the Ranch; and (d) two local libraries. A public hearing will be held by the County of Los Angeles Regional Planning Commission after the release of this Final EIR. Notice of that hearing will be provided through the same means as the notice for the June 4, 2012, Hearing Examiner hearing.

Comment No. 30-2

Can you extend the comment period by 60 days?

Response No. 30-2

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 30-3

I would like to study the plan before commenting on it. Is there a draft environmental impact report available that I might see? I live in santa clarita [sic] and work in the film industry. Thank you very much.

Response No. 30-3

As of May 4, 2012, the Draft EIR for the Project has been available for review online at <http://planning.lacounty.gov/case/all> (listed under Vesting Tentative Tract Map 071216). In addition, the Draft EIR was available for review at the following libraries within the Project area from May 4, 2012 through the end of the public review period on June 18, 2012:

Castaic Library
27971 Sloan Canyon Road
Castaic, CA 91384
(661) 257-7410

Newhall Library
22704 West 9th Street
Newhall, CA 91321
(661) 259-0750

Canyon Country Jo Anne Darcy Library
18601 Soledad Canyon Road
Santa Clarita, CA 91351
(661) 251-2720

Valencia Library
23743 West. Valencia Boulevard.
Santa Clarita, CA 91355
(661) 259-8942

Copies of the Draft EIR and documents referenced in the Draft EIR have also been available for public review Monday through Thursday, 7:30 A.M. to 5:30 P.M., at:

Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012
(213) 974-6461

From: Michael Jarocki [michael@lajibs.com]
Sent: Monday, June 04, 2012 3:52 PM
To: Tran, Christina
Subject: Disney Ranch expansion

Christina, When is the los angeles county planning commission Holding a hearing on the disney ranch Expansion santa clarita? | 31-1

Sent from my Verizon Wireless 4G LTE smartphone

Can you extend the comment period 60 days so that I might be able to see the draft environmental impact report? Are there plans and a copy of the report to that I might see first? Thank you, michael Jarocki | 31-2
| 31-3

Letter No. 31

Michael Jarocki
Michael@lajibs.com

Comment No. 31-1

Christina, When [sic] is the los angeles [sic] county planning commission Holding [sic] a hearing on the disney [sic] ranch Expansion [sic] santa clarita? [sic]

Response No. 31-1

Please refer to Response No. 30-1.

Comment No. 31-2

Can you extend the comment period 60 days so that I might be able to see the draft environmental impact report?

Response No. 31-2

Please refer to Response No. 14-1.

Comment No. 31-3

Are there plans and a copy of the report to that I might see first?

Response No. 31-3

Please refer to Response No. 30-3.

From: Michael Jarocki [michael@lajibs.com]
Sent: Monday, June 04, 2012 4:31 PM
To: Tran, Christina
Subject: Disney ranch expansion

Hi christina, Has a date been set for the ranch expansion Planning |32-1
commission hearing? Can you extend the comment period by 60 days so that |32-2
I may view the plans in the draft environmental impact report? Where may |32-3
I see a copy of that EIR and the plans? Thank you michael jarocki

Sent from my Verizon Wireless 4G LTE smartphone

Letter No. 32

Michael Jarocki
Michael@lajibs.com

Comment No. 32-1

Hi christina, [sic] Has a date been set for the ranch expansion Planning [sic] commission hearing?

Response No. 32-1

Please refer to Response No. 30-1.

Comment No. 32-2

Can you extend the comment period by 60 days so that I may view the plans in the draft environmental impact report?

Response No. 32-2

Please refer to Response No. 14-1.

Comment No. 32-3

Where may I see a copy of that EIR and the plans?

Response No. 32-3

Please refer to Response No. 30-3.

From: Margie Junker [marginarj@yahoo.com]
Sent: Monday, June 04, 2012 9:21 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at the Ranch-county Project #TR071216-(5)

Ms. Christina Tran
Los Angeles County Department of Regional Planning
Special Projects Section, Room 1362

320 W. Temple Street
Los Angeles, CA 90012

Reference: Disney/ABC Studios at The Ranch - County Project #TR071216-(5)

Dear Ms. Tran;

The project proposed by Disney /ABC is an important one that I hope will receive your full consideration and positive report.

33-1

The project is a win-win on many levels. Importantly, it would result in thousands of new jobs, generate millions in local economic stimulus, add millions in annual revenues to our state and millions to our annually to the county.

Beyond the economic benefits, however, the project brings other tangible benefits to the area, according to the draft Environmental Impact Report, Disney plans to invest in the water, sewer and road infrastructure required to support the project --all of which will benefit the community.

In addition, the DEIR said the company plans to connect to existing trails in the Angeles National Forest, which would be a welcome addition to avid walkers, hikers and bikers. I hope you agree that the Disney/ABC project is a win - win for the community I love.

Thank you for your time.

Sincerely,

Dennis and Marjorie Junker
24303 Mornington Drive
Valencia , CA. 91355

cc: Hon. Michael Antonovich, Supervisor, 5th District

Letter No. 33

Dennis and Marjorie Junker
24303 Mornington Drive
Valencia, CA.91355

Comment No. 33-1

The project proposed by Disney /ABC [sic] is an important one that I hope will receive your full consideration and positive report.

The project is a win-win on many levels. Importantly, it would result in thousands of new jobs, generate millions in local economic stimulus, add millions in annual revenues to our state and millions to our [sic] annually to the county.

Beyond the economic benefits, however, the project brings other tangible benefits to the area, according to the draft Environmental Impact Report, Disney plans to invest in the water, sewer and road infrastructure required to support the project --all of which will benefit the community.

In addition, the DEIR said the company plans to connect to existing trails in the Angeles National Forest, which would be a welcome addition to avid walkers, hikers and bikers. I hope you agree that the Disney/ABC project is a win - win for the community I love.

Thank you for your time.

Response No. 33-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Steven C Kassel, MFT, BCB, BCN, AAPM [kassel.us@gmail.com]
Sent: Monday, June 04, 2012 11:45 AM
To: Tran, Christina
Subject: Don't allow Disney to remove oaks

I will not be able to attend the hearing tonight, so I am writing this note in support of saving the Oaks which have been around a lot longer than The Disney Corp and, if respected, will continue to live long past any corporate needs at this moment of time. Otherwise, I consider myself a friend of many of the Disney projects.

34-1

In the even that Disney is allowed to remove the oaks and proceed, I believe they should at least be mandated to move the oaks, even the bigger, older and less accessable ones, to other local grounds.

Thank you.

Steven C Kassel, MFT
Board Certified in Biofeedback
Board Certified in Neurofeedback
Fellow, American Academy of Pain Management
23560 Lyons Ave, 204, Newhall, CA 91321
1545 Sawtelle Ave, #25, West Los Angeles, CA 90025
661 259-3704
fax 661 254-8574
s@kassel.us
www.kassel.us

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Letter No. 34

Steven C Kassel, MFT
23560 Lyons Avenue, Suite 204
Newhall, CA 91321-5726

Comment No. 34-1

I will not be able to attend the hearing tonight, so I am writing this note in support of saving the Oaks which have been around a lot longer than The Disney Corp and, if respected, will continue to live long past any corporate needs at this moment of time. Otherwise, I consider myself a friend of many of the Disney projects.

In the even [sic] that Disney is allowed to remove the oaks and proceed, I believe they should at least be mandated to move the oaks, even the bigger, older and less accessible [sic] ones, to other local grounds.

Response No. 34-1

The relocation of oak trees is discussed in Section 3.2 of the Oak Tree and Woodland Mitigation and Monitoring Plan (OTWMMP), included as Appendix F.6 to the Draft EIR. As discussed on pages 13 and 14 therein, the relocation of oak trees from the Development Area would be considered and evaluated prior to Project construction activity. The selection of trees for relocation would involve a comprehensive evaluation of each tree and relocation site to determine the likelihood of the tree would survive and thrive following relocation. Not all trees would be suitable candidates for relocation. Consistent with the County Oak Tree Ordinance (County Code Sections 22.56.2050, *et seq.*), tree relocation is a voluntary alternative and any relocated trees would require the same mitigation as removed trees. If candidate relocation trees were identified and feasible to relocate, they would be moved to areas where they would receive the maintenance and care necessary to sustain transplanted oaks. Generally, this would not include existing oak woodlands, but might include transition areas on the periphery of oak woodlands and in landscape areas in the Development Area. Regardless of any relocation activities that may be undertaken, the Project Applicant would plant at least 1,600 new oak trees as part of the OTWMMP, with sizes ranging from acorns and seedling plantings to larger oak trees, all of which would be grown from acorns harvested on the Ranch. The mitigation oaks would be planted in suitable habitat in the southeast portion of the Ranch, generally within, surrounding, or adjacent to existing oak woodland and within areas previously containing oak woodlands prior to a wildfire which destroyed oaks in some of the potential restoration and expansion planting areas (refer to Response No. 15-6 for further discussion of the mitigation planting areas). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Lisa Kassner [lisa@angelappliances.com]
Sent: Monday, June 04, 2012 10:56 AM
To: Tran, Christina
Subject: Please oppose cutting down oak trees by Disney in Placerita Cyn.

Hello, Planner Tran:

I urge you to oppose Disney's cutting down of oak trees in beautiful Placerita Canyon! | 35-1

Disney is proposing massive sound stages, etc. in rural Placerita Canyon near the Nature Center where many of you have probably hiked at their existing movie ranch. We worked hard, along with Disney, to save the two adjacent canyons, Whitney and Elsemere from a massive landfill. To have this property converted to industrial use by them now is quite incredible. | 35-2

The project will require a plan amendment changes since the area is rural NOT industrial, (parking waivers (I guess they will all be driving), impacts to Placerita Creek. and the removal of 158 oaks including several heritage oaks (just after the County passed an oak woodland ordinance?), loss of viewshed, etc. | 35-3
| 35-4
| 35-5

No wonder their latest release is coming in behind "the LORAX" movie! How could a company that puts "environmental stewards" on every set propose such an environmentally damaging project? | 35-6

They argue that it will create jobs. But will these jobs be merely moved from their current Burbank stages? Full time work, we doubt it. They need to substantiate any jobs claims. No more destroying the environment ostensibly for thousands of jobs that never appear! | 35-7

Thank you for your support.

Lisa Kassner

Letter No. 35

Lisa Kassner
lisa@angelappliances.com

Comment No. 35-1

I urge you to oppose Disney's cutting down of oak trees in beautiful Placerita Canyon!

Response No. 35-1

This comment expresses opposition to the removal of oak trees. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Refer to Response No. 34-1 regarding the OTWMMP to be implemented as part of the Project.

Comment No. 35-2

Disney is proposing massive sound stages, etc. in rural Placerita Canyon near the Nature Center where many of you have probably hiked at their existing movie ranch. We worked hard, along with Disney, to save the two adjacent canyons, Whitney and Elsemere from a massive landfill. To have this property converted to industrial use by them now is quite incredible.

The project will require a plan amendment changes since the area is rural NOT industrial, [sic]

Response No. 35-2

Refer to Response No. 15-2 regarding the requested local plan amendment. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 35-3

(parking [sic] waivers (I guess they will all be driving),

Response No. 35-3

New development must provide adequate parking in accordance with County Code requirements. All Code-required parking would be provided on the Ranch. As a matter of clarification, the Project will require a parking permit to authorize: (1) some tandem parking

on-site; (2) the use of shared off-lot parking (i.e., parking spaces that serve buildings located on different legal lots within the Project site and parking proposed under the LADWP transmission line corridor); and (3) an exemption from paving and striping requirements for surplus parking within the conditional parking lots to maintain the rural character of the Ranch if parking within the LADWP transmission corridor is later revoked by LADWP.

Comment No. 35-4

impacts to Placerita Creek. [sic] and the removal of 158 oaks including several heritage oaks (just after the County passed an oak woodland ordinance?),

Response No. 35-4

Biological impacts are evaluated in Section V.F, Biological Resources, of the Draft EIR. As indicated on page V.F-95 therein, with the implementation of the proposed Mitigation Measures and Project Design Features, the Project would have less than significant impacts with respect to biological resources. Specifically, impacts on vegetation and jurisdictional waters within Placerita Creek and impacts to oak trees would be fully mitigation via implementation of the Habitat Mitigation and Monitoring Program (HMMP) and the OTWMMP (see Mitigation Measures MM F-1 and MM F-3, as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR). The Project would stabilize eroding slopes on either side of Placerita Creek created by Caltrans when it deposited over 23 acres of fill during the construction of SR-14 in the early 1970s. As illustrated in Figure V.F-23 on page V.F-85 and discussed on page V.F-86 of Section V.F, Biological Resources, of the Draft EIR, the HMMP and the Project's bank stabilization improvements would provide a net gain in habitat functions for the ACOE/RWQCB jurisdictional creek bottom and CDFW-only jurisdictional riparian and upland buffers in terms of geomorphic stability, nutrient processing/recycling, and wildlife habitat. Additionally, a net gain of 1.58 acres of CDFW jurisdictional habitat would be created due to new establishment areas (i.e., the creation of new riparian habitat/jurisdictional waters where they do not occur under existing conditions) within the upland portions of the creek. As a matter of clarification, the County Oak Tree Ordinance (County Code Sections 22.56.2050, *et seq.*) does not prohibit the removal of oak trees, but rather requires an applicant obtain an oak tree permit to authorize such activities, provided various conditions are met and adequate mitigation is implemented. Refer to Response No. 34-1 regarding the OTWMMP to be implemented as part of the Project.

Comment No. 35-5

loss of viewshed, etc.

Response No. 35-5

View impacts are evaluated in Section V.I, Visual Qualities, of the Draft EIR. As indicated on page V.I-38 therein, the Project would not have a substantial adverse effect on a scenic vista or substantially alter views from a public trail, and view impacts would be less than significant.

Comment No. 35-6

No wonder their latest release is coming in behind “the LORAX” movie! How could a company that puts “environmental stewards” on every set propose such an environmentally damaging project?

Response No. 35-6

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As a matter of clarification, the movie “The Lorax” is not a Disney production, but rather one by Universal Pictures.

Comment No. 35-7

They argue that it will create jobs. But will these jobs be merely moved from their current Burbank stages? Full time work, we doubt it. They need to substantiate any jobs claims. No more destroying the environment ostensibly [sic] for thousands of jobs that never appear!

Thank you for your support.

Response No. 35-7

Refer to Response No. 15-5. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Gary Kodel [g5s5k5@sbcglobal.net]
Sent: Monday, June 04, 2012 9:18 PM
To: Tran, Christina
Subject: Disney Sound Studios in rural Placerita Canyon

To Whom It May Concern,

Placerita Canyon needs to be kept rural - not industrial as this project will require. Placerita | 36-1
Canyon provides residents with many recreational opportunities such as hiking in these | 36-2
environmentally sensitive areas. We need to preserve our oak tree communities with all of the | 36-3
species that we have a chance to share this space. Teh Disney studio project should be moved to | 36-4
a less environmentally sensitive area. Thanks.

Sincerely,

Gary Kodel
29262 Marilyn Drive
Canyon Country, CA 91387

Letter No. 36

Gary Kodel
29262 Marilyn Drive
Canyon Country, CA 91387

Comment No. 36-1

Placerita Canyon needs to be kept rural - not industrial as this project will require.

Response No. 36-1

Refer to Response No. 15-2. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 36-2

Placerita Canyon provides residents with many recreational opportunities such as hiking in these environmentally sensitive areas.

Response No. 36-2

As discussed on pages IV-33 through IV-35 in IV, Project Description, of the Draft EIR, as part of the Project, the Applicant would dedicate an easement for a proposed trail, referred to as the Placerita Canyon Connector Trail, which would be constructed as a public, multi-use trail for hiking, mountain-biking, and equestrian use and would connect to existing trails within Angeles National Forest. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 36-3

We need to preserve our oak tree communities with all of the species that we have a chance to share this space.

Response No. 36-3

Refer to Response No. 34-1 regarding the OTWMMP to be implemented as part of the Project. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 36-4

Teh [sic] Disney studio project should be moved to a less environmentally sensitive area. Thanks.

Response No. 36-4

Alternatives to the Project are evaluated in Section VI, Project Alternatives, of the Draft EIR. In accordance with CEQA Guidelines Section 15126.6(c), the EIR identifies alternatives that were considered for analysis but rejected as infeasible, including an Alternative Site. The reasons for which an Alternative Site was rejected as infeasible are discussed on pages VI-7 and VI-8 of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Margaret Lee [margaretleemeans@yahoo.com]
Sent: Tuesday, June 05, 2012 10:55 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney Ranch

Ms. Christina Tran
Los Angeles County
Dept. of Regional Planning
Special Projects Section, Room 1362
320 W. Temple St.
Los Angeles, CA 90012

Reference: Disney/ABC Studios at The Ranch - County Project #TRO71216-(5)

Dear Ms. Tran,

I have been a longtime resident of the Santa Clarita Valley and know how important the entertainment industry is to the area, particularly the local economy and job growth. So I was pleased to learn about the Disney/ABC Studios at The Ranch project.

37-1

Disney/ABC Studios at The Ranch will be a welcome addition to the area's current film and production activities and will mean that the valley will continue to attract filming and production projects, create thousands of jobs, and provide new revenue streams to the county.

I support the project not simply for the economic and job creation benefits, but also for its thoughtful commitment to preserving the area's important environmental features. I understand from the draft Environmental Impact Report that the project includes plans to rehabilitate the creek and plant far more oaks than required by the County when removing oak trees. And how great that those new trees will be generated from acorns that are actually harvested on the property!!

The Disney/ABC Studios at The Ranch is a well-planned project that has my full support. I hope you will give a positive recommendation to this important project.

Sincerely,

Margaret Means Lauffer
27742 Briarcliff Pl.
Valencia, CA 91354

cc: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert

Letter No. 37

Margaret Means Lauffer
27742 Briarcliff Place
Valencia, CA 91354

Comment No. 37-1

I have been a longtime resident of the Santa Clarita Valley and know how important the entertainment industry is to the area, particularly the local economy and job growth. So I was pleased to learn about the Disney/ABC Studios at The Ranch project.

Disney/ABC Studios at The Ranch will be a welcome addition to the area's current film and production activities and will mean that the valley will continue to attract filming and production projects, create thousands of jobs, and provide new revenue streams to the county.

I support the project not simply for the economic and job creation benefits, but also for its thoughtful commitment to preserving the area's important environmental features. I understand from the draft Environmental Impact Report that the project includes plans to rehabilitate the creek and plant far more oaks than required by the County when removing oak trees. And how great that those new trees will be generated from acorns that are actually harvested on the property!!

The Disney/ABC Studios at The Ranch is a well-planned project that has my full support. I hope you will give a positive recommendation to this important project.

Response No. 37-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: isaacinla@gmail.com on behalf of Isaac Lieberman
[ILieberm@UCLA.edu]
Sent: Monday, June 04, 2012 5:15 PM
To: Tran, Christina
Subject: I Oppose Oaks removal, zoning changes, and other issues re. Disney development project in and near Placerita Canyon

Dear LA County Planning,

38-1

38-2

I Oppose Oaks removal, zoning changes, and other issues re. Disney development project in and near Placerita Canyon. 38-3

Thank you,

Isaac Lieberman,
Santa Clarita

Isaac Lieberman
Cell: (661) 373-6084

Letter No. 38

Isaac Lieberman
ilieberm@ucla.edu

Comment No. 38-1

I Oppose [sic] Oaks [sic] removal, zoning changes, and other issues re. [sic] Disney development project in and near Placerita Canyon.

Thank you,

Response No. 38-1

Refer to Response No. 35-4 regarding oak tree impacts and Response No. 15-2 regarding the proposed zone change. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: David Lutness [dlutness@att.net]
Sent: Monday, June 04, 2012 6:25 PM
To: Tran, Christina
Subject: Disney is proposing massive sound stages, etc. in rural Placerita Canyon

As I understand it, Disney proposes to cut 158 oaks including several heritage oaks on their rural property in Placerita Canyon. It is my understanding that goes against the Counties Oak tree ordinance. They make the usual claim of jobs, but it is our traffic, environment and quality of life that will be negatively impacted. I **oppose this.** It is time for the county to stop rolling over.

--
David Lutness

Letter No. 39

David Lutness
dlutness@att.net

Comment No. 39-1

As I understand it, Disney proposes to cut 158 oaks including several heritage oaks on their rural property in Placerita Canyon. It is my understanding that goes against the Counties [sic] Oak tree ordinance.

Response No. 39-1

Refer to Response No. 35-4 regarding oak tree impacts and clarification regarding the County Oak Tree Ordinance.

Comment No. 39-2

They make the usual claim of jobs, but it is our traffic, environment and quality of life that will be negatively impacted. **I oppose this.** It is time for the county to stop rolling over.

Response No. 39-2

Refer to Response No. 15-5 regarding Project employment and Response No. 23-1 regarding traffic impacts. A summary of all Project impacts is provided in Table II-1 on pages II-9 through II-100 in Section II, Executive Summary, of the Draft EIR. As shown therein and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, nearly all of the Project's impacts would be less than significant following mitigation. The only significant and unavoidable impacts would be short-term construction noise and cumulative construction noise impacts associated with the Off-Site Infrastructure Improvement Areas, cumulative off-site operational traffic noise along Placerita Canyon Road (west of Sierra Highway), and short-term construction-related and cumulative construction-related regional air emissions. All significant and unavoidable impacts would require a Statement of Overriding Considerations by the County. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Angela Lynn [angela.b.lynn@gmail.com]
Sent: Friday, June 08, 2012 10:18 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Comments on Disney/ABC Studios Project

Ms. Christina Tran

REF: TRO71216-(5) (Disney/ABC)

Dear Ms. Tran,

I am writing to express my support for the Disney/ ABC Studios at the Ranch application to build new soundstages and production-related facilities on their property near Santa Clarita. This project will create thousands of jobs which would be very helpful in spurring economic recovery. I was born and raised in the Santa Clarita Valley and feel that a project such as the Disney Ranch will be a great addition to this growing valley.

At the same time, the draft EIR shows that development will have minimal impact on the environment. Only 58 acres out of the entire 890-acre property will be affected, with most of the rest remaining as "natural backdrop." The project will also include a number of steps to enhance the property, especially the planting of hundreds of oak trees grown from acorns indigenous to the property, and a new 2-million-gallon water tank that will boost fire protection.

Thank you for your time.

Sincerely,

Angela Lynn
27103 Red Maple Ct
Canyon Country, CA 91387

40-1

Letter No. 40

Angela Lynn
27103 Red Maple Court
Canyon Country, CA 91387

Comment No. 40-1

I am writing to express my support for the Disney/ ABC [sic] Studios at the Ranch application to build new soundstages and production-related facilities on their property near Santa Clarita. This project will create thousands of jobs which would be very helpful in spurring economic recovery. I was born and raised in the Santa Clarita Valley and feel that a project such as the Disney Ranch will be a great addition to this growing valley.

At the same time, the draft EIR shows that development will have minimal impact on the environment. Only 58 acres out of the entire 890-acre property will be affected, with most of the rest remaining as “natural backdrop.” The project will also include a number of steps to enhance the property, especially the planting of hundreds of oak trees grown from acorns indigenous to the property, and a new 2-million-gallon water tank that will boost fire protection.

Thank you for your time.

Response No. 40-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Blondemom0204 [blondemom0204@aol.com]
Sent: Friday, June 08, 2012 3:21 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: RE: Disney Studios at The Ranch -- Project # TRO71216-(5)

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

RE: Disney Studios at The Ranch -- Project # TRO71216-(5)

Ms. Tran:

I was disappointed not to be able to attend the public meeting recently held which offered the public the opportunity to comment on the Disney/ABC Studios Draft Environmental Impact Report.

However, since my support for the project is so strong, I wanted to put a couple of my thoughts on paper for the official record.

Placerita Creek runs through the Golden Oak Ranch and for the most part, the creek and its banks remain wild and native. However when the 14 Freeway was built, Caltrans dumped an enormous amount of construction debris on the property that Disney plans for its studio. Over the years, that debris has undermined the creek banks, despoiling its native beauty. According to the Draft environmental document, Disney’s plans will restore and strengthen the banks, allowing native vegetation to once again flourish. I think that is terrific.

I also like the idea that a studio campus, complete with landscaping, will be built on the existing fill pads, so that instead of seeing the “lunar landscape” that exists today, we will see a bustling and thriving place of employment.

For those reasons, I hope this project will be swiftly approved by those involved in the decision-making process.

41-1

Sincerely,
Jonni Machado

Letter No. 41

Jonni Machado
blondemom0204@aol.com

Comment No. 41-1

I was disappointed not to be able to attend the public meeting recently held which offered the public the opportunity to comment on the Disney/ABC Studios Draft Environmental Impact Report.

However, since my support for the project is so strong, I wanted to put a couple of my thoughts on paper for the official record.

Placerita Creek runs through the Golden Oak Ranch and for the most part, the creek and its banks remain wild and native. However when the 14 Freeway was built, Caltrans dumped an enormous amount of construction debris on the property that Disney plans for its studio. Over the years, that debris has undermined the creek banks, despoiling its native beauty. According to the Draft environmental document, Disney's plans will restore and strengthen the banks, allowing native vegetation to once again flourish. I think that is terrific.

I also like the idea that a studio campus, complete with landscaping, will be built on the existing fill pads, so that instead of seeing the "lunar landscape" that exists today, we will see a bustling and thriving place of employment.

For those reasons, I hope this project will be swiftly approved by those involved in the decision-making process.

Response No. 41-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Randy Martin [drrandymartin@gmail.com]
Sent: Monday, June 04, 2012 12:05 PM
To: Tran, Christina
Cc: Tran, Christina
Subject: Please Deny Disney Permits

6/4/12

Re: Disney permits to remove Oak Trees in Placerita

Sirs:

Please DENY disney the permits to develop an industrial use near Placerita Park. | 42-1

The removal of the Oak Trees should not be allowed to occur in a natural area. | 42-2

Additional employment is not true. It will only be moved from their Burbank facility. -- | 42-3

Recommend removal of this project to the city and not in the rural area. | 42-4

Dr Randy Martin, OMD
23812 Spinnaker Court
Valencia, CA 91355
310 63 8972

Letter No. 42

Randy Martin, OMD
23812 Spinnaker Court
Valencia, CA 91355

Comment No. 42-1

Please DENY disney [sic] the permits to develop an industrial use near Placerita Park.

Response No. 42-1

Refer to Response No. 15-2. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 42-2

The removal of the Oak Trees [sic] should not be allowed to occur in a natural area.

Response No. 42-2

Refer to Response No. 35-4 regarding oak tree impacts. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 42-3

Additional employment is not true. It will only be moved from their Burbank facility. -- [sic]

Response No. 42-3

Refer to Response No. 15-5 regarding Project employment. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 42-4

Recommend removal of this project to the city and not in the rural area.

Response No. 42-4

Refer to Response No. 36-4 regarding an alternative site for the Project. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Randy Martin [drrandymartin@gmail.com]
Sent: Monday, June 04, 2012 5:00 PM
To: Tran, Christina
Subject: Comment on Disney Project

6/4/12

Re: Disney Project at Placeterita Canyon

Please extend the period of time for public comment 45 days so we can look at this more clearly and respond more intelligently. |43-1

Dr Randy Martin
The Cove
Bridgeport
Valencia, CA
310 663 8972

Letter No. 43

Dr. Randy Martin
The Cove
Bridgeport
Valencia, CA
drrandymartin@gmail.com

Comment No. 43-1

Please extend the period of time for public comment 45 days so we can look at this more clearly and respond more intelligently.

Response No. 43-1

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Randy Martin [drrandymartin@gmail.com]
Sent: Monday, June 04, 2012 5:12 PM
To: Tran, Christina
Subject: Re: Comment on Disney Project

44-1

My comments are that the project should be denied.

44-2

It is not an appropriate usage for a rural area and Oak Trees should not be allowed to be pulled out - they are a treasure and natural resource.

Also employment is not new employment - it is just being displaced from Burbank

44-3

Letter No. 44

Randy Martin
drrandymartin@gmail.com

Comment No. 44-1

My comments are that the project should be denied.

It is not an appropriate usage for a rural area

Response No. 44-1

Refer to Response No. 15-2. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 44-2

and Oak Trees [sic] should not be allowed to be pulled out - they are a treasure and natural resource.

Response No. 44-2

Refer to Response No. 35-4 regarding oak tree impacts. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 44-3

Also employment [sic] is not new employment - it is just being displaced from Burbank [sic]

Response No. 44-3

Refer to Response No. 15-5 regarding Project employment. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Judith McClure [mailto:r-j_mcclure@msn.com]
Sent: Monday, June 04, 2012 3:21 PM
To: Tran, Christina
Subject: DEIR - Disney Ranch Project - Request for Extension

Dear Ms. Tran,

The Disney Ranch Project/ABC Studios at the Ranch Project is of concern to us; however, we have not had time to fully read the DEIR.

45-1

Due to its complexity, we respectfully request a time extension. The formal public review period from May 4, 2012 to June 18, 2012 is simply not long enough for us to read and fully understand the contents.

We respectfully request an extension.

Thank you.

Roger and Judith McClure
Santa Clarita, California

Letter No. 45

Roger and Judith McClure
Santa Clarita, California
r-j_mcclure@msn.com

Comment No. 45-1

The Disney Ranch Project/ABC Studios at the Ranch Project is of concern to us; however, we have not had time to fully read the DEIR.

Due to its complexity, we respectfully request a time extension. The formal public review period from May 4, 2012 to June 18, 2012 is simply not long enough for us to read and fully understand the contents.

We respectfully request an extension.

Thank you.

Response No. 45-1

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Kerry Mills
48303 20th Street West, #156
Lancaster, CA 93534
June 8, 2012

Ms. Christina Tran
LA County Dept. of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Subject: County Project # TRO71216 - (5) -Disney Studios

Dear Ms. Tran,

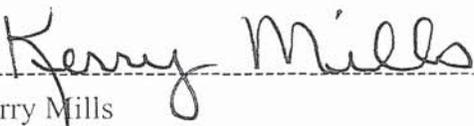
I write today to express my support for the Disney | ABC Studios at the Ranch project for which the Draft Environment Impact Report was just completed. What a great study. Clearly it took the work of many experts to complete such a comprehensive report. And I thank those who put it together.

46-1

I was glad to learn that the project will protect the beauty of the Ranch and will maintain the 600 plus acre natural backdrop area. And I think it's great that the development will be concentrated on a very small portion of the vast property, and that that buildings will directly adjacent to SR-14, rather than in the middle of ranch land.

Seems like a winning project for all concerned. Let's move it forward and help get the economy rolling.

Best Regards,



Kerry Mills

CC: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert, Disney

Letter No. 46

Kerry Mills
48303 20th Street West, No. 156
Lancaster, CA 93534-7418

Comment No. 46-1

I write today to express my support for the Disney | ABC Studios at the Ranch project for which the Draft Environment Impact Report was just completed. What a great study. Clearly it took the work of many experts to complete such a comprehensive report. And I thank those who put it together.

I was glad to learn that the project will protect the beauty of the Ranch and will maintain the 600 plus acre natural backdrop area. And I think it's great that the development will be concentrated on a very small portion of the vast property, and that that [sic] buildings will [sic] directly adjacent to SR-14, rather than in the middle of ranch land.

Seems like a winning project for all concerned. Let's move it forward and help get the economy rolling.

Response No. 46-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: craig mohr [cmohr56@yahoo.com]
Sent: Thursday, June 07, 2012 2:28 PM
To: Tran, Christina
Cc: adam.gilbert@disney.com; fifthdistrict@lacbos.org

...
Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

In reference: Disney/ABC Studios – County Project #TRO71216-(5)

Ms. Tran:

It's truly amazing that for a project the scope of Disney's proposed new studios at their movie ranch, there are so few significant environmental impacts. I think that shows that Disney really went the extra mile in their efforts to plan a project that meshes harmoniously with the environment of their working movie ranch.

47-1

Disney could have located their studios anywhere on the Golden Oak Ranch property. But they wisely chose to focus their development on the existing freeway fill pads that are located on their property directly adjacent to the 14 freeway. By clustering development on those pads, the vast majority of the ranch property is maintained as natural backdrop which is perfect for filming.

The Draft EIR that the County prepared took a look at numerous potential issue areas and identified feasible mitigation measures that will make the project even better than originally proposed. I strongly believe that this is a great project for our community and for the entertainment industry.

Yours truly,

Craig Mohr
21950 Placeritos Blvd
Newhall, CA 91321-1854
310-350-8372

...
...

Letter No. 47

Craig Mohr
21950 Placeritos Boulevard
Newhall, CA 91321-1854

Comment No. 47-1

It's truly amazing that for a project the scope of Disney's proposed new studios at their movie ranch, there are so few significant environmental impacts. I think that shows that Disney really went the extra mile in their efforts to plan a project that meshes harmoniously with the environment of their working movie ranch.

Disney could have located their studios anywhere on the Golden Oak Ranch property. But they wisely chose to focus their development on the existing freeway fill pads that are located on their property directly adjacent to the 14 freeway. By clustering development on those pads, the vast majority of the ranch property is maintained as natural backdrop which is perfect for filming.

The Draft EIR that the County prepared took a look at numerous potential issue areas and identified feasible mitigation measures that will make the project even better than originally proposed. I strongly believe that this is a great project for our community and for the entertainment industry.

Response No. 47-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: RuthAnne [ramurthy@sbcglobal.net]
Sent: Monday, June 04, 2012 4:03 PM
To: Tran, Christina
Subject: Oaks

Please reconsider allowing the oaks on the Placerita Disney property to be cut down. They provide food and shelter for our animals and they are vital members of our natural environment. Some of the oaks are hundreds of years old. There has to be a better solution. | 48-1

Thank you,
RuthAnne Murthy

Sent from my iPhone

Letter No. 48

RuthAnne Murthy
ramurthy@sbcglobal.net

Comment No. 48-1

Please reconsider allowing the oaks on the Placerita Disney property to be cut down. They provide food and shelter for our animals and they are vital members of our natural environment. Some of the oaks are hundreds of years old. There has to be a better solution.

Response No. 48-1

Refer to Response No. 35-4 regarding oak tree impacts. The analysis of biological impacts provided in Section V.F, Biological Resources, of the Draft EIR included an evaluation of potential impacts to habitat, nesting birds, and wildlife movement, as well as indirect impacts to wildlife due to noise and lighting (both during construction and operations), all of which were determined to be less than significant with mitigation. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Jenny [liefjens@ca.rr.com]
Sent: Friday, June 08, 2012 8:36 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at the Ranch

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Subject: Disney/ABC Studios - County Project #TRO71216-(5)

Ms. Tran,

Increased traffic and congestion is always a concern when any major development project is proposed, including Disney/ABC's planned studios at Golden Oak Ranch. 49-1

But the Draft Environmental Impact report points out that project-related traffic will be minimal and that Disney has a traffic mitigation plan that will address all traffic issues. It's also important to understand that studio and production jobs typically don't follow the usual a.m. and p.m. work travel times. Instead, employees often begin their workday much earlier than the usual 9 a.m., and end their work day well before 5 p.m. thereby avoiding rush hour traffic.

In my view, the employment and economic benefits associated with the project far outweigh any potential impacts. I encourage the County decision-makers to do the right thing by approving this crucially important project.

Sincerely yours,

Lief Nicolaisen
26046 Lucerne Ct.
Valencia, CA 91355
661-286-9129

Cc: Supervisor Mike Antonovich
Adam Gilbert

Letter No. 49

Lief Nicolaisen
26046 Lucerne Court
Valencia, CA 91355

Comment No. 49-1

Increased traffic and congestion is always a concern when any major development project is proposed, including Disney/ABC's planned studios at Golden Oak Ranch.

But the Draft Environmental Impact report points out that project-related traffic will be minimal and that Disney has a traffic mitigation plan that will address all traffic issues. It's also important to understand that studio and production jobs typically don't follow the usual a.m. and p.m. work travel times. Instead, employees often begin their workday much earlier than the usual 9 a.m., and end their work day well before 5 p.m. thereby avoiding rush hour traffic.

In my view, the employment and economic benefits associated with the project far outweigh any potential impacts. I encourage the County decision-makers to do the right thing by approving this crucially important project.

Response No. 49-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment also correctly indicates that vehicular trips associated with 24-hour studio operations frequently occur outside of the A.M. and P.M. peak hours. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Adriana O'Dell [chicassalon@hotmail.com]
Sent: Wednesday, June 13, 2012 8:48 PM
To: Tran, Christina
Subject: ABC Studios at the Ranch

Dear Ms. Tran,

I am writing in support of the proposed expansion of Disney/ABC Golden Oaks Ranch.

50-1

This project is a winner for the area and for the larger region on many counts. First, it will provide a much needed financial and employment boost, bringing clean industry and well-paying jobs to the Santa Clarita valley.

At the same time, the Draft EIR points out that major steps will be taken to restore Placerita Creek, at least 1,600 oak trees will be planted on the property, and a rich oak woodland habitat will be created. These are all huge pluses.

For these reasons, I support these plans for the new studio.

Adriana ODell

Sent from my iPhone

Letter No. 50

Adriana O'Dell
chicassalon@hotmail.com

Comment No. 50-1

I am writing in support of the proposed expansion of Disney/ABC Golden Oaks Ranch.

This project is a winner for the area and for the larger region on many counts. First, it will provide much needed financial and employment boost, bringing clean industry and well-paying jobs to the Santa Clarita valley.

At the same time, the Draft EIR points out that major steps will be taken to restore Placerita Creek, at least 1,600 oak trees will be planted on the property, and a rich oak woodland habitat will be created. These are all huge pluses.

For these reasons, I support these plans for the new studio.

Response No. 50-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: esp3800@aol.com
Sent: Monday, June 04, 2012 11:19 AM
To: Tran, Christina
Subject: CRD3 - Public Comment for 158 Oaks - Placerita Canyon near Nature Center - June 4, 2012 24151 Newhall Ave., Newhall CA 91321

Local activists worked very hard, along with Disney, to save two adjacent canyons, Whitney and Elsemere, from a massive landfill. Now, to have this property converted to industrial use is incredible.

51-1

I urge you to pick up a copy of "the LORAX."

This project needs to be changed or moved. Movie jobs go where the camera goes and that needs to be somewhere other than a site with 158 oak trees, that do need our protection. Disney has options, and the best one is to take the high ground and agree to find another site.

51-2

Please confirm receipt. I will not be able to attend this evening but wanted to make my comment part of the official meeting record. I would request that a county representative read it, in my absence. Thank you.

51-3

Eric Preven
The County Resident from District 3
818-762-7719
818-645-2616 mobile

Letter No. 51

Eric Preven
esp3800@aol.com

Comment No. 51-1

Local activists worked very hard, along with Disney, to save two adjacent canyons, Whitney and Elsemere, from a massive landfill. Now, to have this property converted to industrial use is incredible.

I urge you to pick up a copy of “the LORAX.”

Response No. 51-1

Refer to Response No. 15-2. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-2

This project needs to be changed or moved. Movie jobs go where the camera goes and that needs to be somewhere other than a site with 158 oak trees, that do need our protection. Disney has options, and the best one is to take the high ground and agree to find another site.

Response No. 51-2

Refer to Response No. 36-4 regarding an alternative site for the Project and Response No. 35-4 regarding oak tree impacts. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-3

Please confirm receipt. I will not be able to attend this evening but wanted to make my comment part of the official meeting record. I would request that a county representative read it, in my absence. Thank you.

Response No. 51-3

CEQA Guidelines Section 15088(a) states that “[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments that were

received during the notice comment period and any extensions and may respond to late comments.” In accordance with these requirements, this section of the Final EIR provides responses to each of the written comments received regarding the Draft EIR during the public comment period.

From: nayeli Aguirre [acoladiv11@yahoo.com]
Sent: Sunday, June 10, 2012 11:28 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: my support

Nayeli Aguirre Sanchez
27361 Sierra Highway, Spc 120
Canyon Country, CA 91351

Christina Tran
Los Angeles County
Regional Planning Dept.

Re: TRO71216-(5) Disney/ABC Studios Project

Dear Ms. Tran,

I support the Golden Oaks Ranch expansion; it will be a boon to the Santa Clarita Valley and the draft EIR convinces me that the project is well thought out with little in the way of negative environmental effects.

52-1

Adding modern soundstages and production facilities to the existing outdoor movie ranch will create thousands of new jobs in the entertainment industry, benefiting people such as myself who might be able to find work closer to home. It will also help the entertainment industry as whole, keeping the region the entertainment capital of the world. And it will benefit us locally, creating badly needed economic stimulus.

This is positive on all counts and I encourage you to approve the project.

Sincerely,
Nayeli Aguirre Sanchez

Letter No. 52

Nayeli Aguirre Sanchez
27361 Sierra Highway, No. 120
Canyon Country, CA 91351-7433

Comment No. 52-1

I support the Golden Oaks Ranch expansion; it will be a boon to the Santa Clarita Valley and the draft EIR convinces me that the project is well thought out with little in the way of negative environmental effects.

Adding modern soundstages and production facilities to the existing outdoor movie ranch will create thousands of new jobs in the entertainment industry, benefiting people such as myself who might be able to find work closer to home. It will also help the entertainment industry as whole, keeping the region the entertainment capital of the world. And it will benefit us locally, creating badly needed economic stimulus.

This is positive on all counts and I encourage you to approve the project.

Response No. 52-1

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Joann Sarachman [jsarach@yahoo.com]
Sent: Monday, June 04, 2012 11:36 AM
To: Tran, Christina
Subject: oak removal

Please save the Placerita Canyon oaks! Thanks for my future generations. | 53-1
Joann Sarachman
Whittier CA

Letter No. 53

Joann Sarachman
Whittier, CA
jsarach@yahoo.com

Comment No. 53-1

Please save the Placerita Canyon oaks! Thanks for my future generations.

Response No. 53-1

Refer to Response No. 35-4 regarding oak tree impacts. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Jeff Secor [secor6@sbcglobal.net]
Sent: Tuesday, June 12, 2012 8:22 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at the Ranch

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 W. Temple St.
Los Angeles, CA 90012

Re: Disney/ABC Studios at The Ranch -- County Project #TRO71216-(5)

Ms. Tran:

As a longtime resident of the Santa Clarita Valley, I care deeply about the community and its future. I try to stay involved in community matters, listen to different viewpoints, and take a position on matters I believe in.

54-1

When I first learned about the plans for Golden Oak Ranch, I had some concerns about its potential impacts -- such as traffic, construction, noise, and environmental -- in the Placerita Canyon area. But the draft Environmental Impact Report alleviated my concerns.

I was pleased to learn that the County and the company addressed these areas in the DEIR, including plans to develop construction mitigation measures, create a traffic plan and add stoplights, and implement a very comprehensive oak tree mitigation program.

In my mind, the company has taken the key actions to ensure the project covers all the right bases. I support this project and urge you to approve it without hesitation.

Regards --

Jeff Secor
21244 Placerita Canyon
Newhall, CA 91321

cc: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert

Letter No. 54

Jeff Secor
21244 Placerita Canyon
Newhall, CA 91321

Comment No. 54-1

As a longtime resident of the Santa Clarita Valley, I care deeply about the community and its future. I try to stay involved in community matters, listen to different viewpoints, and take a position on matters I believe in.

When I first learned about the plans for Golden Oak Ranch, I had some concerns about its potential impacts -- such as traffic, construction, noise, and environmental -- in the Placerita Canyon area. But the draft Environmental Impact Report alleviated my concerns.

I was pleased to learn that the County and the company addressed these areas in the DEIR, including plans to develop construction mitigation measures, create a traffic plan and add stoplights, and implement a very comprehensive oak tree mitigation program.

In my mind, the company has taken the key actions to ensure the project covers all the right bases. I support this project and urge you to approve it without hesitation.

Response No. 54-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: Michael Shapiro [1hotamericanpirate@gmail.com]
Sent: Tuesday, June 05, 2012 8:50 AM
To: Tran, Christina; fifthdistrict@lacbos.org; adam.gilbert@disney.com; Bashar, Amir
Subject: Comments on Disney/ABC Studios Project

Christina Tran
LA County Planning Dept.

Re: TRO71216-(5) Disney/ABC Studios Project

Dear Ms. Tran,

I am writing to express my support for this project. The draft EIR shows the significant steps that Disney/ABC will undertake to restore oak woodlands previously damaged by fire, make improvements to Placerita Creek, and add to hiking resources with a new trail that will connect to the existing trail network.

55-1

It appears that the project planners have also given careful consideration to minimizing the impacts on area residents during construction, with mitigation plans that will reduce noise, air pollution and traffic impacts.

I believe this is a good project for our community and the county.

Michael Shapiro
26824 MadignDr
Canyon Country, CA 91351

Letter No. 55

Michael Shapiro
26824 Madigan Drive
Canyon Country, CA 91351

Comment No. 55-1

I am writing to express my support for this project. The draft EIR shows the significant steps that Disney/ABC will undertake to restore oak woodlands previously damaged by fire, make improvements to Placerita Creek, and add to hiking resources with a new trail that will connect to the existing trail network.

It appears that the project planners have also given careful consideration to minimizing the impacts on area residents during construction, with mitigation plans that will reduce noise, air pollution and traffic impacts.

I believe this is a good project for our community and the county.

Response No. 55-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

24 May 2012

Mr. Richard J. Bruckner
Director of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Dear Mr. Bruckner,

My schedule unfortunately prohibits me from attending the public hearing on this project, and testifying on its behalf, however, I would like this letter to express my support for the Disney/ABC Studios at the Ranch Project and EIR.

56-1

I have spent over 20 years living and working in the Santa Clarita valley as professional Biologist and later as a Park Superintendent at Placerita Canyon Natural Area, directly east of the Golden Oak Ranch. During this time, I have seen many developers and development projects come and go. Many of these projects took much more from the environment than they gave back (if they gave back at all). After reviewing the EIR for this project, I can say for certain this is not the case with this project. When a project proponent has 890 acres and only develops 58, this not only a win for the environment, it is a win for the community, which also benefits from the project as well.

Having worked with Disney and the Golden Oak Ranch for many years, I have seen firsthand their commitment to the environment on the Ranch. I have never seen a landowner that cares for their land, particularly their oak trees, as well as the Golden Oak Ranch. The Ranch voluntarily goes out of its way to replace oak trees as they die, using seeds (acorns) from the ranch so that native genotypes can be preserved on the property. They raise all the saplings on-site, to ensure they are acclimated to the surrounding environment.

While many development projects mitigate oak tree impacts with trees grown from unknown locations, and monitor the trees for the required five year period, then walk away, leaving the trees to live or die planted and watered in locations they are not adapted to, this will not be the case at the Golden Oak Ranch. This project will have the advantage of the Ranch staff and the hundreds of remaining acres of habitat to nurture and grow oaks over the long-term. This is much more than any other project can claim.

With development projects, as with many things in life, we examine the details and we reward the best with our approval. In regards to the Disney/ABC Studios at the Ranch project, I hope you and the Regional Planning Commission will recognize this project with approval.

Regards,

A handwritten signature in black ink, appearing to read 'Ian Swift', written in a cursive style.

Ian Swift, Biologist

Letter No. 56

Ian Swift
Biologist

Comment No. 56-1

My schedule unfortunately prohibits me from attending the public hearing on this project, and testifying on its behalf, however, I would like this letter to express my support for the Disney/ABC Studios at the Ranch Project and EIR.

I have spent over 20 years living and working in the Santa Clarita valley as professional Biologist and later as a Park Superintendent at Placerita Canyon Natural Area, directly east of the Golden Oak Ranch. During this time, I have seen many developers and development projects come and go. Many of these projects took much more from the environment than they gave back (if they gave back at all). After reviewing the EIR for this project, I can say for certain this is not the case with this project. When a project proponent has 890 acres and only develops 58, this not only a win for the environment, it is a win for the community, which also benefits from the project as well.

Having worked with Disney and the Golden Oak Ranch for many years, I have seen firsthand their commitment to the environment on the Ranch. I have never seen a landowner that cares for their land, particularly their oak trees, as well as the Golden Oak Ranch. The Ranch voluntarily goes out of its way to replace oak trees as they die, using seeds (acorns) from the ranch so that native genotypes can be preserved on the property. They raise all the saplings on-site, to ensure they are acclimated to the surrounding environment.

While many development projects mitigate oak tree impacts with trees grown from unknown locations, and monitor the trees for the required five year period, then walk away, leaving the trees to live or die planted and watered in locations they are not adapted to, this will not be the case at the Golden Oak Ranch. This project will have the advantage of the Ranch staff and the hundreds of remaining acres of habitat to nurture and grow oaks over the long-term. This is much more than any other project can claim.

With development projects, as with many things in life, we examine the details and we reward the best with our approval. In regards to the Disney/ABC Studios at the Ranch project, I hope you and the Regional Planning Commission will recognize this project with approval.

Response No. 56-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: HaveAHunchRanch@aol.com
Sent: Friday, June 08, 2012 3:18 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at The Ranch

Dear Ms. Tran:

As one of the first persons to sign a supporter card for this project, I am pleased once again to extend my full support.

57-1

Not only will Disney/ABC Studios at The Ranch be an economic engine for the greater Santa Clarita Valley, it will also facilitate the keeping of Hollywood in Hollywood, and not migrating out of state or the country. This site is designated within the valuable 30 mile zone, aka TMZ, a major plus for local filming.

I applaud Disney for its aggressive approach at preserving the environment, including the replanting of oak trees as mitigation for those that are being removed. In addition, I am pleased to see that Disney is planning to relocate the trail which currently goes through its property as part of the master Plan of Trails adopted by Los Angeles County and the City of Santa Clarita. As a member of the Santa Clarita Trails Advisory Committee, we look forward to working with Disney as it fine tunes its plan for the trail alternative. Trail connectivity is most important to us.

Again, my full support for Disney/ABC Studios at The Ranch!

Sincerely,

Linda Tarnoff
21618 Oak Orchard Road
Newhall 91321

cc. Hon. Michael D. Antonovich, Supervisor, 5th District
Adam Gilbert, Disney

Letter No. 57

Linda Tarnoff
21618 Oak Orchard Road
Newhall, CA 91321

Comment No. 57-1

As one of the first persons to sign a supporter card for this project, I am pleased once again to extend my full support.

Not only will Disney/ABC Studios at The Ranch be an economic engine for the greater Santa Clarita Valley, it will also facilitate the keeping of Hollywood in Hollywood, and not migrating out of state or the country. This site is designated within the valuable 30 mile zone, aka TMZ, a major plus for local filming.

I applaud Disney for its aggressive approach at preserving the environment, including the replanting of oak trees as mitigation for those that are being removed. In addition, I am pleased to see that Disney is planning to relocated [sic] the trail which currently goes through its property as part of the master Plan of Trails adopted by Los Angeles County and the City of Santa Clarita. As a member of the Santa Clarita Trails Advisory Committee, we look forward to working with Disney as it fine tunes its plan for the trail alternative. Trail connectivity is most important to us.

Again, my full support for Disney/ABC Studios at The Ranch!

Response No. 57-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. As a point of clarification, as described on page IV-33 in Section IV, Project Description, of the Draft EIR (see footnote 12), the Placerita Canyon Connector Trail that would be constructed within the southern portion of the Ranch, south of Placerita Canyon Road, would not replace an existing trail but rather would replace a County proposed Placerita Creek Connector Trail within the central portion of the privately owned Ranch, as designated within the Santa Clarita Valley Area Plan's Trails Plan and the new Conservation and Open Space Element. The alignment of the Placerita Canyon Connector Trail is depicted in Figure IV-12 on page IV-34 in Section IV, Project Description, of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: johnt@jarthurassociates.com
Sent: Monday, June 11, 2012 10:06 AM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios at the Ranch

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Re: Disney/ABC Studios at The Ranch – County Project #TRO71216-(5)

Dear Ms. Tran,

Thank you to Los Angeles County for going forward with the environmental impact for the Disney/Golden Oak Ranch project! As a 25 year resident of Santa Clarita and owner of a marketing/advertising firm (J. Arthur & Associates), I am well aware of the number of potential jobs for residents from in and around our valley should this project be completed.

58-1

Regarding 'saving the oaks,' construction projects throughout Santa Clarita have been successful with the transplantation of our grand trees. The extensive oak tree restoration and planting program detailed in the Draft EIR shows that Disney will continue to be an excellent steward of their property. For years they have been nurturing their oaks, painstakingly planting new oaks that germinate from acorns from existing trees on their property. This will continue into the future as Disney plants far in excess of the 400+ trees required by County code.

This is a great project for the Santa Clarita Valley and I welcome it with open arms and much excitement for our future.

Sincerely,

John Tenorio
P.O. Box 802288
Santa Clarita, CA 91380

Cc: Hon. Mike Antonovich

Mr. Adam Gilbert

Letter No. 58

John Tenorio
P.O. Box 802288
Santa Clarita, CA 91380-2288

Comment No. 58-1

Thank you to Los Angeles County for going forward with the environmental impact for the Disney/Golden Oak Ranch project! As a 25 year resident of Santa Clarita and owner of a marketing/advertising firm (J. Arthur & Associates), I am well aware of the number of potential jobs for residents from in and around our valley should this project be completed.

Regarding 'saving the oaks,' construction projects throughout Santa Clarita have been successful with the transplantation of our grand trees. The extensive oak tree restoration and planting program detailed in the Draft EIR shows that Disney will continue to be an excellent steward of their property. For years they have been nurturing their oaks, painstakingly planting new oaks that germinate from acorns from existing trees on their property. This will continue into the future as Disney plants far in excess of the 400+ trees required by County code.

This is a great project for the Santa Clarita Valley and I welcome it with open arms and much excitement for our future.

Response No. 58-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Jeff Towery
27077 Hidaway Avenue #37
Canyon Country, CA 91351



June 5, 2012

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, CA 90012

Ref: Disney/ABC Studios at The Ranch
County Project # TRO71216-(5)

Dear Ms. Tran,

The entertainment business is one of the most important industries in California, especially here in LA country. The survival of the industry requires continual investment in projects like Disney's so that the industry not only survives but thrives.

59-1

This Disney/ABC project, which was thoroughly studied in the DEIR, shows how committed the company is in making a long-term investment in the entertainment industry in the Santa Clarita Valley.

With so many other states offering incentives to production companies to shoot out of state, it's important that we do something to keep those jobs here in California. This project, which pairs modern soundstages with an outdoor movie ranch, offers filming opportunities that don't currently exist in Southern California and will be most appreciated by those of us in the industry.

What a great project, and a great analysis by the County on the DEIR.

Thank you,


Jeff Towery

cc: Hon. Michael Antonovich, Supervisor, 5th District
Adam Gilbert

Letter No. 59

Jeff Towery
27077 Hidaway Avenue, Apt. 37
Canyon Country, CA 91351-4134

Comment No. 59-1

The entertainment business is one of the most important industries in California, especially here in LA country. [sic] The survival of the industry requires continual investment in projects like Disney's so that the industry not only survives but thrives.

This Disney/ABC project, which was thoroughly studied in the DEIR, shows how committed the company is in making a long-term investment in the entertainment industry in the Santa Clarita Valley.

With so many other states offering incentives to production companies to shoot out of state, it's important that we do something to keep those jobs here in California. This project, which pairs modern soundstages with an outdoor movie ranch, offers filming opportunities that don't currently exist in Southern California and will be most appreciated by those of us in the industry.

What a great project, and a great analysis by the County on the DEIR.

Response No. 59-1

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

From: lilia vergara [1126lili@gmail.com]
Sent: Wednesday, June 06, 2012 5:11 PM
To: Tran, Christina
Cc: fifthdistrict@lacbos.org; adam.gilbert@disney.com
Subject: Disney/ABC Studios Project

Ms. Christina Tran

Los Angeles County Department of Regional Planning

Re: Disney/ABC Studios at The Ranch -- County Project # TRO71216-(5)

Dear Ms. Tran,

I am writing to commend the county on the thoroughness of the Environmental Impact Report for the proposed expansion of ABC Disney's Golden Oaks Ranch.

60-1

This project is a winner for the area and for the larger region on many counts. On an environmental basis, the most important gains will be the restoration of Placerita Creek, the planting of 1600 oaks, and the enhancement of a rich oak woodland habitat. But the project will also provide a needed financial and employment boost to the area, bringing clean industry and well-paying jobs.

For these reasons, I support these plans for the new studio..

Sincerely,

Lilia J. Vergara Paras
661-347-9063
818-415-4814
18014 Flynn Drive, Unit 6601
Canyon Country, Ca. 91387

Letter No. 60

Lilia J. Vergara Paras
18014 Flynn Drive, Unit 6601
Canyon Country, CA 91387-8114

Comment No. 60-1

I am writing to commend the county on the thoroughness of the Environmental Impact Report for the proposed expansion of ABC Disney's Golden Oaks Ranch.

This project is a winner for the area and for the larger region on many counts. On an environmental basis, the most important gains will be the restoration of Placerita Creek, the planting of 1600 oaks, and the enhancement of a rich oak woodland habitat. But the project will also provide a needed financial and employment boost to the area, bringing clean industry and well-paying jobs.

For these reasons, I support these plans for the new studio.. [sic]

Response No. 60-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

III. RESPONSES TO WRITTEN COMMENTS

C. RESPONSES TO LATE COMMENTS

Table III-7
Comment Matrix—Late Comments

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
L1	Scott Morgan Director, State Clearinghouse Governor's Office of Planning and Research State Clearinghouse and Planning Unit 1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044					X											X												X
L2	Elizabeth A. Cheadle, Chairperson Santa Monica Mountains Conservancy Ramirez Canyon Park 5750 Ramirez Canyon Road Malibu, California 90265												X			X	X								X				
L3	Jim Stewart, Ph.D. Chair, Global Warming, Energy & Air Quality Committee Charming Evelyn Chair, Water Committee Lore Pekar Chair, Green Building Committee Sierra Club Angeles Chapter 3435 Wilshire Boulevard, Suite 320 Los Angeles, CA 90010-1904									X	X	X	X			X	X			X			X		X				X

**Table III-7 (Continued)
Comment Matrix—Late Comments**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C NOISE	V.D WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I VISUAL QUALITIES	V.J TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER	
L4	Ron Bottorff, Chairman Friends of the Santa Clara River 660 Randy Drive Newbury Park, CA 91320					X		X		X			X												X				X
L5	Judith McClure r-j_mcclure@msn.com										X	X	X			X	X							X		X			
L6	Ronald Kraus, Vice President Placerita Canyon Nature Center Associates 19152 Placerita Canyon Road Newhall, CA 91321												X				X							X	X				
L7	David Lutness, Secretary of the Board Santa Clarita Organization for Planning and the Environment Post Office Box 1182 Santa Clarita, CA 91386					X							X							X		X							



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
2012 JUN 25 PM 4:16
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

June 19, 2012

Christina Tran
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Disney/ABC Studios (TR071216 / RCUPT200900126 / RZCT200900012 / RPAT200900010 / ROAKT200900041 / RENVT200900112)
SCH#: 2010011010

Dear Christina Tran:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 18, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

L1-1

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

L1-2

SCH# 2010011010
Project Title Disney/ABC Studios (TR071216 / RCUPT200900126 / RZCT200900012 / RPAT200900010 /
Lead Agency ROAKT200900041 / RENV200900112)
 Los Angeles County

Type EIR Draft EIR
Description Disney / ABC Studios at The Ranch would provide up to 12 soundstages, production offices, six mills, a warehouse, writers/producers bungalows, a commissary with associated amenities, an administration building, a central utility plant, an electrical substation, a 220-foot long bridge over Placerita Creek, drainage devices, associated onsite parking, and two surplus parking lots on 11.72 acres (of which 10.04 acres are located within the City of Los Angeles Department of Water and Power transmission line right of way) within the proposed development area of approximately 56 acres of the 890-acre Golden Oak Ranch.

Lead Agency Contact

Name Christina Tran
Agency Los Angeles County Department of Regional Planning
Phone (213) 974-6461 **Fax**
email
Address 320 West Temple Street
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Santa Clarita
Region
Lat / Long 34° 22' 36" N / 118° 29' 30" W
Cross Streets State Route 14 & Placerita Canyon Road
Parcel No. numerous
Township **Range** **Section** **Base**

Proximity to:

Highways SR-14
Airports
Railways
Waterways Placerita Creek, Heil Creek
Schools
Land Use Outdoor filming ranch with some agricultural and oil production uses / A-2-1 and A-2-2 / Rural, Non-urban

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 05/03/2012 **Start of Review** 05/03/2012 **End of Review** 06/18/2012

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING
 IGR/CEQA BRANCH
 100 MAIN STREET, MS # 16
 LOS ANGELES, CA 90012-3606
 PHONE: (213) 897-9140
 FAX: (213) 897-1337



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 Be energy efficient!*

June 13, 2012

*6/18/12
 Clear*



Ms. Christina Tran
 Los Angeles County Dept. of Regional Planning
 Special Projects Section, Room 1362
 320 West Temple Street
 Los Angeles, CA 90012

Re: Disney ABC Studios at the Ranch
 Draft EIR, VTT Map No. 071216
 Vic. LA /14 / PM 27.80 - 28.27
 SCH #2010011010, IGR No. 120507/EA

Dear Ms. Tran:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed Disney ABC Studios at the Ranch project. The proposed development consists of two options, the soundstage option and the studio office option. The soundstage option would include up to 12 soundstages, productions offices, six mills, a warehouse, an administration building. The studio office option would develop studio office uses in lieu of four soundstages, two mills, and production offices.

L1-3

Based on the information contained in the DEIR, Caltrans District 7 has the following comments:

It is noted that the main entrance to the project site is proposed to be located directly across State Route 14 (SR-14) northbound off-ramp to Placerita Canyon Road. The Traffic Study acknowledges that the proposed location of the main entrance requires approval from Caltrans.

Per the traffic study dated May 2010, the studio office option would generate more vehicle trips than the soundstage option. The office option scenario is projected to generate approximately 3,477 vehicle trips daily with 410 occurring during the AM peak hour and 377 during the PM peak hour. Caltrans concurs that vehicle trips expected to utilize SR-14 would not rise to a significant level as they would be traveling in the direction that is generally not congested. Generally, SR-14 is congested through the project site in the southbound direction during the AM peak hour and project related vehicles would be traveling northbound. Project related vehicle trips are projected to contribute to congestion on I-210 east of Roxford Street during the AM peak hour (Tables V.J-10 and 11).

Caltrans acknowledges that the project would include the following improvements to State facilities to improve access to the project site and to mitigate potential transportation impacts:

- MM J-7 and 8: SR-14 Northbound off-ramp to Placerita Canyon Road. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional thru and left-turn lane, and one right turn lane).
- MM J-6: Sierra Highway/Placerita Canyon Road – The project shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway.
- MM J-9, 10, 11: The project shall pay its pro rata share of the cost for improvements to SR-14 southbound ramps to Sierra Highway, Placerita Canyon Road and Sierra Highway intersection, and applicable share to the Eastside Bridge and Major Thoroughfare District.
- The project is to include design features intended to encourage the use of alternate modes of transportation. Those design features include: A carpool matching program, preferred parking for carpool/vanpool vehicles, video conferencing facilities, and bicycle storage areas.
- Caltrans acknowledges mitigation measure J-1 (MM J-1), which states that construction traffic mitigation plan shall be submitted to Caltrans for review and approval.

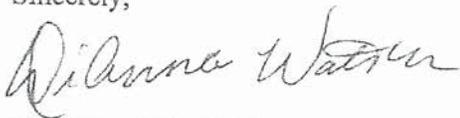
It is recommended that the timing of the proposed traffic signal at SR-14 northbound off-ramp/Placerita Canyon Road intersection and the existing signal at Sierra Highway and Placerita Canyon is synchronized to prevent excessive queuing on the off-ramp.

It is further recommended that the County, as the lead agency under CEQA for this project, coordinate with Caltrans and the City of Santa Clarita to secure the necessary funds to complete those improvements where this project is only contributing its pro rata share of the costs. Otherwise, those impacts should be disclosed as significant and unavoidable.

As part of the encroachment permit process for proposed work on State right-of-way, Caltrans may request additional information. Please condition the project to comply with all Caltrans' standards and requirements for completion of mitigation improvements on State facilities. Please note that Caltrans will request additional soil sampling at locations where construction work is proposed on unpaved areas within its right-of-way and a soil sampling workplan will be required.

If you have any questions regarding our comments or wish to schedule a meeting, please contact Elmer Alvarez, project coordinator at (213) 897 – 6696 or by e-mail at Elmer_Alvarez@dot.ca.gov. Please refer to internal record number 120507/EA.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

Comment Letter No. L1

Scott Morgan
Director, State Clearinghouse
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1400 10th Street
P.O. Box 3044
Sacramento, California 95812-3044

Comment No. L1-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 18, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 211 04(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response No. L1-1

This comment indicates Project compliance with the State Clearinghouse review requirements for the Draft EIR, in accordance with CEQA. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L1-2

**Document Details Report
State Clearinghouse Data Base**

SCH# 20100011010

Project Title Disney/ABC Studios (TR071216/ RCUPT200900126/ RZCT200900012/
RPAT200900010 / ROAKT200900041/ RENV200900112)

Lead Agency Los Angeles County

Type EIR Draft EIR

Description Disney / ABC Studios at The Ranch would provide up to 12 soundstages, production offices, six mills, a warehouse, writers/producers bungalows, a commissary with associated amenities, an administration building, a central utility plant, an electrical substation, a 220-foot long bridge over Placerita Creek, drainage devices, associated onsite parking, and two surplus parking lots on 11.72 acres (of which 10.04 acres are located within the City of Los Angeles Department of Water and Power transmission line right of way) within the proposed development area of approximately 56 acres of the 890-acre Golden Oak Ranch.

Lead Agency Contact

Name Christine Tran

Agency Los Angeles County Department of Regional Planning

Phone (213) 974-6461

Fax

email

Address 320 West Temple Street

City Los Angeles

State CA

Zip 90012

Project Location

County Los Angeles

City Santa Clarita

Region

Lat / Long 340 22' 36" N /1180 29' 30" W

Cross Streets State Route 14 & Placerita Canyon Road

Parcel No. numerous

Township

Range

Section

Base

Proximity to:

Highways SR-14

Airports

Railways

Waterways Placerita Creek, Heil Creek

Schools

Land Use Outdoor filming ranch with some agricultural and oil production uses / A-2-1 and A-2-2 / Rural, Non-urban

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/ Seismic; Noise; Population/Housing Balance; Public Services; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/ Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/ Riparian; Wildlife; Growth Inducing; Landuse; [sic] Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 05/03/2012 **Start of Review** 05/03/2012 **End of Review** 06/18/2012

Response No. L1-2

The Document Details Report summarizes various aspects of the Project. As a matter of clarification, the Development Area consists of approximately 58 acres, not 56 acres. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L1-3

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed Disney ABC Studios at the Ranch project. The proposed development consists of two options, the soundstage option and the studio office option. The soundstage option would include up to 12 soundstages, productions offices, six mills, a warehouse, an administration building. The studio office option would develop studio office uses in lieu of four soundstages, two mills, and production offices.

Based on the information contained in the DEIR, Caltrans District 7 has the following comments:

It is noted that the main entrance to the project site is proposed to be located directly across State Route 14 (SR-14) northbound off-ramp to Placerita Canyon Road. The Traffic Study acknowledges that the proposed location of the main entrance requires approval from Caltrans.

Per the traffic study dated May 2010, the studio office option would generate more vehicle trips than the soundstage option. The office option scenario is projected to generate approximately 3,477 vehicle trips daily with 410 occurring during the AM peak hour and 377 during the PM peak hour. Caltrans concurs that vehicle trips expected to utilize SR-14 would not rise to a significant level as they would be traveling in the direction that is generally not congested. Generally, SR-14 is congested through the project site in the southbound direction during the AM peak hour and project related vehicles would be traveling northbound. Project related vehicle trips are projected to contribute to congestion on I-210 east of Roxford Street during the AM peak hour (Tables V.J-10 and 11).

Caltrans acknowledges that the project would include the following improvements to State facilities to improve access to the project site and to mitigate potential transportation impacts:

- MM J-7 and 8: SR-14 Northbound off-ramp to Placerita Canyon Road. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional thru and left-turn lane, and one right turn lane).
- MM J-6: Sierra Highway/Placerita Canyon Road – The project shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway.
- MM J-9, 10, 11: The project shall pay its pro rata share of the cost for improvements to SR-14 southbound ramps to Sierra Highway, Placerita Canyon Road and Sierra Highway intersection, and applicable share to the Eastside Bridge and Major Thoroughfare District.

- The project is to include design features intended to encourage the use of alternate modes of transportation. Those design features include: A carpool matching program, preferred parking for carpool/vanpool vehicles, video conferencing facilities, and bicycle storage areas.
- Caltrans acknowledges mitigation measure J-1 (MM J-1), which states that construction traffic mitigation plan shall be submitted to Caltrans for review and approval.

It is recommended that the timing of the proposed traffic signal at SR-14 northbound off-ramp/Placerita Canyon Road intersection and the existing signal at Siena Highway and Placerita Canyon is synchronized to prevent excessive queuing on the off-ramp.

It is further recommended that the County, as the lead agency under CEQA for this project, coordinate with Caltrans and the City of Santa Clarita to secure the necessary funds to complete those improvements where this project is only contributing its pro rata share of the costs. Otherwise, those impacts should be disclosed as significant and unavoidable.

As part of the encroachment permit process for proposed work on State right-of-way, Caltrans may request additional information. Please condition the project to comply with all Caltrans' standards and requirements for completion of mitigation improvements on State facilities. Please note that Caltrans will request additional soil sampling at locations where construction work is proposed on unpaved areas within its right-of-way and a soil sampling workplan will be required.

If you have any questions regarding our comments or wish to schedule a meeting, please contact Elmer Alvarez, project coordinator at (213) 897-6696 or by e-mail at Elmer_Alvarez@dot.ca.gov. Please refer to internal record number 120507/EA.

Response No. L1-3

This comment letter was sent from Caltrans to the County on June 13, 2012, during the formal 45-day public review period for the Draft EIR. Refer to Letter No. 2 of this Final EIR for the original comment letter and associated responses.

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



June 20, 2012

Christina Tran
Los Angeles County
Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, California 90012

**Disney - ABC Studios at the Ranch Project
Draft Environmental Impact Report Comments
SCH No. 2010011010**

Dear Ms. Tran:

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor Zone that includes the sum of the 890-acre Golden Oak Ranch. The Conservancy submitted a Notice of Preparation (NOP) comment letter dated January 25, 2010. L2-1

As stated in the NOP comment letter, the proposed project would create a 44-acre modern business park with 60-foot-tall buildings, and 1200 parking places on another 10 acres in an otherwise four-mile-long section of “building free” San Gabriel Mountains viewshed along the east side State Route 14 and Interstate 5. The attached figure shows how the State Route 14 entry into Placerita Canyon is flanked on all sides by public parkland owned by the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), United States Forest Service, City of Santa Clarita, and the Mountains Recreation and Conservation Authority (MRCA). L2-2

In Los Angeles County, generally projects located in scenic viewsheds with one million cubic yards of grading (35,000 truck trips of soil export), loss of 158 oak trees, loss of two acres of willow riparian habitat, impacts in designated Critical Habitat for coastal California gnatcatcher, and impacts within proposed Significant Ecological Area, result in the permanent protection of a substantially greater amount of natural open space than is affected by adverse direct and indirect project impacts. L2-3

The proposed project, and every DEIR alternative, offer not a single acre of permanently protected open space. The applicant clearly counters with an argument that it is in Disney’s interest to keep the remaining open space open for film back drops and to provide habitat L2-4

for the planted mitigation oak trees. Why would Disney, or its successors, ever build any homes or more commercial uses on a prime property with perfect freeway access, scores of acres of disturbed flat land, upgraded utilities (sewer main, million gallon ridgeline water tank, and onsite two-acre electrical substation), and unparalleled scenic surroundings? The Conservancy would like to see that question put to sleep forever. Mitigation timing must be commensurate with project impacts. Mitigation certainty must not rest on the future goodwill of a Fortune 500 corporation.

L2-4
Cont.

With such a visible proposed project in a regionally significant viewshed/natural area and with a level of development that is an order of magnitude outside of the existing General Plan designations, the public deserves to know that the remainder of the Golden Oak Ranch will not ever be subjected to any permanent development. Anything less leaves open a CEQA piecemeal project issue and an unnecessary community tension regarding whether or not Golden Oak Ranch can be permanently considered a part of the western San Gabriel Mountains ecosystem, the Santa Clara River watershed recharge area, and western gateway to the Angeles National Forest.

L2-5

The Conservancy urges the applicant to step up to the conservation plate and diffuse that community tension and uncertainty by, in writing, agreeing to a voluntary project condition that places a conservation easement over the remaining undeveloped portions of the Golden Oak Ranch as a condition precedent to any permit issuance. The allowed uses within that conservation easement can accommodate any and all uses for filming and events proposed by Disney, but not allow any permanent development of any type unless allowed by the public agency conservation easement holder. With this customized conservation easement prescription, if Disney has no intent ever to construct permanent development, the voluntary provision of such an easement would garner great public trust and appreciation. The absence of such an action to benefit the public trust sows a lack of trust and decades of uncertainty.

L2-6

The obvious conservation easement holders are SCWRCA, MRCA or the Desert and Mountain Conservation Authority (DMCA). The easement holder must be a public agency accountable to the public.

Absent the applicant's written voluntary agreement to the above described comprehensive conservation easement project condition over the remainder of the Golden Oak Ranch, the Conservancy opposes the proposed project because of its significant visual and biological impacts and unnecessary massive scale in a regionally sensitive location.

Christina Tran - Department of Regional Planning
DEIR comments - Disney - ABC Studios at the Ranch Project
June 20, 2012
Page 3

Please address any future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address, by email at edelman@smmc.ca.gov and by phone at (310) 589-3200 ext. 128.

L2-6
Cont.

Sincerely,



ELIZABETH A. CHEADLE
Chairperson

Comment Letter No. L2

Elizabeth A. Cheadle, Chairperson
Santa Monica Mountains Conservancy
Ramirez Canyon Park
5750 Ramirez Canyon Road
Malibu, California 90265

Comment No. L2-1

The Santa Monica Mountains Conservancy is the principal State planning agency for the Rim of the Valley Trail Corridor Zone that includes the sum of the 890-acre Golden Oak Ranch. The Conservancy submitted a Notice of Preparation (NOP) comment letter dated January 25, 2010.

Response No. L2-1

The previous comment letter referenced in this comment is included in Appendix A of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L2-2

As stated in the NOP comment letter, the proposed project would create a 44-acre modern business park with 60-foot-tall buildings, and 1200 parking places on another 10 acres in an otherwise four-mile-long section of “building free” San Gabriel Mountains viewshed along the east side State Route 14 and Interstate 5. The attached figure shows how the State Route 14 entry into Placerita Canyon is flanked on all sides by public parkland owned by the Santa Clarita Watershed Recreation and Conservation Authority (SCWRCA), United States Forest Service, City of Santa Clarita, and the Mountains Recreation and Conservation Authority (MRCA).

Response No. L2-2

This comment summarizes various aspects of the Project. The figure referenced in the comment was not included with the letter sent to the County. However, the 890-acre Golden Oak Ranch, which is bordered on its western side by SR-14 within Placerita Canyon, is privately owned by the Project Applicant, although the eastern portion of the Ranch includes private in-holdings within Angeles National Forest, as stated on page III-2 of Section III, Environmental Setting, and on page V.N-2 in Section V.N, Land Use, of the Draft EIR. In addition, as shown in Figures V.N-1 and V.N-2 on pages V.N-3 and V.N-4, respectively, in Section V.N, Land Use, of the Draft EIR, within the Project vicinity, the

areas immediately west of SR-14 in the City of Santa Clarita largely consist of residential and commercial properties. In addition, a residential subdivision is located along Placerita Canyon Road to the east of the Ranch and the private 1,259-acre Golden Valley Ranch development is located north of the Development Area and the Ranch. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L2-3

In Los Angeles County, generally projects located in scenic viewsheds with one million cubic yards of grading (35,000 truck trips of soil export), loss of 158 oak trees, loss of two acres of willow riparian habitat, impacts in designated Critical Habitat for coastal California gnatcatcher, and impacts within proposed Significant Ecological Area, result in the permanent protection of a substantially greater amount of natural open space than is affected by adverse direct and indirect project impacts.

Response No. L2-3

As a matter of clarification, as stated on page IV-44 in Section IV, Project Description, of the Draft EIR and discussed throughout relevant analyses therein, the Project is anticipated to involve approximately 700,000 cubic yards of cut and 350,000 cubic yards of fill within the Ranch, with approximately 350,000 cubic yards of soil export. However, to be conservative, soil export of up to 500,000 cubic yards was evaluated in relevant sections of the Draft EIR, thus overstating any impacts associated with haul truck trips. With respect to the impacts summarized in this comment, such impacts were determined in the Draft EIR to be less than significant or mitigated to a less than significant level. Los Angeles County does not have any general requirement that development projects, regardless of location or impacts, be required to permanently protect natural open space, as such matters are determined on a case-by-case basis. Refer to the responses below, particularly Response No. L2-4, for additional discussion of this issue.

As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects

the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L2-4

The proposed project, and every DEIR alternative, offer not a single acre of permanently protected open space. The applicant clearly counters with an argument that it is in Disney's interest to keep the remaining open space open for film back drops and to provide habitat for the planted mitigation oak trees. Why would Disney, or its successors, ever build any homes or more commercial uses on a prime property with perfect freeway access, scores of acres of disturbed flat land, upgraded utilities (sewer main, million gallon ridgeline water tank, and onsite two-acre electrical substation), and unparalleled scenic surroundings? The Conservancy would like to see that question put to sleep forever. Mitigation timing must be [sic] commensurate with project impacts. Mitigation certainty must not rest on the future goodwill of a Fortune 500 corporation.

Response No. L2-4

As stated on page V.F-72 in Section V.F, Biological Resources, of the Draft EIR and again in Mitigation Measure MM F-3, as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, in this Final EIR, the OTWMMP includes a requirement for the Applicant to record a use restriction which will run with the land in perpetuity over the planted mitigation areas in which oak woodland planting, restoration, and enhancement occurs to protect these areas for purposes of oak woodland conservation, restoration, and enhancement. The mitigation plantings would be required to survive the monitoring period and would occupy approximately 10.5 acres of oak woodland expansion and enhancement area. Thus, approximately 10.5 acres would be protected in perpetuity from future development.

In addition, in response to the CDFW's comments on the Draft EIR, a new Mitigation Measure, MM F-11, has been proposed to require the Applicant to record a use restriction which will run with the land in perpetuity over 3.18 acres of other coastal sage scrub that is suitable for coastal California gnatcatcher within the Ranch south of Placerita Canyon Road located within designated critical habitat for the coastal California gnatcatcher to mitigate permanent impacts to 1.06 acres of coastal sage scrub/chamise chaparral and disturbed coastal sage scrub/chamise chaparral within designated critical habitat on the Ranch south of Placerita Canyon Road. This use restriction would recognize the ability of those holding oil and other subsurface rights in the property to continue existing subsurface oil extraction operations within the use restriction area. Therefore, an additional 3.18 acres would be

protected in perpetuity from future development, for a total of approximately 13.68 acres of protected areas within the Ranch. See Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR for the full text of MM F-11.

Moreover, as described on pages IV-33 through IV-35 in Section IV, Project Description, of the Draft EIR, as part of the Project, the Applicant would dedicate a variable-width, 12- to 20-foot-wide easement for a proposed approximately 4,600-foot-long trail, referred to as the Placerita Canyon Connector Trail, which would be constructed as a public, multi-use trail for hiking, mountain-biking, and equestrian use. The trail would thus be preserved as publicly accessible open space.

A recently adopted Significant Ecological Area (SEA) designation for portions of the Ranch will also serve to protect biologically sensitive areas from future development. Section V.F, Biological Resources, of the Draft EIR addresses on page V.F-33 the new SEA overlay maps for the Santa Clarita Valley, which the County was in the process of updating at that time as part of the One Valley One Vision Plan (i.e., the Draft 2012 Santa Clarita Valley Area Plan and the SEA overlay maps, which were subsequently adopted and became effective on December 27, 2012).¹ In the SEA overlay maps, portions of the Development Area, in particular, the hillside above the northern fill pad, Placerita Creek, and the Water Tank Area, have been adopted for designation within the Santa Clara River SEA (SEA 20). This designation excludes most of the Ranch floor and the two large, mostly barren fill pads within the Development Area. Although the Project is not subject to the 2012 Area Plan and the associated newly adopted SEA regulations, the Project would enhance the SEA area around the Development Area by improving Placerita Creek and planting native vegetation throughout. Additionally, any future applications for new development beyond the requests of this Project (after the effective date of the 2012 Area Plan) would be subject to the 2012 Area Plan and associated updated SEA regulations.

Implementation of the mitigation measures listed in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR, would be required as part of the Project. Furthermore, the MMRP specifies the timing of all the mitigation measures, the vast majority of which would occur prior to or during Project construction. The nature, extent,

¹ On November 27, 2012 the County of Los Angeles Board of Supervisors adopted the 2012 Santa Clarita Valley Area Plan, which contains new Area Plan land use designations for the Project site. The Draft General Plan as well as the 2012 Area Plan allow complete project applications filed prior to the effective date of the plans to be reviewed for consistency under the then current adopted General Plan and Area Plan. The County deemed complete the Project's application for a vesting tentative tract map and conditional use permit on May 4, 2010, and thus the Project is subject to the former plans. Refer to Section V.N, Land Use, of the Draft EIR for further discussion.

and timing of these measures are commensurate with Project impacts and meet the requirements of CEQA as well as those of the County of Los Angeles.

Comment No. L2-5

With such a visible proposed project in a regionally significant viewshed/natural area and with a level of development that is an order of magnitude outside of the existing General Plan designations, the public deserves to know that the remainder of the Golden Oak Ranch will not ever be subjected to any permanent development. Anything less leaves open a CEQA piecemeal project issue and an unnecessary community tension regarding whether or not Golden Oak Ranch can be permanently considered a part of the western San Gabriel Mountains ecosystem, the Santa Clara River watershed recharge area, and western gateway to the Angeles National Forest.

Response No. L2-5

CEQA Guidelines Section 15378 defines “project” to mean “the whole of an action” that may result in either a direct or reasonably foreseeable indirect physical change in the environment. In general, a lead agency must fully analyze each project in a single environmental review document. In performing its analysis, the lead agency must not “piecemeal” or “segment” the environmental review of a project by splitting it into two or more proposals to minimize potential environmental impacts. There is no “piecemealing” of development projects on the Ranch. The Project includes all new development and the continuation of existing uses on the Ranch, as well as all associated off-site improvements, currently contemplated by the Applicant. The Project would retain the existing outdoor filming uses on 195 acres within the Ranch and protect 637 acres of surrounding hillsides used as a filming backdrop. No additional future use or development of the Ranch beyond the currently proposed new development, ongoing existing outdoor filming operations, the continued construction of temporary filming sets, and existing intermittent agricultural and oil drilling operations is envisioned at this time. Accordingly, the Draft EIR evaluates the full scope of proposed development in compliance with CEQA, and any allegations of “piecemeal” documentation are unfounded. Moreover, such issues are unrelated to the geographic location of the Ranch with respect to the western San Gabriel Mountains ecosystem, the Santa Clara River watershed recharge area, and western gateway to the Angeles National Forest.

Comment No. L2-6

The Conservancy urges the applicant to step up to the conservation plate and diffuse that community tension and uncertainty by, in writing, agreeing to a voluntary project condition that places a conservation easement over the remaining undeveloped portions of the Golden Oak Ranch as a condition precedent to any permit issuance. The allowed uses

within that conservation easement can accommodate any and all uses for filming and events proposed by Disney, but not allow any permanent development of any type unless allowed by the public agency conservation easement holder. With this customized conservation easement prescription, if Disney has no intent ever to construct permanent development, the voluntary provision of such an easement would garner great public trust and appreciation. The absence of such an action to benefit the public trust sows a lack of trust and decades of uncertainty.

The obvious conservation easement holders are SCWRCA, MRCA or the Desert and Mountain Conservation Authority (DMCA). The easement holder must be a public agency accountable to the public.

Absent the applicant's written voluntary agreement to the above described comprehensive conservation easement project condition over the remainder of the Golden Oak Ranch, the Conservancy opposes the proposed project because of its significant visual and biological impacts and unnecessary massive scale in a regionally sensitive location.

Please address any future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address, by email at edelman@smmc.ca.gov and by phone at (310) 589-3200 ext. 128.

Response No. L2-6

Refer to Response No. L2-4 regarding the Applicant's commitments to record use restrictions which will run with the land in perpetuity over a total of approximately 13.68 acres of the Ranch. As a matter of clarification, as stated on page V.I-49 in Section V.I, Visual Qualities, of the Draft EIR, Project-level and cumulative impacts on aesthetics/visual qualities and views (as well as light and glare) would be less than significant. Nonetheless, mitigation measures are proposed; see MM I-1 through MM I-3 therein and as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, which would provide for review and approval of the Project's final design drawings and lighting plans by the County of Los Angeles Department of Regional Planning and would ensure that light trespass on sensitive habitat within Placerita Creek is minimized. Additionally, as stated on page V.F-95 in Section V.F, Biological Resources, of the Draft EIR, with the implementation of the Mitigation Measures and Project Design Features, the Project would have less than significant impacts with respect to biological resources. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

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Angeles Chapter

June 22, 2012

Christina Tran
Los Angeles County Regional Planning Dept.
320 W. Temple St.
Los Angeles, CA 90012
ctran@planning.lacounty.gov

**Re: Request for Extension of Time to Comment on the DEIR and Preliminary Comments
Disney Studio Sound Stage Project in Placerita Canyon;
County Project TR071216 – (5), Plan Amendment 200100010, Zone Change 20090012,
VTT 071216, CUP 200900126, Oak Tree Permit, Parking Permit, and all associated
permits**

Dear Ms. Tran:

The Sierra Club requests an extension of 30 days of time to allow for adequate review of the above-referenced project. Not only is the DEIR several thousand pages, but the number and magnitude of the approvals requested require close public evaluation.

L3-1

We also request a public hearing before the Commission on the DEIR, to allow the Commissioners an opportunity to provide input to the draft document before the document becomes final. Many people do appreciate the County’s effort to hold a hearing on this project that will substantially change the character of the east side canyons in Santa Clarita, yet others express concern that the hearing was before a “hearing officer” rather than before the Commission. Ex parte rules rightly discourage interaction with Commission members, so speaking to them during a hearing process is the only time the public has an opportunity to air concerns and hear them addressed by the Commission. But most importantly, we believe this hearing was premature because the community had insufficient time to even begin review of this huge and plan amendment-dependent project.

L3-2

It is our understanding that this project would turn an existing movie ranch in rural Placerita Canyon into an industrial facility by building 12 sound stages, 6 production offices, 6 bungalows, a warehouse, a commissary, and an administration building (555,950 square feet of development). In the process, 158 oak trees would be removed and the project would cut 700,000 cubic yards of earth and fill 350,000 cubic yards with an additional 350,000 cubic yards of soil export-- a massive scale of earth moving. And the proposed studio would operate 24 hours per day and require over 2000 parking spaces.

L3-3

Project not Consistent with the New Areawide Plan for Santa Clarita

L3-4

At a time when both the City and County portions of the Santa Clarita Valley have just completed General Plan updates, this project now seeks circumvention by asking for a plan amendment to approve a large industrial project in an area zoned for agriculture and open space. It seems particularly unreasonable that the County would immediately backtrack and consider a Plan Amendment involving increased parking permits to support increased commuting despite the Greenhouse gas reduction promised by the approval of One Valley One Vision, a plan that was seek to encourage increased density in the City Center and discourage auto-oriented sprawl development in the surrounding green areas. Now, with the first large project proposal before you, your department is proposing to amend the plan to allow intensive industrial use in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

Greenhouse Gas Reduction Climate Change

L3-5

The proposal also violates the Climate Action Plan developed by the City of Santa Clarita that must be consistent with the County Plan.

It is imperative that Disney describe and incorporate specific measures to reduce greenhouse gas generation and lessen climate change impacts. Among the measures it could take are those suggested by CAPCOA¹ in the Santa Clarita Climate Action Plan (CAP):

CAP Energy Measures²

- Higher Efficiency Public Street and Area Lighting
Power consumed by lighting sources contributes to GHG emissions. Lamp efficiency and the amount of lighting produced (lumens) per watt of power supplied vary by light fixture design. A strategy to reduce GHG emissions is the installation of more efficient public street and area lights that are able maintain the level of lumens per area while consuming less electricity. Disney should commit to not using high pressure sodium and metal halide lights, but instead using energy efficient induction or LED lighting throughout the project.
- Any additional Traffic Lights must be LED Traffic Lights. Replacing traffic lights with higher efficacy ones, such as light-emitting diode (LED) traffic lights. Such lights can result in a reduction of GHG emissions since they consume about 90% less energy than traditional incandescent traffic lights.
- Establish Onsite Renewable Energy Systems - Solar Power
Electricity generated from photovoltaic (PV) systems is associated with zero GHG emissions²⁹, thus installation of PV systems in residential or commercial buildings displaces electricity consumed from local utilities that generally have larger carbon footprints; this translates into a reduction of GHG emissions.
- Disney should commit to LEED certified buildings at a minimum of the LEED Gold level, with LEED Platinum as preferable. Instead, the EIR states that the project will achieve “LEED equivalent” and does not specify a level of equivalency.

¹ Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, California Air Pollution Control Officers Association (CAPCOA), August 2010.

² This information is paraphrased from the City of Santa Clarita’s draft Climate Action Plan, pages 30-32

- If Disney sought to comport itself within the structures of the climate and habitat protective guidelines set for the project area, it would consider implementation of The Living Building Challenge for the project site—and provide the leadership of which it is certainly capable. The Living Building Challenge was first developed by the Cascadia Chapter of USGBC in the pursuit of a future that is socially just, culturally rich and ecologically restorative, and is now under the oversight of the International Living Building Institute.

CAP Water Measures

- Use Reclaimed Water

Reclaimed water is water treated from a wastewater treatment plant but instead of being released to the environment is re-used for non-potable purposes. Using reclaimed water requires less energy to collect and redistribute to their consumption points since it is generated in local treatment plants, as opposed to fresh water supplies that may be transported over long distances from its natural sources. Since reclaimed water is less energy intensive, its consumption has a smaller carbon footprint.

- Low-Flow Water Fixtures

Decreasing water use reduces GHG emissions associated with the electricity consumed to pump, treat and distribute the water. A strategy to reduce indoor water demand is installing low-flow or high efficiency water fixtures such as low-flow toilets, urinals, showerheads, or faucets, or high-efficiency clothes-washers and dishwashers in residential and commercial buildings. For each improved water fixture installed, there is an associated reduction in indoors water demand and hence in GHG emissions. To quantify reductions from this measure, GHG emissions are calculated for a baseline scenario (regular water demand) and a mitigated scenario, with reduced water demand from the percentile reduction provided by each water fixture installed. The difference in GHG emissions from both scenarios represents the reduction achieved by this measure.

- Landscape Irrigation Systems

Water consumption for outdoor uses can be diminished by utilizing water-efficient landscape irrigation systems. Efficient Irrigation techniques, such as “smart” irrigation technology, reduce water use and its associated GHG emissions. “Smart” irrigation systems relay on weather, climate and soil moisture information to adjust watering frequency, hence maintaining the vegetation adequately moist while conserving water. Quantification of this measure can be achieved by calculating the water savings from this technology, multiplying by the water energy intensity of the local water supply and applying local utility emission factors to calculate GHG emissions.

CAP Vegetation Measures

- New Vegetated Open Space

Vegetated open space serves as natural “carbon sinks”, places where carbon dioxide is naturally sequestered. By creating new vegetated open space, or preventing the transformation of open space into urban/rural development areas, GHG emissions reductions are achieved by the amount of carbon dioxide sequestered per acre of preserved land. The amount of carbon sequestered will depend on the type of vegetated land (forests, croplands, grasslands, etc.)

The City has developed an Open Space Plan that calls for the creation of a "green belt" around the City, serving as a vegetated buffer between the City and County development. Through this plan, the City will seek to acquire as much as 9300 acres of open space with the purpose of

saving the land from development threat from other jurisdictions or for restorative purposes of the land from contamination where necessary. The GHG reductions associated with this measure are calculated based on the amount of preserved land (acres) multiplied by the expected annual CO₂ accumulation per acre, which depends on the type of vegetated land.

L3-5
Cont.

How will the Disney proposal increase these greenhouse gas calculations? What affect will this have on the City's ability to meet the AB32 goals with its current Plan? These issues must be addressed in the Climate Section of the DEIR.

L3-6

The City of Santa Clarita's Climate Action Plan (and by inference, the County's, since this is a "One Valley, One Vision" Plan) intends to meet the required AB 32 goals in part through landuse planning, particularly transportation planning. The Local Plan Amendment and parking CUP requested as part of this approval is not consistence with these goals because it will increase congestion on the Highway 14 and does not provide public transportation or pedestrian and cycling alternatives. It will thus impair the Santa Clarita Valley's ability to meet AB32 and SB375 goals.

The City's Plan states

"Overall Land Use Transportation Measure

*Emission reductions from land use planning are generally achieved by reducing total vehicle miles traveled (VMT) and improving traffic flow (i.e. reducing idling and low-speed emissions). While many of these are implemented on a project level, for the purpose of a region analysis, ENVIRON has utilized the in-City VMT projection in the prior City General Plan, which did not include land-use improvement measures, as well as the valley-wide VMT projections in the new General Plan, which are modeled to incorporate a mix of land use planning measures. With the guidance from City Staff, ENVIRON has estimated an overall 10% VMT reduction within City boundaries by 2020 as compared to the business-as-usual scenario. This reduction incorporates a mix of measures including, but not limited to, increase density of in-City development and diversity of urban and suburban developments, increase the location efficiency, destination and transit accessibility, integrate affordable and below market rate housing, implement trip reduction programs such as ride-share, improve the transit system by expanding the transit network and increase service frequency, and improve the flow of traffic at city intersections and congested roadways. Reductions in VMT by implementing these programs are directly correlated with reductions in GHG emissions."*³

This proposal will significantly alter the current Plan for the Santa Clarita Valley by arbitrarily changing one of the greenbelt areas, Placerita Canyon, to intensive industrial use and massive numbers of additional car and truck trips.

Air Quality

The Santa Clarita Valley is in a Federal non-attainment zone for ozone and PM10 and PM2.5 (small particle dust). These pollutants are especially damaging to children's lungs as evidenced by the well-documented rise in asthma rates for school age children.

L3-7

Adding traffic congestion and more commuter traffic to the valley will only make the ozone and particulate matter impacts worse. This is especially true due to the added truck traffic generated

³ City of Santa Clarita Climate Action Plan, May 2012, page 30

by Disney's sound stage activities, since diesel exhaust is a significant generator of particulate matter and a cause of asthma.

L3-7
Cont.

Disney may not avoid this problem by a finding that long term air quality impacts are less than significant without even evaluating these impacts. Impacts to air quality must also be found significant since this project's proposed Plan Amendment will interfere with the City's ability to reduce greenhouse gases as described above.

While the DEIR admits that significant impacts to air quality will occur during construction, it appears to manipulate facts to make a finding that long-term air quality impacts will be less than significant. This manipulation does not pass the straight fact test. Obviously, a project that needs a plan amendment is not consistent with the existing OVOV Plan, the Climate Action Plan or the AQMP.

Therefore, the Sierra Club asserts that the DEIR must be changed to properly reflect the impacts to Air Quality as being Significant and include all possible mitigation measures to reduce air quality impacts. These should include at the very least, but are not limited to such measures as

- Required employees car-pooling, fee-only or unbundled parking cash-out, reduced parking spaces to encourage car-pooling and public transportation
- Required use of only Natural Gas or Electric trucks at the site.
- In addition to making all measures proposed in the DEIR mandatory

The DEIR should Provide a "Jobs Analysis"

Disney has made claims that this project will create a substantial number of jobs. A cursory review of the DEIR reveals no substantiation or even discussion of these claims. We ask that the County request of the developer some substantiation/economic analysis that these jobs are not merely transfers from Disney's facility in Burbank, thus needlessly creating additional traffic, air pollution and GHG in the Santa Clarita Valley. This issue should be discussed and disclosed in the DEIR.

L3-8

Oak Tree Removals and Mitigation

While the project proponent has stated publicly that the 158 oaks slated to be destroyed will be replaced on a greater than County required basis, we note that oaks cannot be established in all soil types and do not generally grow on slopes facing in certain directions. We ask that some evaluation be provided in the DEIR to indicate sufficient and biologically adequate soil and location for any proposed mitigation plantings.

L3-9

Further Spread of the Whittiker Bermite Pollution Plume

A Resolution passed by the Angeles Chapter in 2006 (attached) indicates the Sierra Club's commitment to ensuring that existing residents of Santa Clarita have a safe and healthy water supply before additional new development is approved.

L3-10

While the treatment facility is now functioning, it is producing far less water than previously anticipated and has encountered various problems requiring a shut down and repair of wells, and more frequent analysis of water quality due to concerns regarding VOCs.

In April of 2012, Valencia Water Company voluntarily shut down yet another drinking water supply well (well 205) due to the presence of Volatile Organic Compounds (VOCs). While these chemicals were found at low levels, their presence would seem to indicate the further westerly spread of the Whittiker Bermite pollution plume. This information was not publicly disclosed and only recently came to light through a public record request to the Dept. of Health Services.

L3-10
Cont.

While the project before you will not be supplied by Valencia Water Co., the spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire Santa Clarita Valley will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

Conclusion

L3-11

Thank you for considering our requests and suggestions, and we look forward to receiving a response to our concerns as outlined above.

Sincerely,

Jim Stewart, PhD
Sierra Club Angeles Chapter
Chair, Global Warming, Energy & Air Quality Committee

Charming Evelyn
Sierra Club Angeles Chapter
Chair, Water Committee

Lore Pekrul
Sierra Club Angeles Chapter
Chair, Green Building Committee

Attachments:

1. Sierra Club California Parking Resolution
2. Description of Bundled Parking Concept
3. Additional Information on Parking Concept
4. Resolution Regarding Ammonium Perchlorate Pollution in the Santa Clarita Valley

L3-11
Cont.



Resolution: **More Equitable and Eco-Friendly Car Parking Policy**

Sierra Club California supports equitable changes in parking policies to reduce vehicle miles traveled (VMT) and greenhouse gas emissions. Some methods include eliminating or reducing minimum parking requirements (in off-street parking ordinances and any land use actions), unbundling car parking costs, operating shared parking, and congestion pricing. Policies must protect the privacy of drivers, consider the disabled and low-income drivers, and protect the public's right to access public lands and, within the coastal zone, visitor serving facilities.

Approved: July 24, 2010

L3-11
Cont.

A Plan to Efficiently and Conveniently Unbundle Car Parking Costs

Paper 2010-A-554-AWMA

Mike R. Bullock

Retired Satellite Systems Engineer (36 years), 1800 Bayberry Drive, Oceanside, CA 92054

Jim R. Stewart, PhD

University of the West, 1409 N. Walnut Grove Avenue, Rosemead, CA 91770

ABSTRACT

The *Introduction* shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called “*Intelligent Parking*,” will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a “Request for Proposal” (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of *Intelligent Parking*. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of *Intelligent Parking* are listed. Eleven definitions and concepts, that together define *Intelligent Parking*, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% (“Congestion Pricing”). An implementation strategy is described.

INTRODUCTION:

It has been well established that appropriately priced parking will significantly reduce driving¹. Most case studies presented in Table 1 are evaluations of the most general type of “car-parking cash-out”: *a program that pays employees extra money each time they get to work without driving*. They show that a price differential between using parking and not using parking will significantly reduce driving, even when transit is described as poor. Since driving *must* be reduced², the pricing of parking is desirable.

Shared parking is also recognized as desirable because it can sometimes result in less parking being needed.

Although the advantages of pricing and sharing parking have been recognized for many years, these practices are still rare. This paper identifies some of the reasons for this lack of progress. The pricing and sharing method of this paper has a natural transparency and ease of use that would reduce many of the concerns. This paper also suggests that those governments that have the necessary resources can take the lead role in developing and implementing the described systems. These governments will recover their investments, over time.

This paper describes how parking facilities could be tied together and operated in an optimum system, named *Intelligent Parking*. The description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, leading to full implementation.

There are two distinct parts to *Intelligent Parking*. The first is how to set the price. The second is how to distribute the earnings. Briefly, the earnings go to the individuals in the group for whom the parking is built.

Table 1 Eleven Cases of Pricing Impact on Parking Demand

Location	Number of Workers @ Number of Firms	1995 \$'s Per Mo.	Parking Use Decrease
<i>Group A: Areas with poor public transportation</i>			
West Los Angeles	3500 @ 100+	\$81	15%
Cornell University, Ithaca, NY	9000 Faculty & Staff	\$34	26%
San Fernando Valley, Los Angeles	850 @ 1	\$37	30%
Costa Mesa, CA	Not Shown	\$37	22%
Average for Group		\$47	23%
<i>Group B: Areas with fair public transportation</i>			
Los Angeles Civic Center	10,000+ @ "Several"	\$125	36%
Mid-Wilshire Blvd, Los Angeles	1 "Mid-Size" Firm	\$89	38%
Washington DC Suburbs	5,500 @ 3	\$68	26%
Downtown Los Angeles	5,000 @ 118	\$126	25%
Average for Group		\$102	31%
<i>Group C: Areas with good public transportation</i>			
U. of Washington, Seattle, WA	50,000 employees, students	\$18	24%
Downtown Ottawa, Canada	3,500 government staff	\$72	18%
Bellevue, WA	430 @ 1	\$54	39%*
Average for Group, except Bellevue, WA Case*		\$45	21%
Overall Average, Excluding Bellevue, WA Case*			25%

* Bellevue, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

PERTINENT BACKGROUND INFORMATION

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution^{2,3}.
- California’s Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035².
- The appropriate pricing of parking is one of the least costly documented tools to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.

- Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.
- Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.
- Good policies will eventually let cities turn parking minimums into parking maximums.

A GLIMPSE INTO A POSSIBLE FUTURE

Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery charges.

Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confident that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking.

As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of \$2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of \$3 per hour and learns that the GPS has located parking.

It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus's next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.

Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings, he finds that the day's parking did indeed cost about \$30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about \$10 per day that month. He then notices the parking lot earnings from the store, where he spent about \$1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about \$17. So for the day, Jason only spent a net of about \$3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the \$27 earnings from the two parking facilities and he would have paid nothing

for parking. So the choice to drive cost him \$30. He remembers that the delivery would have only been \$25 dollars. Oh well. He enjoyed his before-work and after-work walks.

THE CASE FOR LESS PARKING

Less parking will support more compact development.¹ This makes walking and biking more enjoyable and less time consuming. There would certainly be less “dead space”, which is how parking lots feel to people, whether they arrive by car or not, after they become pedestrians.

Since parking can be expensive, less parking can reduce overhead costs significantly, such as leasing expense and parking-lot maintenance cost. Less overhead means more profit and less expense for everyone. A need for less parking can create redevelopment opportunities at existing developments and reduce project cost at new developments.

At new developments, car-parking costs could prevent a project from getting built.²

THE CASE FOR SHARED PARKING

Shared parking for mixed uses means that less parking is needed. For example, shared parking could be used mostly by employees during the day and mostly by residents at night.

Fully shared parking means that very little parking would be off limits to anyone. In a central business district with shared parking, drivers would be more likely to park one time per visit, even when going to several locations. Pedestrian activity adds vitality to any area.

THE CASE FOR APPROPRIATELY-PRICED PARKING

To Reduce Driving Relative to Zero Pricing

Traditional Charging or Paying Cash-out Payments

As shown in the Introduction, this relationship (pricing parking reduces driving) is not new.³

Using results like Table 1, at least one study⁴ has used an assumption of widespread pricing to show how driving reductions could help meet greenhouse gas (GHG) target reductions. Dr. Silva Send of EPIC <http://www.sandiego.edu/epic/ghgpolicy/> assumes that all work locations with 100 employees or more in San Diego County will implement cash-out, to result in 12% less driving to work. Currently, almost all employees in San Diego County “park for free”, unless they happen to work in a downtown core area.

¹ This is especially true of surface parking, which only accommodates 120 cars per acre.

² On September 23, 2008, a panel of developers reviewed the Oceanside, Ca. “Coast Highway Vision” http://www.ci.oceanside.ca.us/pdf/chv_finalvisionstrategicplan.pdf. Parts of this plan were described as smart growth.

At the review, developer Tom Wiegel said, “Parking is the number 1 reason to do nothing,” where “do nothing” meant “build no project.” The other developers at the meeting agreed.

³ For many years the Victoria Transport Policy Institute (VTPI) has been recognized as a source of reliable information on “Transportation Demand Management”, or TDM.

From http://www.vtpi.org/tdm/tdm72.htm#_Price_Parking:

Even a relatively small parking fee can cause significant travel impacts and provide significant TDM benefits. “TDM Benefits” refers to the many public and private benefits of having fewer people choosing to drive.

Current, Best-Practice “Unbundling”

The “best-practice” use of the phrase, “unbundled parking cost”, is to describe the case where either the cost of parking, for the case of a condominium, or the rent for parking, for the case of an apartment, is separated from either the purchase price and common fees or the rent of the dwelling unit.

This gives the resident families the choice of selecting the number of parking spaces they would like to rent or buy, including the choice of zero. This would tend to reduce the average number of cars owned per dwelling unit and, in this way, would also tend to reduce driving. Its major drawback is that this method does not encourage sharing.

To Increase Fairness and Protect the US Economy

It is stated above that almost all employees in San Diego County “park for free”. Of course there is really no such thing as “parking for free”. So-called “free parking” always reduces wages or increases costs. At a work site, it reduces everyone’s wage, even those employees that never drive. At an apartment complex, so-called “free parking” increases the rent. Therefore, “free parking” at work or at apartments violates the fundamental rule of the free market, which is that people should pay for what they use and not be forced to pay for what they do not use. Parking should at least be priced to achieve fairness to non-drivers.

The US economy would also benefit. Reductions in driving would lead to reductions in oil imports, which would reduce the US trade deficit.⁴

BARRIERS TO PROGRESS

Given all this, it might seem that the widespread pricing of parking should have happened by now. However there are barriers. In 2007, a majority of the City Council of Cupertino, Ca. indicated that they wanted their City Manger to negotiate reduced parking requirements with any company that would agree to pay sufficient cash-out payments. To this date, no company, including Apple Inc., has expressed an interest. Most companies probably perceive cash-out as expensive. Even if they realize they could get a reduced parking requirement in exchange for paying sufficient cash-out amounts and even if the economics worked in support of this action (quite possible where land is expensive), they want to stay focused on their core business, instead of getting involved in new approaches to parking, real estate, and redevelopment.

On the other hand, simply charging for parking and then giving all the employees a pay raise is probably going to run into opposition from the employees, who will feel that they would be losing a useful benefit.

In addition, neighbors fear the intrusion of parked cars on their streets. Permit parking, which could offer protection, is not always embraced. City Council members know that a sizable fraction of voting citizens believe that there can actually never be too much “free parking”,

⁴ From http://en.wikipedia.org/wiki/Balance_of_trade#Warren_Buffett_on_trade_deficits, Warren Buffet wrote in 2006,

“The U.S. trade deficit is a bigger threat to the domestic economy than either the federal budget deficit or consumer debt and could lead to political turmoil. Right now, the rest of the world owns \$3 trillion more of us than we own of them.”

Professor Shoup's famous book⁵ notwithstanding. Some Council members probably feel that way themselves.

It doesn't help that current methods of charging for downtown parking are often very inefficient.⁵ For example, downtown Oceanside, California has parking meters that will only accept coins. Besides this, all their on-street, downtown parking is timed, with maximums from 10 minutes to 4 hours. These time limits are enforced by a city employee, who applies chalk from a tire to the street and then records the time. However, by watching the time and moving their car soon enough, drivers can avoid getting a ticket. Of course, they could instead drive to the mall and not have to worry about having coins or elapsed time since parking. It is not surprising that downtown merchants often object to charging for parking.

In summary, those that resist charging for parking, *based on their perceptions*, include

- Companies, *who fear the complexity and expense of paying cash-out payments*;
- Employees, *who fear of losing a current benefit*;
- City leaders, *who fear the political repercussions*;
- Downtown patrons, *who dislike the inconvenience and worry*;
- Downtown business owners, *who fear that it will drive away customers*.

THE COST, VALUE, AND FAIR PRICE OF PARKING

Estimated and Actual Capital Cost

Surface Parking

One acre of surface parking will accommodate 120 cars. Land zoned for mixed use is sometimes expensive. At \$1.2 million per acre, the land for a single parking space costs \$10,000.

Construction cost should be added to this to get the actual, as-built cost of each parking space. Estimated cost can be determined by using appraised land value and construction estimates. For new developments, after the parking is constructed, it is important to note the actual, as-built cost.

Parking-Garage Parking

One acre of parking-garage will accommodate considerably more than 120 cars. The construction cost of the garage and the value of its land can be added together to get the total cost. Dividing that total cost by the number of parking spaces yields the total, as-built cost of each parking space. Adding levels to a parking garage may seem like a way to cut the cost of each parking space, for the case of expensive land. However, there is a limit to the usefulness of this strategy because the taller the parking garage, the more massive the supporting structural members must be on the lower levels, which increases total cost. Parking-garage parking spaces are often said to cost between \$20,000 and \$40,000. The actual costs should be noted.

Underground Parking

In order to compute an estimate for the cost of a parking space that is under a building, it is necessary to get an estimate of the building cost with and without the underground parking. The difference, divided by the number of parking spaces, yields the cost of each parking space. The

⁵ According to Bern Grush, Chief Scientist of Skymeter Corporation <http://www.skymetercorp.com/cms/index.php>, often two-thirds of the money collected from parking meters is used for collection and enforcement costs.

cost or value of land plays no role in the cost of this parking. However, it does not follow that this parking is cheap. Underground parking spaces are often said to cost between \$60,000 and \$90,000 dollars each. Although there will be an “as built” cost of the building with the parking, there will never be an “as built” cost of the building without the parking. However, after the construction is done, the estimate for the cost of the underground parking should be reconsidered and re-estimated if that is needed. The final, best-estimate cost should be noted.

Value

Initially, value and cost are the same. For surface parking and parking-garage parking, the value would initially be the same as the as-built cost. For underground parking, the value would initially be the same as the best-estimate cost. However, over time, the value must be updated. Both construction costs and land-value costs will change. The value assigned to a parking place should always be based on the current conditions.

Fair Pricing

Parking space “values”, as described above, must first be converted to a yearly price by using a reasonable conversion factor. This conversion factor could be based on either the “cost of money” or the “earnings potential of money”. It is expected that this conversion factor would be 2% to 5% during times of low interest rates and slow growth; but could be over 10% during times of high-interest and high growth. For example, if the surface parking value is \$12,000 and it is agreed upon to use 5% as the conversion factor, then each parking spot should generate \$600 per year, just to cover capital costs. The amount needed for operations, collection, maintenance, depreciation, and any special applicable tax is then added to the amount that covers capital cost. This sum is the amount that needs to be generated in a year, by the parking space.

The yearly amount of money to cover capital cost needs to be re-calculated every year or so, since both the value and the conversion factor will, in general, change each year. The cost of operations, collection, maintenance, depreciation, and any special applicable tax will also need to be reconsidered.

Once the amount generated per year is known, the base price, per unit year, can be computed by dividing it (the amount generated per year) by the estimated fraction of time that the space will be occupied, over a year. For example, if a parking space needs to generate \$900 per year but it will only be occupied 50% of the time, the time rate charge is \$1800 per year. This charge rate per year can then be converted to an hourly or even a per-minute rate. The estimated fraction of time that the parking is occupied over a year will need to be reconsidered at least yearly.

NEW DEFINITIONS TO PROMOTE AN OBJECTIVE VIEW OF PRICING

- The “fair price” means the price that accounts for all costs.
- The “baseline amount of driving” means the driving that results from the application of the fair price.
- “Zero transportation demand management” (“zero TDM”) is the amount of demand management that results when the fair price is used. It will result in the baseline amount of driving.
- “Negative TDM” refers to the case where the price is set below the fair price. This will cause driving to exceed the baseline amount. Since TDM is commonly thought to be an action that reduces driving, it follows that negative TDM would have the opposite effect.
- “Positive TDM” refers to the case where the price is set above the fair price. This would cause the amount of driving to fall below the baseline amount.

Clearly, so-called “free parking” is an extreme case of negative TDM. The only way to further encourage driving would be to have a system that pays a driver for the time their car is parked.

THE GOALS OF *INTELLIGENT PARKING*

- There is only one agency operating all parking. (“All parking” does not include driveways and garages in single-family homes.) *Intelligent Parking* is designed and installed by regional or state government, using low-bid contractors, with design and start-up costs covered by the overhead portion of collection fees.
- Nearly all parking is shared. Almost always, anyone can park anywhere. Those who want exclusive rights to parking will pay “24/7” (all day, every day).
- Parking is operated so that the potential users of parking will escape the expense of parking by choosing to not use the parking. This characteristic is named “unbundled” because the cost of parking is effectively unbundled from other costs.
- Parking is priced and marketed to eliminate the need to drive around looking for parking.
- Parking at any desired price is made as easy as possible to find and use.
- Records of the use of each parking space are kept, to facilitate decisions to either add or subtract parking spaces.
- The special needs of disabled drivers, the privacy of all drivers, and, if desired, the economic interests of low-income drivers are protected.

DEFINITIONS & CONCEPTS OF *INTELLIGENT PARKING*

Parking Beneficiary Groups

There are at least 7 types of beneficiary groups. Note that in all cases, members of beneficiary groups must be old enough to drive.

- 1.) People who have already paid for the capital cost of parking. An example of this type of beneficiary group would be the owners of condominiums, where parking has been built and the cost is included in the price of the condominium. Note that although they have technically already paid for the parking, if they borrowed money to pay for some portion of the price, the cost is built into their monthly payment. This illustrates why the value of parking and the cost of borrowing money (rate of return on money) are key input variables to use to compute the appropriate base, hourly charge for parking.
- 2.) People who are incurring on-going costs of parking. An example of this type of beneficiary group is a set of office workers, where the cost of “their” parking is contained in either the building lease or the cost of the building. Either way, the parking costs are reducing the wages that can be paid to these employees.⁶
- 3.) People who are purchasing or renting something where the cost of the parking is included in the price. Examples of this beneficiary group are people that rent hotel rooms, rent an apartment, buy items, or dine in establishments that have parking.

⁶ Such parking is often said to be “for the benefit of the employees”. Defining this beneficiary group will tend to make this statement true, as opposed to the common situation where the employees benefit only in proportion to their use of the parking.

- 4.) People who own off-street parking as a business. They could be the individual investors or could be a government or government-formed entity.
- 5.) People who are said to benefit from parking, even though the money for the parking has been supplied by a source that may have very little relationship to those that are said to benefit. An example of this group would be train riders that make round trips from a station which has parking that is said to be “for riders”. Students at a school with parking would be another example.
- 6.) People who are considered by many to be the logical beneficiaries of on-street parking. Owners of single-family homes are the beneficiaries of the parking that is along the boundaries of their property. The same status is given to residents of multi-family housing.
- 7.) Governments. Since they build and maintain the streets, they should get a significant benefit from on-street parking.

Unbundled Cost and Spontaneous Sharing

“Unbundled cost” means those who use the parking can see exactly what it costs and those who don’t use the parking will either avoid its cost entirely or will get earnings to make up for the hidden parking cost they had to pay. This conforms to the usual rule of the free market where a person only pays for what they choose to use. Unbundled cost is fair.

“Spontaneous sharing” means that anyone can park anywhere at any time and for any length of time. Proper pricing makes this feasible.

How to Unbundle

The method of unbundling can be simply stated, using the concept of “beneficiary group” as discussed above. First, the fair price for the parking is charged. The resulting earnings⁷ amount is given to the members of the beneficiary group in a manner that is fair to each member. Methods are described below.

Why this Supports Sharing

Members of a beneficiary group benefit financially when “their” parking is used. They will appreciate users increasing their earnings. They are also not obligated to park in “their” parking. If there is less-expensive parking within a reasonable distance, they might park there, to save money. This is fine, because all parking is included in the *Intelligent Parking* system.

Computing the Earnings for Individuals

Intelligent Parking must be rigorous in paying out earnings⁷. For a mixed use, the total number of parking spaces must first be allocated to the various beneficiary groups. For example in an office/housing complex, 63.5% of the parking might have been sold with the office. If so, the housing portion must be paying for the other 36.5%. For this case, it would follow that the first step is to allocate 63.5% of the earnings to the workers and 36.5% to the residents.

⁷ The earnings amount is the revenue collected minus the collection cost and any other costs that will have to be paid due to the implementation of *Intelligent Parking*. The costs associated with the parking, paid *before* the implementation of *Intelligent Parking*, should *not* be subtracted from the revenue because they will continue to be paid as they were before the implementation of *Intelligent Parking*. Therefore, these costs will continue to reduce wages and increase the prices of goods and services.

How the monthly earnings are divided up among the members of the beneficiary group depends on the beneficiary group type. For each member, the group's total monthly earnings amount is always multiplied by a quantity and divided by the sum (the sum is the denominator) of that quantity, for all members.

For example, for each employee, the multiplier is the number of hours that the employee worked over the month while the denominator is the total number of hours worked by all employees over the month. At a school, for each student, the numerator is the total time spent at the school, over the month, while the denominator is the sum of the same quantity, for all the students.

For a train station with parking being supplied for passengers that ride on round trips of one day or less, the numerator is the passenger's monthly hours spent on such round trips, over the month; while the denominator is the total number of hours spent by all passengers on such round trips, over the month. Radio Frequency Identification (RFID) units on passengers could support an automated calculation of monthly charges for fares, as well as monthly hours on round trips.

At a shopping center, the numerator is the sum of the money spent by the shopper, over the month, while the denominator is the total amount of money spent by all shoppers over the month.

At a condominium, the numerator is the number of parking places that were paid for (directly or indirectly) by the resident family and the denominator is the total number of parking places at the condominium project; similarly, for apartment complexes.

Where Earnings Are Low

The goal is that if someone doesn't park, they don't pay, either directly or indirectly, because the earnings that they get will balance out their losses (like reduced wages, for example). However, charging for parking that few want to use will not sufficiently compensate the people that have been forced, or are being forced, to pay for such parking. The only remedy in this case is to redevelop the parking or lease the parking in some other way, for storage, for example. The earnings from the new use should go to those that are in the beneficiary group that was associated with the low-performing parking.

Why This Method of Unbundling Will Feel Familiar to Leaders

Developers will still be required to provide parking and will still pass this cost on, as has been discussed. There will be no need to force an owner of an exiting office with parking to break his single business into two separate businesses (office and parking).

Parking beneficiaries are identified that conform to traditional ideas about who should benefit from parking.⁸

Unbundling the Cost of On-Street Parking

The revenue from on-street parking in front of businesses will be split evenly between the city and the business's parking beneficiaries. All of the earnings from on-street parking in front of apartments or single-family homes will be given to the resident families.⁹

⁸ Showing exactly where parking earnings go will reduce the political difficulties of adopting pay parking in a democracy where the high cost of parking is often hidden and rarely discussed.

⁹ Although governments own the streets, often, back in history, developers paid for them and this cost became embedded in property values. Admittedly, how to allocate on-street parking earnings is somewhat arbitrary. With

Special Considerations for Condominiums

Unbundling for a condominium owner means that, although their allocated amount of parking has added to their initial cost, their allocated amount of parking also earns money for them. Unbundling for a condominium could also mean that an owner can choose to have control over a single or several parking places. Such parking spaces could be equipped with a red light and a green light. If the red light is lit, this will mean that the space is not available for parking, except for the person who is controlling the spot. If the green light is lit, it will mean that the space is available to anyone. A space that is being reserved with a red light is charged at the full price to the condominium owner that has control over the space. The owner that controls these spaces can change the state of the parking space (available or not available) by either a phone call, on line, or at any pay station system that might be in use for the system. After condominium owners experience the cost of reserving a space for themselves, they might give up on the idea of having their own, personal, unshared parking space; especially since *Intelligent Parking* will give most owners and their guests all the flexibility they need in terms of parking their cars.

Some people think that condominium parking should be gated, for security reasons. However, parking within parking garages needs to be patrolled at the same frequency level as on-street parking, which is enough to ensure that crime around either type of parking is very rare. Cameras can help make parking garages that are open to the public safe from criminal activity.

Special Considerations for Renters

Unbundling for renters means that, although their allocated amount of parking increases their rent, their allocated amount of parking also earns money for them. Therefore, their traditional rent (includes parking) is effectively reduced by the money earned by those parking spaces allocated to them. Renters will be motivated to either not own a car or to park in a cheaper location. Parking in a cheaper location is not a problem because all parking is part of the *Intelligent Parking* system. Renters will welcome anyone to park in “their” parking, because it will increase their earnings.

Special Considerations for Employers

At first, companies may want the option of offering “free parking” to their employees so as to be able to compete with traditional job sites. This means giving employees that drive every single day an “add-in” amount of pay so that the sum of the add-in and their parking-lot earnings equals their charge, for any given monthly statement. The operator of the parking, which sends out statements, can pay out the “add in” amount, in accordance with the company’s instruction. The company will then be billed for these amounts. There could be no requirement for the company to provide any such “add-in” amount to the employees that don’t drive every day. This would allow the company to treat its every-day drivers better than other employees and so this would be a negative TDM. However, this economic discrimination would be substantially less than the current, status-quo, economic discrimination, where drivers get “free” parking and non-drivers get nothing.

Clusters of Parking

Clusters are a contiguous set of parking spaces that are nearly equal in desirability and thus can be assigned the same price. They should probably consist of from 20 to 40 spaces. For off-street

congestion pricing and efficient methods, governments may earn significantly more than they are under current practices.

parking, they could be on either side of the access lane to the parking spaces, so that an observer could see the 20 to 40 cars, and get a feel for the vacancy rate. At a train station, clusters will normally be organized so that their parking spaces are approximately an equal distance from the boarding area. On-street clusters would normally conform to our current understanding of what a block is, which is to say from one cross street to the next cross street. The width of the street and the length of the block should be taken into account in defining on-street clusters of parking and in deciding if the parking on either side of the street should or should not be in the same cluster of parking spaces.

Examples of Good and Bad Technology

Parking Meters or Pay Stations

Parking meters are a relic of an earlier period, before computers. Pay stations do not add enough usefulness to merit their inclusion in *Intelligent Parking*, except as a bridge technology. Once good systems are set up, pay stations should cost additional money to use because of their expense. It would be best to devise an implementation strategy that will minimize their use when the system is first put into effect and will take them out of service as soon as possible.

Radio Frequency Identification Backed Up by Video-Based “Car Present” and License Recognition

Government will eventually enter into an RFID (Radio Frequency Identification) age. Organizers of large athletic events already have. Organizers that put on large open-water swims, foot races, and bike rides have routinely used RFID for many years.¹⁰ An RFID vendor in San Diego¹¹ states that passive RFID units cost less than \$5, are reliable, are durable, and they could be used to identify cars as well as people. He also sees no problem in implementing most of the features of *Intelligent Parking*.¹²

Automatic Data Collection and Sending Out Statements

Note that the “back end database” of Dr. Carta’s written statement¹² refers to the ability to send statements of earnings and billing to students.¹³

¹⁰ For example, over 20,000 people ran the 2008 Bay-to-Breakers foot race in San Francisco. Each runner had a “chip” in their shoe lace. Each runner’s start time and finish time were recorded and all results were available as soon as the last runner crossed the finish line.

¹¹David R. Carta, PhD, CEO Telaeris Inc., 858-449-3454

¹² Concerning a Final Environmental Impact Report-approved and funded new high school in Carlsbad, California, where the School Board has signed a *Settlement Agreement* to consider “*unbundled parking*”, “*cash-out*”, and “*pricing*”, Dr. Carta wrote, in a January 13th, 2010 written statement to the Board,

I wanted to send a quick note discussing the technical feasibility of tracking cars into a lot without impacting students or requiring the need for gates. Mike Bullock and I have discussed this project; it can be accomplished straightforwardly by utilizing Radio Frequency Identification and/or Video Cameras integrated with automated license recognition systems. The cars would need to register with the system at the start, but it would be fairly painless for the users after the initial installation. The back end database system can also be implemented both straightforwardly and at a reasonable price.

This is not necessarily a recommendation of the proposal for unbundled parking. Rather it is strictly an unbiased view of the technical feasibility of the proposal to easily and unobtrusively track cars, both registered and unregistered, into a fixed lot.

¹³ In an earlier email on this subject, Dr. Carta wrote,

Putting it Together

Certainly, government, and in particular transit agencies and parking agencies, could use RFID-based technology. For example, when a person with an RFID unit which is tied to a billable address or a credit card with an open account gets on a bus or a train, they should not have to pay at that time, visit a pay station, or “swipe a card” that has a positive balance. Utility customers that pay their bills are not required to pre-pay. The same courtesy should be extended to transit riders, people that drive on roads, people that get parking-lot earnings, and people that park cars. There should be one monthly bill or statement, for all four activities.

Global Positioning Systems GPS

An alternative model is to have GPS systems in cars that would detect the car’s parking location, that location’s current charge rate, and would perform all of the charging functions in the car. The only information the parking-lot-enforcement system would need is whether or not a car being parked is owned by a bill-paying owner. The car owner’s responsibility would be to pay the bills indicated by the box in the car. The box would need to process a signal that a bill had been paid. It would also need to process pricing signals.

Not Picking Winners

The purpose of this report is to describe what an ideal system would do, *not* how it is done. How a proposed system works is left to the systems, software, and hardware engineers that work together to submit a proposal based on this description of what an ideal system does.

Privacy

Privacy means that no one can see where someone has parked, without a search warrant. Also, the level of the detail of information that appears on a bill is selected by the customer.¹⁴

Ease of Use for Drivers

For credit-worthy drivers that have followed the rules of the system, pay parking will not require any actions other than parking. Paying for all parking fees over a month is then done in response to a monthly billing statement. Parking will feel to the consumer like a service provided by a municipality, such as water, energy, or garbage. One important difference is that users belonging to a “beneficiary group” will get an earnings amount in their monthly statement. Those that earn more than what they are charged will receive a check for the difference. This ease of use will make all parking less stressful.

Base Price

Off-Street

This is not too tough - we probably would integrate with a service that already sends physical mail from an electronic submission instead of re-inventing this wheel.

¹⁴ License plates that have no RFID tags fail to use the best technology to accomplish the primary purpose of license plates, which is to identify and help intercept cars used in a crime. Identifying cars is a legitimate government goal. Protecting privacy is also a legitimate goal. Both goals can be realized with good laws, good enforcement, and good systems engineering.

Off-street parking is priced so that even if demand does not threaten to fill the parking beyond 85%, the money generated will at least equate to an agreed-upon return on the parking value and pay all yearly costs. Equation 1 shows the calculation of the hourly rate.

$$r_{BaselineHourly} = \frac{(r_{Investment} \times v_{Parking}) + c_{YOPD}}{(n_{HoursPerYear} \times f_{TO})} \quad \text{(Eq. 1)}$$

where:

$r_{BaselineHourly}$	=	the computed baseline hourly rate to park
$r_{Investment}$	=	yearly return on investment, such as .06
$v_{Parking}$	=	value of a parking space, such as (parking garage) \$40,000
c_{YOPD}	=	yearly operations ¹⁵ plus depreciation, per space, such as \$100
$n_{HoursPerYear}$	=	number of hours per year, 24 x 365 = 8760 Hours per Year
f_{TO}	=	fraction of time occupied, such as 0.55.

For the example values given, the base hourly rate of parking, to cover the cost of the investment, operations¹⁵, and depreciation is \$0.519 per hour. This could be rounded up to \$0.52 per hour. This price could also be increased to result in positive TDM, to reduce driving more than the fair-price, zero-TDM amount.

On-Street

If on-street parking is located within walking distance (one-quarter mile) of off-street parking, its base price is set equal to the closest off-street parking's base price. Otherwise, it is set to some agreed-upon value, like fifty cents per hour. However, on-street parking has a special meaning for downtown merchants and for neighborhoods, two powerful political forces in any city. Merchants that have few cars parking on their street, even though it is permitted, are probably failing in their businesses. They would like free parking to help draw visitors to their store front. Neighborhoods that are not impacted by parking would probably prefer no pricing. For these reasons, for any on-street parking cluster, no price is charged until the cluster occupancy reaches 50%. (Time of day is irrelevant.)

Congestion Pricing

The time-rate price of parking is dynamically set on each cluster of parking, to prevent the occupancy rate from exceeding 85% (to reduce the need to drive around looking for parking). An 85% occupancy rate (15% vacancy) results in just over one vacant parking space per city block⁵. If the vacancy rate is above 30%, the price is left at the baseline hourly rate. If vacancies fall below 30%, the price can be calculated in a stair-step method, such as shown in Table 2.

Equation 2 is an alternative method.

In either case, the total charge is time parked, multiplied by the time-averaged, time-rate price. The base multiplier would be adjusted to be just large enough to keep the vacancy rate from falling below a desired level, such as 15%, so it is always easy to find parking.

¹⁵ This includes money for policing, cleaning, maintenance, any applicable parking tax, and all collection costs. Collection costs will need to include an amount to recover the development and installation costs of *Intelligent Parking*.

Table 2 Hourly Rates for 2 Base Multipliers and a Baseline Hourly Rate of \$0.52

Vacancy Rate	Base Multiplier = 2			Base Multiplier = 2.5		
	Multiplication		Hourly Rate	Multiplication		Hourly Rate
	Formula	Value		Formula	Value	
Above 30%	r_0	1	\$0.52	r_{50}	1	\$0.52
25% to 30%	r_1	2	\$1.04	r_{51}	2.5	\$1.30
20% to 25%	r_2	4	\$2.08	r_{52}	6.25	\$3.25
15% to 20%	r_3	8	\$4.16	r_{53}	15.625	\$8.13
10% to 15%	r_4	16	\$8.32	r_{54}	39.0625	\$20.31
5% to 10%	r_5	32	\$16.64	r_{55}	97.6563	\$50.78
Below 5%	r_6	64	\$33.28	r_{56}	244.1406	\$126.95

$$r_{HourlyRate} = r_{BaselineHourly} \times (B^{(30-V)/5}), \text{ for } V < 30; r_{BaselineHourly}, \text{ otherwise (Eq. 2)}$$

where:

$r_{HourlyRate}$ = the congestion-priced hourly rate to park

$r_{BaselineHourly}$ = the baseline hourly rate to park, such as \$0.52 per hour (taken from from Eq. 1.

B = the base of the multiplier being computed, such as 2.50

V = the vacancy rate percent, such as 17.5, for 7 vacancies in a cluster of 40 spaces, $100*(7/40) = 17.5$

For the example values given, the hourly rate of parking would be \$9.88 per hour.

Pricing Predictions and Notifications

Drivers will develop strategies for their routine trips. The computer system that keeps records of parking use will also provide help for users. The *Intelligent Parking* website will direct a user to an appropriate cluster of parking if the user provides the destination location or locations, the time and date, and the hourly rate they wish to pay. If the walk is going to be long, the website could suggest using transit to get from the cheaply-priced parking to the destination. In such cases, the website may also suggest using transit for the entire trip.

Another user option is to specify the time, location, and the distance the user is willing to walk. In this case, the computer would give the cheapest cluster of parking available at the specified walk distance. The price prediction would be provided.

All price predictions would also have a probability of correctness associated with them. If a user can show that a computer has predicted a much lower price than what actually occurred, with a sufficiently high probability, it would be reasonable to charge the user the predicted price rather than the actual price.

Websites could routinely inform viewers when occupancy rates are expected to be unusually high, due to a special event (for example, a sporting event). The parking system website will always give current and predicted hourly rates for all locations. The hourly rates of parking will

also be available at a phone number and possibly at pay stations. The base-price hourly rate, for any parking cluster, would be stable and could therefore be shown on signs. Parking garage entrances could have large video screens showing both predicted and existing price. Users will also learn to look at parking and judge whether congestion pricing applies, or could apply, while their car is parked. It would not be long before these capabilities are added into GPS navigation systems.

Prepaid RFID

To be inclusive, pay stations or convenience stores will offer a pre-paid RFID that can be set on the dashboard of a car. This will support drivers with poor credit or drivers who have not obtained the necessary equipment to support the normal, trouble-free methods. This will also work for drivers that do not trust the system to protect their privacy for a certain trip (by removing or disabling the permanent RFID) or for all trips. No billing would occur.

Enforcement

The system would notify the appropriate law enforcement agency if an unauthorized car was parked. Authorized cars would need either a pre-paid RFID or equipment indicating that their owners had *Intelligent Parking* accounts and were sufficiently paid up on their bills.

IMPLEMENTATION

This description of *Intelligent Parking* will help to implement efficient parking systems. Parking at train stations, schools, and government buildings could introduce many of these concepts. This description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, which could lead to full implementation. Widespread installation should be done by a government agency, to minimize actions required on the part of the private sector. Laws would simply require the cooperation of all private-sector and government entities.

SUMMARY

A parking plan, *Intelligent Parking* has been described.

1. Technology will make it easy to use for most drivers.
2. Its parking is almost always shared, to support mixed uses.
3. It unbundles cost by charging and having earnings go to the parking beneficiaries.
4. Traditional groups, such as single-family home owners, employees, tenants, train riders, and students benefit from parking. The benefit is equal for drivers and non-drivers.
5. Baseline prices are computed primarily from the value of the parking and an agreed-upon rate of return. On-street parking is free until it is half full, at which time its base price often matches that of the closest off-street parking.
6. For all parking, price is dynamically increased to guarantee availability. Earnings are therefore only limited by what people are willing to pay.
7. Technology helps drivers find parking and decide if they want to drive or use transit.
8. Prepaid RFIDs provide service to those who have poor credit or don't want to be billed.
9. Disabled and perhaps low-income drivers will have accounts that allow them to park at reduced prices and perhaps avoid congestion pricing. Specially designated spots might also be required for disabled drivers.

10. The system will provide reports showing where additional parking would be a good investment and where it would be wise to convert existing parking to some other use.
11. Privacy will be protected. Law enforcement officials would need a search warrant to see where someone's car has been parked. The level of detail on billing would be selected by the car's owner.
12. Implementations could begin in carefully selected locations and expand.

Global warming, air pollution, trade deficits, and fairness are some of the significant reasons that governments have a responsibility to implement *Intelligent Parking*.

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Additional Details, Car Parking

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I. Background Information

1. Vehicle miles traveled are a major cause of global warming and pollution in California.

The June 2008 issue of *Scientific American (The Ethics of Climate Change*, by Professor John Broome) reports that the levels of GHG expected in 20 years will result in a 5% chance of a 14.4 degree Fahrenheit increase in the earth's temperature and this would be an "utter catastrophe" and create the possibility of a "devastating collapse of the human population, perhaps even to extinction."

Transportation produces about 40% of California's GHG emissions and most of that is from cars and small trucks. The world's leaders know this. They will be more likely to adopt the measures needed to avoid climate catastrophe if California demonstrates an unwavering commitment to climate protection.

According to the testimony of Justin Horner, Policy Analyst for the Natural Resources Defense Council, *Reducing Congestion & Greenhouse Gas Emissions through Parking Policy*, presented to the California State Senate Transportation and Housing Committee on February 24, 2009, "reducing global warming pollution from the Transportation sector rests on a "three-legged stool" of cleaner cars, cleaner fuels and reductions in vehicle miles traveled (VMT). "All three strategies are necessary to meet AB32 goals and the goal set out in the Governor's Executive Order of 80% of 1990 emissions by 2050."

The October 2008 Climate Change Scoping Plan from the California Air Resources Board (ARB) identifies 38% of the State's total greenhouse gas emissions as attributable to the transportation sector. Smart Mobility benefits are an essential part of implementing AB 32, the Global Warming Solutions Act of 2006, as has been recognized by the State Legislature and ARB. Legislative findings adopted as part of SB 375 note that "without improved land uses and transportation policy, California will not be able to achieve the goals of AB 32." Land use and pricing strategies are necessary components of the emissions reduction program called for in the adopted Scoping Plan as Measure T-3, Regional Transportation Related Greenhouse Gas Targets.

2. SB375 requires a significant reduction of vehicle miles traveled (VMT). According to the Findings and Declarations of SB518 (Senator Lowenthal), ". . . parking requirements greatly expand the built footprint and increase travel distances, thereby increasing vehicle miles traveled and reducing the viability of alternate transportation modes." Also, "The high cost of land, construction, and maintenance to provide free parking adds significantly to the cost of economic development, making many developments, especially those on infill or transit-oriented sites, financially infeasible and hindering economic development strategies."

3. Appropriate Pricing of Parking is an Important Tool to Make SB375 Successful. The NRDC states, "Since 1992, California law has mandated that certain employers offer parking cash-out (AB 2019, Katz), giving employees the option of a cash payment for their free parking space. Surveys of employees before and after the introduction of parking cash-out showed a 17% reduction in solo driving and a 64% increase in carpooling. VMT dropped an average of 12% per employee per year, the equivalent of removing one out of every eight cars driven to work." "But while many of the land use reforms envisioned in the Scoping Plan and SB 375 may take years to realize, parking reforms can be done now, at relatively low cost, and have a major impact."

From the Findings and Declarations of SB518 (Senator Lowenthal), "Eliminating subsidies for parking has enormous potential to reduce traffic congestion and greenhouse gas and other vehicle emissions by reducing vehicle miles traveled. If drivers must pay the true cost of parking, it will affect their choices on whether or not to drive. In the short term, changes to parking policy can reduce traffic congestion and greenhouse gas emissions more than all other strategies combined, and they are usually the most cost-effective." "Employer-paid parking increases rates of driving by as much as 22 percent."

4.) New technologies offer the potential to efficiently bill drivers and alert law enforcement if unauthorized cars trespass.

Examples are cameras, frequency scanners sensing RFIDs (Radio Frequency IDs) on cars, and license plate readers. The computer receiving this information can bill car owners and notify law enforcement if needed. Pay stations could play a role during the transition to full automation. However, pay stations are expensive and users should pay extra so that the use of pay stations can be phased out as soon as possible. Note that these same technologies should soon be able to automate fare collection for transit usage as well as road-use fee collection for driving. This means that in the near future, people could receive a monthly bill for parking, using transit, and driving.

5. Reformed Parking Policies will Increase Fairness

Findings and Declarations of SB518: “Free parking at stores is paid for by all customers in higher prices for goods, including those customers who do not drive. Free parking in housing developments is paid for by all residents, even those who do not drive. Free employer-provided parking is paid for by lower wages for all workers, including those who do not drive. Free on-street parking is paid for by the entire community in the form of taxes.” NRDC states, “By encouraging driving, free parking also creates a number of driving-related externalities, including collisions and collision-related injury, conventional air pollution and greenhouse gas emissions.”

6. Current Car Parking Cash-out Law rarely applies to employers

Currently, our state-mandated parking cash-out law (AB 2019) rarely applies. For AB 2019 to apply, companies must have at least 200 employees, own no parking, be leasing a building that has no parking, and be leasing parking for their employees in a contract that allows them to change the number of parking spaces being leased, with no economic penalty. It is easy to design a contract to avoid the provisions of AB 2019. Despite this, companies that own or lease buildings with parking have occasionally elected to pay their employees extra money for not driving. Unbundling the full cost of the parking for employees requires reasonable estimates of the per-unit-time and space value of the car parking.

7. Unbundling parking fees is inefficient if it does not support the spontaneous sharing of parking.

Again, Mr. Horner’s testimony states, “unbundling separates the cost of parking from the total cost of housing. This rewards those who do not choose to own a car with more affordable housing, while transferring to car owners the true, rightful cost of owning an automobile.” The problem with this method of unbundling is that it does not support the spontaneous sharing of parking. If a condominium owner elects to buy a parking space, it is theirs, full time. Likewise, if an apartment resident elects to rent a car-parking space, it is theirs, full time. This type of unbundling is better than bundled parking cost, but it is not optimum because it does not support the spontaneous sharing of parking. Sharing makes more efficient use of space. For mixed use, sharing can significantly reduce the amount of parking needed.

8. Current systems of timed parking and timed, pay parking are inefficient, unpleasant, and costly.

About 67% of the money collected in parking meters is spent on collection and enforcement. Time limits on parking detract from a driver’s enjoyment. The driver has to note when they started to park and then, as the time left gets short, they have to worry about getting an expensive parking ticket. Only rarely does a driver know exactly how long they will want to park. These types of concerns detract greatly from the downtown experience. Drivers either have to drive away with time left on their parking meter or risk getting a traffic ticket. Getting coins for a meter is sometimes difficult. Pay stations are better, but even the most advanced systems are still difficult. For example, motorists in Coral Gables, Florida can register their cell phones, credit cards, and license plates and then call in when they pull into a parking place and then call again, when they leave. This eliminates overpaying or underpaying and getting a ticket, but it is still difficult, because two phone calls are required and if these actions are forgotten the motorist may have to pay for more time than they parked or have to pay a fine.

9. Current systems have poor or no record keeping.

Generally, there are no records kept of how much money any given parking space is earning. Free parking is also generally unmonitored. Cities have to pay significant fees to have consultants come in and count parked cars to determine how “free” parking is being utilized.

10. Besides well-implemented, privately-owned, public parking, one other method that could fully, efficiently, and conveniently unbundle the cost of parking to support sharing would be one with the following characteristics:

a. The base, per-unit-time price per space (before any congestion-price increase) is at least the current cost to provide the parking, multiplied by the time rate cost of money, divided by the average fraction of time that the space is rented.

b. In order to state the second characteristic, it is useful to define the term, “beneficiary group”. The beneficiary group is generally that group of potential users that *paid for* the parking, either directly or indirectly; or those that *are paying* for the parking, either directly or indirectly. The exception is, for example, at a school or a transit station. In these cases, the potential users have *not* paid for the parking. However, since the baseline is “free” parking, it is clear that the providers of this parking (often tax payers) are content to (in effect), “give” the parking to the groups using the facility. The second requirement can now be stated. The parking-lot net earnings are divided up among the members of the beneficiary group that is associated with the parking. These earnings will appear in the monthly statement generated as in Background Information Item 4 above.

Note. **How to Compute Each Beneficiary Group Member’s Share of the Parking Lot Net Earnings** The formulas used to divide up the money among the members of the beneficiary group should reflect either the extent to which they paid, the extent to which they are paying, or the time they might have parked. For example, students would receive earnings in proportion to the time they spend at the school. Train riders would receive earnings in proportion to the amount of time they spend on round-trip train rides. Shoppers would get earnings in proportion to the amount of money they spend. Renters would get earnings in proportion to the amount that their rent is paying for parking. Condominium owners would get earnings in proportion to the amount that their purchase price paid for parking. Employees could get earnings in proportion to the amount of time they spend at work.

With this method, sharing is acceptable to the beneficiary group, because they are earning money from anyone who uses the parking.

c. **All parking is available to anyone willing to pay the price.**

d. **“Congestion Priced” or “Convenience Priced” Parking**

This means that the base price is instantaneously increased to prevent the occupancy rate from getting too close to 85%. This maximum occupancy rate has been identified by UCLA Professor Donald Shoup. Keeping occupancy below this threshold guarantees that anyone that is willing to pay a premium price can find a parking place, even in high-demand areas, without needing to drive around looking for it (emitting GHG and other pollutants).

e. **Protect the Economic Health of Downtowns**

Merchants and their advocates within government often fear that charging for parking will cause potential customers to go to locations with “free” parking. For this reason, on-street parking could be free until it is 50% full, at which point it is assigned a base price equal to the base price of the closest off-street parking.

f. **Provide Information to Help Potential Drivers Decide Whether They Want to Drive and If So, Where to Park**

Software can be developed so that a potential user can specify time, place, (or a set of time and places) and desired price and be given (on a computer or on a phone) available parking locations (including an estimated Parking Resolution

probability of accuracy). The software will also provide transit information. This will encourage “park once” behavior, walking, and a rational decision as to whether or not the trip should be made by car. It will minimize driving because no search for parking will be necessary.

g. Protect Low-Income Drivers as Appropriate

The computer that sends out statements can provide qualified low-income drivers and disabled drivers reduced rates, as appropriate.

h. Protect Privacy Appropriately

Privacy protections can be provided so that where and when people park, the vehicle they drive, and any Requirement 7 advantage, is fully protected, unless a warrant is issued by a judge in response to substantiated allegations of a serious, felony crime.

i. Keep Parking Cost Unbundled

No block leasing of parking is allowed if it “rebundles” the cost of parking. For example, no store could lease a block of either on-street or off-street parking for its customers. Likewise, no employer could lease a block of parking for its employees, if this would defeat the intent of the state’s current cashout law.

j. Keep Complete Records

The computer system that controls pricing, enforcement, billing, the payout of earnings, and provides cost and location estimates to potential users also keeps records of the use of each parking space. This will support decisions as to whether parking should be eliminated or added.

11. Reduce amount of parking. As often pointed out by the Bay Chapter’s parking expert Howard Strassner, it is very important to reduce the amount of parking. When costs are unbundled and parking is shared, less will be needed. When good records show an excess of parking, cities can find the political will to enact the elimination of minimum off-street parking requirements for all existing or new uses. Best practice is often described as turning the current minimums into maximums and then reducing these maximums.

12. “Free parking” increases our use of petroleum. This is a national security issue. We have two on-going wars in the Middle East and military recruitment in many of our high schools. Oil is probably a factor.

13. Many downtowns would have more appeal if their streets were not operated like a strip mall parking lot.

14. Cities are strapped for cash to provide police, parks, fire protection, transit, roads, water, power, sewers and other community services that the community wants, in part because sprawl (abetted by “free” mall parking) increases the cost of these services. See <http://online.wsj.com/article/SB124027127337237011.html>

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Resolution of the Executive Committee of the Angeles Chapter

L3-10
Cont.

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

Approved unanimously
7-23-06

Comment Letter No. L3

Jim Stewart, PhD
Chair, Global Warming, Energy & Air Quality Committee

Charming Evelyn
Chair, Water Committee

Lore Pekrul
Chair, Green Building Committee

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Comment No. L3-1

The Sierra Club requests an extension of 30 days of time to allow for adequate review of the above-referenced project. Not only is the DEIR several thousand pages, but the number and magnitude of the approvals requested require close public evaluation.

Response No. L3-1

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-2

We also request a public hearing before the Commission on the DEIR, to allow the Commissioners an opportunity to provide input to the draft document before the document becomes final. Many people do appreciate the County's effort to hold a hearing on this project that will substantially change the character of the east side canyons in Santa Clarita, yet others express concern that the hearing was before a "hearing officer" rather than before the Commission. Ex parte rules rightly discourage interaction with Commission members, so speaking to them during a hearing process is the only time the public has an opportunity to air concerns and hear them addressed by the Commission. But most importantly, we believe this hearing was premature because the community had insufficient time to even begin review of this huge and plan amendment-dependent project.

Response No. L3-2

Refer to Response No. 15-3 regarding the public hearing process for the Project. Of note, the hearing held by the County of Los Angeles Hearing Examiner on June 4, 2012, occurred on Day 31 of the formal 45-day public comment period that began

on May 4, 2012, and ended on June 18, 2012. At that hearing the general public was invited to provide oral comments regarding the Project, transcripts of which are included and responded to in Section IV, Responses to Oral Testimony, of this Final EIR.

Additionally, refer to Response No. 15-2 regarding the requested local plan amendment.

Comment No. L3-3

It is our understanding that this project would turn an existing movie ranch in rural Placerita Canyon into an industrial facility by building 12 sound stages, 6 production offices, 6 bungalows, a warehouse, a commissary, and an administration building (555,950 square feet of development). In the process, 158 oak trees would be removed and the project would cut 700,000 cubic yards of earth and fill 350,000 cubic yards with an additional 350,000 cubic yards of soil export-- a massive scale of earth moving. And the proposed studio would operate 24 hours per day and require over 2000 parking spaces.

Response No. L3-3

This comment summarizes certain elements of the Project. As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

As a matter of clarification, the number of parking spaces required per County Code would range from 940 to 954 spaces, as indicated in Tables V.J-12 and V.J-13 on pages V.J-52 and V.J-53 in Section V.J, Traffic, Access, and Parking, of the Draft EIR. However, the Project would provide parking in excess of the Code requirements in order to meet demand requirements and give the Project flexibility regarding parking around the

soundstages and office buildings (particularly with regards to the use of studio trailers).² As shown in Figure V.J-2 on page V.J-24 and Figure V.J-3 on page V.J-25 of the Draft EIR, the Soundstage Option would provide at least 1,228 parking spaces within the Development Area (with up to 260 spaces in the northern pad area including 88 tandem spaces, up to 507 spaces in the southern pad area, and up to 569 spaces within the parking lots located in the LADWP transmission corridor), and the Studio Office Option would provide at least 1,162 parking spaces within the Development Area (with up to 460 spaces in the northern pad area, up to 507 spaces in the southern pad area, and up to 569 spaces within the parking lots located in the LADWP transmission corridor). If LADWP were to revoke all or part of the authorization for use of the LADWP property as a parking lot, the Conditional Parking Areas could be developed, with up to 295 parking spaces in the northern Conditional Parking Area (Lot 2) and up to 482 parking spaces in the southern Conditional Parking Area (Lot 1).

The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-4

Project not Consistent with the New Areawide Plan for Santa Clarita

At a time when both the City and County portions of the Santa Clarita Valley have just completed General Plan updates, this project now seeks circumvention by asking for a plan amendment to approve a large industrial project in an area zoned for agriculture and open space. It seems particularly unreasonable that the County would immediately backtrack and consider a Plan Amendment involving increased parking permits to support increased commuting despite the Greenhouse gas reduction promised by the approval of One Valley One Vision, a plan that was seek [sic] to encourage increased density in the City Center and discourage auto-oriented sprawl development in the surrounding green areas. Now, with the first large project proposal before you, your department is proposing to amend the plan to allow intensive industrial use in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

² As explained on page V.J-13 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, Code parking requirements represent the minimum supply that a project needs to provide and are based on average day conditions. The demand rates represent design day conditions, which account for fluctuations in studio activities and typically represent the 10th to 20th busiest hour of the year. Such conditions are considered worst-case in terms of parking needs.

Response No. L3-4

This comment is incorrect, as the Project is consistent with the new land use designations for the Ranch that became effective on December 27, 2012 following the recent adoption of the 2012 Area Plan. However, the Draft General Plan as well as the 2012 Area Plan allow complete project applications filed prior to the effective date of the plans to be reviewed for consistency under the then current adopted General Plan and Area Plan. The County deemed complete the Project's application for a vesting tentative tract map and conditional use permit on May 4, 2010, and thus the Project is subject to the former plans. As such, the Project Applicant seeks an Area Plan amendment in accordance with the 1990 Area Plan. Refer to Response No. 15-2 for further discussion regarding consistency with land use designations and zoning.

Comment No. L3-5**Greenhouse Gas Reduction Climate Change**

The proposal also violates the Climate Action Plan developed by the City of Santa Clarita that must be consistent with the County Plan.

It is imperative that Disney describe and incorporate specific measures to reduce greenhouse gas generation and lessen climate change impacts. Among the measures it could take are those suggested by CAPCOA¹ in the Santa Clarita Climate Action Plan (CAP):

CAP Energy Measures²

- Higher Efficiency Public Street and Area Lighting
Power consumed by lighting sources contributes to GHG emissions. Lamp efficiency and the amount of lighting produced (lumens) per watt of power supplied vary by light fixture design. A strategy to reduce GHG emissions is the installation of more efficient public street and area lights that are able maintain the level of lumens per area while consuming less electricity. Disney should commit to not using high pressure sodium and metal halide lights, but instead using energy efficient induction or LED lighting throughout the project.
- Any additional Traffic Lights must be LED Traffic Lights. Replacing traffic lights with higher efficacy ones, such as light-emitting diode (LED) traffic lights. Such lights can result in a reduction of GHG emissions since they consume about 90% less energy than traditional incandescent traffic lights.
- Establish Onsite Renewable Energy Systems - Solar Power
Electricity generated from photovoltaic (PV) systems is associated with zero GHG emissions²⁹, [sic] thus installation of PV systems in residential or commercial buildings displaces electricity consumed from local utilities that

generally have larger carbon footprints; this translates into a reduction of GHG emissions.

- Disney should commit to LEED certified buildings at a minimum of the LEED Gold level, with LEED Platinum as preferable. Instead, the EIR states that the project will achieve “LEED equivalent” and does not specify a level of equivalency.
- If Disney sought to comport itself within the structures of the climate and habitat protective guidelines set for the project area, it would consider implementation of The Living Building Challenge for the project site—and provide the leadership of which it is certainly capable. The Living Building Challenge was first developed by the Cascadia Chapter of USGBC in the pursuit of a future that is socially just, culturally rich and ecologically restorative, and is now under the oversight of the International Living Building Institute.

CAP Water Measures

- Use Reclaimed Water

Reclaimed water is water treated from a wastewater treatment plant but instead of being released to the environment is re-used for non-potable purposes. Using reclaimed water requires less energy to collect and redistribute to their consumption points since it is generated in local treatment plants, as opposed to fresh water supplies that may be transported over long distances from its natural sources. Since reclaimed water is less energy intensive, its consumption has a smaller carbon footprint.

- Low-Flow Water Fixtures

Decreasing water use reduces GHG emissions associated with the electricity consumed to pump, treat and distribute the water. A strategy to reduce indoor water demand is installing low-flow or high efficiency water fixtures such as low-flow toilets, urinals, showerheads, or faucets, or high-efficiency clothes-washers and dishwashers in residential and commercial buildings. For each improved water fixture installed, there is an associated reduction in indoors water demand and hence in GHG emissions. To quantify reductions from this measure, GHG emissions are calculated for a baseline scenario (regular water demand) and a mitigated scenario, with reduced water demand from the percentile reduction provided by each water fixture installed. The difference in GHG emissions from both scenarios represents the reduction achieved by this measure.

- Landscape Irrigation Systems

Water consumption for outdoor uses can be diminished by utilizing water-efficient landscape irrigation systems. Efficient Irrigation techniques, such as “smart” irrigation technology, reduce water use and its associated GHG emissions. “Smart” irrigation systems relay on weather, climate and soil moisture information to adjust watering frequency, hence maintaining the vegetation adequately moist while conserving water. Quantification of this measure can be achieved by

calculating the water savings from this technology, multiplying by the water energy intensity of the local water supply and applying local utility emission factors to calculate GHG emissions.

CAP Vegetation Measures

- **New Vegetated Open Space**

Vegetated open space serves as natural “carbon sinks”, [sic] places where carbon dioxide is naturally sequestered. By creating new vegetated open space, or preventing the transformation of open space into urban/rural development areas, GHG emissions reductions are achieved by the amount of carbon dioxide sequestered per acre of preserved land. The amount of carbon sequestered will depend on the type of vegetated land (forests, croplands, grasslands, etc.)

The City has developed an Open Space Plan that calls for the creation of a “green belt” around the City, serving as a vegetated buffer between the City and County development. Through this plan, the City will seek to acquire as much as 9300 acres of open space with the purpose of saving the land from development threat from other jurisdictions or for restorative purposes of the land from contamination where necessary. The GHG reductions associated with this measure are calculated based on the amount of preserved land (acres) multiplied by the expected annual CO₂ accumulation per acre, which depends on the type of vegetated land.

¹ *Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures, California Air Pollution Control Officers Association (CAPCOA), August 2010.*

² *This information is paraphrased from the City of Santa Clarita’s draft Climate Action Plan, pages 30-32*

Response No. L3-5

Refer to Response No. 15-2 regarding consistency with the County’s 2012 Area Plan.

Project impacts related to greenhouse gases (GHGs) are evaluated in Section V.E.2, Air Resources—Global Climate Change, of the Draft EIR. Included on pages V.E.2-22 through V.E.2-28 therein is a discussion of the sustainability features to be implemented as part of the Project that would serve to minimize GHGs and climate change impacts. As discussed, some of the key sustainability features would include the following measures (or any equivalent measures designed to achieve the same results at minimum), which mirror several of those listed in the comment above: the use of highly efficient electric and heating, ventilation, and air-conditioning (HVAC) equipment (housed in the proposed central utility plant); photovoltaic technology on selected roofs; LEED™ Certification or LEED™ Silver Certification (or equivalent) for many of the proposed buildings; low flow/ultra low-flow fixtures, Energy Star appliances, and use of drip irrigation

systems; substantial landscaping within the Development Area, in addition to 10.5 acres of the Ranch within which mitigation oak woodland planting would occur; and the use of drought-tolerant plant species for a minimum of 75 percent of total landscaping. The Project's GHG emissions reduction of 17 percent compared to the "business-as-usual" scenario constitutes an equivalent or slightly larger break from "business-as-usual" than has been determined by the California Air Resources Board (CARB) to be necessary to meet AB 32's goals (approximately 16 percent for 2020). Therefore, the Project would have a less than significant impact on the environment with respect to its GHG emissions and no further mitigation measures would be required.

In addition, while it is recognized that GHGs represent a regional and even global issue, as a matter of clarification, other than limited off-site infrastructure improvements, the Project is located within the County of Los Angeles, not the City of Santa Clarita, and would therefore be subject to County, not City, plans and requirements, including the County's Green Building Program, except where City plans and requirements are applicable to the infrastructure improvements.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-6

How will the Disney proposal increase these greenhouse gas calculations? What affect will this have on the City's ability to meet the AB32 goals with its current Plan? These issues must be addressed in the Climate Section of the DEIR.

The City of Santa Clarita's Climate Action Plan (and by inference, the County's, since this is a "One Valley, One Vision" Plan) intends to meet the required AB 32 goals in part through landuse [sic] planning, particularly transportation planning. The Local Plan Amendment and parking CUP requested as part of this approval is not consistence [sic] with these goals because it will increase congestion on the Highway 14 and does not provide public transportation or pedestrian and cycling alternatives. It will thus impair the Santa Clarita Valley's ability to meet AB32 and SB375 goals.

The City's Plan states

*"Overall Land Use Transportation Measure
Emission reductions from land use planning are generally achieved by reducing total vehicle miles traveled (VMT) and improving traffic flow (i.e. reducing idling and low-speed emissions). While many of these are implemented on a project level, for the purpose of a region analysis,*

ENVIRON has utilized the in-City VMT projection in the prior City General Plan, which did not include land-use improvement measures, as well as the valley-wide VMT projections in the new General Plan, which are modeled to incorporate a mix of land use planning measures. With the guidance from City Staff, ENVIRON has estimated an overall 10% VMT reduction within City boundaries by 2020 as compared to the business-as-usual scenario. This reduction incorporates a mix of measures including, but not limited to, increase density of in-City development and diversity of urban and suburban developments, increase the location efficiency, destination and transit accessibility, integrate affordable and below market rate housing, implement trip reduction programs such as ride-share, improve the transit system by expanding the transit network and increase service frequency, and improve the flow of traffic at city intersections and congested roadways. Reductions in VMT by implementing these programs are directly correlated with reductions in GHG emissions.”³

This proposal will significantly alter the current Plan for the Santa Clarita Valley by arbitrarily changing one of the greenbelt areas, Placerita Canyon, to intensive industrial use and massive numbers of additional car and truck trips.

³ *City of Santa Clarita Climate Action Plan, May 2012, page 30*

Response No. L3-6

As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s, and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

As discussed on page IV-5 in Section IV, Project Description, of the Draft EIR, one of the underlying purposes of the Project is to recognize the synergy of having the existing outdoor filming activities and proposed indoor film production consolidated on the same site, thus maximizing efficiencies and reducing vehicle trips. Further, as discussed on pages V.J-63 through V.J-67 in Section V.J, Traffic, Access, and Parking, of the Draft EIR,

with implementation of mitigation, the impact of the Project on intersections and access would be less than significant.

Given the Project's location within the County of Los Angeles (other than limited off-site infrastructure improvements), Section V.E.2, Air Resources—Global Climate Change, of the Draft EIR includes discussion of the Project's potential impact on the County's ability to meet the goals of AB 32, not the City's. Nonetheless, as indicated on pages V.E-2-34 and V.E.2-35 therein, the Project would incorporate a number of features that are consistent with the Los Angeles County Green Building Program, which is intended to improve the County's energy efficiency, reduce its contribution of GHGs within California, and achieve compliance with AB 32. The Project's sustainability features would serve to decrease vehicle miles traveled, conserve water, increase energy efficiency, use appropriate building materials, reduce solid waste, and improve public health by virtue of all of the above. In particular, the Project would substantially reduce the number of truck trips from outside film productions which currently require travel between film shoots on the Ranch and off-site production facilities, thus advancing regional air quality goals. In addition, the Project would minimize GHG emissions from new development by energy conservation through the use of highly efficient electric and HVAC equipment (housed in the proposed central plant), water conservation through the use of irrigation/sprinkler controls and low consumption fixtures, and building design and construction that achieves the equivalent of LEED™ Silver Certification for many of the buildings within the Development Area. The Project would be consistent with the goals set forth in AB 32, as well as in CARB's *Climate Change Scoping Plan*. The Project's GHG emissions reduction of 17 percent compared to the "business-as-usual" scenario constitutes an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet AB 32's goals (approximately 16 percent for 2020). Therefore, the Project would have a less than significant impact on the environment with respect to its GHG emissions.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-7

Air Quality

The Santa Clarita Valley is in a Federal non-attainment zone for ozone and PM10 and PM2.5 (small particle dust). These pollutants are especially damaging to children's lungs as evidenced by the well-documented rise in asthma rates for school age children.

Adding traffic congestion and more commuter traffic to the valley will only make the ozone and particulate matter impacts worse. This is especially true due to the added truck traffic

generated by Disney's sound stage activities, since diesel exhaust is a significant generator of particulate matter and a cause of asthma.

Disney may not avoid this problem by a finding that long term air quality impacts are less than significant without even evaluating these impacts. Impacts to air quality must also be found significant since this project's proposed Plan Amendment will interfere with the City's ability to reduce greenhouse gases as described above.

While the DEIR admits that significant impacts to air quality will occur during construction, it appears to manipulate facts to make a finding that long-term air quality impacts will be less than significant. This manipulation does not pass the straight fact test. Obviously, a project that needs a plan amendment is not consistent with the existing OVOV Plan, the Climate Action Plan or the AQMP.

Therefore, the Sierra Club asserts that the DEIR must be changed to properly reflect the impacts to Air Quality as being Significant and include all possible mitigation measures to reduce air quality impacts. These should include at the very least, but are not limited to such measures as

- Required employees car-pooling, fee-only or unbundled parking cash-out, reduced parking spaces to encourage car-pooling and public transportation
- Required use of only Natural Gas or Electric trucks at the site.
- In addition to making all measures proposed in the DEIR mandatory

Response No. L3-7

As correctly indicated in this comment, the South Coast Air Basin (Basin), within which the Project site is located, is in non-attainment of the federal (and state) air quality standards for ozone (O_3), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$), as also indicated in Table V.E.1-1 on page V.E.1-3 in Section V.E.1, Air Resources—Air Quality, of the Draft EIR.

The long-term air quality impacts associated with Project operations are evaluated throughout Section V.E.1, Air Resources—Air Quality, of the Draft EIR, in accordance with SCAQMD protocols. The significance of operational air quality impacts is not based on whether a plan amendment would be required as part of the Project (which would not be necessary for the Project based on the new land use designations for the Ranch that became effective with the recent adoption of the 2012 Area Plan—see Response No. 15-2 for further discussion), but rather is determined based on significance thresholds that are derived in part from Appendix G of the State CEQA Guidelines, as well as federal and state

air quality standards, relevant plans adopted by the SCAQMD and/or the County, and SCAQMD thresholds of potential significance. Furthermore, area-wide plans such as the County's 2012 Area Plan (part of the OVOV process) and the SCAQMD's AQMP are not intended to preclude local plan amendments. Such plans take into account anticipated growth (in terms of new development, population, etc.), which may occur due to a variety of factors, including plan amendments. To that end, in accordance with the procedures established in the SCAQMD *CEQA Air Quality Handbook*, the Draft EIR includes an analysis of Project consistency with the AQMP on pages V.E.1-54 through V.E.1-57 in Section V.E.1, Air Resources—Air Quality, of the Draft EIR, which includes discussion of whether the Project would be consistent with the population, housing, and employment growth projections upon which the AQMP forecasted emission levels are based. As stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the Project is projected to result in a net increase of approximately 1,240 full-time equivalent jobs within the Development Area or less than 4.9 percent of the total job growth projected for the subregion through 2015 and 3.0 percent through 2020. Such levels of employment growth are consistent with the employment forecasts for the subregion as adopted by SCAG. Because the SCAQMD is expected to incorporate these same projections into the AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP.

In addition, the Project's potential to produce toxic air contaminants (TACs), specifically those related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities, are addressed on page V.E.1-41 in Section V.E.1, Air Resources—Air Quality, of the Draft EIR. As discussed, toxic emission impacts related to construction activities within the Ranch would be less than significant. Similarly, TACs associated with long-term operation of the Project are addressed on pages V.E.1-46 and V.E.1-47. As concluded, the Project would not release substantial amounts of toxic contaminants, and no significant impact on human health would occur.

With respect to the mitigation measures suggested in this comment, the Project includes a Transportation Demand Management (TDM) program to encourage the use of alternative modes of transportation and reduce vehicular traffic on the street and freeway system during the most congested time periods of the day. Relevant TDM measures would include a rideshare/vanpool/carpool matching program, preferred parking for carpool/vanpool vehicles, and preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles among other measures, as detailed in PDF J-1 as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. Moreover, implementation of all Project Design Features and Mitigation Measures included in the MMRP would be mandatory. With the implementation of all relevant measures, operational air quality impacts would be less than significant, as stated on page V.E.1-63 in Section V.E.1, Air Resources—Air Quality, of the Draft EIR.

Comment No. L3-8**The DEIR should Provide a “Jobs Analysis”**

Disney has made claims that this project will create a substantial number of jobs. A cursory review of the DEIR reveals no substantiation or even discussion of these claims. We ask that the County request of the developer some substantiation/economic analysis that these jobs are not merely transfers from Disney’s facility in Burbank, thus needlessly creating additional traffic, air pollution and GHG in the Santa Clarita Valley. This issue should be discussed and disclosed in the DEIR.

Response No. L3-8

Refer to Response No. 15-5 regarding Project employment, which was eliminated from further evaluation in the EIR during the Initial Study process. In analyzing impacts on the environment, a Draft EIR considers physical impacts on the environment, not economic impacts. Nonetheless, the economic benefits of the Project provide a justification for the Statement of Overriding Considerations required per CEQA Guidelines Section 15093. Refer to the Economic & Fiscal Impact Analysis provided as Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-9**Oak Tree Removals and Mitigation**

While the project proponent has stated publicly that the 158 oaks slated to be destroyed will be replaced on a greater than County required basis, we note that oaks cannot be established in all soil types and do not generally grow on slopes facing in certain directions. We ask that some evaluation be provided in the DEIR to indicate sufficient and biologically adequate soil and location for any proposed mitigation plantings.

Response No. L3-9

Refer to Response No. 15-6.

Comment No. L3-10**Further Spread of the Whittiker Bermite Pollution Plume**

A Resolution passed by the Angeles Chapter in 2006 (attached) indicates the Sierra Club’s commitment to ensuring that existing residents of Santa Clarita have a safe and healthy water supply before additional new development is approved.

While the treatment facility is now functioning, it is producing far less water than previously anticipated and has encountered various problems requiring a shut down and repair of wells, and more frequent analysis of water quality due to concerns regarding VOCs.

In April of 2012, Valencia Water Company voluntarily shut down yet another drinking water supply well (well 205) due to the presence of Volatile Organic Compounds (VOCs). While these chemicals were found at low levels, their presence would seem to indicate the further westerly spread of the Whittiker Bermite pollution plume. This information was not publicly disclosed and only recently came to light through a public record request to the Dept. of Health Services.

While the project before you will not be supplied by Valencia Water Co., the spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire Santa Clarita Valley will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

Response No. L3-10

Refer to Response No. 15-7.

The referenced resolution, entitled Resolution Regarding Ammonium Perchlorate Pollution in the Santa Clarita Valley and provided as Attachment 4 to the comment letter (see page III-268 of this Final EIR), indicates the Sierra Club's opposition to any "land use approvals in Santa Clarita that rely on water from the contaminated Saugus aquifer" until appropriate treatment facilities are operational. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L3-11

Conclusion

Thank you for considering our requests and suggestions, and we look forward to receiving a response to our concerns as outlined above.

Attachments:

1. Sierra Club California Parking Resolution
2. Description of Bundled Parking Concept
3. Additional Information on Parking Concept
4. Resolution Regarding Ammonium Perchlorate Pollution in the Santa Clarita Valley

Response No. L3-11

The documents referenced in this comment and provided as attachments to the comment letter (see Attachment 1 on page III-246, Attachment 2 on page III-247, and Attachment 3 on page III-264 of this Final EIR) pertain to the Sierra Club's stated position to support "equitable changes in parking policies to reduce vehicle miles traveled (VMT) and greenhouse gas emissions" and a suggested plan to unbundle parking costs in order to reduce vehicular trips.

As discussed on page IV-5 in Section IV, Project Description, of the Draft EIR, one of the underlying purposes of the Project is to recognize the synergy of having the existing outdoor filming activities and proposed indoor film production consolidated on the same site, thus maximizing efficiencies and reducing vehicle trips. Further, with the Project located in the 58 acres of the Ranch adjacent to SR-14, the Project satisfies the Project objective, stated on page IV-8 in Section IV, Project Description, to provide for convenient vehicular access to and from SR-14 to limit the amount of Project-related vehicles traveling along Placerita Canyon Road and other local roadways in the Project vicinity. Finally, as new development must provide adequate parking in accordance with County Code requirements, all Code-required parking would be provided on the Ranch. The Project will require a parking permit to authorize: (1) some tandem parking on-site; (2) the use of shared off-lot parking (i.e., parking spaces that serve buildings located on different legal lots within the Project site and parking proposed under the LADWP transmission line corridor); and (3) an exemption from paving and striping requirements for surplus parking within the conditional parking lots to maintain the rural character of the Ranch if parking within the LADWP transmission corridor is later revoked by LADWP. Thus, the use of shared parking appears consistent with the Sierra Club's position papers.

Refer to Response No. L3-10 regarding Attachment 4 (see page III-268 of this Final EIR). These comments are noted for the record and will be forwarded to the decision-makers for review and consideration.

Friends of the Santa Clara River
660 Randy Drive Newbury Park, CA 91320
805-498-4323 www.fscr.org

7-15-12

Christina Tran
Los Angeles County Regional Planning Dept.
320 W. Temple St.
Los Angeles, CA 90012

Via email to ctran@planning.lacounty.gov

Re: Request for Extension of Time to comment on the DEIR – Disney Studio Project - Placerita Canyon County Project TR071216 – (5), Plan Amendment 200100010, Zone Change 20090012, VTT 071216, CUP 200900126, Oak Tree Permit, Parking Permit, Flood Map Change, etc.

Dear Ms. Tran:

Friends of the Santa Clara River was formed in 1993 to provide community oversight of issues pertaining to the Santa Clara River Watershed. We particularly review projects that will affect the river and its tributaries in an effort to ensure habitat protection, retention of the natural hydrology, protection of floodplains and continued groundwater recharge.

L4-1

As a tributary the to Santa Clara River, Placerita Creek provides an important contribution to the watershed through surface flows, sediment movement and habitat.

Although the County generally provides us with a digital or hard copy of all projects affecting the river and its tributaries, we do not believe we received notice of this project. We would therefore now like to formally request an extension of the time for review of 30 days because of the number and magnitude of the approvals requested with this proposal.

L4-2

We wish to begin by expressing our concern that there will be no hearing on the DEIR for this substantial project before the Planning Commission, only a hearing on the Final EIR. This process is contrary to all previous Regional Planning hearing procedures for large projects and particularly inappropriate for a large proposal that includes a Plan Amendment. We request that the Commission hold a hearing on the Draft document so that it has the opportunity to hear from the public and make changes before the Final document is presented.

L4-3

We participated in the One Valley One Vision (OVOV) General Plan update for Santa Clarita and are frankly dismayed that his proposal for a Plan Amendment change from

L4-4

agriculture to an industrial use is coming before you now when the County update was only recently approved. OVOV purported to meet air quality standards and address climate change by reducing density in the County areas, continuing the green belt around the City and increasing density in the City Center near transportation nodes.

L4-4
Cont.

This proposal does none of that. Instead, as was feared by several commentors during the OVOV public process, the County now proposes to increase density in an area zoned for agricultural use by allowing a heavy industrial, auto-dependant use. We believe this plan amendment change is inappropriate and oppose its approval.

Project Description

L4-5

The Project proposes a plan amendment change to provide up to 12 soundstages, production offices, six mills, a warehouse, writers/producers bungalows, a commissary, an administration building, a central utility plant, and an electrical substation on approximately 58 acres located currently zoned for agriculture. The proposed studio would operate 24 hours per day and employ over 1800 people and have over 2000 parking spaces.

In the process, the project would require removal of 158 oak trees (including 16 heritage oaks) and encroach upon an additional 82 oaks (3 heritage oaks). According to the DEIR, the entire Development Area would be cleared and mass graded at one time, involving approximately 700,000 cubic yards of cut and 350,000 cubic yards of fill within the Ranch, with up to 500,000 cubic yards of soil exported to a landfill. Additional cut and fill of up to 20,000 cubic yards would be required for off site improvements.¹

The project would turn a filming ranch into a massive industrial studio complex with greatly increased traffic and noise in this rural area. It would destroy native vegetation and compromise the view shed in Placerita Canyon.

Comments on the Flood Section

L4-6

Impacts to the Floodplain

We wish to begin our comments on this section by stating that we support the Regional Water Quality Board's efforts to encourage a reduction of hydromodifications to natural streams and rivers. We attach their Resolution 2005-02. It appears this project would not be consistent with this Resolution due to the extensive debris basin and storm drain infrastructure proposed for the project and the hardscaping of the creek channel.

We also have the following additional concerns.

L4-7

Page V.B-8 the DEIR states:

The County also adopted a floodplain and floodway for the Ranch area in October 2005. The proposed areas to be developed within the Ranch are outside the County's adopted floodway. However, approximately the northern third of the southern portion of the Development Area east of the southern fill pad, the northern Conditional Parking Area, and a portion of the southern Conditional Parking Area are within the County's adopted floodplain.

¹ DEIR, Executive Summary

First, it appears from the Floodway Maps included in the DEIR (and attached to this comment letter) that the above is not an entirely accurate statement. Portions of the buildings seem to be in the floodway and can only be removed by bank protection and fill that artificially narrows the creek further than its current hydrological configuration². We request that the developer downsize the project by removing structures from the flood plain and next to the creek so that the natural floodplain can be maintained.

L4-7
Cont.

Second, we understand that FEMA is updating several flood maps in the Santa Clarita area and elsewhere. Please address whether the maps referred to above are the most up to date for flood information. If newer maps have been approved, those maps should be used for the purposes of this project.

L4-8

Page V-B-27 states that

“Prior to the commencement of construction, the Applicant would obtain a Conditional Letter of Map Revision (CLOMR) from FEMA for the proposed change to Zone A, the 100- year flood zone, per the FIRM, which would be provided to the satisfaction of LACDPW as required as a CUP condition of approval and a condition of the vesting tentative tract map.”

L4-9

Previous County projects have been required to receive this CLOMAR letter during the EIR process as it is our understanding that it involves a check of flood calculations by FEMA to at least preliminarily ensure their accuracy. This CLOMAR letter should be required of this developer also.

Further, throughout the flood section, the DEIR refers to evaluations of only a 50-year event, not a 100 or 500 year event. Evaluation of larger flood events should be required.

L4-10

According to the DEIR “Project grading would change the County adopted floodway and floodplain. A conceptual floodway map revision would be adopted at the time of Project approval for the proposed alteration to the County adopted floodway and floodplain limits.” (p. V.B-27). This change requires a County Permit that doesn’t seem to be listed in the entitlements in the NOP or Hearing Notice? Is this change going to be granted in a separate permit? If so, we believe such a bifurcation of the process would constitute piece-mealing of the project. We urge the County to include any permit application for floodway changes in this document so that the impacts of the whole project are reviewed at the same time.

L4-11

The DEIR continues with the conclusion “...no significant flood impacts would result during Project construction, including flooding resulting from the alteration of the course of a stream or river.” This statement cannot be made without at least a review of the CLOMAR letter and a review of the application for floodway map changes which the DEIR illegally defers to a later date.

Flooding

L4-12

² As discussed above, ***following grading for the Project***, no structures would be placed within the 100-year floodplain.[emphasis added], DEIR p. V.B-29

According to the DEIR (V.B-12) “A 50-year hydrology analysis was performed for the Project using the analysis methods specified in the LACDPW 2006 Hydrology Manual.” All storm drains and other flood facilities were designed to the fifty year event.

L4-12
Cont.

Why is only a 50-year analysis used? This time span is not sufficient to provide accurate flood predictions. The DEIR should re-calculate flood flows using at least the 100 year flood event. Also, climate change is predicted to cause heavier single rain events although overall rainfall may be reduced. It appears that this scenario was not addressed. Heavier rainfall events should be included in the DEIR hydrology calculations.

Page V.B-29 of the DEIR states:

L4-13

“...following grading for the Project, no structures would be placed within the 100-year floodplain. Further, the average water surface elevation in Placerita Creek during a County 50-year storm event is far below the future elevations within the Development Area. Accordingly, the Development Area would lie outside the floodplain for Placerita Creek and would not be subject to inundation. ... **Therefore, no significant impacts associated with flooding would result from buildout of the Project, including flooding resulting from the alteration of the course of a stream or river.**” [emphasis added]

With changes to the floodplain that have not received final FEMA or County approval, as well as only using a 50-year flood event, we believe it is premature and inaccurate to state that there will be no flooding impacts associated with the proposed hydrological changes.

As for off-site flooding, the DEIR states on page V.B-30:

L4-14

“With respect to downstream flooding, impacts would be less than significant since the Project’s drainage systems for the conveyance of both on- and off-site generated flows would ensure post-development peak flow rates would not exceed pre-development peak flow rates.”

However, again, this appears to only be calculated on a 50-year event, not a sufficient evaluation of the flood potential, especially in light of the heavier rainfall events predicted to occur as a result of climate changes. One hundred and five hundred-year events should be included in this calculation.

The DEIR continues:

L4-15

“Additionally, the Project’s potential hydromodification impacts to Placerita Creek were evaluated. As part of this study, sediment transport analyses were conducted under pre- and post-Project conditions for various storm events to determine the long-term impacts to the streambed. ...Such increases in streambed elevation would not impact the creek’s capacity, which could experience a peak flow rate of approximately 5,800 cfs during a County 50-year storm event (bulk and burned) from a tributary watershed of almost 6 square miles, as runoff would still be contained within the natural channel. Thus, the sediment load transported downstream of the SR-14 culvert that abuts the Development Area after Project construction would not adversely impact streambed elevations and would not result in adverse impacts to downstream properties. Therefore, no significant impacts associated with hydromodification or associated downstream flooding would result from buildout of the Project.”

Again, only the 50-year event is analyzed. No potential Venturi effect caused by increased flood-flows through the culvert under Highway 14 is discussed.

L4-15
Cont.

The DEIR claims that the I-14 culvert is large enough to handle any additional run-off and increased floodflows that will result from project changes to the flood plain, but there is no confirming letter from CalTrans to that affect.

L4-16

We urge the County to contact CalTrans and urge them to review the sufficiency of the culvert to handle the proposed changes to the hydrology of Placerita Creek.

Insufficient LID Analysis

L4-17

While the DEIR lists the County's Low Impact Development requirements on page V.B-11, it does not describe how the project will comply with LID or where these features will be in the project. Instead, storm drains and catch basin locations, all draining to Placerita Creek, are described in detail.

For instance the DEIR states on page Pg. V.B-14:

"With the grading changing the topography of the Development Area, the Project would require new on-site storm drain facilities to convey stormwater flows from the developed portions of the Development Area as well as from off-site areas that drain to the Development Area. Through a combination of sheet flow, concentrated drainage swales, localized catch basin inlets, and storm drain pipes, all stormwater runoff from the Development Area would flow to Placerita Creek. Surface runoff would be collected by a series of grate inlets designed and located to maximize interception and then conveyed by a combination of surface gutters and underground lines to on-site detention basins. Similarly, building downspouts would direct stormwater to the streets and storm drain system for discharge into on-site detention basins. The Project's storm drain system would be designed and sized to ensure that post-development peak flow rates would not exceed pre-development peak flow rates so as to prevent off-site downstream flooding caused by the Project.

Again at page Pg.V.B-15:

"Surface flows from the southern lot would be directed to the west to underground drainage lines that would drain into the other on-site detention basin (Det-04) further west. The final design of these improvements would be determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final Project design."

Page V.B- 17:

"Off-site stormwater runoff that flows to the northern portion of the Development Area would be intercepted by drainage ditches and directed around the Development Area south to Placerita Creek. Energy dissipators and/or velocity reducers would be used at outlets in Placerita Creek, as determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final design drawings. "

"One of these debris basins (DB-05) would be 16 feet deep with side slopes of 2:1 to allow for containment of approximately 10,258 cubic yards of debris flows and runoff from Subareas Off-1a and Off-7a. The other debris basin (DB-06) would be 14 feet deep with side slopes of 2:1 and would be able to contain approximately 6,467 cubic yards of debris flows and runoff from Subareas Off-2a and Off-8a. Stormwater from these two

basins would then flow north in a proposed underground storm drain system through the Development Area to Placerita Creek. Subarea Off-site 3a would continue to drain to Placerita Creek, but a debris desilting inlet may be constructed on the southern side of Placerita Canyon Road to intercept the tributary debris flows. Refer to Figure 8 within the Drainage Concept for an illustration of the debris basins. The placement of these improvements would maintain the existing off-site drainage patterns as much as possible. While the on- and off-site systems would be separate, flows from each would be routed to the same creek outlets so as to minimize the number of outlets and disturbance to the creek banks. The final design of these improvements, including the debris basin slopes and the design of terrace drains, would be determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final Project design.

L4-17
Cont.

We note that each of the paragraphs above describe storm drains in detail but defer other required details of LID and SUSMP compliance to a Final Hydrology and Hydraulics Study that is not available and, according to the EIR, will not even be completed until after the EIR is certified.

This hydrology study has apparently not yet been completed because the developer has not yet decided what the project will actually be.

In a cover letter to Matrix Environmental included in Appendix C, the Study preparer of the preliminary Hydrology and Hydraulics Plan states:

“As indicated in Mitigation Measure B-1 in the Draft EIR, a final Hydrology and Hydraulics study based on final project design and plans and demonstrating impacts will remain less than significant will be submitted to County of Los Angeles Department of Public Works for review and approval”

L4-18

The same letter further states:

“While the approved Drainage Concept/SUSMP/LID Plan may reflect slightly different project conditions than indicated in the Draft EIR, the modifications do not impact the conclusions in our report, and, with the mitigation measures set forth in the Draft EIR, impacts on the environment would remain less than significant”

How can we know that the impacts will be less than significant when the impacts in the Drainage Plan are different than those described in the DEIR? What are the differences? What aren't the correct impacts stated in the DEIR as required by law?

The County cannot decide whether the impacts are less than significant or not based on a deferred report for a nebulous and changing project. Inaccurate descriptions as well as deferral of the project description, determination of impacts and inadequate and deferred description of mitigation measures makes it obvious that this DEIR fails to meet the requirements of the California Environmental Quality Act. Nor will such vague and deferred project analysis meet the requirements of the other permits that this project will be required to obtain.

L4-19

Where are the stormwater retention structures required to retain the first flush rainfall flows on site? The DEIR describes vegetation swales, but does not discuss their location in detail or evaluate their adequacy to retain first flush runoff on site as required by stormwater rules. Instead it merely states swales will be placed “where appropriate”.

L4-20

Although page V.B-19 describes BMPs to address water run-off problems, again it is merely a list without specificity of their use on the project or even a precise definition of what is meant. For instance “Roof run-off controls” – what controls, where will they be placed? “Efficient irrigation” – exactly what does this mean? ER controlled sprinklers/ drip lines? Gray water recycling?

L4-21

Buffer of the Riparian Zone

The DEIR states that “The existing riparian buffer adjacent to Placerita Creek would be expanded as part of the Project after stabilization of the fill pad slopes.” (V.B-18) But it does specify what the original buffer is or by how much it would be increased. Thus, no evaluation of the impact or lack thereof can be made.

L4-22

According to the **Jurisdictional Waters Report** provided in the DEIR Appendix F-7 (pg. 6):

L4-23

“The creek and its two tributary systems mapped in the study area, likely would be considered jurisdictional “waters of the U.S.” under Sections 404 and 401 of the Clean Water Act (CWA), and are jurisdictional “waters of the State” under the Porter Cologne Water Quality Control Act and Section 1600 of the California Fish and Game Code (FGC). Therefore, all of these drainage features are regulated by all three agencies. A final Jurisdictional Determination must be completed by the ACOE. Any proposed impacts to these features likely would require permit approvals by the various resource agencies.”

Thus, one must ask if this proposal will even comply with the Army Corps of Engineers 404 permit and others that must be obtained for this project? Due to the lack of specific details in the DEIR, there is no way of knowing.

Cumulative Impacts

On page V.B-32 the DEIR purports to analyze the cumulative impacts for this project, but looks only at the watershed of Placerita Creek without looking at the whole watershed of the Santa Clara River. While this project is only a small percentage of the Upper Watershed, a large number of projects have been approved or are proposed in the Santa Clarita Valley area that cumulatively will reduce the flood plain of the Santa Clara River and its tributaries, reduce surface flow through ground water pumping and loss of ground water recharge and generally affect the natural function of the river. This section does not discuss any of the impacts of local and regional projects on the various functions of a healthy watershed. It is not a sufficient discussion or disclosure of impacts to enable decision makers to address the potential issues.

L4-24

Although the DEIR states that “Related Projects that are anticipated to be developed within the vicinity of the Development Area, could subject people and property to flood hazards if either located within areas subject to flooding or if downstream flooding results.” It does not look at whether residences in Placerita Canyon are already in a floodway that would be aggravated by this project. This analysis should be required and downstream homeowners notified if the project will require changes to their flood way and subsequent increases in flood insurance. hazards would be less than significant.

Pg. v.b-32

Insufficient Mitigation measures

L4-25

The Flood Section only proposes two mitigation measures:

***MM B-1:** Prior to the issuance of a grading permit, the Applicant shall submit to the County of Los Angeles Department of Public Works for review and approval the final Hydrology and Hydraulic Study based on final Project designs in compliance with the County's codes and policies, including the County of Los Angeles Department of Public Works Hydraulic Design Manual, Sedimentation Manual, Low Impact Development Standards Manual, and consistent with the approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR. The final Hydrology and Hydraulic Study shall demonstrate that relevant Project impacts remain less than significant.*

***MM B-2:** Project design and construction shall comply with applicable County codes and policies and the final Hydrology and Hydraulic Study.*

Given the magnitude of impacts to the habitat and Placerita Creek that would be incurred by the narrowing of the creek flood channel, reduction of the flood plain, hardscaping of the of the project site and removal of 158 native oaks, including many heritage trees, the above mitigation is certainly insufficient.

Further, these proposed mitigation measures are, in fact, legal requirements with which the developer must comply. They are not mitigation for impacts.

We therefore ask that in addition to that described above, the developer comply with the requirements of the Ventura County MS-4 Permit (attached). We also recommend that the project proponent consult with the Regional Water Quality Control Board for compliance with Resolution 2005-02.

Conclusion

L4-26

At a time when Santa Clarita has just completed its updated General Plan, it seems untoward that the County would immediately propose a Plan Amendment and one that would require increased parking permits, thus indicating increased commuting. The One Valley One Vision Plan was supposed to encourage increased density in the City Center and discourage auto-oriented sprawl development in the surrounding green areas. Already with the first large project proposal before you, your department is proposing to amend the plan to allow an intensive industrial use in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

Sincerely,

Ron Bottorff, Chairman

Attachments

1. RWQCB Resolution #2005-02
2. Two flood Maps from the DEIR
3. Ventura County MS4 permit

L4-26
Cont.

**State of California
California Regional Water Quality Control Board, Los Angeles Region**

L4-6
Cont.

**RESOLUTION NO. 2005-002
January 27, 2005**

Reiteration of Existing Authority to Regulate Hydromodifications within the Los Angeles Region, and Intent to Evaluate the Need for and Develop as Appropriate New Policy or Other Tools to Control Adverse Impacts from Hydromodification on the Water Quality and Beneficial Uses of Water Courses in the Los Angeles Region

WHEREAS, the California Regional Water Quality Control Board, Los Angeles Region, finds that:

1. Protecting beneficial uses within the Los Angeles Region consistent with the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) requires careful consideration of projects that result in hydrogeomorphic changes and related adverse impacts to the water quality and beneficial uses of waters of the State. The alteration *away from a natural state* of stream flows or the beds or banks of rivers, streams, or creeks, including ephemeral washes, which results in hydrogeomorphic changes, is generally referred to in this resolution as a hydromodification.
2. This resolution is intended to reiterate the existing authority the Regional Board relies upon to regulate hydromodifications within the Los Angeles Region. As such, it has no regulatory effect. This resolution represents a initial step in the process of first, heightening awareness about the potential impacts of hydromodification on water quality and beneficial uses and evaluating existing laws and regulations and the current methods employed by Regional Board staff when reviewing proposed hydromodification projects and, second, strengthening, if necessary, controls and policies governing hydromodifications that negatively affect water quality and beneficial uses. As a first step, it sets forth a process to achieve one of the Regional Board's highest priorities, which is to maintain and restore, wherever feasible, the physical and biological integrity of the Region's water courses. Secondly, maintaining the natural functions of water courses maximizes opportunities for stormwater conservation and groundwater recharge, which is very important in the semi-arid Los Angeles region where groundwater makes up half of the Region's water supply.
3. In addition to the process outlined in this resolution, the Regional Board has and will continue to strongly support restoration efforts in and along the Region's urbanized, highly modified water courses. The Regional Board also strongly supports preservation efforts geared toward ensuring long-term protection for the Region's remaining natural water courses.
4. Section 101(a) of the Clean Water Act, sets forth a national objective "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." (33 U.S.C. § 1251(a).) Chapter 1 of the Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) recognizes this national goal and specifies that the Basin Plan is designed to implement the Clean Water Act and its goals. As a result, a regional priority of maintaining and restoring, wherever feasible, the physical and biological integrity of the Region's water courses is firmly grounded in federal and state law.

5. To realize this objective, the Clean Water Act (33 U.S.C. § 1313(c)) and federal regulations (40 C.F.R. § 131.10(a)) direct States to specify appropriate designated uses to be achieved and protected. The classification of the waters of the State must take into consideration the use and value of water for public water supplies, protection and propagation of fish, shellfish and wildlife, recreation in and on the water, agricultural, industrial and other purposes including navigation. The standards must explicitly be designed to “protect the public health or welfare and enhance the quality of the water.” (33 U.S.C. § 1313(c).)
6. The Basin Plan designates the beneficial uses of the Region’s water bodies consistent with the California Water Code, federal Clean Water Act, federal regulations, and with the national “fishable/swimmable” goal of the CWA forming the broad basis for the beneficial use designations of surface waters throughout the Region. Some of the beneficial uses most benefited by preserving water courses in a natural state include aquatic life [WARM and COLD among others], wetland habitat, and groundwater recharge. In addition, the Basin Plan establishes water quality objectives for the protection of these beneficial uses. An important provision of the Basin Plan, which is required by federal law (40 C.F.R. § 131.12) and state law (SWRCB Resolution No. 68-16), is an anti-degradation policy designed to maintain existing, high quality waters. The beneficial uses of water bodies, water quality objectives and anti-degradation policies, together, constitute a State’s water quality standards.
7. The Regional Board primarily relies upon a three-pronged approach to regulating hydromodifications. The first two are (1) waste discharge requirements issued pursuant to Water Code section 13263 and waivers issued pursuant to Water Code section 13269 to protect waters of the State and (2) certifications issued in accordance with Clean Water Act section 401 to protect waters of the U.S. These two approaches are not mutually exclusive. (Cal. Code Regs., tit. 23, § 3857.) The third prong consists of municipal stormwater permits issued pursuant to section 402 (p) of the Clean Water Act to address stormwater related problems including stormwater quality and increased flows.
8. “Waters of the State” include all waters of the U.S. In addition, waters of the State include waters that are not “navigable waters” under the federal Clean Water Act, including certain intermittent and ephemeral streams, wetlands, lakes, reservoirs, and other isolated non-navigable waters.
9. Human civilization has attempted to alter the environment through hydromodifications for centuries. In the Los Angeles Region, beginning in the early part of the 20th century, hydromodifications were constructed by public agencies to protect residents from floods and to collect and conserve stormwater for drinking water purposes and recreation. In addition, extensive urban development, and the corresponding increase in impervious area within the watershed and decrease in the width of natural floodplains, has often resulted in significantly altered patterns of surface runoff and infiltration and, consequently, stream flow. This, in turn, has necessitated further in-stream hydromodification in order to stabilize banks and constrain the stream to the channel to prevent flooding. The sequence of events is discussed extensively in the Basin Plan and in the Regional Board’s municipal storm water permit for Los Angeles County. (Regional Board Order No. 01-182.)
10. Many hydromodifications were undertaken with laudable goals often for public safety and welfare, but have later been shown to de-stabilize and enlarge stream channels as well as degrade habitat and reduce species abundance and diversity. As a result, when reviewing

hydromodification projects it is important to carefully consider whether the immediate improvements sought are designed in such a way as to avoid unintended adverse consequence on the character of the receiving water and its beneficial uses in the vicinity, and downstream of the hydromodification.

11. Activities that alter natural *stream flows* may include increasing the amount of impervious land area within the watershed, altering patterns of surface runoff and infiltration, and channelizing natural water courses. Activities that alter the natural *stream channel* include but are not limited to human-induced straightening, narrowing or widening, deepening, lining, piping/under-grounding, filling or relocating (i.e. channelization); bank stabilization; in-stream activities (e.g. construction, mining, dredging); dams, levees, spillways, drop structures, weirs, and impoundments.
12. Hydromodifications may impair beneficial uses such as warm and cold water habitat, spawning habitat, wetland habitat, and wildlife habitat in a variety of ways. Modifications to stream flow and the stream channel may alter aquatic and riparian habitat and affect the tendency of aquatic and riparian organisms to inhabit the stream channel and riparian zone. As a result of these hydromodifications, the biological community (aquatic life beneficial uses) may be significantly altered, compared to the type of community that would inhabit an unaltered, natural stream.
13. For example, channelization usually involves the straightening of channels and hardening of banks and/or channel bottom with concrete or riprap. These modifications may impair beneficial uses by disturbing vegetative cover, removing habitat; modifying or eliminating instream and riparian habitat; degrading or eliminating benthic communities; increasing scour and erosion as a result of increased velocities, and increasing water temperature when riparian vegetation is removed. The regular maintenance of modified channels may impair beneficial uses by disturbing instream and riparian habitats if not managed properly. These modifications may also, if not managed properly, impair beneficial uses by depriving wetlands and estuarine shorelines of enriching sediments or by excessive deposition in downstream environments; changing the ability of natural systems to both absorb hydraulic energy and filter pollutants from surface waters; and altering habitat for spawning and other critical life stages of aquatic organisms. Hardening of channels may also eliminate opportunities for groundwater recharge in some areas. Furthermore, some hydromodifications may reduce recreational opportunities and may reduce the aesthetic enjoyment of people engaged in recreation in and around the water body.
14. As a result of past hydromodifications, there are few natural stream systems remaining in the region. Water bodies that have not undergone extensive hydromodification such as portions of the Santa Clara River, upper San Gabriel and Los Angeles Rivers, Malibu Creek, Topanga Canyon, coastal streams in the Santa Monica Mountains, and tributaries to these larger rivers provide immeasurable benefits to the Region. These benefits include high quality warm and cold-water aquatic habitat, spawning habitat, migratory pathways, wildlife corridors, wildlife and riparian habitat, wetland habitat, recreational and aesthetic enjoyment, and groundwater recharge. Yet, many of these water bodies and their tributaries continue to be threatened by expanding urban development.
15. The Regional Board acknowledges that there is a wide array of hydromodification projects. Some result in positive environmental impacts such as stream restoration projects. Others result in negligible or temporary adverse environmental impacts if managed properly. These may include widening bridges and installing flow measuring devices, such as weirs, or energy

dissipating devices where a constructed channel meets a natural channel. On the other end of the continuum are large hydromodification projects or multiple projects with cumulative impacts that permanently alter the hydrologic and ecological functions of a stream and, thus, adversely affect the beneficial uses described above. These include, but are not limited to, projects that bury natural stream channels, channelize natural water courses, or involve instream activities such as mining or construction. Regional Board staff evaluates the severity of adverse environmental impacts on a project-by-project basis.

16. The Regional Board recognizes that maintenance activities are required in modified channels in order to ensure continued flood protection and vector control. The Regional Board has authorized such activities through the issuance of Section 401 certifications in the past and would expect to continue to authorize such activities. The Regional Board also recognizes that maintenance activities may need to be carried out on an emergency basis due to various exigencies, including brush fires and flooding. The Board through the issuance of Section 401 certifications has also authorized these emergency maintenance activities. Nothing in this resolution is intended to alter the ability of these local agencies to continue ongoing maintenance activities.
17. The Regional Board also recognizes the value of the spreading grounds that have been constructed along many of the Region's larger water courses. These spreading grounds serve a valuable function by recharging storm water into the Region's groundwater to bolster local water supplies. Nothing in this resolution is intended to alter the ability of local and regional agencies to conserve stormwater within existing regulations with the goal of increasing local water supplies.
18. The Regional Board and local agencies have undertaken or sponsored hydromodification field assessments and studies to develop peak flow design criteria to minimize or eliminate adverse impacts from urbanization for water courses in the counties of Ventura and Los Angeles. These studies include the 'Urbanization and Channel Stability Assessment in the Arroyo Simi Watershed of Ventura County, CA' (2004), and the 'Peak Impact Discharge Study' sponsored by the County of Los Angeles, which is in progress. The results from these studies will be used to develop objective criteria to reduce or eliminate the adverse impacts of hydromodification in the Los Angeles Region from new development and redevelopment.
19. Though the Regional Board does not have authority to regulate land use, the Regional Board strongly encourages land use planning agencies and developers to carefully consider, early in the development planning process, the potential impacts on water quality and beneficial uses of hydromodification projects proposed as part of new development. The Regional Board strongly discourages direct hydromodification of water courses except in limited circumstances where avoidance or other natural alternatives are not feasible. In these limited circumstances, project proponents must clearly demonstrate that a range of alternatives, including avoidance of impacts, has been thoroughly considered, hydromodification has been minimized to the extent practicable, and adequate in situ and/or off site mitigation measures have been incorporated to offset related impacts. Project proponents must also document that there will be no adverse effects to water quality or beneficial uses. This approach is consistent with the California Environmental Quality Act (CEQA), federal regulations and State and federal antidegradation policies.
20. Chapter 4 of the Basin Plan, "Strategic Planning and Implementation", outlines the suite of regulatory tools available to the Regional Board to maintain and enhance water quality. One of these tools is the 401 Certification Program. This federally required program regulates

most hydromodification projects to ensure that the projects will not violate State water quality standards of which beneficial uses are an essential component. Section 401 Certifications may include conditions to minimize impacts from hydromodification activities by implementing Best Management Practices such as working in the dry season or out of the water, among many others. Certifications may also include monitoring requirements in order to ensure that the project is completed as specified and any proposed mitigation is successful.

21. Under section 401 of the Clean Water Act, the State Water Resources Control Board and the Regional Boards have a time limit as prescribed by applicable laws and regulations, from the receipt of a complete application, to certify that a project will comply with applicable state water quality standards prior to issuance of a federal 404 dredge and fill permit for any activity that may result in a discharge to a surface water of the United States. In the event that a project will not comply with applicable water quality standards, even with all conditions proposed, then the certification may be denied. (Cal. Code Regs., tit. 23, § 3837, subd. (b).)
22. Under section 402 (p) of the federal Clean Water Act, the State Water Resources Control Board and the Regional Boards are required to issue storm water permits to owners and operators of municipal separate storm sewer systems (MS4s). On a permit-by-permit basis, MS4 permits may identify storm water-related problems and include provisions requiring municipalities to implement measures to reduce adverse impacts of hydromodification, primarily increased flows, on beneficial uses.
23. Under separate authority granted by State law (see Article 4 (commencing with section 13260) of Chapter 4 of the Porter-Cologne Act), a Regional Board may regulate discharges of dredge or fill materials as necessary to protect water quality and the beneficial uses of waters of the State by issuing or waiving waste discharge requirements, a type of State discharge permit. For projects that may result in a discharge to a surface water of the U.S., waste discharge requirements may be issued in addition to the 401 certification. (Cal. Code Regs., tit. 23, § 3857.) Issuance of waste discharge requirements may be the only option for the Regional Board in situations where the proposed discharge is to waters of the state (e.g. isolated waters, vernal pools, etc.) rather than waters of the U.S., or in situations where the federal agency does not claim jurisdiction. All discharges of waste, including dredged and fill material, to waters of the State are privileges and not rights.
24. With certain exceptions, the California Environmental Quality Act (CEQA) requires the preparation of environmental documents for all projects requiring certifications by the state or state-law-only waste discharge requirements from the Regional Board. Hydromodification activities discussed above that require certification under section 401 of the Clean Water Act or that require waste discharge requirements for dredging and filling of State waters may be subject to CEQA. For projects that may have a significant effect on the environment that cannot be mitigated, an environmental impact report must be prepared that requires consideration of feasible alternatives to the project. (Pub. Resources Code, § 21061.)

THEREFORE, be it resolved that

1. Maintaining and restoring, where feasible, the physical, chemical and biological integrity of the Region's watercourses is one of the Regional Board's highest priorities.

This resolution reiterates existing law and regulatory requirements and current staff practices. As such, it has no regulatory effect. However, the Regional Board directs staff to undertake a two-step process to evaluate and consider further action to control adverse impacts from hydromodification. During this process, staff is directed to involve stakeholders and regulatory agencies with jurisdiction, consistent with the requirements of the Porter-Cologne Water Quality Control Act. The first step shall be an evaluation process and shall address, at a minimum, the following:

- Prioritization for control of those hydromodification activities that cause the greatest adverse effects on water quality and beneficial uses;
- Evaluation of existing regulation of hydromodification as defined herein;
- Consideration, in light of the existing regulatory scheme, of issues affecting the Board's ability to achieve its identified objectives;
- Consideration of existing legal authorities for Board actions;
- Consideration of staff resources; and
- Evaluation and identification of the best regulatory means available to the Board and the other agencies with jurisdiction to fulfill Board objectives.

The second step shall involve, as necessary based on the above evaluation, proposals for Board consideration of actions, including without limitation educational campaigns, memoranda of understanding with other regulatory agencies, adoption of new guidance, additional municipal stormwater permit requirements or further Basin Plan amendments as necessary to address gaps in existing hydromodification control in order to maximize the Regional Board's authority to ensure that a hydromodification project does not adversely affect water quality or degrade beneficial uses of those waters.

2. Given the priority set forth in paragraph 1, the Regional Board reaffirms that the Executive Officer will only issue a certification pursuant to Clean Water Act section 401 with adequate documentation (i) that the project will comply with applicable water quality standards, including antidegradation policies, and (ii) if necessary, that adequate analysis of a range of alternatives has been performed consistent with federal regulations, the California Environmental Quality Act, and antidegradation requirements.
3. Furthermore, given the significant potential adverse impact of large-scale or multiple hydromodification projects, the Regional Board reaffirms that the Executive Officer may at his discretion choose to bring a proposed project before the Board for direction prior to certification or recommend waste discharge requirements for the proposed project, which would be subject to Board approval.
4. Given the priority set forth in paragraph 1, the Regional Board reaffirms that it will only issue waste discharge requirements with adequate documentation (i) that the WDR will implement any relevant water quality control plan, including the water quality standards contained therein, and (ii) that adequate analysis of a range of alternatives, where an alternatives analysis is required, has been performed consistent with the Porter-Cologne Water Quality Control Act, CEQA and antidegradation requirements.
5. Following completion of the two-step evaluation process described in 2 above, the Regional Board directs staff to develop, if necessary based on the conclusions of the evaluation, new policy or additional regulatory or non-regulatory tools to control adverse impacts from hydromodification, which may include educational campaigns, memoranda of understanding,

guidelines, additional municipal stormwater permit requirements and amendments to the Basin Plan.

L4-6
Cont.

Regulatory tools may incorporate specific criteria and evaluation requirements to be used by Regional Board staff when evaluating projects for water quality certification or waste discharge requirements, and setting conditions for certification or for Standard Urban Stormwater Mitigation Plan (SUSMP) or Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) approval by the local agency. If a Basin Plan amendment is necessary, the Regional Board further directs staff to bring said amendment to the Board for its consideration in the near future. Any proposed criteria and evaluation requirements should ensure that developers avoid, minimize or, as a last course, compensate for both the on-site and downstream adverse impacts of development on the water quality and beneficial uses of watercourses.

6. When evaluating the issue of hydromodification and identifying specific actions to be taken if necessary, the Regional Board shall consider at a minimum the following:
 - Existing federal and state law and regulation; state and regional policies; and current methods employed by Regional Board staff related to hydromodification of water courses.
 - Consistency and coordination with other agencies' authorities over hydromodifications.
 - Existing staff resources available to implement current Regional Board programs and regulations related to hydromodification of water courses.
 - The local and regional value of maintaining water courses in their natural state.
 - Federal guidelines including, but not limited to, section 404(b)(1), which constitutes the substantive federal environmental criteria that are used in evaluating applications for certain discharges of dredge or fill material;
 - Statewide General Waste Discharge Requirement for certain dredge and fill activities not requiring a Section 404 Permit or a Section 401 Certification under the federal Clean Water Act (State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ);
 - State Water Resources Control Board, "Regulatory Steps Needed to Protect and Conserve Wetlands not subject to the Clean Water Act," Report to the Legislature, Supplemental Report of the 2002 Budget Act, April 2003.
 - The State Water Resources Control Board Workplan: Filling the Gaps in Wetlands Protection (Sept. 24, 2004);
 - State Water Resources Control Board Guidance for Regulation of Discharges to "Isolated" Waters (June 25, 2004);
 - National Research Council, "Riparian Areas: Functions and Strategies for Management, Committee on Riparian Zone Functioning and Strategies for Management," National Academy Press, Washington, D.C., 2002.
 - State guidance including, but not limited to, "A Primer on Stream and River Protection for the Regulator and Program Manager" (by Ann L. Riley) and the "California Rapid Assessment Method for Wetlands" for evaluating mitigation sites;
 - "Stream Corridor Restoration: Principles, Processes, and Practices." Prepared by the Federal Interagency Stream Restoration Working Group (FISRWG) (10/1998);
 - General principles of low impact development (various sources);
 - The findings of the study commissioned by the Los Angeles County Department of Public Works through the Storm Water Monitoring Coalition in order to satisfy a requirement of the Los Angeles County Municipal Storm Water Permit (Regional Board Order No. 01-182), which calls for a study to evaluate peak flow control and determine numeric criteria to prevent or minimize erosion of natural stream channels and banks caused by urbanization, and to protect stream habitat;

L4-6
Cont.

- The findings of the study “Urbanization and Channel Stability Assessment in the Arroyo Simi Watershed of Ventura County, CA – Final Report” (2004) completed by the Ventura County Watershed Protection District, in order to satisfy a requirement of the Ventura County Municipal Storm Water Permit (Regional Board Order No. 00-108), which calls for the development of criteria to prevent or minimize erosion of natural channels and banks caused by urbanization and protect stream habitat; and
 - Additional data collected or initiated by municipalities, dischargers and developers on stream stability for study sites in Los Angeles and Ventura Counties to reduce statistical uncertainty and/or improve model predictability when establishing stream stability protective criteria.
7. If a Basin Plan amendment is deemed necessary, staff is directed to consult with affected state and local agencies prior to formulating the draft amendment(s).
 8. During the evaluation process, staff is directed to seek input from:
 - the Department of Fish and Game and the U.S. Army Corps of Engineers, the United States Fish and Wildlife Service and other agencies with jurisdiction over hydromodification projects to ensure that any future policies and requirements to be proposed do not conflict with the jurisdiction and regulatory authority of these agencies; and
 - stakeholders, including flood control agencies, agricultural interests, the building and construction industry, and environmental groups.
 9. Pursuant to section 13224 and 13225 of the California Water Code, the Regional Board, after considering the entire record, including oral testimony at the hearing, hereby adopts the Resolution.

I, Jonathan Bishop, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a resolution adopted by the California Regional Water Quality Control Board, Los Angeles Region, on January 27, 2005.

ORIGINAL SIGNED BY

2/23/05

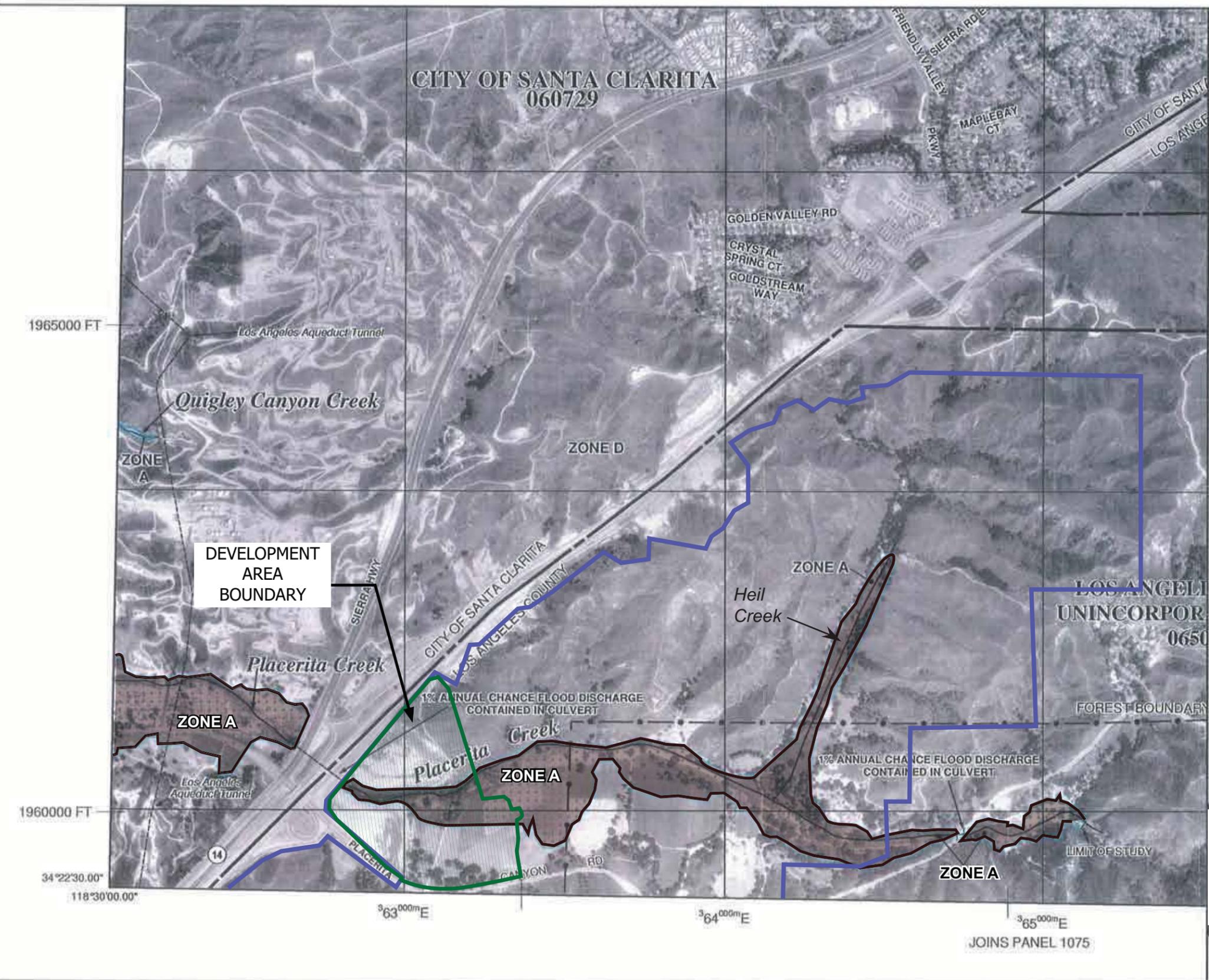
Jonathan S. Bishop, P.E.
Executive Officer

Date

If insurance is available in this community, contact your local Flood Insurance Program at 1-800-638-6620.



MAP SCALE 1" = 1000'
0 1000 2000 FEET



NFIP PANEL 0840F

FIRM
FLOOD INSURANCE RATE MAP
LOS ANGELES COUNTY,
CALIFORNIA
AND INCORPORATED AREAS

PANEL 840 OF 2350
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
LOS ANGELES COUNTY	06043	0840	F
SANTA CLARITA, CITY OF	06079	0840	F

Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
06037C0840F

EFFECTIVE DATE
SEPTEMBER 26, 2008

Federal Emergency Management Agency

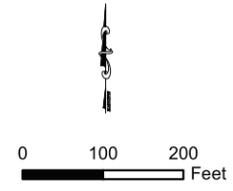
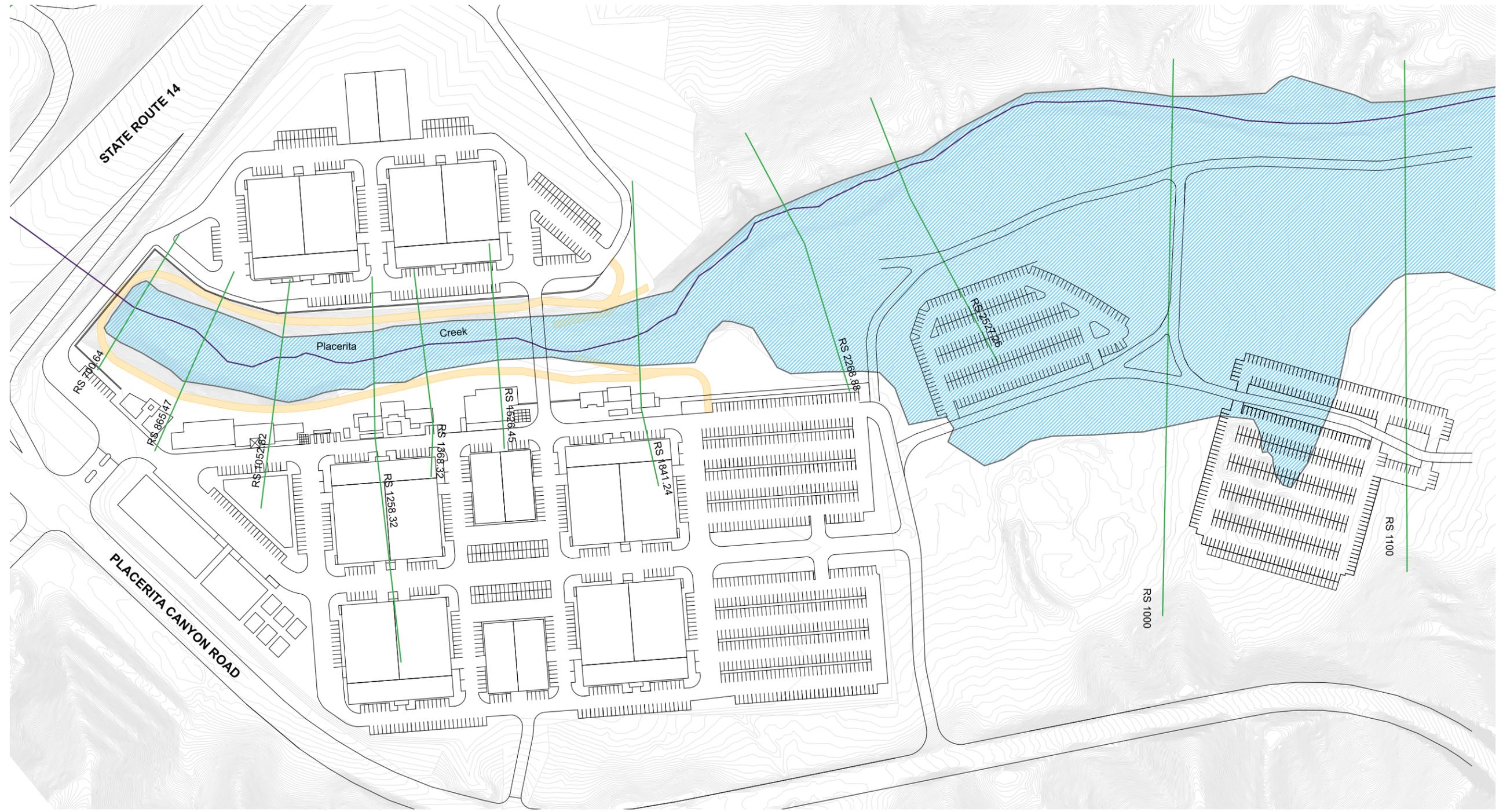
NATIONAL FLOOD INSURANCE PROGRAM

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

Source: David Evans and Associates, 2012.



Figure V.B-2
Existing Floodplain Map



	Floodplain Area* (Ac)
Existing Conditions	40.75
Proposed Conditions	29.06
Difference	11.69

* From Culvert to River Station 1100

- LEGEND**
- Water Surface Profile Cross Sections
 - Placenta Creek
 - Approximate Floodplain
 - Access Roads

Source: David Evans and Associates Inc. 2012.

Disney | ABC Studios at The Ranch



Figure V.B-4
Post-Project Floodplain Map

STATE OF CALIFORNIA

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

**ORDER R4-2010-0108
NPDES PERMIT NO. CAS004002
WASTE DISCHARGE REQUIREMENTS
FOR
STORM WATER (WET WEATHER) AND NON-STORM WATER (DRY WEATHER)
DISCHARGES FROM
THE MUNICIPAL SEPARATE STORM SEWER SYSTEMS WITHIN THE VENTURA
COUNTY WATERSHED PROTECTION DISTRICT, COUNTY OF VENTURA AND
THE INCORPORATED CITIES THEREIN.**

July 8, 2010



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STATE OF CALIFORNIA

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

**ORDER R4-2010-0108
NPDES PERMIT NO. CAS004002
WASTE DISCHARGE REQUIREMENTS**

**FOR
STORM WATER AND NON-STORM WATER DISCHARGES FROM THE
MUNICIPAL SEPARATE STORM SEWER SYSTEM WITHIN THE VENTURA
COUNTY WATERSHED PROTECTION DISTRICT, COUNTY OF VENTURA AND
THE INCORPORATED CITIES THEREIN**

FINDINGS

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter called Regional Water Board), finds that:

A. Permit Parties and History

1. Ventura County Watershed Protection District (Principal Permittee and Co-permittee), County of Ventura, cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura (Ventura), Santa Paula, Simi Valley and Thousand Oaks (hereinafter referred to separately as Permittees) have joined together to form the Ventura Countywide Storm Water Quality Management Program to discharge wastes. The Permittees discharge or contribute to discharges of storm water and non-storm water from municipal separate storm sewer systems (MS4s), also called storm drain systems, into the Watershed Management Areas of Ventura River, Santa Clara River, Calleguas Creek, Malibu Creek and Miscellaneous Ventura Coastal all within Ventura County and Los Angeles County (see Attachment "A").
2. Prior to the issuance of this permit, storm water discharges from the Ventura County MS4 were covered under the countywide waste discharge requirements contained in Order No. 09-0057, adopted by the Regional Water Board on May 7, 2009, which replaced Order No. 00-108, adopted by the Regional Water Board on July 27, 2000, which replaced Order No. 94-082, adopted by the Regional Water Board on August 22, 1994. Order No. 09-0057 also served as a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of municipal storm water.
3. On June 8, 2009, the Building Industry Legal Defense Foundation, Construction Industry Coalition on Water Quality, and the Building Industry Association of Southern California, Inc. (collectively, "BIA") submitted a petition to the State Water Resources Control Board (State Water Board) challenging Order No. 09-0057. On

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March 10, 2010, the State Water Board requested that the Regional Water Board agree to a voluntary remand of Order No. 09-0057 in order to address perceived procedural issues in connection with adoption of Order No. 09-0057. The State Water Board also requested that BIA agree to place its petition in abeyance. On March 11, 2010, the Regional Water Board agreed to a voluntary remand, and stated its intention to hold a hearing to reconsider the permit in July 2010. Since BIA did not agree to place its petition in abeyance, BIA's petition was thereafter dismissed by operation of law. On May 5, 2010, the Regional Water Board notified the Permittees, the parties and other interested persons of its intent to reconsider Order No. 09-0057 and has provided them with an opportunity to submit written comments on provisions of the permit that were not previously subject to notice and comment.

4. The Ventura County Board of Supervisors approved the concept of a countywide NPDES permit program and the use of the Flood Management District (presently the Watershed Protection District) benefit assessment authority to finance it on April 14, 1992. On June 30, 1992, the Ventura County Board of Supervisors adopted a benefit assessment levy for storm water and flood management in the unincorporated areas of Ventura County and the cities within the County, to be used in part to finance the implementation of a countywide NPDES municipal storm water permit program. The Ventura County MS4 Permittees have entered into an agreement with the Watershed Protection District to finance the activities related to the Ventura County MS4 Permit for shared and district wide expenses. The Permittees are also given the option to use the Benefit Assessment Program to finance their respective activities related to reducing the discharge of storm water pollutants under the MS4 Permit.
5. The Regional Water Board may require a separate NPDES permit for any entity that discharges storm water into the watersheds of Ventura County. Such an entity can be any State or Federal facility, special district or other public or private party.

B. Nature of Discharge

1. Storm water discharges consist of surface water runoff generated from various land uses in all the hydrologic drainage basins, which discharge into Waters of the State. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events. Based on the Ventura Countywide Storm Water Monitoring Program's Water Quality Monitoring Reports which were required under Order No. 00-108, the dry weather and wet weather Pollutants of Concern (POC) in urban stormwater include chloride, fecal indicator bacteria, conventional pollutants, metals, nitrogen, organic compounds, and pesticides. The POC are identified in Attachment "B" of this Order. Many of the POC listed are causing impairments identified on the federal Clean Water Act (CWA) § 303(d) list of impaired waterbodies.

The State Water Board submits a report (a list of water quality limited segments (§ 303[d] list)) on the State's water quality to the U.S. EPA pursuant to § 305(b) of the

1972 CWA, and Title 40, CFR 130.7, every 2 years. The Report provides water quality information to the general public and serves as the basis for the U.S. EPA's National Water Quality Inventory Report to Congress. Section 303(d) requires that all waters that are not attaining standards after the implementation of those controls required by 1977, shall be included on the list. Title 40 CFR 130.7(b)(3) defines "water quality standard applicable to such waters" as "those water quality standards established under § 303 of the Clean Water Act, including numeric criteria, narrative criteria, waterbody uses, and antidegradation requirements."

2. Common pollutants in urban storm water and their respective sources include, but are not limited to: bacteria from illegal discharges, illicit connections and animal waste; Polycyclic Aromatic Hydrocarbons (PAHs) from the products of internal combustion engine operation and parking lot sealants; nitrogen compounds from fertilizer application; pesticides from pest mitigating applications and from plant mitigating applications; bis (2-ethylhexyl) phthalate from the break down of plastic products; mercury from atmospheric fallout and improper disposal of mercury switches; lead from fuels, paints and automotive parts; copper from brake pad wear and roofing materials; zinc from tire wear and galvanized sheeting and fencing; sediment from land disturbance and erosion; trash; and dioxins as products of combustion.
3. In general, the pollutants that are found in municipal storm water runoff can harm human health and aquatic ecosystems. In addition, the high volumes and high velocities of storm water discharged from MS4s into receiving waters can adversely impact aquatic ecosystems and stream habitat and cause stream bank erosion and physical modifications; these changes are collectively termed hydromodification. Hydromodification and discharges of runoff and stormwater from urbanized areas remain a leading cause of impairment of surface waters in California and nationwide (U.S. EPA 2009).
4. Ammonia as Nitrogen, and Nitrate plus Nitrite as Nitrogen are biostimulatory substances that can cause or contribute to eutrophic effects such as low dissolved oxygen and algae growth impairing aquatic and wildlife habitats as well as recreational uses. At elevated concentrations, ammonia is highly toxic to fish and other aquatic life.
5. Elevated bacterial indicator densities impair the water contact recreation (REC-1) beneficial use at beaches, creeks, lakes, estuaries, lagoons, and marinas. Swimming in waters with elevated bacterial indicator densities has been associated with adverse health effects. Specifically, local and national epidemiological studies indicate that there is a causal relationship between adverse health effects and recreational water quality, as measured by bacterial indicator densities (Pruss, 1998, Review of epidemiological studies on health effects from exposure to recreational waters, International Journal of Epidemiology; Haile et al., 1996, An epidemiological study of possible adverse health effects of swimming in Santa Monica Bay, Santa Monica Bay Restoration Project; and Haile et al., 1999, The health effects of swimming in

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ocean water contaminated by storm drain runoff, Epidemiology). Sources of elevated bacteria to marine and fresh waters may also include illegal discharges from improperly maintained standard septic systems, on-site wastewater treatment systems (OWTS) and illicit discharges from private drains.

6. Pesticides are substances used to prevent, destroy, repel or mitigate pests such as insects, weeds, and microorganisms. Their effects can be direct (e.g. fish die from exposure to a pesticide entering waterways, or birds do not reproduce after ingesting contaminated fish), or indirect (a hawk becomes sick from eating a mouse dying from pesticide poisoning). Pesticide categories include: Organochlorine, Organophosphorus, Organophosphate, and Pyrethroid.
7. Polychlorinated Biphenyls (PCBs) are a subset of the synthetic organic chemicals known as chlorinated hydrocarbons. Concern over PCBs' toxicity, persistence (chemical stability) in the environment and bioconcentration in aquatic organisms has led to prohibitions on PCBs.
8. Rising groundwater and swimming pool water have been found to be sources of pollutants such as salts (chloride). Salts increase the salinity of otherwise freshwater systems and disrupt physiological processes. The Regional Water Board has waterbodies listed on the CWA § 303(d) list for impairment due to salts and has adopted Basin Plan amendments to include Total Maximum Daily Loads (TMDLs) for salts. This Order includes provisions to control the discharges from these activities in order to directly or indirectly reduce or eliminate the discharge of salts to fresh water systems where salts may impair water quality and beneficial uses.
9. Trash and debris are pervasive pollutants which accumulate in streams, rivers, bays, and the ocean throughout Southern California. They pose a serious threat to our oceans and coasts, navigation, biological resources, recreation, human health and safety, aesthetics, and economies.
10. Municipal storm water (wet weather) and non-storm water (dry weather) discharges may contain pollutants that cause or threaten to cause an exceedance of the water quality standards, as outlined in the Los Angeles Region's Basin Plan. Wet weather and dry weather discharges from the MS4 are subject to conditions and requirements established in the Basin Plan for point source discharges. Discharges from the MS4 may not cause or contribute to exceedances of water quality standards.
11. Biological communities act to integrate the effects of water quality conditions in a stream by responding with changes in their population abundances and species composition over time. These populations are sensitive to multiple aspects of water and habitat quality, and provide expressions of ecological health easier to understand than the results of chemical and toxicity tests. Biological assessments and criteria address the cumulative impacts of all stressors, especially habitat degradation, and chemical contamination, which result in a loss of biological diversity. Biological

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information can help provide an ecologically based assessment of the status of a waterbody. Bioassessment is a cost-effective tool and protocol for assessing the biological and physical habitat conditions of streams and rivers for evaluation of the overall health of a watershed. The Principal Permittee consents to participate in the Southern California Storm Water Monitoring Coalition (SMC) Southern California Regional Bioassessment Monitoring Program.

12. Studies indicate that facilities with paved surfaces subject to frequent motor vehicular traffic (such as: strip malls, parking lots, commercial business parks, and fast food restaurants), or facilities that perform vehicle repair, maintenance, or fueling (automotive service facilities) are potential sources of POC in storm water (*California Stormwater Quality Association, Stormwater Best Management Practice Handbook, Municipal, January 2003*).
13. Retail Gasoline Outlets (RGOs) are points of convergence for vehicular traffic and are similar to parking lots and urban roads. Studies indicate that storm water discharges from RGOs have high concentrations of hydrocarbons and heavy metals (*California Stormwater Quality Association, Stormwater Best Management Practice Handbook, Municipal, January 2003*).
14. The industries and businesses listed in this Order that are to be inspected by Permittees have the potential to discharge contaminated storm water into the MS4. This storm water is an environmental threat because it can adversely impact public health and safety, and the quality of receiving waters. For example, pretreatment program compliance inspections and audits performed in the Los Angeles and Ventura Counties indicate that automotive service and food service facilities sometimes discharge polluted storm water to the MS4s. The POC in such wash waters include oil and grease, toxic chemicals, and food waste. Spills from clogged sanitary sewer lines have a high likelihood to reach the receiving waters via MS4s. Overall, the most common POC identified in storm water discharge to the MS4s are: (i) heavy metals, (ii) oil and grease/ PAHs, (iii) sediments, (iv) oxygen demanding substances, (v) litter/ trash/ debris, (vi) nutrients, (vii) other toxic materials, such as pesticides. Municipal storm water monitoring data and industrial storm water monitoring data indicate that industrial and commercial sites continue to contribute significant quantities of pollutants in storm water runoff.
15. Development and urbanization increase pollutant loads, volume, and discharge velocity. First, natural vegetated pervious ground cover is converted to impervious surfaces (paved) such as highways, streets, rooftops and parking lots. While natural vegetated soil can both absorb rainwater and remove pollutants providing an effective natural purification process, in contrast, impervious surfaces (such as pavement and concrete) can neither absorb water nor remove pollutants, and thus the natural purification characteristics are lost. Second, urban development creates new pollution sources as the increased density of human population brings proportionately higher levels of vehicle emissions, vehicle maintenance wastes, municipal sewage waste,

pesticides, household hazardous wastes, pet wastes, trash, and other anthropogenic pollutants. Development and urbanization especially threaten environmentally sensitive areas. Such areas have a much lower capacity to withstand pollutant shocks than might be acceptable in the general circumstance. In essence, development that is ordinarily insignificant in its impact on the environment may become significant in a particularly sensitive environment. These environmentally sensitive areas (ESAs) designated by the State in the Ventura County watershed are defined in Part 6 (Definitions).

16. The increased volume, increased velocity, and discharge duration of storm water runoff from developed areas has the potential to accelerate downstream erosion and impair stream habitat in natural drainages. Studies have demonstrated a direct relationship between the degree of imperviousness of an area and waterbody degradation (*Impacts of Impervious Cover on Aquatic Systems, Center for Watershed Protection, March 2003; Management Strategies for Urban Stream Rehabilitation, Booth, D. et al., February 2003*). Significant declines in the biological integrity and physical habitat of streams and other receiving waters have been found to occur with as little as 3-10 percent conversion from natural to impervious surfaces in a subwatershed. Recent studies conducted in California indicate that intermittent and ephemeral streams are even more susceptible to the effects of hydromodification than streams from other regions of the U.S. with stream degradation being recognized when the associated catchment's impervious cover is as little as 3-5% (*Managing Runoff to Protect Natural Streams: The Latest Development on Investigation and Management of Hydromodification in California, Stein, E. and Zaleski, S., December 2005; Effect of Increase in Peak Flows and Imperviousness on the Morphology of Southern California Streams, Coleman, D., April 2005*). The percentage of impervious cover is one indicator and predictor of potential water quality degradation expected from new development.
17. The Order requires projects where it has been demonstrated to be technically infeasible to achieve less than 30% Effective Impervious Area, to mitigate off-site 1.5 times the volume that would normally be required to be retained on site. The increase in off-site mitigation is warranted because it has been concluded that, at impervious land cover over 30%, impacts on streams and wetlands become more severe, and degradation is almost unavoidable without special measures (Prince George's County, MD 1999; BASMAA 1999; Center for Watershed Protection 2003). The off-site mitigation volume requirement may be met through retention and/or biofiltration.
18. Low Impact Development (LID) is an effective approach to minimizing the adverse effects of urbanization and development on waterbodies and their beneficial uses that has been endorsed by California and other states. The California Ocean Protection Council (OPC), in a resolution adopted on May 15, 2008, found that LID is a practicable and superior approach that new and redevelopment projects can implement to minimize and mitigate increases in runoff and runoff pollutants and the resulting impacts on downstream uses, coastal resources and communities. In its

Strategic Plan Update 2008-2012, the State Water Board reiterated sustainability as a key principle, stating its commitment to “enhancing and encouraging sustainability within the administration of Water Board programs and activities by promoting water management strategies such as low impact development...” (SWRCB 2008).

19. LID is a comprehensive source control strategy first pioneered by Prince George’s County, Maryland in 1997 to help address the growing economic and environmental limitations of conventional stormwater management practices. As LID was developed by a local government, it is sensitive to addressing local government’s unique environmental and regulatory needs in the most economical manner possible by reducing costs associated with stormwater infrastructure design, construction, maintenance and enforcement. LID also provides for local government’s need for economic vitality through reasonable and continued growth and redevelopment. LID allows for greater development potential with less environmental impacts through the use of smarter designs and advanced technologies to achieve a better balance between conservation, growth, ecosystem protection and public health / quality of life. (Low Impact Development: Smart Technology For Clean Water Definitions, Issues, Roadblocks, and Next Steps, Coffman, Larry)
20. The implementation of LID techniques across the United States and Canada has demonstrated that the proper implementation of LID techniques results in more benefits than single purpose stormwater and flood control infrastructure, including increased water quality protection, enhanced property values, improved aquatic and terrestrial habitat, aesthetic amenities, and improved quality of life (Reducing Stormwater Costs through Low Impact Development (LID) Strategies and Practices, USEPA Doc No. EPA 841-F-07-006, December 2007). Further, properly implemented LID techniques can help mimic the pre-project runoff volume and time of concentration, thus minimizing the adverse effects of hydromodification on stream habitat and biological condition (A Review of Low Impact Development Policies: Removing Institutional Barriers to Adoption, Low Impact Development Center and State of California, State Water Resources Control Board, December 2007). The requirements of this Order facilitate the implementation of LID strategies to protect water quality, reduce runoff volume, and to garner additional benefits.
21. The implementation of LID techniques have been associated with the following environmental benefits: improved air quality due to the increased use of trees and vegetation, reduced urban temperatures due to the shade offered by increased vegetation and the reduction of heat absorbing materials (concrete, etc.), the moderation of climate change due to reduced urban temperatures, increased energy efficiency due to lower ambient temperatures when LID practices are implemented on and around buildings, and aesthetic benefits due to the increased use of trees and vegetation (U.S. EPA Technical Guidance on Implementing the Storm Water Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act).

22. Furthermore, the implementation of LID not only benefits water quality, but also enhances water supply. LID is consistent with and supports the Governor's 20 x 2020 Water Conservation Plan (February 2010); the State Board's 2008-2012 Strategic Plan Update (i.e. to promote sustainable local water supplies); the State Board's Recycled Water Policy (Resolution No. 2009-0011) objective to increase [beneficial] use of stormwater; requirements of the Water Conservation in Landscaping Act of 2006 (AB 1881, Laird), which requires cities and counties to adopt landscape water conservation ordinances by January 1, 2010; and the Department of Water Resources' Water Efficient Landscape Ordinance (Cal. Code Regs. §492.15).
23. This Order requires specified New Development and Redevelopment projects to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces by specifying a 5% Effective Impervious Area (EIA) site limitation and a fixed runoff volume to be retained on site. There is a growing acceptance by stormwater professionals and local governments to integrate LID strategies that limit impervious area, and associated onsite retention criteria, into stormwater management programs and MS4 permits. For example, West Virginia's Small MS4 Permit # WV0116025, requires the on-site retention of the volume of runoff produced from the first inch of a 24-hour storm; the U.S. EPA's Technical Guidance on Implementing the Storm Water Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act, requires the on-site retention of the volume of runoff produced from the 95th percentile storm event where technically feasible; the City of Philadelphia requires the onsite retention of the volume of runoff produced from the first inch of a 24-hour storm; and the City of Portland, Oregon requires the onsite infiltration of the runoff volume from a 10-year, 24-hour design storm.
24. Based on a study conducted by Horner (2007) in Ventura County, it was found that a 5% EIA threshold can be met in typical developments. This result was reached assuming the use of native soils typical to Ventura County; soil enhancements can further increase onsite infiltration potential. Using six different development types, the Horner study tested the feasibility of draining all but 3% of impervious area to pervious land on the sites. Five of the six sites had adequate or greater capacity to infiltrate the full annual runoff volume from the "Not-Connected Impervious Area" (NCIA) and pervious areas where EIA is limited to 3% of the total site area. By showing that it is possible to retain all runoff from pervious areas where EIA is limited to 3% of the total site area under typical site conditions (i.e. native soils) and a wide range of development types, the study results provide support for the feasibility of the 5% EIA threshold.
25. Horner (2007) also found that developments implementing low impact strategies can achieve significant reductions in pollutant loading and runoff volume as well as greatly enhanced recharge rates compared to both developments with no BMPs and developments with traditional treatment BMPs.

26. In some circumstances, however, site conditions and the type of development can limit the feasibility of retaining, infiltrating, and reusing stormwater at sites due to a variety of site specific conditions. Factors that affect the feasibility of a fixed volume capture standard include, but are not limited to: successive storms, soil infiltration capacity, subsurface pollution, and infill in urban core centers (e.g. R. Horner, *Investigation of the Feasibility and Benefits of Low-Impact Site Design Practices ("LID") for Ventura County* (February 2007); E. Strecker, A. Poresky, D. Christsen, *Memorandum: Rainwater Harvesting and Reuse Scenarios and Cost Consideration* (April, 2009)).
27. A major concern expressed by commenters is the 30% EIA limitation may not allow some projects to be built. Part of the rationale supporting the feasibility of on site retention in Order 09-0057 was derived from the Richard Horner (2007) study. The Horner study purports to demonstrate that stormwater infiltration is feasible throughout Ventura County and is the key study for an upper-bound EIA requirement. Horner's approach to demonstrate feasibility is to estimate stormwater runoff volume and compare it to infiltration capacity. While the Horner report has value at a general level and complements findings of other studies in Southern California and elsewhere. Staff has the following concerns with the Horner study conclusions with regard to the universal feasibility of achieving less than 30% EIA:
- The Horner analysis is based on engineered infiltration basins rather than undisturbed pervious cover.
 - The Horner analysis cites the UCSB infiltration studies which are based on a relatively high permeability soils. However, the EIR cited in the study by Horner shows a significant quantity percentage of the Ventura County soils are described as sandy loamy and are classified as "low permeability and slow draining.
 - The Horner analysis normalizes runoff rates and infiltration capacity to an annual basis which may not address the critical conditions appropriate for the seasonal precipitation patterns in Ventura County.
 - Horner states the study was limited in scope such that its universal applicability throughout Ventura County is not well supported.

Staff recognizes the significance of the 30% EIA threshold but cannot justify a strict cap.

28. In a letter dated April 10, 2009, the Ventura County Permittees, NRDC and Heal the Bay presented an agreement to the Regional Water Board proposing new development/redevelopment criteria, including on-site retention requirements, a 5% EIA limitation, infeasibility criteria, a 30% EIA cap, and off-site mitigation provisions; the elimination of Municipal Action Levels (MALs), and weekly, year-round beach water quality monitoring at 10 sites. The letter was signed by representatives of the parties, including NRDC, Heal the Bay, Ventura, Oxnard, Simi Valley, and the County of Ventura. At the Regional Board hearing on May 7, 2009,

the Ventura County Permittees, NRDC, and Heal the Bay reiterated their support for the agreement set forth in their joint April 10, 2009 comment letter and advocated that the agreement be incorporated into the permit in its entirety.

29. Specific LID strategies include bioretention and rainwater harvesting for reuse. Bioretention is a method of treating stormwater by pooling water on the surface and allowing filtering and settling of suspended solids and sediment at the mulch layer, prior to entering the plant/soil/microbe complex media for infiltration and pollutant removal. Rain Gardens / bioretention techniques are used to accomplish water quality improvement and water quantity reduction. Prince George's County, Maryland, and Alexandria, Virginia have used this BMP since 1992 with success in many urban and suburban settings. Rain Gardens can be integrated into a site with a high degree of flexibility and can balance nicely with other structural management systems, including porous asphalt parking lots, infiltration trenches, as well as non-structural stormwater BMPs. The Rain Garden vegetation serves to filter (water quality) and transpire (water quantity) runoff, and the root systems can enhance infiltration. The plants take up pollutants; the soil medium filters out pollutants and allows storage and infiltration of stormwater runoff; and the infiltration bed provides additional volume control ("Rain Gardens", River-Friendly Landscaping Coalition, Sacramento, CA). Properly designed bioretention techniques mimic natural forest ecosystems through species diversity, density and distribution of vegetation, and the use of native species, resulting in a system that is resistant to insects, disease, pollution, and climatic stresses (Draft - Pennsylvania Stormwater Management Manual).

As an alternative to redirection of stormwater to functional landscape, rain gutter flows can be directed into rain barrels or cisterns for later use in irrigating lawns and gardens. Disconnections of rain gutters can effectively be implemented on existing properties with little change to present site designs. The benefits of urban area rainwater harvesting can be huge, providing supplemental water for many local uses. Such as irrigating a vegetable garden and surrounding landscape, which also leaves more treated water in the municipal water supply to help cities through times of drought or other shortages. A number of cities in the Los Angeles Region, including Los Angeles, Long Beach and Santa Monica, have implemented successful rainwater harvesting incentive programs.

30. Traditional approaches to stormwater management involve conveying runoff off-site to receiving waters, to a combined sewer system, or to a regional facility that treats runoff from multiple sites. These designs typically include hard infrastructure, such as curbs, gutters, and piping. LID-based designs, in contrast, are designed to use natural drainage features or engineered swales and vegetated contours for runoff conveyance and treatment. In terms of costs, LID techniques like conservation design can reduce the amount of materials needed for paving roads and driveways and for installing curbs and gutters. Conservation designs can be used to reduce the total amount of impervious surface, which results in reduced road and driveway lengths and reduced costs. Other LID techniques, such as grassed swales, can be used to infiltrate roadway

runoff and eliminate or reduce the need for curbs and gutters, thereby reducing infrastructure costs. Also, by infiltrating or evaporating runoff, LID techniques can reduce the size and cost of flood-control structures (Reducing Stormwater Costs through Low Impact Development (LID) Strategies and Practices, U.S. EPA).

The U.S. EPA looked at 17 case studies throughout the country to determine if LID strategies were a cost effective alternative to conventional storm water control measures. They found that the use of LID practices can be both fiscally and environmentally beneficial to communities. They found total capital cost savings ranging from 15% to 80% when LID strategies were used compared with traditional stormwater control measures, with only a few cases noted where LID projects resulted in higher costs than traditional storm water controls. In the majority of the cases, costs for projects implementing LID strategies were found to be less due to reduced costs for site grading and preparation, stormwater infrastructure, site paving, and landscaping (Reducing Stormwater Costs through Low Impact Development (LID) Strategies and Practices, U.S. EPA).

31. The use of LID strategies also has the potential to create larger economic benefits, including but not limited to, reduced need for flood control, which could save up to \$400 million; increased property values, which could amount to up to \$5 billion; and creation of additional groundwater supplies worth up to \$7.2 billion (Deviny et al. 2004; MacMullan, E., Assessing Low Impact Developments Using a Benefit-Cost Approach, 2nd National Low Impact Development Conference, March 12-14, 2007).
32. The Regional Water Board adopted a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (Order No. R4-2005-0080) on November 3, 2005. The objective of the program is to monitor runoff from irrigated agriculture facilities in the coastal watersheds of Ventura and Los Angeles Counties. The Basin Plan, which designates beneficial uses and establishes water quality objectives for the Region, recognizes that agricultural activities can generate pollutants such as sediment, pesticides, and nutrients that upon discharge to receiving water can degrade water quality and impair beneficial uses. A category identified by the Conditional Waiver as a source of pollutants is nursery operations. This Order includes requirements for the municipal operator to confirm that nursery operators implement pollutant reduction and control measures with the objective of reducing pollutants in storm water runoff discharges.
33. Research conducted on the contribution of aerial deposition of trace heavy metals in Los Angeles County watersheds indicates that dry indirect deposition may account for a significant load of pollutants into surface waters. Similar patterns of aerial deposition likely occur in Ventura County. Of the atmospherically deposited pollutants on the watersheds, ten to twenty percent may account for the total load for copper, zinc, nickel, lead, and chromium to the waterbodies. Land reservoirs and sequestration may account for the remaining eighty to ninety percent of the atmospherically deposited pollutants on the watersheds. Emissions of semi-volatile

organics such as polycyclic aromatic hydrocarbons (PAHs) and pesticides and their subsequent deposition may contribute to the contamination of receiving waters but appear to be less significant. The remaining percentage is stored in land reservoirs and eventually shows up in receiving waters.

C. Permit Background

1. The essential components of the Storm Water Management Program, as required by the Code of Federal Regulations (CFR) [40 CFR 122.26(d)] are:
 - (a) Adequate Legal Authority.
 - (b) Fiscal Resources.
 - (c) Storm Water Quality Management Program (SMP)
 - (1) Public Information and Participation Program
 - (2) Industrial/ Commercial Facilities Program
 - (3) Planning and Land Development Program
 - (4) Development Construction Program
 - (5) Public Agency Activities Program
 - (6) Illicit Connection and Illicit Discharges Elimination Program
 - (d) Reporting Program (Monitoring Report and Program Report)

2. The Ventura County SMP, dated November 2001 (revision 2) identifies seven program areas, which are listed below and were previously approved under Board Order No. 00-108. For purposes of consistency, they are titled as follows:
 - (a) Ventura County SMP.
 - (1) Program Management
 - (2) Programs for Residents
 - (3) Programs for Industrial/ Commercial Businesses
 - (4) Programs for Planning and Land Development
 - (5) Programs for Construction Sites
 - (6) Programs for Public Agency Activities
 - (7) Programs for Illicit Connections/ Illegal Discharges
 - (b) For purposes of region-wide consistency, the program titles are revised and consolidated into the six areas listed in the preceding C.1(c). All Permittee storm water documents submitted to the Regional Water Board are to follow the organization enumerated in C.1(c).

3. The Permittees filed a Report of Waste Discharge (ROWD), dated January 26, 2005. The Permittees applied for renewal of their waste discharge requirements for a 5-year period, which serves as an NPDES permit to discharge wastes to surface waters.

4. The Regional Water Board reviewed the ROWD and determined it to be partially complete under the reapplication policy for MS4s issued by the United States Environmental Protection Agency (U.S. EPA) (61 Fed. Reg. 41697). The Regional Water Board has prepared this Order so that implementation of provisions contained

in this Order by Permittees will meet the requirements of the federal NPDES regulations at 40 CFR 122.26.

5. The Permittees ROWD contained a proposed Storm Water Management Program and a Monitoring Program to be considered by the Regional Water Board for incorporation into an MS4 NPDES Permit as permit conditions and to demonstrate compliance with federal law.
6. To-date, the monitoring program has consisted of mass emission, receiving water (tributaries), and land-use monitoring stations, toxicity testing, special studies for bioassessment of the Ventura River and hydrology, identification of ESAs, implementation of the Storm Water Quality Urban Impact Mitigation Plan (SQUIMP), and has provided support for volunteer monitoring programs. This Order requires a monitoring program consisting of mass emission, toxicity, TMDL storm water (wet weather) MS4 water quality-based effluent limits, TMDL non-storm water (dry weather) MS4 water quality-based effluent limits, Pyrethroid assessment study, continuation of the hydromodification study, low impact development study, and participation in the Southern California Regional Bioassessment Program and Southern California Bight Project (SCBP).
7. The Principal Permittee is a member of the Southern California Coastal Water Research Project (SCCWRP) Commission. The Principal Permittee also participates in the Regional Monitoring Programs and research partnerships, such as the Southern California Storm Water Monitoring Coalition (SMC) and the Bioassessment Working Group.

D. Permit Coverage

1. The area covered by this Order includes all areas within Ventura County boundaries and all areas within each co-permittee's boundaries (see Figure 1) that drain into the MS4.
2. The Permittees covered under this Order were designated on a system-wide basis under Phase I of the CWA § 402(p)(3)(B)(i). The action of covering all Ventura County municipalities under a single MS4 permit on a system-wide basis was consistent with the provisions of 40 CFR 122.26(a)(3)(iv), which states that one permit application may be submitted for all or a portion of all municipal separate storm sewers within adjacent or interconnected large or medium municipal separate storm sewer systems; and the Regional Water Board may issue one system-wide permit covering all, or a portion of all municipal separate storm sewers in adjacent or interconnected large or medium municipal separate storm sewer systems.
3. Federal, State, Regional, or local entities within the Permittees' boundaries or in jurisdictions outside the Ventura County Watershed Protection District, and not currently named in this Order, may operate storm drain facilities and/ or discharge

storm water to storm drains and receiving waters covered by this Order. The Permittees may lack legal jurisdiction over these entities under State and Federal constitutions. The Regional Water Board will coordinate with these entities to implement programs that are consistent with the requirements of this Order. The Regional Water Board may consider such facilities for coverage under its NPDES permitting scheme pursuant to USEPA Phase II storm water regulations. Permittees have expressed their intention to work cooperatively to control the contribution of pollutants from one portion of the MS4 to another portion of the system. Permittees shall make good faith efforts to control the contribution of pollutants to the MS4 from non-permittee dischargers such as Caltrans, the U.S. Department of Defense, and other state and federal facilities.

4. TMDLs are numerical calculations of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point sources (Waste Load Allocation (WLA)) and non-point sources (Load Allocation (LA)). Discharges from the MS4s are considered point sources discharges, because the MS4 is a point source.
5. This Order incorporates applicable WLAs that have been adopted by the Regional Water Board and have been approved by the Office of Administrative Law and the U.S. EPA. The TMDL WLAs in the Order are expressed as water quality-based effluent limits in a manner consistent with the assumptions and requirements of the TMDL from which they are derived.
6. The CWA and the California Water Code contain specific provisions on how wastewater discharges from point sources are to be permitted. Stormwater discharges (both dry weather and wet weather) are considered point source discharges.
7. Permittees should work cooperatively to control the contribution of pollutants from one portion of the MS4 to another portion of the system through inter-agency agreements or other formal arrangements.

E. Federal, State and Regional Regulations

1. The Water Quality Act of 1987 added § 402(p) to the CWA (33U.S.C. § 1251-1387). This section requires the U.S. EPA to establish regulations setting forth NPDES requirements for storm water discharges in 2 phases.
 - (a) U.S. EPA Phase I storm water regulations were directed at MS4s serving a population of 100,000 or more, including interconnected systems and storm water discharges associated with industrial activities, including construction activities. The Phase I Final Rule was published on November 16, 1990 (55 Fed. Reg. 47990).
 - (b) U.S. EPA Phase II storm water regulations are directed at storm water discharges not covered in Phase I, including small MS4s (population of less than 100,000),

small construction projects (less than 5 acres), municipal facilities with delayed coverage under the Intermodal Surface Transportation Efficiency Act of 1991, and other discharges for which the U.S. EPA Administrator or the State determines that the storm water discharge contributes to a violation of a water quality standard, or is a significant contributor of pollutants to waters of the U.S. The Phase II Final Rule was published on December 8, 1999 (64 Fed. Reg. 68722).

2. The U.S. EPA published an Interpretative Policy Memorandum on Reapplication Requirements for MS4 permits on August 9, 1996 (61 Fed. Reg. 41697). This policy requires that MS4 reapplication for reissuance for a subsequent five-year permit term contain certain basic information and information for proposed changes and improvements to the storm water management program and monitoring program.
3. The U.S. EPA has entered into a Memorandum of Agreement (MOA) with the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service for enhancing coordination regarding the protection of endangered and threatened species under section 7 of the Endangered Species Act, and the CWA's water quality standards and NPDES programs. Among other actions, the MOA establishes a framework for coordination of actions by the U.S. EPA, the Services, and CWA delegated States on CWA permit issuance under § 402 of the CWA [66 Fed. Reg. 11202-11217].
4. The CWA allows the U.S. EPA to authorize states with an approved environmental regulatory program to administer the NPDES program in lieu of the U.S. EPA. The State of California is a delegated State. The Porter-Cologne Water Quality Control Act (California Water Code) authorizes the State Water Resources Control Board (State Water Board), through the Regional Water Boards, to regulate and control the discharge of wastes that could affect the quality of waters of the State, including waters of the United States, and tributaries thereto.
5. Under CWA § 303(d) of the CWA, States are required to identify a list of impaired water-bodies and develop and implement TMDLs for these waterbodies (33 USC § 1313 (d)(1)). The most recent 303(d) list's U.S. EPA approval date was June 28, 2007. The U.S. EPA entered into a consent decree with the Natural Resources Defense Council (NRDC), Heal the Bay, and the Santa Monica Baykeeper on March 22, 1999, under which all TMDLs for the Los Angeles Region must be adopted within 13 years from that date. This Order incorporates provisions incorporating approved WLAs for municipal storm water discharges and requires amending the SMP after subsequent pollutant loads have been allocated and approved.
6. Collectively, the restrictions contained in the TMDL Provisions for Storm Water (Wet Weather) Discharges and Non-Storm Water (Dry Weather) Discharges of this Order on individual pollutants are no more stringent than required to implement the provisions of the TMDL, which have been adopted and approved in a manner that is consistent with the CWA. Where a TMDL has been approved, NPDES permits must

contain effluent limits and conditions consistent with the assumptions and requirements of the available WLAs in TMDLs (40 CFR 122.44(d)(1)(vii)(B)).

7. This Order does not constitute an unfunded local government mandate subject to subvention under Article XIII B, Section (6) of the California Constitution for several reasons, including, but not limited to, the following. This Order implements federally mandated requirements under CWA § 402, subdivision (p)(3)(B) (33 U.S.C. § 1342(p)(3)(B)). This includes federal requirements to effectively prohibit non-storm water discharges, to reduce the discharge of pollutants to the maximum extent practicable, and to include such other provisions as the Administrator or the State determines appropriate for the control of such pollutants. Federal cases have held these provisions require the development of permits and permit provisions on a case-by-case basis to satisfy federal requirements. (*Natural Resources Defense Council, Inc. v. U.S. E.P.A.* (9th Cir. 1992) 966 F.2d 1292, 1308, fn. 17.) The authority exercised under this Order is not reserved state authority under the Clean Water Act's savings clause (cf. *Burbank v. State Water Resources Control Bd.* (2005) 35 Cal.4th 613, 627-628 [relying on 33 U.S.C. § 1370, which allows a state to develop requirements which are not "less stringent" than federal requirements]), but instead, is part of a federal mandate to develop pollutant reduction requirements for municipal separate storm sewer systems. To this extent, it is entirely federal authority that forms the legal basis to establish the permit provisions. (See, *City of Rancho Cucamonga v. Regional Water Quality Control Bd.-Santa Ana Region* (2006) 135 Cal.App.4th 1377, 1389; *Building Industry Ass'n of San Diego County v. State Water Resources Control Bd.* (2004) 124 Cal.App.4th 866, 882-883.)

Likewise, the provisions of this Order to implement TMDLs are federal mandates. The CWA requires TMDLs to be developed for waterbodies that do not meet federal water quality standards (33 U.S.C. § 1313(d)). Once the U.S. EPA or a state develops a TMDL, federal law requires that permits must contain effluent limitations consistent with the assumptions of any applicable wasteload allocation. (40 CFR 122.44(d)(1)(vii)(B)).

Second, the local agency Permittees' obligations under this Order are similar to, and in many respects less stringent than, the obligations of non-governmental dischargers who are issued NPDES permits for storm water discharges. With a few inapplicable exceptions, the Clean Water Act regulates the discharge of pollutants from point sources (33 U.S.C. § 1342) and the Porter-Cologne regulates the discharge of waste (Wat. Code, § 13263), both without regard to the source of the pollutant or waste. As a result, the "costs incurred by local agencies" to protect water quality reflect an overarching regulatory scheme that places similar requirements on governmental and nongovernmental dischargers. (See *County of Los Angeles v. State of California* (1987) 43 Cal.3d 46, 57-58 [finding comprehensive workers compensation scheme did not create a cost for local agencies that was subject to state subvention].)

The Clean Water Act and the Porter-Cologne Water Quality Control Act largely regulate storm water with an even hand, but to the extent there is any relaxation of this even-handed regulation, it is in favor of the local agencies. Generally, the Clean Water Act requires point source dischargers, including discharges of storm water associated with industrial or construction activity, to comply strictly with water quality standards. (33 U.S.C. § 1311(b)(1)(C), *Defenders of Wildlife v. Browner* (1999) 191 F.3d 1159, 1164-1165 [noting that industrial storm water discharges must strictly comply with water quality standards].) As discussed in prior State Water Resources Control Board decisions, certain provisions of this Order do not require strict compliance with water quality standards. (SWRCB Order No. WQ 2001-15, p. 7.) Therefore, certain provisions of this Order regulate the discharge of waste in municipal storm water more leniently than the discharge of waste from non-governmental sources.

Third, the local agency Permittees have the authority to levy service charges, fees, or assessments sufficient to pay for compliance with this Order subject to certain voting requirements contained in the California Constitution. (See California Constitution XIII D, section 6, subdivision (c); see also *Howard Jarvis Taxpayers Association v. City of Salinas* (2002) 98 Cal. App. 4th 1351, 1358-1359.) The fact sheet demonstrates that numerous activities contribute to the pollutant loading in the municipal separate storm sewer system. Local agencies can levy service charges, fees, or assessments on these activities, independent of real property ownership. (See, e.g., *Apartment Ass'n of Los Angeles County, Inc. v. City of Los Angeles* (2001) 24 Cal.4th 830, 842 [upholding inspection fees associated with renting property].) The ability of a local agency to defray the cost of a program without raising taxes indicates that a program does not entail a cost subject to subvention. (*County of Fresno v. State of California* (1991) 53 Cal.3d 482, 487-488.)

Fourth, the Permittees have requested permit coverage in lieu of compliance with the complete prohibition against the discharge of pollutants contained in federal Clean Water Act section 301, subdivision (a) (33 U.S.C. § 1311(a)) and in lieu of numeric restrictions on their discharges. (See finding C.5., supra.) To the extent that the local agencies have voluntarily availed themselves of the permit, the program is not a state mandate. (*Accord County of San Diego v. State of California* (1997) 15 Cal.4th 68, 107-108.) Likewise, where MS4 Permittees are regulated under a Best Management Practices (BMP) based storm water management program rather than end-of-pipe numeric limits, there exists no compulsion of a specific regulatory scheme that would violate the 10th Amendment to the United States Constitution. (See *City of Abilene v. U.S. E.P.A.* (5th Cir. 2003) 325 F.3d 657, 662-663 [noting that municipalities can choose between a management permit or a permit with numeric limits].) The local agencies' voluntary decision to file a report of waste discharge proposing a program-based permit is a voluntary decision not subject to subvention. (See *Environmental Defense Center v. USEPA* (9th Cir. 2003) 344 F.3d 832, 845-848.)

Fifth, the local agencies' responsibility for preventing discharges of waste that can create conditions of pollution or nuisance from conveyances that are within their ownership or control under state law predates the enactment of Article XIII B, Section (6) of the California Constitution.

8. Under § 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA), Coastal States with approved coastal zone management programs are required to address non-point pollution impacting or threatening coastal water quality. CZARA addresses five sources of non-point pollution: 1) agriculture; 2) silviculture; 3) urban; 4) marinas; and 5) hydromodification. This Waste Discharge Requirement addresses the management measures required for the urban category and the hydromodification category, with the exception of septic systems.
9. The Regional Water Board addresses septic systems through the administration of non-Chapter 15 regulatory programs and the implementation of Regional Water Board Order No.R4-2004-0146. Septic systems are also addressed under State Assembly Bill (AB) 885 (2000). The Regional Water Board will implement and enforce regulations issued by the State Board pursuant to AB 885. Taken together, these State and Local agency requirements when imposed on septic system operators are expected to reduce the bacterial contamination of storm water from improperly maintained septic systems.
10. The State Water Board has issued waste discharge requirements for discharges from utility vaults (CAG990002). The Regional Water Board has issued waste discharge requirements for discharges from well heads and hydrostatic pipe testing (CAG674001). These discharges to the MS4 shall be conducted under coverage of a separate NPDES permit specific to that activity.
11. On May 18, 2000, the U.S. EPA established numeric criteria for priority toxic pollutants for the State of California (California Toxics Rule (CTR) 65 Fed. Reg. 31682 (40 CFR 131.38)) for the protection of human health and aquatic life. These apply as ambient water quality criteria for inland surface waters, enclosed bays and estuaries.
12. The State Water Board adopted a revised Water Quality Control Plan for Ocean Waters of California (Ocean Plan) in 2005. The California Ocean Plan establishes water quality objectives for California's ocean waters and provides the basis for regulation of wastes discharged into the State's coastal waters. It applies to point and nonpoint source discharges. The Ocean Plan identifies the applicable beneficial uses of marine waters that include preservation and enhancement of designated Areas of Special Biological Significance (ASBS)-(now called "State Water Quality Protection Areas") and establishes a set of narrative and numerical water quality objectives designed to protect beneficial uses. The SWRCB adopted the California Ocean Plan, and both the SWRCB and the six coastal Regional Water Quality Control Boards (RWQCBs) implement and interpret the California Ocean Plan.

13. This Regional Water Board adopted a revised Water Quality Control Plan (Basin Plan) for the Los Angeles Region on June 13, 1994. The Basin Plan specifies the beneficial uses of Ventura County waterbodies and their tributary streams, and contains both narrative and numerical water quality objectives for these receiving waters. The following beneficial uses identified in the Basin Plan apply to all or portions of each watershed covered by this Order:
 - (a) Municipal and domestic supply
 - (b) Agricultural supply
 - (c) Industrial service supply
 - (d) Industrial process supply
 - (e) Ground water recharge
 - (f) Freshwater replenishment
 - (g) Navigation
 - (h) Hydropower generation
 - (i) Water contact recreation
 - (j) Non-contact water recreation
 - (k) Ocean commercial and sport fishing
 - (l) Warm freshwater habitat
 - (m) Cold freshwater habitat
 - (n) Preservation of Areas of Special Biological Significance
 - (o) Saline water habitat
 - (p) Wildlife habitat
 - (q) Preservation of rare and endangered species
 - (r) Marine habitat
 - (s) Fish migration
 - (t) Fish spawning
 - (u) Shellfish harvesting

14. On March 22, 1999 the Consent Decree in Heal the Bay, Inc.; Santa Monica Baykeeper, Inc. v. Browner, Case No. 98-4825 SBA was approved. Under Establishment of TMDLs- The parties understand that California has the initial opportunity pursuant to § 303(d) of the CWA to adopt and submit to U.S. EPA for approval TMDLs to be established under this Consent Decree. TMDLs developed by Regional Water Boards are generally adopted through Basin Plan amendments. Basin plan amendments adopted by the State Board pursuant to Water Code section 13246, and the regulatory portions must be approved by the Office of Administrative Law pursuant to Government Code section 11353(b). TMDLs established pursuant to CWA section 303(d)(1) must be submitted to U.S. EPA for approval pursuant to section 303(d)(2), and incorporated into the state's water quality management plan.

15. The Regional Water Board has adopted amendments to the Basin Plan, to incorporate TMDLs for the following:
 - (a) The following TMDLs have been or will be incorporated into the Basin Plan within the term of the Order.

- (1) Santa Clara River - Nitrogen Compounds
 - (A) Regional Water Board Resolution No. 2003-011
 - (B) State Water Board Resolution No. 2003-0073
 - (C) OAL file No. 04-0123-35
 - (D) U.S. EPA approval date March 18, 2004
 - (E) Final fee exemption date March 23, 2004 (effective date).
 - (F) Compliance is 1 year after effective date (March 23, 2005)

- (2) Malibu Creek and Lagoon - Bacteria.
 - (A) Regional Water Board Resolution No. 2004-019
 - (B) State Water Board Resolution No. 2005-0072
 - (C) OAL file No. 05-1018-03 S
 - (D) U.S. EPA approval date January 10, 2006
 - (E) Final fee exemption date January 24, 2006 (effective date)
 - (F) Compliance for Summer Dry is 3 years after effective date (January 24, 2009)
 - (G) Compliance for Winter Dry is 6 years after effective date (January 24, 2012).
 - (H) Compliance for Wet Weather is 10 years after effective date (January 24, 2016), which is beyond the term of this Order

- (3) Toxicity, Chlorpyrifos and Diazinon in the Calleguas Creek, Its Tributaries and Mugu Lagoon.
 - (A) Regional Water Board Resolution No. 2005-009
 - (B) State Water Board Resolution No. 2005-0067
 - (C) OAL file No. 05-1110-02 S
 - (D) U.S. EPA approval date March 14, 2006
 - (E) Final fee exemption date March 24, 2006 (effective date)
 - (F) Compliance for Toxicity and Interim WLA is effective date (March 24, 2006)
 - (G) Compliance for Final WLA is 2 years after effective date (March 24, 2008)

- (4) Organochlorine (OC) Pesticides, Polychlorinated Biphenyls (PCBs), and Siltation in Calleguas Creek, Its Tributaries and Mugu Lagoon.
 - (A) Regional Water Board Resolution No. 2005-010
 - (B) State Water Board Resolution No. 2005-0068
 - (C) OAL file No. 05-1206-03 S
 - (D) U.S. EPA approval date March 14, 2006
 - (E) Final fee exemption date March 24, 2006 (effective date)
 - (F) Compliance for Interim WLA is effective date (March 24, 2006)
 - (G) Compliance for Final WLA is 20 years after effective date (March 24, 2026), which is beyond the term of this Order

- (5) Calleguas Creek Watershed Metals

- (A) Regional Water Board Resolution No. 2006-012
 - (B) State Water Board Resolution No. 2006-0078
 - (C) OAL file No. 06-1222-015 S
 - (D) U.S. EPA approval date March 26, 2007.
 - (E) Final fee exemption date March 27, 2007 (effective date)
 - (F) Compliance for Interim WLA is effective date (March 27, 2007)
 - (G) Compliance for Final WLA is Within 15 years after the effective date (March 27, 2022), which is beyond the term of this Order
- (6) Revolon Slough & Beardsley Wash Trash TMDL
- (A) Regional Water Board Resolution No. 2007-007
 - (B) State Water Board Resolution No 2007-0076
 - (C) OAL file No 2007-1227-05 S
 - (D) U.S. EPA approval date February 27, 2008
 - (E) Final fee exemption date March 6, 2008 (effective date)
 - (F) Compliance for Trash Monitoring & Reporting Plan Submittal is 6 months from effective date (September 6, 2008)
 - (G) Compliance for Final WLA is 8 years from effective date (March 6, 2016)
- (7) Ventura River Estuary Trash TMDL
- (A) Regional Water Board Resolution No. 2007-008
 - (B) State Water Board Resolution No 2007-0072
 - (C) OAL file No 2007-1227-01 S
 - (D) U.S. EPA approval date February 27, 2008
 - (E) Final fee exemption date March 6, 2008 (effective date)
 - (F) Compliance for Trash Monitoring & Reporting Plan Submittal is 6 months from effective date (September 6, 2008)
 - (G) Compliance for Final WLA is 8 years from effective date (March 6, 2016)
- (8) Harbor Beaches of Ventura County Bacteria TMDL
- (A) Regional Water Board Resolution No. 2007-017
 - (B) State Water Board Resolution No 2008-0072
 - (C) OAL file No 2007-1023-01 S
 - (D) U.S. EPA approval date December 18, 2008
 - (E) Final fee exemption date January 17, 2009 (effective date)
16. The Regional Water Board adopted and approved requirements for new development and significant redevelopment projects in Ventura County to control the discharge of storm water pollutants in post-construction storm water, on January 26, 2000, in Board Resolution No. R-00-02. The Regional Water Board Executive Officer issued the approved Standard Urban Storm Water Mitigation Plans (SUSMPs) on March 8, 2000 for Los Angeles County and the Cities in Los Angeles County. Since 2000, new development and redevelopment water quality criteria have been implemented by the Permittees to be consistent with SUSMP. The State Board affirmed the Regional

Water Board action and SUSMPs in State Board Order No. WQ 2000-11, issued on October 5, 2000.

- (a) A statewide policy memorandum (dated December 26, 2000), which interprets the Order to provide broad discretion to Regional Water Boards and identifies potential future areas for inclusion in SUSMPs and the types of evidence and findings necessary. Such areas include ministerial projects, projects in environmentally sensitive areas, and water quality design criteria for Retail Gasoline Outlets (RGOs, see Part 6 for definition). The Regional Water Board properly justified the extensions of SUSMPs and water quality criteria to ministerial projects, projects in environmentally sensitive areas, and RGOs, during the adoption of Regional Water Board Order 01-182. The Regional Water Board's action was upheld by the County of Los Angeles Superior Court (*In Re: County of Los Angeles v. State Water Resources Control Board* (2006) 143 Cal.App.4th 985).
 - (b) The State Water Board's Chief Counsel interpreted the Order to encourage regional solutions and endorsed a mitigation fund or "bank" as alternatives for new development and significant redevelopment. The Regional Water Board has included provisions for regional solutions and the establishment of a mitigation bank in this Order.
17. The Regional Water Board supports Watershed Management planning to address water quality protection in the region. The objective of the Watershed Management planning is to provide a comprehensive and integrated strategy towards water resource protection, enhancement, and restoration while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. It emphasizes cooperative relationships between regulatory agencies, the regulated community, environmental groups, and other stakeholders in the watershed to achieve the greatest environmental improvements with available resources.
 18. To facilitate compliance with federal regulations, the State Water Board has issued the following 4 Statewide General NPDES Permits associated with storm water:
 - (a) Industrial General Permit (IASGP- Industrial Activities Storm Water General Permit), NPDES No. CAS000001, issued on November 19, 1991, reissued on September 17, 1992 and April 17, 1997, currently under review for reissuance.
 - (b) Construction General Permit (CASGP- Construction Activities Storm Water General Permit), NPDES No. CAS000002, issued on August 20, 1992, reissued August 19, 1999, and September 2, 2009.
 - (c) Small Linear Underground/ Overhead Construction Projects General Permit (small LUPs), NPDES No. CAS000005, issued on June 18, 2003.
 - (d) Small MS4 Permit WQ Order No. 2003-0005-DWQ, NPDES No. CAS000004, adopted on April 30, 2003.
 19. Facilities discharging storm water associated with industrial activities, construction projects that disturb one or more acres of soil, or construction projects that disturb less than one acre but are part of a larger common plan of development or sale that in

total disturbs 1 or more acres, and construction activities associated with small linear underground/ overhead projects that result in land disturbances greater than one acre, but less than five acres (small LUPs), are all required to obtain individual NPDES permits for storm water discharges, or be covered by the statewide General Permits by completing and filing a Notice of Intent (NOI) with the State Board. The U.S. EPA guidance anticipates coordination of the state-administered programs for industrial and construction activities with the local agency program to reduce pollutants in storm water discharges to the MS4.

20. State Water Board Resolution No. 68-16 contains the state Antidegradation Policy, titled "Statement of Policy with Respect to Maintaining High Quality Waters in California" (Resolution 68-16), which applies to all waters of the state, including ground waters of the state, whose quality meets or exceeds (is better than) water quality objectives. Resolution No. 68-16 is considered to incorporate the federal Antidegradation Policy (40 CFR 131.12) where the federal policy applies, (State Water Board Order WQO 86-17). Administrative policies that implement both, federal and state antidegradation policies acknowledge that an activity that results in a minor water quality lowering, even if incrementally small, can result in violation of Antidegradation Policies through cumulative effects, for example, when the waste is a cumulative, persistent, or bioaccumulative pollutant.
 - (a) Federal Antidegradation Policy (40 CFR 131.12) states that the State shall develop and adopt a statewide antidegradation policy and identify the methods for implementing such policy pursuant to this subpart. The antidegradation policy and implementation methods shall, at a minimum, be consistent with the following:
 - (1) Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected.
 - (2) Where the quality of the waters exceed levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water, that quality shall be maintained and protected unless the State finds, after full satisfaction of the intergovernmental coordination and public participation provisions of the State's continuing planning process, that allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located. In allowing such degradation or lower water quality, the State shall assure water quality adequate to protect existing uses fully. Further, the State shall assure that there shall be achieved the highest statutory and regulatory requirements for all new and existing point sources and all cost-effective and reasonable best management practices for nonpoint source control.
 - (3) Where high quality waters constitute an outstanding National resource, such as waters of National and State parks and wildlife refuges and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected.

- (4) In those cases where potential water quality impairment associated with a thermal discharge is involved, the antidegradation policy and implementing method shall be consistent with section 316 of the Act.
- (b) State Water Board Resolution No. 68-16 establishes essentially a 2-step process for compliance with the policy.
- (1) Step 1- if a discharge will degrade high quality water, the discharge may be allowed if any change in water quality:
- (A) Will be consistent with maximum benefit to the people of the State.
 - (B) Will not unreasonably affect present and anticipated beneficial use of such water.
 - (C) Will not result in water quality less than that prescribed in state policies (e.g., water quality objectives in Water Quality Control Plans).
- (2) Step 2- any activities that result in discharges to high quality waters are required to:
- (A) Meet waste discharge requirements that will result in the best practicable treatment or control of the discharge necessary to avoid a pollution or nuisance.
 - (B) Maintain the highest water quality consistent with the maximum benefit to the people of the State.
21. The State Water Board on June 17, 1999, adopted Order No. WQ 99-05, which specifies standard receiving water limitation language to be included in all municipal storm water permits issued by the State and Regional Water Boards.
22. Cal. Water Code § 13263(a) requires that waste discharge requirements issued by Water Boards shall implement any relevant water quality control plans that have been adopted; shall take into consideration the beneficial uses to be protected and the water quality objectives reasonably required for that purpose; other waste discharges; and the need to prevent nuisance.
23. Clean Water Act section 402(p)(3)(B)(iii) requires municipal separate storm sewer system (MS4) operators to reduce the discharge of pollutants to the "maximum extent practicable" (MEP). The MEP requirement is analogous to a technology-based requirement in that it focuses upon the feasibility of pollutant reduction measures rather than achievement of water quality standards in the receiving waters to achieve improvements in the quality of the storm water that is discharged. Compliance with the MEP requirement can range from implementation of structural and nonstructural best management practices to installation of end-of-pipe treatment systems. MEP generally provides the MS4 operators the flexibility to determine what controls should be implemented through the development of a storm water management plan, subject to the Regional Water Board's approval. Nevertheless, MEP does not define the limits of pollution control measures that may be required of MS4 operators, and the requirement to implement controls that reduce pollutants to the MEP is not limited by the goal of attaining water quality standards. In some circumstances, compliance with MEP may result in controls more stringent than applicable WQS.

and in others, less stringent. The Regional Water Board may use its discretion to impose other provisions beyond MEP, as it determines appropriate for the control of pollutants, including ensuring strict compliance with water quality standards. (Defenders of Wildlife v. Browner (1999) 191 F.3d 1159, 1168.)

24. The California Supreme Court has ruled that although Water Code section 13263 requires the Water Boards to consider the factors set forth in Water Code section 13241 when issuing an NPDES permit, the Water Boards may not consider the factors to justify imposing pollutant restrictions that are less stringent than the applicable federal regulations require (City of Burbank v. State Water Resources Control Bd. (2005) 35 Cal.4th 613). However, when the pollutant restrictions in an NPDES are more stringent than federal law requires, Water Code section 13263 requires that the Water Boards consider the factors described in section 13241 as they apply to those specific restrictions.
25. The City of Burbank case related to NPDES permits for publicly owned treatment works, not permits for municipal separate storm sewer systems (MS4s). Among other requirements, federal law requires MS4 permits to include requirements to effectively prohibit non-storm water discharges into the storm sewers, in addition to requiring controls to reduce the discharge of pollutants to the maximum extent practicable. Therefore, a 13241 analysis is not required for permit requirements that implement the effective prohibition on the discharge of non-storm water into the MS4, or for practicable controls to reduce the discharge of pollutants to the maximum extent, as those requirements are mandated by federal law.
26. The requirements in this Order may be more specific or detailed than those enumerated in federal regulations under 40 CFR 122.26 or in U.S. EPA guidance. However, the requirements have been designed to be consistent with and within the federal statutory mandates described in CWA § 402(p)(3)(B)(ii) and (iii) and the related federal regulations. Consistent with federal law, all of the conditions in this permit could have been included in a permit adopted by U.S. EPA in the absence of the in lieu authority of California to issue NPDES permits.
27. The Board finds that all requirements in this order are practicable. Moreover, while commenters have alleged that the permit requirements are "beyond MEP," no commenter has presented evidence that demonstrates that any particular permit requirement is not actually practicable.
28. Notwithstanding findings 23 through 27, the Regional Water Board has developed an economic analysis of the permit's requirements, consistent with Water Code section 13241. That analysis is contained in the "Economic Considerations of the Proposed Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein, June 2, 2008, which is contained in the administrative record for this Order. The Regional

Water Board has considered all of the evidence that has been presented regarding the 13241 factors in adopting this permit, both as contained in the economic analysis and as reflected in the fact sheet and comments (and responses thereto) submitted to the many drafts of this permit. The Regional Water Board finds that the requirements in this Order are reasonably necessary to protect beneficial uses identified in the Basin Plan, and the economic information related to costs of compliance and other 13241 factors are not sufficient to justify failing to protect those beneficial uses. Where appropriate, additional time to implement certain measures and achieve water quality objectives can be provided through the iterative storm water management plan process.

F. Implementation

1. The California Environmental Quality Act (CEQA) (Cal. Pub. Resources Code § 2100 et seq.) requires that public agencies consider the environmental impacts of the projects they approve for development. CEQA applies to projects that are considered discretionary (a governmental agency can use its judgment in deciding whether and how to carry out or approve a project, § 15357) and does not apply to ministerial projects (the law requires a governmental agency to act on a project in a set way without allowing the agency to use its own judgment, § 15369). A ministerial project may be made discretionary by adopting local ordinance provisions or imposing conditions to create decision-making discretion in approving the project. In the alternative, Permittees may establish standards and objective criteria administratively for storm water mitigation for ministerial projects. For water quality purposes regardless of whether a project is discretionary or ministerial, the Regional Water Board considers that all new development and significant redevelopment activity in specified categories, that receive approval or permits from a municipality, are subject to storm water mitigation requirements in a manner that is consistent with and complies with the provisions of CEQA.
2. The objective of this Order is to ensure that discharges from the MS4 in Ventura County comply with water quality standards, including protecting the beneficial uses of receiving waters. To meet this objective, the Order requires that Best Management Practices (BMPs) will be implemented to reduce the discharge of pollutants in storm water to the maximum extent practicable (MEP), and achieve water quality objectives and standards. The U.S. EPA envisioned that municipal storm water programs would be implemented in an iterative manner and improved with each iteration by using information and experience gained during the previous permit term (*Interpretative Policy Memorandum on Reapplication Requirements for MS4 permits* - 61 Fed. Reg. 41697). Municipalities are required to evaluate what is effective and make improvements in order to protect beneficial uses of receiving waters. This Order requires implementation of an effective combination of pollution control and pollution prevention measures, education, public outreach, planning, and implementation of source control BMPs and Structural and Treatment Control BMPs.

The better-tailored BMPs combined with the performance objectives outlined in this Order have the purpose of attaining water quality objectives and standards (*Interim Permitting Approach for Water Quality-Based Effluent Limitations in Storm Water Permits*- 61 Fed. Reg. 43761). Where WLAs have been adopted for storm water (wet weather) and non-storm water (dry weather) discharges from MS4s, this Order requires Permittees to implement controls to achieve the WLAs within the compliance schedule provided in the TMDLs.

3. The implementation of measures set forth in this Order are reasonably expected to reduce the discharge of pollutants conveyed in storm water discharges into receiving waters, and to meet the TMDL WLAs for discharges from MS4s that have been adopted by the Regional Water Board.
4. The U.S. EPA has recommended that all future TMDLs and TMDL amendments be expressed as daily increments consistent with a federal court ruling (*Friends of the Earth, Inc. v. EPA, et al.* No. 05-5015 (D.C. Cir. 2006)). However, this interpretation does not affect the discretionary authority of the Regional Water Board to express NPDES permit limits and conditions in non daily terms because there is no express or implied statutory limitation (CWA §502(11)) (*Establishing TMDL "Daily Loads" in Light of the Decision by the U.S. Court of Appeals for the D.C. Circuit in Friends of the Earth, Inc. v. EPA, et al. (April 2006) and Implications for NPDES Permits*, U.S. EPA Office of Water, memorandum, Nov 15, 2006). This Order translates MS4 TMDL WLAs adopted by the Regional Water Board into forms "consistent with the assumptions and requirements of the TMDL".
5. During the term of the Order, the Permittees shall implement all necessary control measures to reduce pollutant(s) which cause or continue to cause or contribute to water quality impairments, but for which TMDLs have not yet been developed or approved, to eliminate the water quality impairment(s). Successful efforts to reverse the wet weather impairments during the permit term for such pollutants, may avoid the need for a WLA for wet weather or the need to develop a TMDL in the future.
6. This Order promotes land development and redevelopment strategies that consider water quality and water management benefits associated with smart growth techniques. Such measures may include hydromodification mitigation requirements, minimization of effective impervious area, integrated water resources planning, and low impact development guidelines. (Reference: *Protecting Water Resources with Smart Growth*, EPA 231-R- 04-002, U.S. EPA 2004; *Using Smart Growth Techniques as Storm Water Best Management Practices*, EPA 231-B-05-002, U.S. EPA 2005; *Parking Spaces/Community Places: Finding the Balance through Smart Growth Solutions*, EPA 231-K-06-001, U.S. EPA 2006; *Protecting Water Resources with Higher-Density Development*, EPA 231-R-06-001, U.S. EPA 2006.)
7. The implementation of an effective Public Information and Participation Program is a critical component of a storm water management program. While commercial and

industrial facilities are traditionally subject to multiple environmental regulations and receive environmental protection guidance from multiple sources, the general public, in comparison, receives significantly less education in environmental protection. An effective Public Information and Participation Program is required because:

- (a) Activities conducted by the public such as vehicle maintenance, improper household waste materials disposal, improper pet waste disposal and the improper application of fertilizers and pesticides have the potential to generate a significant amount of pollutants that could be discharged in storm water.
 - (b) An increase in public knowledge of storm water regulations, proper storage and disposal of household wastes, proper disposal of pet wastes and appropriate home vehicle maintenance practices can lead to a significant reduction of pollutants discharged in storm water.
8. This Order also provides flexibility for Permittees to seek authorization from the Regional Water Board Executive Officer to substitute a BMP under this Order with an alternative BMP, if they can provide information and documentation on the effectiveness of the alternative, equal to or greater than the prescribed BMP in meeting the objectives of this Order.
 9. This Order contemplates that the Permittees are responsible for considering potential storm water impacts when making planning decisions in order to fulfill the Permittees' CWA requirement to reduce the discharge of pollutants in municipal storm water to the MEP and attain water quality objectives from new development and redevelopment activities. However, the Permittees retain authority to make the final land-use decisions and retain full statutory authority for deciding what land uses are appropriate at specific locations within each Permittee's jurisdiction. This Order and its requirements are not intended to restrict or control local land use decision-making authority.
 10. The State Water Board amended the Policy for the Implementation of Toxics Standards In Inland Surface Waters, Enclosed Bays and Estuaries of California (State Implementation Policy – SIP) on February 24, 2005. The SIP does not apply directly to the stormwater discharges. However, this Order includes a Monitoring Program that incorporates Minimum Levels (MLs) established under the State Implementation Policy. The MLs represent the lowest quantifiable concentration for priority toxic pollutants that is measurable with the use of proper method-based analytical procedures and factoring out matrix interference. The SIP's MLs therefore represent the best available science for determining MLs and are appropriate for a storm water monitoring program. The use of MLs allows the detection of toxic priority pollutants at concentrations of concern using recent advances in chemical analytical methods.
 11. The International Storm Water Best Management Practices (BMP) Database was established in 1996 as a cooperative initiative between the U.S. EPA and the American Society of Civil Engineers (ASCE) to provide scientifically sound information to improve the design, selection and performance of storm water BMPs.

The BMP database includes standardized BMP monitoring and reporting protocols, a storm water BMP database, BMP performance evaluation protocols, and BMP monitoring guidance. The storm water BMP database is updated approximately semi-annually to add new BMP studies and performance data. The International Storm Water Database is now maintained by the Water Environment Research Foundation (WERF).

12. This Order is not intended to prohibit the inspection for or abatement of vectors by the State Department of Public Health or local vector agencies in accordance with CA Health and Safety Code, § 116110 et seq. Certain Treatment Control BMPs if not properly designed, operated or maintained may create habitats for vectors (e.g. mosquitoes and rodents). This Order contemplates that the Permittees will closely cooperate and collaborate with local vector control agencies and the State Department of Public Health for the implementation, operation, and maintenance of Treatment Control BMPs in order to minimize the risk to public health from vector borne diseases.
13. This Order contemplates that Permittees will ensure that implemented Treatment Control BMPs will not pose a safety or health hazard to the public. This Order contemplates that Permittees will ensure that the maintenance of implemented Treatment Control BMPs will comply with all applicable health and safety regulations, such as, but not limited to requirements for worker entry into confined spaces under OSHA Safety and Training education, § 1926.21(b)(6)(i).
14. This Order incorporates presumptive BMPs to reduce pollutants in storm water discharges from construction sites to the MEP. The BMPs are identified in Table 6 (BMPs at Construction sites less than 1 acre), Table 7 (BMPs at Construction Sites 1 acre or greater but less than 5 acres), and Table 8 (BMPs at Construction sites 5 acres or greater). These BMPs include erosion control, sediment control, and construction site waste management practices. The BMPs listed in part 4.F of the Order were selected based on the Water Boards' experience of regulating such sites since 1992, and are referenced in the *California Stormwater Quality Association (CASQA) Storm Water Best Management Practice Handbook Construction (January 2003)* and from the *Stormwater Quality Handbooks, Project Planning and Design Guide, Stormwater Pollution Prevention Plan (SWPPP) and Water Pollution Control Plan (WPCP) Preparation Manual, Construction Site Best Management Practices (BMPs) Reference Manual, March 2007* (Caltrans Document Number CTSW-RT-06-171.11-1) which serve as an industry standard for California. The BMPs identified in the Tables are technically feasible, practicable, and cost-effective. Where an identified BMP may be impracticable on a particular site, this Order includes a provision to select and implement an alternative BMP, through the BMP substitution provisions in subpart 4.A.2.
15. This Order incorporates presumptive BMPs to reduce pollutants in storm water discharges from commercial and industrial sites to the MEP. The BMPs are

identified in Table 2 (BMPs at Restaurants), Table 3 (BMPs at Automotive Service Facilities), Table 4 (BMPs at Retail Gasoline Outlets), and Table 5 (BMPs at Nurseries). These BMPs include the implementation of good housekeeping practices designed to control pollutants at the source, promote the use of proper waste management practices, and implement control practices to keep pollutants away from any entrance to the storm drainage system. The BMPs listed in part 4.D of the Order were selected based on the Water Boards' experience of regulating such sites since 1992 and referenced in the California Stormwater Quality Association (CASQA) Storm Water Best Management Practice Handbook Commercial/Industrial Activity (January 2003) and from the Caltrans Storm Water Quality Handbook Maintenance Staff Guide May 2003 (Caltrans Document Number CTSW-RT-02-057), which serve as an industry standard for California. The BMPs identified in the Tables are technically feasible, practicable, and cost-effective. Where an identified BMP may be impracticable, this Order includes a provision to select and implement an alternative BMP, through the BMP substitution provisions in subpart 4.A.2.

16. This Order incorporates presumptive BMPs to reduce pollutants in storm water discharges from Public Agency Activities to the MEP. The BMPs are identified in Table 10 (BMPs at Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards). These BMPs include the implementation of good housekeeping practices designed to control pollutants at the source, promote the use of proper waste management practices, implement control practices to keep pollutants away from any entrance to the storm drainage system and from being deposited or discharged directly into waters of the U.S. The BMPs listed in part 4.G of the Order were selected based on the Water Boards' experience of regulating such sites since 1990, and are referenced in the Caltrans Storm Water Quality Handbook Maintenance Staff Guide May 2003 (Caltrans Document Number CTSW-RT-02-057), which serves as a statewide standard for the California Department of Transportation (Caltrans). The BMPs identified in the Table are technically feasible, practicable, and cost-effective, and are the standard of practice for Caltrans sites statewide. Where an identified BMP may be impracticable, this Order includes a provision to select and implement an alternative BMP, through the BMP substitution provisions in subpart 4.A.2.
17. This Order incorporates BMPs to ensure that authorized Non-Storm Water Discharges are not a source of pollutants to the MS4, Table 1 (Required Conditions for Non-Storm Water Discharges). The BMPs included are for the purpose of dechlorination and/or for prevention of erosion and sediment loss, or to reduce other harmful pollutants during the discharge of authorized non-storm water discharges to the MS4. The BMPs listed in part 1.A of the Order were selected from the *American Water Works Association AWWA Guidelines For The Development Of Your Best Management Practices (BMP) Manual For Drinking Water System Releases Developed by the CA-NV AWWA Environmental Compliance Committee (2005)* which serves as an industry standard for California, from the results of studies directed by the Los Angeles Water Board, - *Evaluation of Non-Storm Water Discharges to California Storm Drains and Potential Policies for Effective*

Prohibition Methods, Final Report, University of California, Los Angeles, Contract No. 5-104-140-0 (1997), and *Water Quality Concerns and Regulatory Controls for Non Storm Water Discharges to Storm Drains*, Duke L.D. and M. Kihara, Journal of the American Water Resources Association, Vol. 34: 661-676, (1998), and from the Water Boards' experience of controlling authorized non-storm discharges to the MS4 since 1990. The BMPs identified in the Table are technically feasible, practicable, and cost-effective. Where an identified BMP may be impracticable, this Order includes a provision to select and implement an alternative BMP, through the BMP substitution provisions in subpart 4.A.2.

18. In accordance with Federal regulations at 40 CFR 124.8, a Fact Sheet has been prepared to explain the principal facts and the significant factual, legal, methodological, policy, and economic matters considered in preparing the Order. This Fact Sheet has been made a part of the Administrative Record.
19. The State Water Board adopted statewide General Waste Discharge Requirements for Sanitary Sewer Systems, (WQ Order No. 2006-0003) on May 2, 2006, to provide a consistent, statewide regulatory framework to address sanitary sewer overflows ("SSO Orders"). The SSO Order establishes requirements for public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and to report SSOs. SSOs that enter MS4s have the potential to impair the recreational use of receiving waters, and to harm public health. This Order establishes coordination, response, and notification requirements for MS4 Permittees when SSOs result in a discharge to the MS4 system.
20. This Order takes into consideration the housing needs in the area under the Permittees' jurisdiction by balancing the implementation of Smart Growth and Low Impact Development techniques with the protection of the water resources of the region. Although not required, the Regional Water Board considered the need for housing and the appropriate techniques to allow for reasonable development while protecting the receiving waters from degradation.
21. This Order may have an effect on costs required for compliance with the provisions contained herein. Although not required, the Regional Water Board has considered costs in preparing this Order. Though also not required, the Regional Water Board has also considered the factors set forth in Water Code section 13241.

G. Public Notification

1. The issuance of waste discharge requirements pursuant to California Water Code section 13370 et seq. is exempt from the California Environmental Quality Act in accordance with California Water Code section 13389. *County of Los Angeles et al., v. California Water Boards et al.*, (2006), 143 Cal.App.4th 985.

Ventura County Municipal Separate Storm Sewer System Permit

2. The Regional Water Board has notified the Permittees, and interested agencies and persons of its intent to reconsider Order No. 09-0057 and issue waste discharge requirements for this discharge, and has provided them with an opportunity to make statements and submit their comments.
3. The Regional Water Board staff has conducted more than 35 meetings from February 9, 2007 through December 19, 2008, with Permittees, their representatives (Larry Walker Associates, and Somach, Simmons & Dunn), and various stakeholders (Building Industry Association of Southern California/Greater Los Angeles Ventura Chapter (BIA/LAV), California State Dept. of Public Health, Calleguas Municipal Water District, California Stormwater Quality Association (CASQA), City of Downey, City of Los Angeles-EMD, Coalition for Practical Regulation (CPR), Construction Industry Coalition on Water Quality (CICWQ), County of Orange, Geosyntec Consultants, Golden State, Heal the Bay; Local Government Commission, Los Angeles City; Los Angeles County Department of Public Works, Los Angeles County-SD, Los Angeles Department of Water and Power, Metropolitan Water District, Natural Resources Defense Council (NRDC), Richard Watson and Associates, San Bernardino Flood Control District, Santa Monica Bay Restoration Commission, Southern California Coastal Water Research Project, University of California Sea Grant, Ventura CoastKeeper). On April 5, 2007 and September 20, 2007, the Regional Water Board conducted workshops to discuss drafts of the NPDES Order and received input from the Permittees and the public regarding proposed changes.
4. This Order shall serve as a NPDES permit, pursuant to CWA § 402, and shall take effect on (Order adoption date) provided the Regional Administrator of the U.S. EPA has no objections.
5. Pursuant to Cal. Water Code § 13320, any aggrieved party may seek review of this Order by filing a petition with the State Board within 30 days of the date of adoption of the Order by the Regional Water Board. A petition must be sent to:

State Water Resources Control Board
Office of the Chief Counsel
P.O. Box 100
Sacramento, CA 95812-0100
6. This Order may be modified or alternatively revoked or reissued prior to its expiration date or any administrative extension thereto, in accordance with 40 CFR 122.41(f) and 122.62.

IT IS HEREBY ORDERED that the Permittees, in order to meet the provisions contained in Division 7 of the Cal. Water Code and regulations adopted thereunder, and the provisions of the CWA and regulations adopted thereunder, shall comply with the following:

PART 1 - DISCHARGE PROHIBITIONS

A. Prohibitions - Non-Storm Water Discharges

1. The Permittees shall, within their respective jurisdictions, effectively prohibit non-storm discharges into the MS4 and receiving waters, except where such discharges:
 - (a) Originate from a State, Federal, or other source for which they are pre-empted from regulating by State or Federal law; or
 - (b) Are covered by a separate individual or general NPDES permit, or conditional waiver for irrigated lands; or
 - (c) Flows from fire fighting activities.
 - (d) Fall within one of the categories below, are not a source of pollutants that exceed water quality standards, and meet all conditions where specified by the Regional Water Board Executive Officer:
 - (1) Category A – Natural flows
 - (A) Stream diversions authorized by the State Water Board
 - (B) Natural springs and rising ground water
 - (C) Uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)]¹
 - (D) Flows from riparian habitats or wetlands
 - (2) Category B – Flows incidental to urban activities, providing conditions listed in table below:
 - (A) Discharges from potable water sources²
 - (B) Gravity flow from foundation, footing and crawl space drains.
 - (C) Air conditioning condensate
 - (D) Reclaimed and potable landscape irrigation runoff
 - (E) Dechlorinated/ debrominated swimming pool discharges [see def. part 6]
 - (F) Non-commercial car washing by residents or non-profit organizations
 - (G) Sidewalk rinsing
 - (H) Pooled non-storm water from treatment BMPs³

¹ NPDES permit for ground water dewatering is required within the Los Angeles Region including Ventura County.

² The term applies to low volume, incidental and infrequent releases that are innocuous from a water quality perspective. Those releases for dewatering or hydro-testing or flushing of water supply and distribution mains and incidental and infrequent releases from well heads shall be allowed with the implementation of appropriate BMPs until such time as a new General Permit is adopted that addresses those types of releases. Discharges from hydrostatic pipe testing shall be subject to separate NPDES general permit coverage (CAG674001) and discharges from utility vaults shall be conducted under coverage of a separate NPDES permit specific to that activity.

³ All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer, and designed to drain within 72 hours of the end of a rain. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.

Table 1 – Required Conditions for Non-Storm Water Discharges

Type of Discharges:	Conditions under which allowed:	Required conditions for discharge to occur:
Stream diversions permitted by the State Board	Authorization by the State Water Board	Permittees shall comply with all conditions in the authorization.
Natural springs and rising ground water	1. Ground water dewatering requires a separate NPDES permit. 2. Segregate flow to prevent introduction of pollutants.	Permittees shall comply with all conditions in the authorization.
Uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)] (Utility vault dewatering requires a separate NPDES permit.)	NPDES permit for ground water dewatering is required within the Los Angeles Region including Ventura County	Permittees shall comply with all conditions in the authorization.
Flows from riparian habitats or wetlands	Provided that all necessary permits or authorizations are received prior to diverting the stream flow.	Permittees shall comply with all conditions in the authorization.
Discharges from potable water sources	See Footnote #2. Provided discharges from water lines and potable water sources shall be dechlorinated, pH adjusted if necessary, reoxygenated, and volumetrically and velocity controlled to prevent resuspension of sediments.	See Footnote #2. To be discharged, this type of water shall be dechlorinated using aeration and/ or sodium thiosulfate and/ or other appropriate means and/or be allowed to infiltrate to the ground. BMPs such as sand bags or gravel bags, or other appropriate means shall be utilized to prevent sediment transport. All sediments shall be collected and disposed of in a legal and appropriate manner.
Drains for foundation, footing and crawl drains	Dewatering requires a separate NPDES permit.	Permittees shall comply with all conditions in the authorization.
Air conditioning condensate	Segregation of flow to prevent introduction of pollutants. Percolation whenever possible.	Permittees shall comply with all conditions in the authorization.
Water from crawl space pumps	Dewatering requires a separate NPDES permit within the Los Angeles Region including Ventura County	Permittees shall comply with all conditions in the authorization.
Reclaimed and potable landscape irrigation runoff	Segregation of flow to prevent introduction of pollutants.	Implement conservation programs to minimize this type of discharge by using less water.
Dechlorinated/ debrominated	Where the discharge is not excepted by the sanitary sewer operator. Swimming pool	Pool water may be dechlorinated using time,

Type of Discharges:	Conditions under which allowed:	Required conditions for discharge to occur:
swimming pool discharges [see definition Part 6]	<p>discharges are to be dechlorinated, pH adjusted if necessary, aerated to remove chlorine if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments.</p> <p>Cleaning waste water and filter back wash shall not be discharged to municipal separate storm sewers.</p> <p>No discharges are allowed containing salts in excess of Water Quality Standards.</p> <p>Chlorine residual in discharge shall not exceed 0.1mg/L.</p>	aeration, and/ or sodium thiosulfate.
Non-commercial car washing by residents or non-profit organizations	Preferably at a commercial carwash or designated area where wash water can percolate. Pumps or vacuums may be used to direct water to pervious areas.	Permittees shall comply with all conditions in the authorization.
Sidewalk rinsing	This may be undertaken only if high pressure low volume is used as described in the glossary under "Sidewalk Rinsing".	
Pooled storm water from treatment BMPs	All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer. All storm water BMPs shall be designed to drain within 72 hours of the end of the rain event to avoid the breeding of vectors. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. The discharge shall cease before the discharge has become a source of a pollutant(s), (bottom sediment included). Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.	

2. If the Regional Water Board Executive Officer determines that any of the preceding categories of non-storm water discharges are a source of pollutants that exceed water quality standards, the Permittee(s) shall either:
 - (a) Prohibit the discharge from entering the MS4; or
 - (b) Authorize the discharge category and require implementation of appropriate or additional BMPs to ensure that the discharge will not be a source of pollutants; or
 - (c) Require or obtain coverage under a separate RWQCB or SWRCB permit for discharge into the MS4.

PART 2 – RECEIVING WATER LIMITATIONS

1. Discharges from the MS4 that cause or contribute to a violation of water quality standards are prohibited.
2. Discharges from the MS4 of storm water, or non-storm water, for which a Permittee is responsible, shall not cause or contribute to a condition of nuisance.
3. The Permittee shall comply with Receiving Water Limitations 1 and 2 through timely implementation of control measures and other actions to reduce pollutants in the storm water discharges in accordance with the requirements of this Order including any modifications. The Permittees' Program shall be designed to achieve compliance with Receiving Water Limitations 1 and 2. If exceedance(s) of water quality objectives or water quality standards (collectively WQS) persist, notwithstanding implementation of this permit, the Permittees shall ensure compliance with Receiving Water Limitations 1 and 2 by complying with the following procedure:
 - (a) Upon determination by either the Permittees or the Regional Water Board that discharges are causing or contributing to an exceedance of an applicable WQS, the Permittee(s) upstream of the point of discharge shall promptly notify and thereafter submit a report to the Regional Water Board Executive Officer that describes BMPs that are currently being implemented and additional BMPs that will be implemented to prevent or reduce any pollutants that are causing or contributing to the exceedance of WQSs. The report may be included with the Annual Report, unless the Regional Water Board Executive Officer directs an earlier submittal. The Regional Water Board Executive Officer may require modifications to the report.
 - (b) Submit any modifications to the report required by the Regional Water Board Executive Officer within 30 days of notification.
 - (c) Within 30 days following approval of the Report described above by the Regional Water Board Executive Officer, the Permittees shall revise their Program and monitoring program to incorporate the approved modified BMPs that have been and will be implemented, the implementation schedule, and any additional monitoring required.
 - (d) Implement the revised Program and monitoring program according to the approved schedule.
4. Permittees shall annually report the effectiveness of BMPs in reducing exceedances of receiving water limitations. The Regional Water Board Executive Officer may direct implementation of additional BMPs if there are continuing or recurring exceedances of the same receiving water limitation.

PART 3 - STORM WATER QUALITY MANAGEMENT PROGRAM
IMPLEMENTATION

A. General Requirements

1. Each Permittee shall, at a minimum, adopt and implement applicable terms of this Order within its jurisdictional boundary. The Principal Permittee shall be responsible for program coordination as described in this Order as well as compliance with applicable portions of the permit within its jurisdiction. This Order shall be implemented no later than July 8, 2010, unless a later date has been specified for a particular provision in this Order and provided the Regional Administrator of the U.S. EPA has no objections.
2. Each Permittee shall comply with the requirements of 40 CFR 122.26(d)(2) and implement programs and control measures so as to reduce the discharges of pollutants in storm water to the MEP and achieve water quality standards.
3. Each Permittee shall require that treatment control BMPs being implemented under the provisions of this Order shall be designed, at a minimum, to achieve the BMP performance criteria for storm water pollutants likely to be discharged as identified in Attachment "C", for an 85th percentile 24-hour runoff event determined as the maximized capture storm water volume for the area using a 48 to 72-hour draw down time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998). Expected BMP pollutant removal performance for effluent quality was developed from the WERF-ASCE/ U.S. EPA International BMP Database. Permittees shall select Treatment BMPs based on the primary class of pollutants likely to be discharged from the site/facility (e.g. metals from an auto repair shop). Permittees may develop guidance for appropriate Treatment BMPs for project type based on Attachment "C". For the treatment of pollutants causing impairments within the drainage of the impaired waterbody, permittees shall select BMPs from the top three performing BMP categories or alternative BMPs that are designed to meet or exceed the performance of the highest performing BMP for the pollutant causing impairment.
4. Each Permittee shall implement programs and measures to comply with the TMDLs' WLAs for the MS4 as specified in Part 5.
5. If TMDL requirements, including Implementation Plans and Reports, address substantially similar requirements as the MS4 permit, the Executive Officer may approve the applicable reports, plans, data or submittals under the applicable TMDL as fulfilling requirements under the MS4.

B. Legal Authority

1. Permittees shall possess the necessary legal authority to prohibit, including, but not limited to:
 - (a) Illicit connections and illicit discharges, and to remove illicit connections.
 - (b) The discharge of non-storm water to the MS4 from:
 - (1) Washing or cleaning of gas stations, auto repair garages, or other types of automotive service facilities
 - (2) Mobile auto washing, carpet cleaning, steam cleaning, sandblasting and other such mobile commercial and industrial operations
 - (3) Areas where repair of machinery and equipment which are visibly leaking oil, fluid or antifreeze, is undertaken
 - (4) Storage areas for materials containing grease, oil, or other hazardous substances, and uncovered receptacles containing hazardous materials
 - (5) Swimming pools¹ that have a concentration greater than:
 - (A) Chlorine/ bromine- 0.1mg/L
 - (B) Chloride- 250mg/L
 - (6) Swimming pool filter backwash
 - (7) Decorative fountains and ponds
 - (8) Industrial/ Commercial areas, including restaurant mats
 - (9) Concrete truck cement, pumps, tools, and equipment washout
 - (10) Spills, dumping, or disposal of materials other, such as:
 - (A) Litter, landscape and construction debris, garbage, food, animal waste, fuel or chemical wastes, batteries, and any other materials which have the potential to adversely impact water quality; and
 - (B) Any pesticide, fungicide or herbicide
 - (11) Stationary and mobile pet grooming facilities
 - (12) Trash container leachate
2. The Permittees shall possess adequate legal authority to:
 - (a) Control through interagency agreement, the contribution of pollutants from one portion of the MS4 to another portion of the MS4.
 - (b) Require persons within their jurisdiction to comply with conditions in the Permittees' ordinances, permits, contracts, model programs, or orders (i.e. hold dischargers to its MS4 accountable for their contributions of pollutants and flows).
 - (c) Utilize enforcement measures (e.g., stop work orders, notice of violations, fines, referral to City, County, and/ or District Attorneys, referral to strikeforces, etc.) by ordinances, permits, contracts, orders, administrative authority, and civil and criminal prosecution.²

¹ MS4s discharging directly to the ocean are not subject to this prohibition.

²In the case of private responsible parties such as, HOAs, the Permittee must retain enforcement authority.

- (d) Control pollutants, including potential contribution¹ in discharges of storm water runoff associated with industrial activities, including construction activities to its MS4, and control the quality of storm water runoff from industrial sites, including construction sites.
 - (e) Carry out all inspections, surveillance and monitoring procedures necessary to determine compliance and non-compliance with permit conditions including the prohibition on illicit discharges to the MS4.
 - (f) Require the use of control measures to prevent or reduce the discharge of pollutants to achieve water quality objectives.
 - (g) Require that Treatment Control BMPs be properly operated and maintained.
3. Each Permittee has adopted a Storm Water Quality Ordinance based upon a countywide model. Each Permittee shall ensure, no later than [two years after Order adoption date], that its Storm Water Quality Ordinance authorizes the Permittee to enforce all requirements of this Order.
4. Each Permittee shall submit no later than (two years after Order adoption date), a statement by its legal counsel that the Permittee has obtained and possesses all necessary legal authority to comply with this Order through adoption of ordinances and/ or municipal code modifications.

C. Fiscal Resources

1. The Permittees shall implement the activities required to comply with the provisions of this Order.² Each Permittee shall:
- (a) Submit an Annual Budget Summary that shall include:
 - (1) Budgets for the upcoming report year (estimated expenditure) for the following specific categories (estimated percentages and written explanations where necessary):
 - (A) Program Management Activities.
 - (i) Overall Administrative costs
 - (B) Program Implementation Activities (permit related activities only).
Provide figures breakdown of expenditures for the categories below:
 - (i) Illicit connection/ illicit discharge program.
 - (ii) Development planning and approval
 - (iii) Construction program including inspection activities
 - (iv) Industrial/ Commercial program including inspection activities
 - (v) Public Agency Activities
 - (I) Maintenance and inspection of Treatment Control BMPs
 - (II) Municipal Street Sweeping

¹ "Potential contributions" and "potential to discharge," means adequate legal authority to prevent an actual discharge of pollutants to the municipal separate storm sewer system.

² The sources of funding may be the general funds, and/or Benefit Assessment, plan review fees, permit fees, industrial/ commercial user fee, revenue bonds, grants or other similar funding mechanism.

- (III) Municipal Drainage Maintenance including catch basin clean-outs
- (IV) Other costs associated with storm water management (describe)
- (vi) Public Information and Participation.
- (vii) Monitoring Program
- (viii) Miscellaneous Expenditures (describe)

D: Modifications/ Revisions

1. No later than (two years after the Order adoption date), each Permittee shall modify its storm water management programs, protocols, practices, and municipal codes to make them consistent with the requirements herein.

E. Designation and Responsibilities of the Principal Permittee

1. The Ventura County Watershed Protection District is hereby designated as the Principal Permittee. The Principal Permittee shall:
 - (a) Participate in the County Environmental Crimes Task Force
 - (b) Coordinate and facilitate activities necessary to comply with the requirements of this Order, but the Principal Permittee is not responsible for ensuring compliance of any other individual Permittee
 - (c) Coordinate permit activities among Permittees and act as liaison between the Permittees and the Regional Water Board on permitting issues
 - (d) Provide technical and administrative support for committees that will be organized to implement this Order and its requirements
 - (e) Evaluate, assess, and synthesize the results of the monitoring program and the effectiveness of the implementation of BMPs
 - (f) Convene the Committee Meetings constituted pursuant to subpart 4.F.1., below, upon designation of representatives
 - (g) Implement the Countywide Monitoring Program required under the Order and evaluate, assess and synthesize the results of the monitoring program
 - (h) Provide personnel and fiscal resources for the collection, processing and submittal to the Regional Water Board of monitoring and annual reports, and summaries of other reports required under this Order

F. Responsibilities of the Permittees

1. Each Permittee is required to comply with the requirements of this Order applicable to discharges within its boundaries (see Findings- Permit Coverage D.1 and D.2). Permittees are not responsible for the implementation of the provisions applicable to the Principal Permittee or other Permittees. Each Permittee shall:
 - (a) Comply with the requirements of this Order and any modifications thereto

- (b) Coordinate among its internal departments and agencies, as necessary, to facilitate the implementation of the requirements of this Order applicable to such Permittees in an efficient and cost-effective manner
- (c) Participate in intra-agency coordination (e.g., Planning Department, Fire Department, Building and Safety, Code Enforcement, Public Health, Parks and Recreation, and others) necessary to successfully implement the provisions of this Order
- (d) Report, in addition to the Budget Summary, any supplemental dedicated budgets for the same categories
- (e) Participate in Committee Meetings, as necessary

PART 4 - SPECIAL PROVISIONS (BASELINE)

A. General Requirements

1. This Order and the provisions herein are intended to develop, achieve, and implement a timely, comprehensive, cost-effective storm water pollution control program to reduce the discharge of pollutants in storm water to the MEP and not cause or contribute to exceedances of water quality standards for the permitted areas in the County of Ventura.
2. Best Management Practice Substitution
 - (a) The Regional Water Board Executive Officer may approve any site-specific BMP substitution upon written request by a Permittee(s) and after public notice, if the Permittee can document that:
 - (1) The proposed alternative BMP or program will meet or exceed the objective of the original BMP or program in the reduction of storm water pollutants.
 - (2) The fiscal burden of the original BMP or program is greater than the proposed alternative and does not achieve a greater improvement in storm water quality.
 - (3) The proposed alternative BMP or program will be implemented within a similar period of time.
 - (4) BMP substitution will be in accordance with the public review provisions of the Order (Part 7.C.1 and Part 7.C.2).

B. Watershed Initiative Participation

1. The Principal Permittee shall participate in water quality meetings for watershed management and planning, including but not limited to the following:
 - (a) Southern California Stormwater Monitoring Coalition (SMC)
 - (b) Other Watershed planning groups as appropriate
2. The Principal Permittee shall participate in the following regional water quality programs, and projects for watershed management and planning:

- (a) SMC Regional Monitoring Programs
 - (1) Southern California Regional Bioassessment
 - (A) Level of effort per watershed
 - (i) Probabilistic sites per watershed
 - (I) Ventura River - Six
 - (II) Santa Clara River - Three
 - (III) Calleguas Creek - Six
 - (ii) Integrator sites per watershed
 - (I) Ventura River - One
 - (II) Santa Clara River - One
 - (III) Calleguas Creek - One
 - (iii) Fixed bioassessment sites
 - (I) The Permittees shall perform bioassessment at one fixed urban site in each major watershed. Site selection shall be determined by the results of the first year SMC results, as approved by the Executive Officer.
- (b) Southern California Bight Projects
 - (1) Regional Monitoring Survey - 2008, and successive years.

C. Public Information and Participation Program (PIPP)

1. The Principal Permittee shall implement a Public Information and Participation Program (PIPP) that includes, but is not limited to, the requirements listed in this part. The Principal Permittee shall coordinate with Permittees to implement specific PIPP requirements. The objectives of the PIPP are as follows:
 - (a) To increase the knowledge of the target audience about the MS4, the adverse impacts of storm water pollution on receiving waters and potential solutions to mitigate the impacts
 - (b) To change the waste disposal and storm water pollution generation behavior of target audiences by encouraging implementation of appropriate solutions
 - (c) To involve and engage communities in Ventura County to participate in mitigating the impacts of storm water pollution
2. Residential Program
 - (a) "No Dumping" Message
Each Permittee shall label all storm drain inlets that they own with a legible "no dumping" message. In addition, signs with prohibitive language discouraging illegal dumping shall be posted at designated public access points to creeks, other relevant waterbodies, and channels. Signage and storm drain messages shall be legible and maintained.
 - (b) Public Reporting
Each Permittee shall identify staff who will serve as the contact person(s) for reporting clogged catch basin inlets and illicit discharges/dumping, faded or missing catch basin labels, and general storm water management information.

Permittees shall include this information, updated by July 1 of each year, in public information media such as the government pages of the telephone book, and internet web sites. The Principal Permittee shall compile a list of the general public reporting contacts submitted by all Permittees and make this information available on the web site (<http://www.vcstormwater.org/contact.htm>) and upon request. Each Permittee is responsible for providing current, updated information to the Principal Permittee.

(c) Outreach and Education

- (1) Collaboratively, the Permittees shall implement the following activities:
 - (A) Conduct a Storm Water pollution prevention advertising campaign.
 - (B) Conduct Storm Water pollution prevention public service announcements.
 - (C) Distribute storm water pollution prevention public education materials no later than (365 days after Order adoption date) to:
 - (i) Automotive parts stores
 - (ii) Home improvement centers/ lumber yards/ hardware stores
 - (iii) Pet shops/ feed stores
 - (D) Public education materials shall include, but are not limited to information on the proper disposal, storage, and use of:
 - (i) Vehicle waste fluids
 - (ii) Household waste materials
 - (iii) Construction waste materials
 - (iv) Pesticides and fertilizers (including integrated pest management practices-IPM)
 - (v) Green waste (including lawn clippings and leaves)
 - (vi) Animal wastes
 - (E) Work with existing local watershed groups or organize watershed Citizen Advisory Groups/ Committees to develop effective methods to educate the public about storm water pollution no later than (365 days after Order adoption date).
 - (F) Organize events targeted to residents and population subgroups; and
 - (G) Maintain the Countywide storm water website (www.vcstormwater.org), which shall include educational material listed in the preceding subpart C.2(c)(1)(D).
- (2) The Principal Permittee shall develop a strategy to educate ethnic communities through culturally effective methods. Details of this strategy should be incorporated into the PIPP, and implemented, no later than (365 days after Order adoption date).
- (3) Each Permittee shall continue the existing outreach program to residents on the proper disposal of litter, green waste, pet waste, proper vehicle maintenance, lawn care and water conservation practices.
- (4) Each Permittee shall conduct educational activities within its jurisdiction and participate in countywide events.
- (5) The Permittees shall make a minimum of 5 million impressions per year to the general public related to storm water quality, with a minimum of 2.5

million impressions via newspaper, local TV access, local radio and/ or internet access.

- (6) The Principal Permittee, in cooperation with the Permittees, shall provide schools within each School District in the County with materials, including, but not limited to, videos, live presentations, and other information necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution. Alternatively, a Permittee may submit a plan to the Regional Water Board Executive Officer for consideration no later than (90 days after Order adoption date), to provide outreach in lieu of the school curriculum. Pursuant to Water Code section 13383.6, the Permittees, in lieu of providing educational materials/ funding to School Districts in the County, may opt to provide an equivalent amount of funds or fraction thereof to the Environmental Education Account established within the State Treasury.
- (7) Each Permittee shall provide the contact information for their appropriate staff responsible for storm water public education activities to the Principal Permittee and contact information changes no later than 30 days after a change occurs.
- (8) The Permittees shall develop and implement a behavioral change assessment strategy no later than (365 days after Order adoption date) in order to determine whether the PIPP is demonstrably effective in changing the behavior of the public. The strategy shall be developed based on current sociological data and studies.

(d) Pollutant-Specific Outreach

The Principal Permittee, in cooperation with the Permittees, shall coordinate to develop outreach programs that focus on metals, urban pesticides, bacteria and nutrients as the pollutants of concern no later than (365 days after Order adoption date). Metals may be appropriately addressed through the Industrial/ Commercial Facilities Program (e.g. the distribution of educational materials on appropriate BMPs for metal fabrication and recycling facilities that have been identified as a potential source). Region-wide pollutants may be included in the Principal Permittee's mass media outreach program.

3. Businesses Program

(a) Corporate Outreach

- (1) The Permittees shall work with other regional or statewide agencies and associations such as the California Storm Water Quality Association (CASQA), to develop and implement a Corporate Outreach program to educate and inform corporate franchise operators and/or local facility managers about storm water regulations and BMPs. Once developed, the program shall target a minimum of four Retail Gasoline Outlets (RGO) franchisers and cover a minimum of 80% of RGO franchisees in the county, four retail automotive parts franchisers, two home improvement center franchisers and six restaurant franchisers. Corporate outreach for all target facilities shall be conducted not less than twice during the term of this

Order, with the first outreach contact to begin no later than two years after Order adoption date. At a minimum, this program shall include:

- (A) Confer with franchise operators and/or local facility managers to explain storm water regulations.
- (B) Distribution and discussion of educational material regarding storm water pollution and BMPs, and provide managers with recommendations to facilitate employee and facility compliance with storm water regulations.

(b) Business Assistance Program

- (1) The Permittees shall implement a Business Assistance Program to provide technical information to small businesses to facilitate their efforts to reduce the discharge of pollutants in storm water. The Program shall include:
 - (A) On-site, telephone or e-mail consultation regarding the responsibilities of businesses to reduce the discharge of pollutants, procedural requirements, and available guidance documents.
 - (B) Distribution of storm water pollution prevention education materials to operators of auto repair shops, car wash facilities (including mobile car detailing), mobile carpet cleaning services, commercial pesticide applicator services and restaurants.

D. Industrial/ Commercial Facilities Program

I. Each Permittee shall require implementation of pollutant reduction and control measures, unless precluded by local ordinances, at industrial and commercial facilities, with the objective of reducing pollutants in storm water. Except where specified otherwise in this Order, pollutant reduction and control measures may be used alone or in combination, and may include Treatment Control, Source Control BMPs, and operation and maintenance procedures, which may be applied before, during, and/ or after pollutant generating activities. At a minimum, the Industrial/ Commercial Facilities Control Program shall include requirements to:

- (a) Track
- (b) Inspect
- (c) Ensure compliance with municipal ordinances at industrial and commercial facilities that are critical sources of pollutants in storm water

1. Inventory of Critical Sources

- (a) Each Permittee shall maintain a watershed-based inventory or database of all facilities within its jurisdiction that are critical sources of storm water pollution. Critical Sources to be tracked are summarized below, and specified in Attachment "D":
 - (1) Commercial Facilities
 - (A) Restaurants
 - (B) Automotive service facilities
 - (C) RGOs and automotive dealerships

- (D) Nurseries and nursery centers
 - (2) U.S. EPA Phase I, II Facilities
 - (3) Other Federally-mandated Facilities [as specified in 40 CFR 122.26(d)(2)(iv)(C)]
 - (A) Municipal landfills
 - (B) Hazardous waste treatment, disposal, and recovery facilities
 - (C) Facilities subject to SARA Title III (also known as the Emergency Planning and Community Right-to-Know Act (EPCRA))
 - (b) Each Permittee shall include the following minimum fields of information for each critical source industrial and commercial facility
 - (1) Name of facility and name of owner/ operator.
 - (2) Address of facility
 - (3) Coverage under the IASGP or other individual or general NPDES permits or any applicable waiver issued by the Regional or State Board pertaining to runoff discharges.
 - (4) A narrative description including Standard Industrial Classification (SIC) System/ North American Industry Classification System (NAICS) codes that best describe the industrial activities performed and principal products used at each facility and status of exposure to storm water.
 - (c) The Regional Water Board recommends that Permittees include additional fields of information, such as material usage and/ or industrial output, and discrepancies between SIC System/ NAICS Code designations (as reported by facility operators) and identify the actual type of industrial activity that has the potential to pollute storm water. In addition, the Regional Water Board recommends the use of an automated database system, such as a Geographical Information System (GIS) or Internet-based system.
 - (d) Each Permittee shall update its inventory of critical sources at least annually. The update may be accomplished through collection of new information obtained through field activities or through other readily available inter and intra-agency informational databases (e.g. business licenses, pretreatment permits, sanitary sewer hook-up permits, and similar information).
2. Inspect Critical Sources
- (a) Commercial Facilities
Permittee shall inspect all facilities identified in subpart 4.D.1. twice during the 5-year term of the Order, provided that the first inspection occurs no later than (2 years after Order adoption date). A minimum interval of 6 months between the first and the second mandatory compliance inspection is required. In addition, each Permittee shall implement the activities outlined in the following subparts. At each facility, inspectors shall verify that the operator is implementing the source control BMPs. The Permittees may require implementation of additional BMPs where storm water flows from the MS4 discharge to an environmentally sensitive area (ESA, see Part 6 for definition) or a CWA § 303(d) listed waterbody (see subpart 3(b) below).

- (1) Restaurants-
 Level of inspections: Each Permittee shall inspect all restaurants within its jurisdiction to confirm that storm water BMPs are being effectively implemented in compliance with State law, County and municipal ordinances. BMPs in Table 2 (BMPs at Restaurants) shall be implemented, unless the pollutant generating activity does not occur.

Table 2 - BMPs at Restaurants

Pollutant-Generating Activity	BMP Narrative Description	2003 California Stormwater BMP Handbook Industrial and Commercial BMP Identification #
Waste/ Hazardous Materials Storage, Handling and Disposal	Implementation of effective storage, handling and disposal procedures for hazardous materials.	By Municipality
Unauthorized Non-Storm Water Discharges	Effective elimination of non-storm water discharges.	SC-10
Accidental Spills/ Leaks	Implementation of effective spills/ leaks prevention and response procedures.	SC-11
Outdoor Storage of Raw Materials	Implementation of effective source control practices and structural devices.	SC-33
Storage and Handling of Solid Waste	Implementation of effective solid waste storage/ handling practices and appropriate control measures	SC-34
Parking/ Storage Area Maintenance	Implementation of effective parking/ storage area designs and housekeeping/ maintenance practices	SC-43
Storm Water Conveyance System Maintenance	Implementation of proper conveyance system operation and maintenance protocols.	SC-44

(2) Automotive Service Facilities-

Level of Inspection: Each Permittee shall confirm that BMPs are being effectively implemented at each facility within its jurisdiction, in compliance with County and municipal ordinances. The inspections shall verify that BMPs in Table 3 (BMPs at Automotive Service Facilities) are being implemented, unless the pollutant generating activity does not occur.

Table 3 - BMPs at Automotive Service Facilities

Pollutant-Generating Activity	BMP Narrative Description	2003 California Stormwater BMP Handbook Industrial and Commercial BMP Identification #
Unauthorized Non-Storm Water Discharges	Effective elimination of non-storm water discharges.	SC-10
Accidental Spills/ Leaks	Implementation of effective spills/ leaks prevention and response procedures.	SC-11
Vehicle/ Equipment Fueling	Implementation of effective fueling source control devices and practices.	SC-20
Vehicle/ Equipment Cleaning	Implementation of effective equipment/ vehicle cleaning practices and appropriate wash water management practices	SC-21
Vehicle/ Equipment Repair	Implementation of effective vehicle/ equipment repair practices and source control devices.	SC-22
Outdoor Liquid Storage	Implementation of effective outdoor liquid storage source controls and practices.	SC-31
Outdoor Storage of Raw Materials	Implementation of effective source control practices and structural devices.	SC-33
Storage and Handling of Solid Waste	Implementation of effective solid waste storage/ handling practices and appropriate control measures	SC-34
Parking/ Storage Area Maintenance	Implementation of effective parking/ storage area designs and housekeeping/ maintenance practices	SC-43
Storm Water Conveyance System Maintenance Practices	Implementation of proper conveyance system operation and maintenance protocols.	SC-44

- (3) Retail Gasoline Outlets and Automotive Dealerships-
 Level of Inspections: Each Permittee shall confirm that BMPs are being effectively implemented at each facility within its jurisdiction, in compliance with County and municipal ordinances. The inspections shall verify that BMPs in Table 4 (BMPs at Retail Gasoline Outlets) are being implemented, unless the pollutant generating activity does not occur.

Table 4 - BMPs at Retail Gasoline Outlets

Pollutant-Generating Activity	BMP Narrative Description	2003 California Stormwater BMP Handbook Industrial and Commercial BMP Identification #
Unauthorized Non-Storm Water Discharges	Effective elimination of non-storm water discharges.	SC-10
Accidental Spills/ Leaks	Implementation of effective spills/ leaks prevention and response procedures.	SC-11
Vehicle/ Equipment Fueling	Implementation of effective fueling source control devices and practices.	SC-20
Vehicle/ Equipment Cleaning	Implementation of effective wash water control devices.	SC-21
Outdoor Storage of Raw Materials	Implementation of effective source control practices and structural devices.	SC-33
Storage and Handling of Solid Waste	Implementation of effective solid waste storage/ handling practices and appropriate control measures	SC-34
Building and Grounds Maintenance	Implementation of effective facility maintenance practices.	SC-41
Parking/ Storage Area Maintenance	Implementation of effective parking/ storage area designs and housekeeping/ maintenance practices	SC-43

- (4) Commercial Nurseries and Nursery Centers (Merchant Wholesalers, Nondurable Goods, and Retail Trade)-

Level of Inspection: Each Permittee shall confirm that BMPs are being effectively implemented at each facility within its jurisdiction, in compliance with County and municipal ordinances. The inspections shall verify that BMPs in Table 5 (BMPs at Nurseries) are being implemented, unless the pollutant generating activity does not occur.

Table 5 - BMPs at Nurseries

Pollutant-Generating Activity	BMP Narrative Description	2003 California Stormwater BMP Handbook Industrial and Commercial BMP Identification #
Unauthorized Non-Storm Water Discharges	Effective elimination of non-storm water discharges.	SC-10
Outdoor Loading/ Unloading	Implementation of effective outdoor loading/ unloading practices.	SC-30
Outdoor Liquid Storage	Implementation of effective outdoor liquid storage source controls and practices.	SC-31
Outdoor Equipment Operations	Implementation of effective outdoor equipment source control devices and practices.	SC-32
Outdoor Storage of Raw Materials	Implementation of effective source control practices and structural devices.	SC-33
Building and Grounds Maintenance	Implementation of effective facility maintenance practices.	SC-41

(b) Industrial Facilities

Each Permittee shall conduct compliance inspections as specified below.

(1) **Frequency of Inspection**

- (A) Each Permittee shall perform an initial inspection at all industrial facilities identified by the U.S. EPA in 40 CFR 122.26(c) no later than (2 years after Order adoption date). After the initial inspection, all facilities determined as having exposure of industrial activities to storm water are subject to a second mandatory compliance inspection. A minimum interval of 6 months between the first and the second compliance inspection is required.
- (B) Following the first mandatory compliance inspection, a Permittee shall perform a second mandatory compliance inspection yearly at a minimum of 20% of the facilities determined not to have exposure of industrial activities to storm water. The purpose of this inspection is to verify the continuity of the no exposure status. Facilities determined

as having exposure will be notified that they must obtain coverage under the IASGP. A facility need not be inspected more than twice during the term of the Order unless subject to an enforcement action. A minimum interval of 6 months in between the first and the second compliance inspection is required.

- (C) Applicable to all facilities: A Permittee need not inspect facilities that have been inspected by the Regional Water Board within the previous 24 month interval. However, if the Regional Water Board performed only one inspection, the Permittee shall conduct the second required mandatory compliance inspection.
 - (2) **Level of Inspection:** Each Permittee shall confirm that each operator:
 - (A) Has a current Waste Discharge Identification (WDID) number for facilities discharging storm water associated with industrial activity, and that a Storm Water Pollution Prevention Plan (SWPPP) is available on-site.
 - (B) Is effectively implementing BMPs in compliance with County and municipal ordinances. Facilities must implement the source control BMPs identified in subpart 4.D.2. and Appendix D, *California Stormwater Industrial and Commercial BMP Handbook (2003)*; or
 - (C) Has applied and has a current No Exposure Certification (and WDID number) for facilities subject to this requirement.
3. **Ensure Compliance of Critical Sources**
- (a) **BMP Implementation:** Facilities must implement the source control BMPs identified in Part 4.D.2. and, as applicable, Appendix D, *California Stormwater Industrial and Commercial BMP Handbook (2003)*. In the event that a Permittee determines that a BMP is infeasible at any site, the Permittee shall require implementation of similar BMPs that will achieve the equivalent reduction of pollutants in the storm water discharges. Likewise, for those BMPs that are not protective of water quality standards, Permittees may require additional site-specific controls.
 - (b) **Environmentally Sensitive Areas (ESAs) and Impaired Waters:** For critical sources that discharge to MS4s that directly discharge to ESAs or to CWA § 303(d) listed impaired waterbodies, the Permittees shall require operators to implement additional pollutant specific controls to reduce pollutants in storm water runoff that are causing or contributing to exceedances of water quality objectives. A Regional Water Board approved TMDL Implementation Plan for the receiving water will substitute for this requirement.
 - (c) **Progressive Enforcement:** Each Permittee shall implement a progressive enforcement policy to ensure that facilities are brought into compliance with all storm water requirements within a reasonable time period as specified below.
 - (1) In the event that a Permittee determines, based on an inspection conducted, that an operator has failed to adequately implement all necessary BMPs, that Permittee shall take progressive enforcement actions which, at a minimum,

shall include a follow-up inspection within 4 weeks from the date of the initial inspection.

- (2) In the event that a Permittee determines that an operator has failed to adequately implement BMPs after a follow-up inspection, that Permittee shall take enforcement action as established through authority in its municipal code and ordinances or through the judicial system.
- (3) Each Permittee shall maintain records and make them available on request to the Regional Water Board, including inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating a good faith effort to bring facilities into compliance.

4. Interagency Coordination

(a) **Referral of Violations of the Municipal Storm Water Ordinances and California Water Code § 13260:** A Permittee may refer a violation(s) of § 13260 by Industrial and Commercial facilities to the Regional Water Board provided that under its municipal storm water ordinance the Permittee has made a good faith effort of progressive enforcement. At a minimum, a Permittee's good faith effort must be documented with:

- (1) Two follow-up inspections
- (2) Two warning letters or notices of violation

(b) **Referral of Violations of the Industrial Activities Storm Water General Permit (IASGP), including Requirements to File a Notice of Intent or No Exposure Certification:** For those facilities in violation of the municipal storm water ordinance and subject to the IASGP, Permittees may escalate referral of such violations to the Regional Water Board (electronically on a quarterly basis to the Regional Water Board's Storm Water Site at MS4stormwaterrb4@waterboards.ca.gov) after one inspection and one written notice (copied to the Regional Water Board) to the operator regarding the violation. In making such referrals, Permittees shall include, at a minimum, the following documentation:

- (1) Name of the facility
- (2) Operator of the facility
- (3) Owner of the facility
- (4) WDID Number (if applicable)
- (5) Industrial activity being conducted at the facility that is subject to the IASGP
- (6) Records of communication with the facility operator regarding the violation, which shall include at least an inspection report
- (7) The written notice of the violation copied to the Regional Water Board

- (c) **Investigation of Complaints Regarding Facilities – Transmitted by the Regional Water Board Staff:** Each Permittee shall initiate, within one business day,¹ investigation of complaints (other than non-storm water discharges) to the MS4 from facilities within its jurisdiction. The initial investigation shall include, at a minimum, a limited inspection of the facility to confirm the complaint to determine if the facility is effectively complying with the municipal storm water urban runoff ordinances and, if necessary, to oversee corrective action.
- (d) **Assistance of Regional Water Board Enforcement Actions:** As directed by the Regional Water Board Executive Officer, Permittees shall assist Regional Water Board enforcement actions by: helping in identification of current owners, operators, and lessees of facilities; providing staff, when available, for joint inspections with Regional Water Board inspectors; appearing as witnesses in Regional Water Board enforcement hearings; and providing copies of inspection reports and other progressive enforcement documentation.
- (e) **Participation in a Task Force:** The Permittees shall participate with the Regional Water Board, and other public agencies on an enforcement task force such as the Storm Water Task Force, to communicate concerns regarding special cases of storm water violations by industrial and commercial facilities and to develop a coordinated approach to enforcement action.

E. Planning and Land Development Program

I. Purpose

- 1. The Permittees shall implement a Planning and Land Development Program pursuant to part 4.E. for all New Development and Redevelopment projects subject to this Order to:
 - (a) Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, safeguarding of environmentally sensitive areas, mixing of land uses (e.g., homes, offices, and shops), transit accessibility, and better pedestrian and bicycle amenities.
 - (b) Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of waterbodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21100).
 - (c) Minimize the percentage of effective impervious surfaces on land developments to mimic predevelopment water balance through infiltration, evapotranspiration and reuse.

¹ Permittees may comply with the Permit by taking initial steps (such as logging, prioritizing, and tasking) to “initiate” the investigation within that one business day. However, the Regional Water Board would expect that the initial investigation, including a site visit, to occur within four business days.

- (d) Minimize pollutant loadings from impervious surfaces such as roof-tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), Low Impact Development Strategies, and Treatment Control BMPs.
- (e) Properly select, design and maintain Treatment Control BMPs and Hydromodification Control BMPs to address pollutants that are likely to be generated, assure long-term function, and to avoid the breeding of vectors.¹
- (f) Prioritize the selection of BMPs suites to remove storm water pollutants, reduce storm water runoff volume, and beneficially reuse storm water to support an integrated approach to protecting water quality and managing water resources in the following order of preference:
 - (1) Infiltration BMPs
 - (2) BMPs that store and reuse storm water runoff.
 - (3) BMPs that incorporate vegetation to promote pollutant removal and runoff volume reduction and integrate multiple uses
 - (4) BMPs which percolate runoff through engineered soil and allow it to discharge downstream slowly
 - (5) Approved modular/ proprietary treatment control BMPs that are based on LID concepts and that meet pollution removal goals

II. Applicability

1. New Development Projects.

- (a) Development projects subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution, prior to completion of the project(s), are:
 - (1) All development projects equal to 1 acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area
 - (2) Industrial park 10,000 square feet or more of surface area
 - (3) Commercial strip mall 10,000 square feet or more of impervious surface area
 - (4) Retail gasoline outlet 5,000 square feet or more of surface area
 - (5) Restaurant (SIC 5812) 5,000 square feet or more of surface area
 - (6) Parking lot 5,000 square feet or more of impervious surface area, or with 25 or more parking spaces
 - (7) Streets, roads, highways, and freeway construction of 10,000 square feet or more of impervious surface area shall incorporate USEPA guidance regarding Managing Wet Weather with Green Infrastructure: Green Streets to the maximum extent practicable.
 - (8) Automotive service facilities (SIC 5013, 5014, 5511, 5541, 7532-7534 and 7536-7539) [5,000 square feet or more of surface area]

¹ Treatment BMPs when designed to drain within 72 hours of the end of rainfall minimize the potential for the breeding of vectors.

- (9) Redevelopment projects in subject categories that meet Redevelopment thresholds (identified in subpart E.II.2 below)
- (10) Projects located in or directly adjacent to, or discharging directly to an Environmentally Sensitive Area (ESA), where the development will:
 - (A) Discharge storm water runoff that is likely to impact a sensitive biological species or habitat; and
 - (B) Create 2,500 square feet or more of impervious surface area
- (11) Single-family hillside homes. To the extent that a Permittee may lawfully impose conditions, mitigation measures or other requirements on the development or construction of a single-family home in a hillside area as defined in the applicable Permittee's Code and Ordinances, each Permittee shall require that during the construction of a single-family hillside home, the following measures to be implemented:
 - (A) Conserve natural areas
 - (B) Protect slopes and channels
 - (C) Provide storm drain system stenciling and signage
 - (D) Divert roof runoff to vegetated areas before discharge unless the diversion would result in slope instability
 - (E) Direct surface flow to vegetated areas before discharge unless the diversion would result in slope instability

2. Redevelopment Projects

- (a) Redevelopment projects subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution, prior to completion of the project(s), are:
 - (1) Land-disturbing activity that results in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site on development categories identified in subpart 4.E.III.1.
 - (2) Where Redevelopment results in an alteration to more than fifty percent of impervious surfaces of a previously existing development, and the existing development was not subject to post development storm water quality control requirements, the entire project must be mitigated.
 - (3) Where Redevelopment results in an alteration to less than fifty percent of impervious surfaces of a previously existing development, and the existing development was not subject to post development storm water quality control requirements, only the alteration must be mitigated, and not the entire development.
- (b) Redevelopment does not include routine maintenance activities that are conducted to maintain original line and grade, hydraulic capacity, original purpose of facility or emergency redevelopment activity required to protect public health and safety. Impervious surface replacement, such as the reconstruction of parking lots and roadways which does not disturb additional area and maintains the original grade and alignment, is considered a routine maintenance activity. Redevelopment does not include the repaving of existing roads to maintain original line and grade.

- (c) Existing single-family dwelling and accessory structures are exempt from the Redevelopment requirements unless such projects create, add, or replace 10,000 square feet of impervious surface area.
3. Effective Date –The New Development and Redevelopment requirements contained in Section E of the Order shall begin (90 calendar days) after Regional Water Board Executive Officer approval of the changes to the Technical Guidance Manual needed to comply with this permit. After that date all discretionary permit projects or project phases that have not been deemed complete for processing, or discretionary permit projects without vesting tentative maps that have not requested and received an extension of previously granted approvals must comply with the requirements in Section E. Projects that have been deemed complete prior to the update of the technical design manual are not subject to this section. For Permittee's projects the effective date shall be the date the governing body or their designee approves initiation of the project design.

III. New Development/ Redevelopment Performance Criteria

1. Integrated Water Quality/ Flow Reduction/Resources Management Criteria
- (a) Except as provided in subpart 4.E.III.1.(c) below, Permittees shall require all New Development and Redevelopment projects identified in subpart 4.E.II to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces through infiltration, storage for reuse, evapotranspiration, or bioretention/ biofiltration by reducing the percentage of Effective Impervious Area (EIA) to 5 percent or less of the total project area.
- (b) Impervious surfaces may be rendered "ineffective", and thus not count toward the 5 percent EIA limitation, if the stormwater runoff from those surfaces is fully retained on-site for the design storm event specified in provision (c), below. To satisfy the EIA limitation and low-impact development requirements, the permittees must require stormwater runoff to be infiltrated, reused, or evapotranspired on-site through a stormwater management technique allowed under the terms of this permit and implementing documents. If on-site retention is determined to be technically infeasible pursuant to 4.E.III.2(b), an on-site biofiltration system that achieves equivalent stormwater volume and pollutant load reduction as would have been achieved by on-site retention shall satisfy the EIA limitation. An on-site biofiltration system that releases above the design volume shall achieve 1.5 times the amount of stormwater volume and pollutant load reduction as would have been achieved by on-site retention and, thereby, shall satisfy the EIA limitation.
- (c) The permittees shall require all features constructed or otherwise utilized to render impervious surfaces "ineffective", as described in provision (b), above, to be properly sized to infiltrate, store for reuse, or evapotranspire, without any runoff at least the volume of water, or in the case of biofiltration with release above the design volume, 1.5 times the volume of water, that results from:

- (1) The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area using a 48 to 72-hour draw down time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998);
 - (2) The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the Ventura County Technical Guidance Manual for Storm Water Quality Control Measures (July 2002 and its revisions); or
 - (3) The volume of runoff produced from a 0.75 inch storm event.
- (d) To address any impervious surfaces that may not be rendered "ineffective", surface discharge of stormwater runoff if any, that results from New Development and Redevelopment projects identified in subpart 4.E.II which have complied with subparts 4.E.III.1.(a)-(c), above, shall be mitigated in accordance with subpart 4.E.III.4.

2. Alternative Compliance for Technical Infeasibility

- (a) To encourage smart growth and infill development of existing urban centers where on-site compliance with post-construction requirements may be technically infeasible, the permittees may allow projects that are unable to meet the Integrated Water Quality/Flow Reduction/Resources Management Criteria in subpart 4.E.III.1, above, to comply with this permit through the alternative compliance measures described in subpart 4.E.III.2.(c), below.
- (b) To utilize alternative compliance measures, the project applicant must demonstrate that compliance with the applicable post-construction requirements would be technically infeasible by submitting a site-specific hydrologic and/or design analysis conducted and endorsed by a registered professional engineer, geologist, architect, and/or landscape architect. Technical infeasibility may result from conditions including the following:
 - (1) Locations where seasonal high groundwater is within 5 feet of the surface
 - (2) Locations within 100 feet of a groundwater well used for drinking water
 - (3) Brownfield development sites or other locations where pollutant mobilization is a documented concern
 - (4) Locations with potential geotechnical hazards
 - (5) Smart growth and infill or redevelopment locations where the density and/or nature of the project would create significant difficulty for compliance with the on-site volume retention requirement
 - (6) Other site or implementation constraints identified in the LID Technical Guidance document required by subpart 4.E.IV.4.
- (c) Alternative Compliance Measures. When a permittee finds that a project applicant has demonstrated technical infeasibility, the permittee shall identify alternative compliance measures that the project will need to comply with as a substitute for the otherwise applicable post-construction requirements listed in subparts 4.E.III.1.(a)-(c) of this permit. The Ventura County Technical Guidance Manual shall be revised to identify the alternative compliance measures and shall include the following requirement:

- (1) Minimum on-site requirement. The project must take all feasible measures to reduce the percentage of Effective Impervious Area to no more than 30 percent of the total project area and treat all remaining runoff pursuant to the design and sizing requirements of subparts 4.E.III.1.(b)-(d).
- (2) Offsite mitigation volume. The difference in volume between the amount of stormwater infiltrated, reused, and/ or evapotranspired and/or biofiltered by the project on-site and the otherwise applicable requirements of subparts 4.E.III.1.(a)-(c) (the "offsite mitigation volume"), above, must be mitigated by the project applicant either by performing offsite mitigation that is approved by the permittee or by providing sufficient funding for public or private offsite mitigation to achieve equivalent stormwater volume and pollutant load reduction through infiltration, reuse, evapotranspiration and/ or biofiltration.
 - For projects with demonstrable technical infeasibility that cannot reduce the Effective Impervious Area to 5% or less of the total project, but are able to reduce the Effective Impervious Area to no more than 30 percent of the total project, mitigation or payment in lieu must be equivalent to the amount of stormwater not managed on site.
 - For projects with demonstrable technical infeasibility that cannot reduce the Effective Impervious Area to 30% of the total project or less, mitigation or payment in lieu must be for 1.5 times the amount of stormwater not managed on site
- (3) Location of off site mitigation. Offsite mitigation projects must be located in the same sub-watershed (defined as draining to the same hydrologic area in the Basin Plan) as the new development or redevelopment project. A list of eligible public and private offsite mitigation projects available for funding shall be identified by the Permittees and provided to the project applicant. Off site mitigation projects include green streets projects, parking lot retrofits, other site specific LID BMPs, and regional BMPs. Project applicants seeking to utilize these alternative compliance provisions may propose other offsite mitigation projects, which the Permittees may approve if they meet the requirements of this subpart.
- (4) Timing and Reporting Requirements for Offsite Mitigation Projects. The Permittee(s) shall develop a schedule for the completion of offsite mitigation projects, including milestone dates to identify fund, design, and construct the projects. Offsite mitigation projects shall be completed as soon as possible, and at the latest, within 4 years of the certificate of occupancy for the first project that contributed funds toward the construction of the offsite mitigation project, unless a longer period is otherwise authorized by the Executive Officer. For public offsite mitigation projects, the permittees must provide in their annual reports a summary of total offsite mitigation funds raised to date and a description (including location, general design concept, volume of water expected to be retained, and total estimated budget) of all pending public offsite mitigation projects. Funding sufficient to address the offsite mitigation volume must be

transferred to the permittee (for public offsite mitigation projects) or to an escrow account (for private offsite mitigation projects) within one year of the initiation of construction.

- (5) The project applicant must demonstrate that the EIA achieved on-site is as close to 5 percent EIA as technically feasible, given the site's constraints.
 - (d) Watershed equivalence. Regardless of the methods through which permittees allow project applicants to implement alternative compliance measures, the sub-watershed-wide (defined as draining to the same hydrologic area in the Basin Plan) result of all development must be at least the same level of water quality protection as would have been achieved if all projects utilizing these alternative compliance provisions had complied with subparts 4.E.III.1.(a)-(d) of the permit. The permittees shall provide in their annual report to the Regional Board a list of mitigation project descriptions and pollutant and flow reduction analyses (compiled from design specifications submitted by project applicants and approved by the permittee(s)) comparing the expected aggregate results of alternative compliance projects to the results that would otherwise have been achieved by meeting the 5 percent EIA requirement on-site.
3. Hydromodification (Flow/ Volume/ Duration) Control Criteria
- (a) Each Permittee shall require all New Development and Redevelopment projects identified in subpart 4.E.II to implement hydrologic control measures, to prevent accelerated downstream erosion and to protect stream habitat in natural drainage systems. The purpose of the hydrologic controls is to minimize changes in post-development hydrologic storm water runoff discharge rates, velocities, and duration. This shall be achieved by maintaining the project's pre-project storm water runoff flow rates and durations.
 - (1) Description
 - (A) Hydromodification control in natural drainage systems shall be achieved by maintaining the Erosion Potential (E_p) in streams at a value of 1, unless an alternative value can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and damage stream habitat (see Attachment "E" - Determination of Erosion Potential)
 - (B) Hydromodification control may include one, or a combination of on-site, regional subregional hydromodification control BMPs, LID strategies, or stream restoration measures, with preference given to LID strategies and hydromodification control BMPs. Any in-stream restoration measure shall not adversely affect the beneficial uses of the natural drainage systems
 - (C) Natural drainage systems, which include unlined or unimproved (not engineered) creeks, streams, rivers and their tributaries, are located in the following watersheds:
 - (i) Ventura River
 - (ii) Santa Clara River

- (iii) Calleguas Creek
- (iv) Malibu Creek
- (v) Miscellaneous Ventura Coastal
- (D) The Southern California Storm Water Monitoring Coalition (SMC) is developing a regional methodology to eliminate or mitigate the adverse impacts of hydromodification as a result of urbanization, including hydromodification assessment and management tools.
 - (i) The SMC has identified the following objectives for the Hydromodification Control Study (HCS):
 - (I) Establishment of a stream classification for Southern California streams
 - (II) Development of a deterministic or predictive relationship between changes in watershed impervious cover and stream-bed/ stream bank enlargement
 - (III) Development of a numeric model to predict stream-bed/ stream bank enlargement and evaluate the effectiveness of mitigation strategies
- (E) The Permittees shall participate in the SMC HCS to develop:
 - (i) A regional stream classification system
 - (ii) A numerical model to predict the hydrological changes resulting from new development
 - (iii) A numerical model to identify effective mitigation strategies
- (F) Until the completion of the SMC HCS, Permittees shall implement the Interim Hydromodification Control Criteria, described in subpart 4.E.III.3(a)(3)(A) below, to control the potential adverse impacts of changes in hydrology that may result from new development and redevelopment projects identified in subpart 4.E.II
- (G) Existing single-family structures are exempt from the Hydromodification control requirements unless such projects disturb one acre or more of land or create, add, or replace 10,000 square feet or more of impervious surface area
- (2) Exemptions to Hydromodification Controls. Permittees may exempt the following New Development and Redevelopment projects from implementation of Hydromodification controls where assessments of downstream channel conditions and proposed discharge hydrology indicate that adverse Hydromodification effects to present and future beneficial uses of Natural Drainage Systems are unlikely:
 - (A) All projects that disturb less than one acre.
 - (B) Projects that are replacement, maintenance or repair of a Permittee's existing flood control facility, storm drain, or transportation network.
 - (C) Redevelopment Projects in the Urban Core that do not increase the effective impervious area or decrease the infiltration capacity of pervious areas compared to the pre-project conditions.

- (D) Projects that have any increased discharge go directly or via a storm drain to a sump, lake, area under tidal influence, into a waterway that has a 100-year peak flow (Q100) of 25,000 cfs or more, or other receiving water that is not susceptible to Hydromodification impacts;
 - (E) Projects that discharge directly or via a storm drain into concrete or improved (not natural) channels (e.g., rip rap, sackcrete, etc.), which, in turn, discharge into receiving water that is not susceptible to Hydromodification impacts (as in D above).
- (3) Interim Hydromodification Control Criteria
- (A) The Interim Hydromodification Control Criteria to protect natural drainage systems until Permittees complete Hydromodification Control Plans (HCPs), described in subpart 4.E.III.3(a)(4) below, are as follows:
 - (i) **Projects disturbing land area of less than fifty acres** will be subject to LID and/or source or treatment BMPs as addressed in this permit. The combined effects of LID and the treatment BMPs are considered adequate for Hydromodification control for projects that disturb less than 50 acres.
 - (ii) **Projects disturbing land areas of fifty acres or greater** Projects in this category shall develop and implement a Hydromodification Analysis Study (HAS) that demonstrates that post development conditions are expected to approximate the pre-project erosive effect of sediment transporting flows in receiving waters. The HAS must lead to the incorporation into the project design features intended to approximate, to the extent feasible, an Erosion Potential value of 1 or any alternative value that can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and damage stream habitat in natural drainage systems, or
 - (I) Alternatively, project proponents in this category may elect to develop, in partnership with Permittees, an equivalent implementation method based on flow duration control in the form of nomographs relating planned impervious area and local soil type (infiltration rates) to determine hydromodification control BMP volume and land area requirements for the proposed project. The nomographs shall be derived from continuous simulation modeling using Ventura County specific rain gauge records and soil types, and calibrated using data from a local undeveloped watershed with similar conditions; or
 - (II) Alternatively, the Co-Permittees may revise the Ventura County Technical Guidance Manual for Stormwater

Quality Control Measures to address projects that disturb more than 50 acres.

- (4) Final Criteria
 - (A) The Permittees shall develop and implement watershed specific HCPs no later than (180 days) after the completion of the SMC HCS.
 - (i) The HCP shall identify:
 - (I) Stream classifications
 - (II) Flow rate and duration control methods
 - (III) Sub-watershed mitigation strategies
 - (IV) Stream restoration measures, which will maintain the stream and tributary Erosion Potential at 1 unless an alternative value can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and damage stream habitat in natural drainage system tributaries
 - (B) The HCP shall contain the following elements:
 - (i) Hydromodification Management Standards
 - (ii) Natural Drainage Areas and Hydromodification Management Control Areas
 - (iii) New Development and Redevelopment Projects subject to the HCP
 - (iv) Description of authorized Hydromodification Management Control BMPs
 - (v) Hydromodification Management Control BMP Design Criteria.
 - (vi) For flow duration control methods, the range of flows to control for, and goodness of fit criteria
 - (vii) Allowable low critical flow, Q_c , which initiates sediment transport
 - (viii) Description of the approved Hydromodification Model.
 - (ix) Any alternate Hydromodification Management Model and Design
 - (x) Stream Restoration Measures Design Criteria
 - (xi) Monitoring and Effectiveness Assessment
 - (xii) Record Keeping
 - (C) The HCP shall be deemed in effect upon Executive Officer approval.

4. Water Quality Mitigation Criteria

- (a) Each Permittee shall require all New Development and Redevelopment projects identified in subpart 4.E.II to implement post-construction storm water treatment BMPs and control measures to mitigate storm water pollution as follows:
 - (1) Projects disturbing land areas less than 50 acres
 - (A) Volumetric Treatment Control BMP
 - (i) The 85th percentile 24-hour runoff event determined as the maximized capture storm water volume for the area using a 48 to

- 72-hour draw down time, from the formula recommended in *Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998)*; or
- (ii) The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the Ventura County Technical Guidance Manual for Storm Water Quality Control Measures (July 2002 and its revisions); or
 - (iii) The volume of runoff produced from a 0.75 inch storm event, prior to its discharge to a storm water conveyance system;¹
and/ or
- (B) Flow Based Treatment Control BMP
- (i) The flow of runoff produced from a rain event equal to at least 0.2 inches per hour intensity; or
 - (ii) The flow of runoff produced from a rain event equal to at least 2 times the 85th percentile hourly rainfall intensity as determined from local rainfall records; or
 - (iii) Eight percent of the 50-year storm design flow rate as determined from the method recommended in the Ventura County Technical Guidance Manual for Storm Water Quality Control Measures (July 2002 and its revisions)
- (2) Projects disturbing land area of 50 acres or greater
- (A) Eighty percent of the average runoff volume using an appropriate public domain continuous flow model (such as Storm Water Management Model (SWMM) or Hydrologic Engineering Center – Hydrologic Simulation Program – Fortran (HEC-HSPF), using the local rainfall record and relevant BMP Performance data.

IV. Implementation

- 1. Maintenance Agreement and Transfer
 - (a) Prior to issuing approval for final occupancy each Permittee shall require that all new development and redevelopment projects subject to post-construction BMP requirements provide an operation and maintenance plan and verification of ongoing maintenance provisions for LID practices, Treatment Control BMPs, and Hydromodification Control BMPs including but not limited to: final map conditions, legal agreements, covenants, conditions or restrictions, CEQA mitigation requirements, conditional use permits, and/ or other legally binding maintenance agreements:
 - (1) Verification at a minimum shall include the developer's signed statement accepting responsibility for maintenance until the responsibility is legally transferred; and either

¹ This option is available only for construction projects that disturb land area less than 5 acres.

- (A) A signed statement from the public entity assuming responsibility for BMP maintenance; or
 - (B) Written conditions in the sales or lease agreement, which require the property owner or tenant to assume responsibility for BMP maintenance and conduct a maintenance inspection at least once a year; or
 - (C) Written text in project covenants, conditions, and restrictions (CCRs) for residential properties assigning BMP maintenance responsibilities to the Home Owners Association (HOA); or
 - (D) Any other legally enforceable agreement or mechanism that assigns responsibility for the maintenance of BMPs.
- (b) Each Permittee shall require all development projects subject to post-construction BMP requirements to provide a plan for the operation and maintenance of all structural and treatment controls. The Operation and Maintenance plan shall follow the Technical Guidance Manual Appendix D "Maintenance Plan Guidance" (or subsequent guidance manual) for each BMP component. The plan shall be submitted for examination of relevance to keeping the BMPs in proper working order. Where BMPs are transferred to Permittee for ownership and maintenance, the plan shall also include all relevant costs for upkeep of BMPs in the transfer. Operation and Maintenance plans for private BMPs shall be kept on-site for periodic review by Permittee inspectors.
2. Tracking, Inspection, and Enforcement of Post-Construction BMPs
- (a) Each Permittee shall implement a tracking system and an inspection and enforcement program for new development and redevelopment post-construction storm water BMPs as set forth in part 4.E. no later than (one year after Order adoption date).
- (1) Implement a GIS or other electronic system for tracking projects that have been conditioned for post-construction BMPs. The electronic system, at a minimum, should contain the following information:
- (A) Municipal Project ID
 - (B) State WDID No
 - (C) Project Acreage
 - (D) BMP Type and Description
 - (E) BMP Location (coordinates)
 - (F) Date of Acceptance
 - (G) Date of Maintenance Agreement
 - (H) Maintenance Records
 - (I) Inspection Date and Summary
 - (J) Corrective Action
 - (K) Date Certificate of Occupancy Issued
 - (L) Replacement or Repair Date
- (b) Inspect all development sites upon completion of construction and prior to the issuance of occupancy certificates to ensure proper installation of LID measures,

- structural BMPs, treatment control BMPs and Hydromodification control BMPs. The inspection may be combined with other inspections provided it is conducted by trained personnel.
- (c) Verify proper maintenance and operation of post-construction BMPs previously approved for new development and redevelopment and operated by the Permittees. The post construction BMP maintenance inspection program shall incorporate the following elements:
 - (1) Post-construction BMP Maintenance Inspection checklist.
 - (2) Inspection at least once every 2 years, beginning (Order adoption date), of post-construction BMPs to assess operation conditions with particular attention to:
 - (3) Criteria and procedures for post construction Treatment Control and Hydromodification Control BMP repair, replacement, or re-vegetation.
 - (d) For post construction BMPs operated and maintained by parties other than the Permittees, the Permittees shall require annual reports by the other parties demonstrating proper maintenance and operations.
 - (e) Undertake enforcement as appropriate based on the results of the inspection.
3. Alternative Post Construction Storm Water Mitigation Programs
- (a) A Permittee or a coalition of Permittees may apply to the Regional Water Board for approval of a Redevelopment Project Area Master Plan (RPAMP) for redevelopment projects within the Redevelopment Project Areas, in consideration of exceptional site constraints that inhibit site-by-site or project-by-project implementation of post-construction requirements.
 - (b) Upon review and a determination by the Regional Water Board Executive Officer that the proposal is technically valid and appropriate, the Regional Water Board may consider for approval such a program if its implementation will:
 - (1) Result in equivalent or superior reduction of storm water pollutant loads in comparison to individual projects regulated by this permit.
 - (2) Satisfy, on a Redevelopment Project Area-wide basis, the hydromodification criteria of this section.
 - (3) Reduce the percentage of Effective Impervious Area (EIA) to a target of 5 percent or less of the Redevelopment Project Area, using properly sized storm water treatment/ collection features, as described in this Section.
 - (4) Be fiscally sustainable and have secure funding; and
 - (5) Be completed in four years of the adoption date of this permit.
 - (c) The RPAMP should prioritize the implementation of LID storm water mitigation measures, as described in this section.
 - (d) A Permittee or a coalition of Permittees may apply to the Regional Water Board for approval of a Redevelopment Project Area Master Plan (RPAMP) that takes into consideration the balancing of water quality protection with the needs for adequate housing, population growth, public transportation and management, land recycling, and urban revitalization.
 - (e) For the RPAMP to be considered, a technical panel of the Local Government Commission or an equivalent state or regional planning agency must have

reviewed and approved the proposed RPAMP, prior to its submittal to the Regional Water Board. The Regional Water Board Executive Officer may then consider the RPAMP for approval, or elect to submit it to the Regional Water Board for consideration.

- (f) The RPAMP, on approval, may substitute in part or wholly for post-construction requirements.
 - (g) Redevelopment Project Areas include the following:
 - (1) City Center areas
 - (2) Historic District areas
 - (3) Brownfield areas
 - (4) Infill Development areas
 - (5) Urban Transit Villages
 - (6) Any other redevelopment area so designated by the Regional Water Board
 - (h) Nothing in these provisions shall be construed as to delay the implementation of post-construction control requirements, as approved in this Order.
4. Developer Technical Guidance and Information
- (a) The Permittees shall update the Ventura County Technical Guidance Manual for Storm Water Quality Control Measures to include, at a minimum, the following:
 - (1) Hydromodification Control criteria described in this Order, including numerical criteria.
 - (2) Expected BMP pollutant removal performance including effluent quality (ASCE/ U.S. EPA International BMP Database, CASQA New Development BMP Handbook, technical reports, local data on BMP performance, and the scientific literature appropriate for southern California geography and climate).
 - (3) Selection of appropriate BMPs for storm water pollutants of concern.
 - (4) Data on Observed Local Effectiveness and performance of implemented BMPs.
 - (5) BMP Maintenance and Cost Considerations.
 - (6) Guiding principles to facilitate integrated water resources planning and management in the selection of BMPs, including water conservation, groundwater recharge, public recreation, multipurpose parks, open space preservation, and redevelopment retrofits.
 - (7) LID principles and specifications, including the objectives and specifications for integration of LID strategies in the areas of:
 - (A) Site Assessment.
 - (B) Site Planning and Layout.
 - (C) Vegetative Protection, Revegetation, and Maintenance.
 - (D) Techniques to Minimize Land Disturbance.
 - (E) Techniques to Implement LID Measures at Various Scales
 - (F) Integrated Water Resources Management Practices.
 - (G) LID Design and Flow Modeling Guidance.
 - (H) Hydrologic Analysis.
 - (I) LID Credits.

- (b) Permittees shall update the Technical Guidance Manual within (120 days after Order adoption date).
- (c) The Permittees shall facilitate implementation of LID by providing key industry, regulatory, and other stakeholders with information regarding LID objectives and specifications contained in the LID Technical Guidance Section through a training program. The LID training program will include the following:
 - (1) LID targeted sessions and materials for builders, design professionals, regulators, resource agencies, and stakeholders
 - (2) A combination of awareness on national efforts and local experience gained through LID pilot projects and demonstration projects
 - (3) Materials and data from LID pilot projects and demonstration projects including case studies
 - (4) Guidance on how to integrate LID requirements into the local regulatory program(s) and requirements
 - (5) Availability of the LID Technical Guidance regarding integration of LID measures at various project scales
 - (6) Guidance on the relationship among LID strategies, Source Control BMPs, Treatment Control BMPs, and Hydromodification Control requirements
- (d) The Permittees shall submit revisions to the Ventura County Technical Guidance Manual to the Regional Water Board for Executive Officer approval.

5. Project Coordination

- (a) Each Permittee shall facilitate a process for effective approval of post-construction storm water control measures. The process shall include:
 - (1) Detailed BMP review including BMP sizing calculations, BMP pollutant removal performance, and municipal approval; and
 - (2) An established structure for communication and delineated authority between and among municipal departments that have jurisdiction over project review, plan approval, and project construction through memoranda of understanding (MOU) or an equivalent agreement.

V. State Statute Conformity

1. California Environmental Quality Act (CEQA) Document Update

- (a) Each Permittee shall incorporate into its CEQA process no later than (365 days after Order adoption date) those additional procedures necessary for considering potential storm water quality impacts and providing for appropriate mitigation when preparing and reviewing CEQA documents.
 - (1) The procedures shall require consideration of the following:
 - (A) Potential impact of project construction on storm water runoff.
 - (B) Potential impact of project post-construction activity on storm water runoff.
 - (C) Potential for discharge of storm water from areas from material storage, vehicle or equipment fueling, vehicle or equipment

maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas.

- (D) Potential for discharge of storm water to impair the beneficial uses of the receiving waters.
 - (E) Potential for the discharge of storm water to cause significant harm on the biological integrity of the waterways and waterbodies.
 - (F) Potential for significant changes in the flow velocity or volume of storm water runoff to cause harm to or impair the beneficial uses of natural drainage systems.
 - (G) Potential for significant increases in erosion at the project site or surrounding areas.
2. General Plan Update
- (a) Each Permittee shall amend, revise or update its General Plan to include watershed and storm water quality and quantity management considerations and policies when any of the following General Plan elements are updated or amended:
 - (1) Land Use
 - (2) Housing
 - (3) Conservation
 - (4) Open Space
 - (b) Each Permittee shall provide the Regional Water Board with the draft amendment or revision when a listed General Plan element or General Plan is noticed for comment in accordance with Cal. Govt. Code § 65350 *et seq.*

F. Development Construction Program

- (I) Each Permittee shall implement a construction program that prevents illicit construction-related discharges of pollutants into the MS4, implements and maintains structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites, reduces construction site discharges of pollutants from the MS4 to the MEP, and prevents construction site discharges from the MS4 from causing or contributing to a violation of water quality standards.

1. BMP Implementation - Construction Sites Less Than One Acre

- (a) Each Permittee shall require the implementation of an effective combination of erosion and sediment control BMPs from Table 6 to prevent erosion and sediment loss, and the discharge of construction wastes.¹

¹ The BMPs are taken from the *California BMP Handbook, Construction, January 2003* and the *Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMPs) Manual, March 2003*, and addenda.

Table 6 - BMPs at Construction sites less than 1 acre

Minimum Set of BMPs for All Construction Sites	CASQA Handbook	Caltrans Handbook
For Erosion Control		
Scheduling	EC-1	SS-1
Preservation of Existing Vegetation	EC-2	SS-2
Sediment Controls		
Silt Fence	SE-1	SC-1
Sand Bag Barrier	SE-8	SC-8
Stabilized Construction Site Entrance/Exit	TC-1	TC-1
Non-Storm Water Management		
Water Conservation Practices	NS-1	NS-1
Dewatering Operations (Groundwater dewatering only under NPDES Permit No. CAG994004). ¹	NS-2	NS-2
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Stockpile Management	WM-3	WM-2
Spill Prevention and Control	WM-4	WM-4
Solid Waste Management	WM-5	WM-5
Concrete Waste Management	WM-8	WM-8
Sanitary/ Septic Waste Management	WM-9	WM-9

2. BMP Implementation - Construction Sites One Acre but Less than 5 acres.

- (a) Each Permittee shall require the implementation of an effective combination of appropriate erosion and sediment control BMPs from Table 7 in addition to the ones identified in Table 6 to prevent erosion and sediment loss, and the discharge of construction wastes:

Table 7 - BMPs at Construction sites 1 acre or greater but less than 5 acres

BMPs	CASQA Handbook	Caltrans Handbook
For Erosion Control		
Hydraulic Mulch	EC-3	SS-3
Hydroseeding	EC-4	SS-4
Soil Binders	EC-5	SS-5
Straw Mulch	EC-6	SS-6
Geotextiles and Mats	EC-7	SS-7
Wood Mulching	EC-8	SS-8
Sediment Controls		
Fiber Rolls	SE-5	SC-5
Gravel Bag Berm	SE-6	SC-6
Street Sweeping and/ or Vacuum	SE-7	SC-7
Storm Drain Inlet Protection	SE-10	SC-10
Additional Controls		
Wind Erosion Controls	WE-1	WE-1

¹ Ponedged storm water may be discharged at a concentration of Total Suspended Solids (TSS) of 100mg/L or less.

Ventura County Municipal Separate Storm Sewer System Permit

BMPs	CASQA Handbook	Caltrans Handbook
Stabilized Construction Entrance/ Exit	TC-1	TC-1
Stabilized Construction Roadway	TC-2	TC-2
Entrance/ Exit Tire Wash	TC-3	TC-3
Non-Storm Water Management		
Vehicle and Equipment Washing	NS-8	NS-8
Vehicle and Equipment Fueling	NS-9	NS-9

3. BMP Implementation - Construction Sites 5 acres and Greater

- (a) Each Permittee shall require the implementation of an effective combination of the following BMPs in Table 8 (BMPs at Construction sites 5 acres or greater) in addition to the ones identified in Table 6 (BMPs at Construction sites less than 1 acre) and Table 7 (BMPs at Construction sites 1 acre or greater but less than 5 acres) at all construction sites 5 acres and greater to prevent erosion and sediment loss, and the discharge of construction wastes. Erosion control BMPs shall be preferred to sediment control BMPs.

Table 8 - BMPs at Construction sites 5 acres or greater

BMPs	CASQA Handbook	Caltrans Handbook
Sediment Controls		
Sediment Basin	SE-2	SC-2
Check Dam	SE-4	SC-4
Tracking Control BMPs		
Stabilized Construction Entrance/ Exit	TR-1	TC-1
Non-Storm Water Management		
Vehicle and Equipment Maintenance	NS-10	NS-10
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Spill Prevention and Control	WM-4	WM-4
Concrete Waste Management	WM-8	WM-8
Sanitary/ Septic Waste Management	WM-9	WM-9

4. Enhanced Construction BMP Implementation.
- (a) Each Permittee shall implement, or require implementation of, enhanced practices that preclude impacts to water quality posed by all construction sites on hillsides as defined in this Order and construction sites that directly discharge to a waterbody listed on the CWA § 303 (d) list for siltation or sediment, or that occur within or directly adjacent to an Environmentally Sensitive Area (ESAs). Construction sites located on hillsides, adjacent to CWA 303(d) listed waters for siltation or sediment, and directly adjacent to ESAs are termed "High risk sites."
- (b) Each Permittee shall require implementation of enhanced practices for high risk sites which shall include increased BMP inspection and maintenance requirements.
- (1) Each Permittee shall require that high risk sites shall be inspected by the project proponent's Qualified SWPPP Developer or Qualified SWPPP Practitioner or personnel or consultants who are Certified Professionals in Erosion and Sediment Control (CPESC) at the time of BMP installation, at least weekly during the wet season, and at least once each 24 hour period during a storm event that generates runoff from the site, to identify BMPs that need maintenance to operate effectively, that have failed or could fail to operate as intended.
- (2) During the wet season, the area of disturbance shall be limited to the area that can be controlled with an effective combination of erosion and sediment control BMPs. Enhanced sediment controls should be used in combination with erosion controls and should target portions of the site that cannot be effectively controlled by standard erosion controls described above. Effective sediment and erosion control BMPs proposed by the proponent shall include the BMPs listed in Table 9 below. The project proponents are responsible to implement the BMPs below unless shown unnecessary. The Permittee shall require that the project proponent retain records of the inspection and a determination and rationale of the BMPs selected to control runoff.

Table 9 - Enhanced Construction BMP Implementation.

CONSTRUCTION SITE BMPs	CASQA Handbook	Caltrans Handbook
Erosion Controls		
Scheduling	EC-1	SS-1
Preservation of Existing Vegetation	EC-2	SS-2
Hydraulic Mulch	EC-3	SS-3
Hydroseeding	EC-4	SS-4
Soil Binders	EC-5	SS-5
Straw Mulch	EC-6	SS-6
Geotextiles and Mats	EC-7	SS-7
Wood Mulching	EC-8	SS-8
Slope Drains	EC-11	SS-11
Sediment Controls		

CONSTRUCTION SITE BMPs	CASQA Handbook	Caltrans Handbook
Silt Fence	SE-1	SC-1
Fiber Rolls	SE-5	SC-5
Sediment Basin	SE-2	SC-2
Check Dam	SE-4	SC-4
Gravel Bag Berm	SE-6	SC-6
Street Sweeping and/or Vacuum	SE-7	SC-7
Sand Bag Barrier	SE-8	SC-8
Storm Drain Inlet Protection	SE-10	SC-10
Additional Controls		
Wind Erosion Controls	WE-1	WE-1
Stabilized Construction Entrance/Exit	TC-1	TC-1
Stabilized Construction Roadway	TC-2	TC-2
Entrance/Exit Tire Wash	TC-3	TC-3
Advanced Treatment Systems ¹		
Non-Storm Water Management		
Water Conservation Practices	NS-1	NS-1
Dewatering Operations (Groundwater dewatering only under NPDES Permit No. CAG994004).19	NS-2	NS-2
Vehicle and Equipment Washing	NS-8	NS-8
Vehicle and Equipment Fueling	NS-9	NS-9
Vehicle and Equipment Maintenance	NS-10	NS-10
Waste Management		
Material Delivery and Storage	WM-1	WM-1
Stockpile Management	WM-3	WM-2
Spill Prevention and Control	WM-4	WM-4
Solid Waste Management	WM-5	WM-5
Concrete Waste Management	WM-8	WM-8
Sanitary/Septic Waste Management	WM-9	WM-9

5. Local Agency Requirements

(a) Each Permittee shall require for all construction sites 1 acre or greater, compliance with all conditions identified in the preceding subparts F.1 - F.4, and the following requirements:

(1) Local Storm Water Pollution Prevention Plan (Local SWPPP),

(A) Each Permittee shall require the preparation and submittal of a Local SWPPP, for the Permittee's review and written approval prior to issuance of a grading or construction permit for construction or demolition projects. The Permittees' approval signature shall be contained within the first pages of the Local SWPPP

¹ If appropriate given natural background stormwater runoff and receiving water quality conditions.

- (i) The Permittee shall not approve any Local SWPPP unless it contains appropriate site-specific construction site BMPs, specific locations, and maintenance schedules.
 - (ii) The Local SWPPP must include the rationale used for selecting or rejecting BMPs for various construction phases and weather conditions. The project architect, or engineer of record, or authorized qualified designee, must sign a statement on the Local SWPPP to the effect:
 - (I) *“As the architect/ engineer of record, I have selected appropriate BMPs to effectively minimize the negative impacts of this project’s construction activities on storm water quality. The project owner and contractor are aware that the selected BMPs must be installed, monitored, and maintained to ensure their effectiveness. The BMPs not selected for implementation are redundant or deemed not applicable to the proposed construction activity.”*
- (2) Certification Statement
- (A) Each Permittee shall require that each landowner or the landowner’s agent sign a statement on the Local SWPPP to the effect:
 - (i) *“I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that submitting false and/ or inaccurate information, failing to update the Local SWPPP to reflect current conditions, or failing to properly and/ or adequately implement the Local SWPPP may result in revocation of grading and/ or other permits or other sanctions provided by law.”*
 - (ii) The Local SWPPP certification shall be signed by the property owner or owner’s representative/designee. If the Local SWPPP or SWPPP is being prepared by the local agency then the appropriate authority of the local agency shall sign the document.
6. Roadway Paving or Repaving Operations (For Private or Public Projects)
- (a) Each Permittee shall require that for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces, that the following BMPs be implemented for each project:
 - (1) Restrict paving and repaving activity to exclude periods of rainfall or predicted rainfall unless required by emergency conditions
 - (2) Install sand bags or gravel bags and filter fabric at all susceptible storm drain inlets and at manholes to prevent spills of paving products and tack coat

- (3) Prevent the discharge of release agents including soybean oil, other oils, or diesel to the storm water drainage system or receiving waters.
- (4) Minimize non storm water runoff from water use for the roller and for evaporative cooling of the asphalt
- (5) Clean equipment over absorbent pads, drip pans, plastic sheeting or other material to capture all spillage and dispose of properly
- (6) Collect liquid waste in a container, with a secure lid, for transport to a maintenance facility to be reused, recycled or disposed of properly
- (7) Collect solid waste by vacuuming or sweeping and securing in an appropriate container for transport to a maintenance facility to be reused, recycled or disposed of properly
- (8) Cover the "cold-mix" asphalt (i.e., pre-mixed aggregate and asphalt binder) with protective sheeting during a rainstorm
- (9) Cover loads with tarp before haul-off to a storage site, and do not overload trucks
- (10) Minimize airborne dust by using water spray during grinding
- (11) Avoid stockpiling soil, sand, sediment, asphalt material and asphalt grindings materials or rubble in or near storm water drainage system or receiving waters
- (12) Protect stockpiles with a cover or sediment barriers during a rain

7. Electronic Site Tracking System

- (a) Each Permittee shall use an electronic system to track grading permits, encroachment permits, demolition permits, building permits, or construction permits (and any other municipal authorization to move soil and/ or construct or destruct that involves land disturbance) issued by each Permittee. To satisfy this requirement, the use of a database or GIS system is encouraged, but not required.

8. Inspections

- (a) Each Permittee shall inspect all construction sites for the implementation of storm water quality controls a minimum of once during the wet season. Concurrently, each Permittee shall ensure that:
 - (1) The Local SWPPP is reviewed for compliance with local codes, ordinances, and permits.
 - (2) A follow-up inspection takes place within two weeks for inspected sites that have not adequately implemented their Local SWPPP.
- (b) Each Permittee shall take additional enforcement actions to achieve compliance as specified in municipal codes, if compliance with municipal codes, ordinances, or permits has not been attained.
- (c) Each Permittee can refer sites to the Regional Water Board for joint enforcement actions for violation of municipal storm water ordinances and the Construction Activities Storm Water General Permit (CASGP), or Small Linear Underground/Overhead Construction Projects General Permit (small LUPs), after conducting a minimum of 2 site inspections and issuing a minimum of 2 written notices to the operator regarding the violation (copied to the Regional Water Board). In making

such referrals, Permittees shall include, at a minimum, the following documentation:

- (1) Name of the site
 - (2) WDID number
 - (3) Site developer
 - (4) Site owner
 - (5) Records of communication with the site operator regarding the violation(s), which shall include at least an inspection report
 - (6) Written notice of the violation copied to the Regional Water
- (d) Prior to approving and/ or signing off for occupancy and issuing the Certificate of Occupancy for all construction projects subject to post-construction controls, each Permittee shall inspect the constructed site design, source control and treatment control BMPs to verify that they have been constructed in compliance with all specifications, plans, permits, ordinances, and this Order. The initial/ acceptance BMP verification inspection does not constitute a maintenance and operation inspection, as required in the preceding subpart E.IV.2(c).

9. State Conformity Requirements

- (a) Each Permittee shall ensure that no grading permit, encroachment permit, demolition permit, building permit, electrical permit, or construction permit (or any other municipal authorization to move soil and/ or construct or destruct that involves land disturbance) is issued for any project requiring coverage under the CASGP or Small LUP General Permit¹ unless:
- (1) Proof of filing a Notice of Intent for coverage under a State NPDES permit is demonstrated).
 - (2) Demonstration or Certification that a SWPPP has been prepared by the project developer.
 - (3) Proof of Change of Information form (COI) and a copy of the modified SWPPP(s) at any time a transfer of ownership takes place for the entire development or portions of the common plan of development where construction activities are still on-going.

10. Interagency Coordination

(a) **Referral of Violations:**

A Permittee may refer a violator of the municipal storm water ordinance and CWC § 13260 to the Regional Water Board provided that the Permittee has made a good faith effort at progressive enforcement consistent with the preceding subpart F.8(c). At a minimum, the Permittee's good faith effort shall be documented with:

¹ NPDES Permit No. CAS000005, Waste Discharge Requirements For Discharges of Storm Water Runoff Associated with Small Linear Underground/ Overhead Construction Projects (Small LUP General Permit) for any linear land disturbing activity or activities (cumulatively) that will cause one acre or more of land disturbance but not more than 5 acres.

- (1) A minimum of 2 follow-up inspection reports (inspections completed within 3 months).
- (2) A minimum of two warning letters or NOVs.
- (b) **Referral of Non-filers under the CASGP or the Small LUP General Permit:**
Each Permittee shall refer non-filers (i.e., those projects which cannot demonstrate that they have a WDID number) under the CASGP or Small LUP General Permit, to the Regional Water Board, no later than 15 days after making a determination of failure to file. In making such referrals, Permittees shall include, at a minimum, the following documentation:
 - (1) Project location address
 - (2) Project description
 - (3) Developer or owners name with complete mailing address
 - (4) Project size
 - (5) Records of communication with the developer or owner regarding filing requirements
- (c) **Investigation of Complaints Regarding Facilities – Transmitted by the Regional Water Board Staff:**
 - (1) Each Permittee shall initiate, within one business day,¹ an initial investigation of complaint(s) (other than non-storm water discharges) on the construction site(s) within its jurisdiction.
 - (A) The initial investigation shall include, at a minimum, an inspection on the facility and its perimeter to confirm the complaint and to determine if the site operator is effectively complying with the municipal storm water/ urban runoff ordinances, and to oversee corrective action.
- (d) **Support of Regional Water Board Enforcement Actions – As directed by the Regional Water Board Executive Officer:**
 - (1) Each Permittee shall support Regional Water Board enforcement actions by:
 - (A) Assisting in identification of current owners, operators, and lessees of properties and sites.
 - (B) Providing staff, when available, for joint inspections with Regional Water Board inspectors.
 - (C) Appearing to testify as witnesses in Regional Water Board enforcement hearings.
 - (D) Providing copies of inspection reports and other progressive enforcement documentation.

¹ Permittees may comply with the Permit by taking initial steps (such as logging, prioritizing, and tasking) to “initiate” the investigation within that one business day. However, the Regional Water Board would expect that the initial investigation, including a site visit, to occur within four business days.

G. Public Agency Activities Program

- I. Each Permittee shall implement a Public Agency Activities Program to minimize storm water pollution impacts from public agency activities. Public Agency requirements consist of:
 - i. Public Construction Activities Management.
 - ii. Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards Management/ Municipal Operations.
 - iii. Vehicle and Equipment Wash Areas
 - iv. Landscape and Recreational Facilities Management
 - v. Storm Drain Operation and Management
 - vi. Streets and Roads Maintenance
 - vii. Public Industrial Activities Management
 - viii. Emergency Procedures
 - ix. Employee Training
 - x. Infrastructure Maintenance

1. Public Construction Activities Management
 - (a) Each Permittee shall implement and comply with the Planning and Land Development Program requirements in part 4.E. of this Order at Permittee owned or operated public construction projects for project types identified in part 4.E of this Order.
 - (b) Each Permittee shall implement and comply with the appropriate Development Construction Program requirements in part 4.F. of this Order at Permittee owned or operated construction projects as applicable.
 - (c) For public projects including those under a Capital Improvement Project Plan that disturb less than one acre of soil the Permittees shall require the development and implementation of a Storm Water Pollution Control Plan. The SWPCP shall include BMPs as identified in Table 6.

2. Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards Management/ Long Term Maintenance Programs
 - (a) Each Permittee shall implement the activity specific BMPs¹ listed in Table 10 when such activities occur at Permittee owned/leased facilities and job sites including but not limited to vehicle/ equipment maintenance facilities, material storage facilities, and corporation yards, and at any area that includes the activities as described in the following Tables. Additionally, for any activity or area described in the footnote below,² each Permittee shall also implement the BMPs in the Caltrans Storm Water Quality Handbook Maintenance Staff Guide

¹ These BMPs are identified in Appendix B of the *Caltrans Storm Water Quality Handbook Maintenance Staff Guide, May 2003*, and its addenda. Other BMPs may be substituted upon approval by the Executive Officer.

² Scheduling and Planning; Spill Prevention and Control; Sanitary/ Septic Waste Management; Material Use; Safer Alternative Products; Vehicle/ Equipment Cleaning, Fueling, and Maintenance; Illicit Connections Detection, Reporting and Removal; Illegal Spill / Discharge Control and Maintenance Facility Housekeeping Practices.

described as B-4 in Table 10 (BMPs at Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards).

Table 10 - BMPs at Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards
 From the Caltrans Storm Water Quality Handbook Maintenance Staff Guide Appendix B

Activity Specific BMPs	Page
General BMPs	B-4
Flexible Pavement	B-9
Asphalt Cement Crack and Joint Grinding/ Sealing	B-9
Asphalt Paving	B-10
Structural Pavement Failure (Digouts) Pavement Grinding and Paving	B-11
Emergency Pothole Repairs	B-13
Sealing Operations	B-14
Rigid Pavement	B-15
Portland Cement Crack and Joint Sealing	B-15
Mudjacking and Drilling	B-16
Concrete Slab and Spall Repair	B-17
Slope/ Drains/ Vegetation	B-19
Shoulder Grading	B-19
Nonlandscaped Chemical Vegetation Control	B-21
Nonlandscaped Mechanical Vegetation Control/ Mowing	B-23
Nonlandscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal	B-24
Fence Repair	B-25
Drainage Ditch and Channel Maintenance	B-26
Drain and Culvert Maintenance	B-28
Curb and Sidewalk Repair	B-30
Litter/ Debris/ Graffiti	B-32
Sweeping Operations	B-32
Litter and Debris Removal	B-33
Emergency Response and Cleanup Practices	B-34
Graffiti Removal	B-36
Landscaping	B-37
Chemical Vegetation Control	B-37
Manual Vegetation Control	B-39
Landscaped Mechanical Vegetation Control/ Mowing	B-40
Landscaped Tree and Shrub Pruning, Brush Chipping, Tree and Shrub Removal	B-41
Irrigation Line Repairs	B-42
Irrigation (Watering), Potable and Nonpotable	B-43
Environmental	B-44
Storm Drain Stenciling	B-44
Roadside Slope Inspection	B-45
Roadside Stabilization	B-46
Storm Water Treatment Devices	B-48
Traction Sand Trap Devices	B-49
Public Facilities	B-50
Public Facilities	B-50
Bridges	B-52
Welding and Grinding	B-52
Sandblasting, Wet Blast with Sand Injection and Hydroblasting	B-54
Painting	B-56
Bridge Repairs	B-57

Activity Specific BMPs	Page
Other Structures	B-59
Pump Station Cleaning	B-59
Tube and Tunnel Maintenance and Repair	B-61
Tow Truck Operations	B-63
Toll Booth Lane Scrubbing Operations	B-64
Electrical	B-65
Sawcutting for Loop Installation	B-65
Traffic Guidance	B-67
Thermoplastic Striping and Marking	B-67
Paint Striping and Marking	B-68
Raised/ Recessed Pavement Marker Application and Removal	B-70
Sign Repair and Maintenance	B-71
Median Barrier and Guard Rail Repair	B-73
Emergency Vehicle Energy Attenuation Repair	B-75
Snow and Ice Control	B-76
Snow Removal	B-76
Ice Control	B-77
Storm Maintenance	B-78
Minor Slides and Slipouts Cleanup/ Repair	B-78
Management and Support	B-80
Building and Grounds Maintenance	B-80
Storage of Hazardous Materials (Working Stock)	B-82
Material Storage Control (Hazardous Waste)	B-84
Outdoor Storage of Raw Materials	B-85
Vehicle and Equipment Fueling	B-86
Vehicle and Equipment Cleaning	B-87
Vehicle and Equipment Maintenance and Repair	B-88
Aboveground and Underground Tank Leak and Spill Control	B-90

3. Vehicle and Equipment Wash Areas
 - (a) Each Permittee shall eliminate discharges of wash waters from vehicle and equipment washing no later than (365 days after Order adoption date) by implementing any of the following measures at existing facilities with vehicle or equipment wash areas:
 - (1) Self-contain, and haul off for disposal
 - (2) Equip with a clarifier
 - (3) Equip with an alternative pre-treatment device; or
 - (4) Plumb to the sanitary sewer
 - (b) Each Permittee shall ensure that any municipal facilities constructed, redeveloped, or replaced has all vehicle and equipment wash areas plumbed to the sanitary sewer or be self contained and all wastewater/ washwater hauled for legal disposal.

4. Landscape, Park, and Recreational Facilities Management
 - (a) Integrated Pest Management (IPM)

IPM is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control,

habitat manipulation, modification of cultural practices, and use of resistant varieties. Each Permittee shall implement an IPM program within (365 days after Order adoption date) that includes the following:

- (1) Pesticides are used only if monitoring indicates they are needed according to established guidelines.
 - (2) Treatments are made with the goal of removing only the target organism.
 - (3) Pest controls are selected and applied in a manner that minimizes risks to human health, beneficial, non-target organisms, and the environment.
 - (4) Its use of pesticides, including Organophosphates and Pyrethroids do not threaten water quality.
 - (5) Partner with other agencies and organizations to encourage the use of IPM.
 - (6) Adopt and verifiably implement policies, procedures, and/ or ordinances requiring the minimization of pesticide use and encouraging the use of IPM techniques (including beneficial insects) in the Permittees' overall operations and on municipal property.
 - (7) Policies, procedures, and ordinances shall include commitments and timelines to reduce the use of pesticides that cause impairment of surface waters by implementing the following procedures:
 - (A) Quantify pesticide use by its staff and hired contractors.
 - (B) Prepare and annually update an inventory of pesticides used by all internal departments, divisions, and other operational units.
 - (C) Demonstrate reductions in pesticide use.
- (b) Each Permittee shall implement the following requirements no later than (180 days after Order adoption date):
- (1) Use a standardized protocol for the routine and non-routine application of pesticides (including pre-emergents), and fertilizers.
 - (2) Ensure no application of pesticides or fertilizers are applied to an area immediately prior to, during, or immediately after a rain event, or when water is flowing off the area.
 - (3) Ensure that no banned or unregistered pesticides are stored or applied.
 - (4) Ensure that all staff applying pesticides are certified in the appropriate category by the California Department of Pesticide Regulation, or are under the direct supervision of a pesticide applicator certified in the appropriate category.
 - (5) Implement procedures to encourage the retention and planting of native vegetation to reduce water, pesticide and fertilizer needs; and
 - (6) Store pesticides and fertilizers indoors or under cover on paved surfaces or use secondary containment.
 - (A) Reduce the use, storage, and handling of hazardous materials to reduce the potential for spills.
 - (B) Regularly inspect storage areas.
 - (7) Comply with the provisions and the monitoring requirements for application of aquatic pesticides to surface waters (WQ Order No. 2004-0008-DWQ) (Vector Control) and Order No. 2004-0009-DWQ (Weed Control).

5. Storm Drain Operation and Management

(a) Catch Basin Cleaning

- (1) Each Permittee shall designate catch basin inlets within its jurisdiction as one of the following:

Priority A: Catch basins that are designated as consistently generating the highest volumes of trash.

Priority B: Catch basins that are designated as consistently generating moderate volumes of trash.

Priority C: Catch basins that are designated as generating low volumes of trash.

Within one year of Order adoption (July 8, 2011), Permittees shall submit a map or list of Catch Basins with their GPS coordinates and their designations. The map or list shall contain the rationale or data to support designations.

- (2) Each Permittee shall inspect catch basins according to the following schedule:

Priority A: A minimum of 3 times during the wet season and once during the dry season every year.

Priority B: A minimum of once during the wet season and once during the dry season every year.

Priority C: A minimum of once per year.

Catch basins shall be cleaned as necessary on the basis of inspections. Permittees shall maintain inspection records for Regional Water Board review.

- (3) In addition to the preceding schedule, Permittees shall ensure that any catch basin that is determined to be at least 25% full of trash shall be cleaned out.

(b) Trash Management at Public Events

- (1) Each Permittee shall require for any event in the public right of way or wherever it is foreseeable that substantial quantities of trash and litter may be generated, the following measures:

(A) Proper management of trash and litter generated; and

(B) Arrangement for temporary screens to be placed on catch basins; or

(C) Provide clean out of catch basins, trash receptacles, and grounds in the event area within 24 hours subsequent to the event.

(c) Trash Receptacles

- (1) Each Permittee shall install trash receptacles, or equivalent trash capturing devices in areas subject to high trash generation within its jurisdiction no later than one year after Order adoption date (July 8, 2011).

- (2) Each Permittee shall ensure that all trash receptacles are cleaned out and maintained as necessary to prevent trash overflow.

(d) Catch Basin Labels

- (1) Each Permittee shall inspect the legibility of the catch basin stencil or label nearest each catch basin and inlet before the wet season begins.

- (2) Each Permittee shall record and re-stencil or re-label within 15 days of inspection, catch basins with illegible stencils.
- (e) Additional Trash Management Practices
 - (1) Each Permittee shall install trash excluders, or equivalent devices on or in catch basins or outfalls to prevent the discharge of trash to the storm drain system or receiving water no later than two years after Order adoption date in areas defined as Priority A (subpart 5.(a)(1)) except in sites where the application of such BMP(s) alone will cause flooding. Lack of maintenance that causes flooding is not an acceptable exception to the requirement to install BMPs. Alternatively the Permittee may implement alternative or enhanced BMPs beyond the provisions of this permit (such as but not limited to increased street sweeping, adding trash cans near trash generation sites, prompt enforcement of trash accumulation, increased trash collection on public property, increased litter prevention messages or trash nets within the MS4) that provide substantially equivalent removal of trash. Permittees shall demonstrate that BMPs, which substituted for trash excluders provide equivalent trash removal performance as excluders. When outfall trash capture is provided, revision of the schedule for inspection and cleanout of catch basins in task 5.(a)(2) may be proposed by the Permittee for approval by the Executive Officer.
- (f) Storm Drain Maintenance
 - (1) Each Permittee shall implement a program for Storm Drain Maintenance no later than 90 days after Order adoption (October 6, 2010) that includes the following:
 - (A) Visual monitoring of Permittee-owned open channels and other drainage structures for debris at least annually.
 - (B) Remove trash and debris from open channel storm drains a minimum of once per year before the wet season.
 - (C) Eliminate the discharge of contaminants during MS4 maintenance and clean outs.
 - (D) Quantify the amount of materials removed using techniques appropriate for quantifying solid waste and ensure the materials are properly disposed of.
- (g) Spill Response Plan
 - (1) Each Permittee shall implement a response plan for spills to the MS4 within their respective jurisdiction. The response Plan shall clearly identify agencies responsible and telephone numbers and e-mail address for contact and shall contain at a minimum the following:
 - (A) Investigation of all complaints received within 24 hours of the incident report.
 - (B) Response within 2 hours to spills for containment upon notification, except where such overflows occur on private property, in which case the response should be within 2 hours of gaining legal access to the property.

- (C) Notification to appropriate public health agencies and the Office of Emergency Services (OES).
- (h) Permittee Owned Treatment Control BMPs
 - (1) Each Permittee shall implement an inspection and maintenance program for all Permittee owned treatment control BMPs, including post-construction treatment control BMPs.
 - (2) Each Permittee shall ensure proper operation of all treatment control BMPs and maintain them as necessary for proper operation, including all post-construction treatment control BMPs.
 - (3) Any residual water produced by a treatment control BMP and not being internal to the BMP performance when being maintained shall be:
 - (A) Hauled away and legally disposed of; or
 - (B) Applied to the land without runoff; or
 - (C) Discharged to the sanitary sewer system (with permits or authorization); or
 - (D) Treated or filtered to remove bacteria, sediments, nutrients, and meet the limitations set in Table 11 (Discharge Limitations for Dewatering Treatment BMPs) prior to discharge to the MS4.

Table 11 - Discharge Limitations for Dewatering Treatment BMPs¹

Parameter	Units	Limitation
Total Suspended Solids	mg/L	100
Turbidity	NTU	50
Oil and Grease	mg/L	10

6. Streets and Roads Maintenance

(a) Maintenance

- (1) Each Permittee shall perform street sweeping of curbed streets in commercial areas and areas subject to high-trash generation to control trash and debris at least two times per month.

(b) Road Reconstruction

- (1) Each Permittee shall require that for any project that includes roadbed or street paving, repaving, patching, digouts, or resurfacing roadbed surfaces, that the following BMPs be implemented for each project.
 - (A) Restrict paving and repaving activity to exclude periods of rainfall or predicted rainfall² unless required by emergency conditions.
 - (B) Install sand bags or gravel bags and filter fabric at all susceptible storm drain inlets and at manholes to prevent spills of paving products and tack coat;
 - (C) Prevent the discharge of release agents including soybean oil, other oils, or diesel to the storm water drainage system or receiving waters.

¹ Technology based effluent limits.

² A probability of precipitation (POP) of 50% is required.

- (D) Minimize non storm water runoff from water use for the roller and for evaporative cooling of the asphalt.
- (E) Clean equipment over absorbent pads, drip pans, plastic sheeting or other material to capture all spillage and dispose of properly.
- (F) Collect liquid waste in a container, with a secure lid, for transport to a maintenance facility to be reused, recycled or disposed of properly.
- (G) Collect solid waste by vacuuming or sweeping and securing in an appropriate container for transport to a maintenance facility to be reused, recycled or disposed of properly.
- (H) Cover the "cold-mix" asphalt (i.e., pre-mixed aggregate and asphalt binder) with protective sheeting during a rainstorm.
- (I) Cover loads with tarp before haul-off to a storage site, and do not overload trucks.
- (J) Minimize airborne dust by using water spray during grinding.
- (K) Avoid stockpiling soil, sand, sediment, asphalt material and asphalt grindings materials or rubble in or near storm water drainage system or receiving waters.
- (L) Protect stockpiles with a cover or sediment barriers during a rain.

7. Emergency Procedures

- (a) Each Permittee may conduct repairs of essential public service systems and infrastructure in emergency situations with a self-waiver of the provisions of this Order.
 - (1) Where the self-waiver has been invoked, the Permittee shall submit to the Regional Water Board Executive Officer a statement of the occurrence of the emergency, an explanation of the circumstances, and the measures that were implemented to reduce the threat to water quality, no later than 30 business days after the situation of emergency has passed.
 - (2) Minor repairs of essential public service systems and infrastructure in emergency situations (can be completed in less than one day) are not subject to the notification provisions. Appropriate BMPs to reduce the threat to water quality shall be implemented.

8. Municipal Employee and Municipal Contractor Training

- (a) Each Permittee shall, no later than one year after Order adoption (July 8, 2011) and annually thereafter before June 30, train all of their employees and contractors in targeted positions (whose interactions, jobs, and activities affect storm water quality) on the requirements of the overall storm water management program to:
 - (1) Promote a clear understanding of the potential for activities to pollute storm water.
 - (2) Identify opportunities to require, implement, and maintain appropriate BMPs in their line of work.
- (b) Each Permittee shall, no later than one year after Order adoption (July 8, 2011) and annually thereafter before June 30, train all of their employees and

contractors who use or have the potential to use pesticides or fertilizers (whether or not they normally apply these as part of their work). Training programs shall address:

- (1) The potential for pesticide-related surface water toxicity.
 - (2) Proper use, handling, and disposal of pesticides.
 - (3) Least toxic methods of pest prevention and control, including IPM.
 - (4) Reduction of pesticide use.
- (c) Each Permittee shall, no later than one year after Order adoption (July 8, 2011) and annually thereafter before June 30, train all of their employees and contractors who are responsible for illicit connections and illicit/ illegal discharges. Training programs shall address:
- (1) Identification
 - (2) Investigation
 - (3) Termination
 - (4) Cleanup
 - (5) Reporting of Incidents
 - (6) Documentation of Incidents

H. Illicit Connections and Illicit Discharges Elimination Program

- I. Each Permittee shall implement an Illicit Connections and Illicit Discharges (IC/ IDs) program to eliminate IC/IDs to the storm drain system, and shall document, track, and report all such cases in accordance with the elements and performance measures specified in the following subsections.
 1. General
 - (a) Implementation - Each Permittee shall implement an IC/ ID Program. The IC/ ID procedures shall be documented and made available for public review.
 - (b) Tracking - All Permittees shall, no later than May 7, 2012, map at a scale and in a format specified by the Principal Permittee all known connections to their storm drain system. All Permittees shall map at a scale and in a format specified by the Principal Permittee incidents of illicit connections and discharges since January 2009 on their baseline maps, and shall transmit this information to the Principal Permittee no later than May 7, 2012. Permittees shall use this information to identify priority areas for further investigation and elimination of IC/ ID.
 2. Public Reporting
 - (a) Permittees shall establish and maintain a phone hotline and internet site to receive all reports of IC/ ID complaints.
 - (b) Permittees shall document the location of the reported IC/ ID and the actions undertaken in response to all IC/ ID complaints.
 3. Illicit Connections
 - (a) Screening for Illicit Connections
 - (1) Each Permittee shall submit to the Principal Permittee:

- (A) A map at a scale and in a format specified by the Principal Permittee showing the location and length of underground pipes 18 inches and greater in diameter, and channels within their permitted area and operated by the Permittee in accordance with the following schedule:
 - (i) All channeled portions of the storm drain system no later than 90 days after Order adoption date (October 6, 2010).
 - (ii) All portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater, no later than May 7, 2012.
 - (iii) All portions of the storm drain system consisting of storm drain pipes 18 inches in diameter or greater, no later than May 7, 2014.
 - (B) The status of suspected, confirmed, and terminated illicit connections.
- (2) Permittees shall conduct field screening of their storm drain systems in accordance with screening procedures described in the Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments (2004)¹ or other equally effective alternative methods not listed in the manual. Permittees shall conduct field screening of their storm drain system that has not been previously screened and reported to the Regional Water Board, for illicit connections in accordance with the following schedule:
- (A) All portions of the storm drain system consisting of storm drain pipes 36 inches in diameter or greater, no later than May 7, 2012.
 - (B) High priority areas identified during the mapping of illicit connections and discharges, no later than May 7, 2012.
 - (C) All portions of storm drain systems 50 years or older in age, no later than May 7, 2012.
- (3) Each Permittee shall maintain a list containing all connections under investigation for possible illicit connection and their status.
- (b) Response to Illicit Connections
- (1) Investigation -
Each Permittee, upon discovery or upon receiving a report of a suspected illicit connection, shall complete an investigation within 21 days, to determine the following:
 - (A) Source of the connection.
 - (B) Nature and volume of discharge through the connection.
 - (C) Responsible party for the connection.
 - (2) Termination -
Each Permittee, upon confirmation of an illicit storm drain connection, shall ensure the following:
 - (A) Termination of the connection within 180 days of completion of the investigation, using formal enforcement authority to eliminate the illicit connection.
 - (3) Documentation -

¹ *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*. The Center for Watershed Protection, Pitt R., October 2004. Chapter 13, 13.1, 13.2, 13.3, 13.4

Each Permittee shall keep records of all illicit connection investigations and the formal enforcement taken to eliminate all illicit connections.

4. **Illicit Discharges**
 - (a) Investigation -
Each Permittee shall investigate an illicit/ illegal discharge during or immediately following containment and cleanup activities, and shall take appropriate enforcement action to eliminate the illegal discharge.
 - (b) Abatement and Cleanup -
Each Permittee shall respond, within 1 business day of discovery or a report of a suspected illicit/ illegal discharge, with actions to abate, contain, and/or clean up all illegal discharges, including hazardous waste.
 - (c) Documentation -
Each Permittee shall maintain records of all illicit/ illegal discharge discoveries, reports of suspected illicit/ illegal discharges, their response to the illicit/ illegal discharges and suspected illicit/ illegal discharges, and the formal enforcement taken to eliminate all illicit/ illegal discharges.

I. REPORTING PROGRAM

1. The Principal Permittee in consultation with the Permittees and Regional Water Board staff shall convene an adhoc working group to develop an Electronic Reporting Program, the basis of which shall be the requirements in this Order. The Committee shall no later than one year after Order adoption date (July 8, 2011) submit the electronic reporting form in each subsequent year.
2. Each Permittee shall submit information required in the Reporting Program in a method as appropriate to the format approved by the Regional Water Board Executive Officer.
3. The Principal Permittee shall submit by December 15th of each year, an Annual Report to the Regional Water Board Executive Officer in the form one hard copy and three compact disk (CD) copies (or an electronic equivalent).
4. The Annual Report shall document the status of the Municipal Storm Water Program, an integrated summary of the results of analyses from:
 - (a) The monitoring program described under Part 1- Monitoring Report.
 - (b) The requirements described under Part 2- Program Report.
5. Plans shall be submitted to the Regional Water Board Executive Officer in the form of one hard copy and three compact disk (CD) copies (or an electronic equivalent).

6. Study Reports shall be submitted to the Regional Water Board Executive Officer in the form of one hard copy and three compact disk (CD) copies (or an electronic equivalent).
7. Progress Reports shall be submitted to the Regional Water Board Executive Officer in the form of one hard copy and three compact disk (CD) copies (or an electronic equivalent).

PART 5 - TOTAL MAXIMUM DAILY LOAD PROVISIONS

- I. Part 5 of this Order incorporates provisions to assure that Ventura County MS4 Permittees comply with WLAs and other requirements of TMDLs covering impaired waters impacted by the Permittees' discharges.
- II. Each Permittee shall attain the storm water WLAs incorporated into this Order by implementing BMPs in accordance with the TMDL Technical Reports, Implementation Plans, or as identified as a result of TMDL special studies specified in the Basin Plan Amendment.
- III. The Permittees shall comply with the following Wasteload Allocations, consistent with the assumptions and requirements of the Wasteload Allocations documented in the Implementation Plans, including compliance schedules, associated with the State adoption and approval of the TMDL at compliance monitoring points established in each TMDL (40 CFR 122.44(d)(1)(vii)(B)).
- IV. TMDLs in effect and covered in this Order are the following:
 1. TMDL for Nutrients for Malibu Creek Watershed (Effective date: March 21, 2003)
 2. TMDL for Nitrogen Compounds and Related Effects in Calleguas Creek (Effective date: July 16, 2003)
 3. TMDL for Nitrogen Compounds for the Santa Clara River (Effective date: March 23, 2004).
 4. TMDL for Chloride in Santa Clara River, Reach 3 (Effective date: June 18, 2003)
 5. TMDL for Chloride in Upper Santa Clara River (Effective date: May 4, 2005)
 6. TMDL for Toxicity, Chlorpyrifos and Diazinon in the Calleguas Creek, its Tributaries and Mugu Lagoon - (Effective date: March 24, 2006).
 7. TMDL for Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation in Calleguas Creek, its Tributaries and Mugu Lagoon (Effective date: March 24, 2006).
 8. TMDL for Bacteria in Malibu Creek and Lagoon (Effective date: January 24, 2006).
 9. TMDL for Metals and Selenium in the Calleguas Creek, its Tributaries and Mugu Lagoon (Effective date: March 26, 2007)
 10. TMDL for Trash in Revolon Slough and Beardsley Wash (Effective date: March 6, 2008).
 11. TMDL for Boron, Chloride, Sulfate, and TDS in Calleguas Creek Watershed (Effective date: December 2, 2008)

12. TMDL for Trash in the Ventura River Estuary (Effective date: March 6, 2008).
13. TMDL for Bacteria in Harbor Beaches of Ventura County (Effective date: September 23, 2008).

V. TMDL Interim WLAs incorporated into this Order due to compliance dates which exceed the term of this Order are the following:

1. Final Wet Weather Bacteria WLAs for Malibu Creek and Lagoon – (Compliance date: January 24, 2016).
2. Final Chloride WLAs for Upper Santa Clara River – (Compliance date: May 4, 2016)
3. Final Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation WLAs for Calleguas Creek, its Tributaries and Mugu Lagoon – (Compliance date: March 24, 2026).
4. Final Metals and Selenium WLAs for Calleguas Creek, its Tributaries and Mugu Lagoon (Compliance date: March 26, 2022)
5. Final Boron, Chloride, Sulfate, and TDS WLAs for Calleguas Creek watershed (Compliance date: December 2, 2023)

VI. TMDL WLAs and Other TMDL Provisions Incorporated into this Order are as follows:

1. TMDL for Nutrients for Malibu Creek Watershed

(a) Summer Load Allocations

	Nitrogen (lbs/day)	Phosphorus (lbs/day)
- Runoff from developed areas	26	2.6
- Golf Course Fertilization	37	6.6
- Dry Weather Urban Runoff	52	4.6
- Other	56	4.1

(b) Winter concentration-based Load Allocations

	Nitrogen (Nitrate-N + Nitrite-N) (mg/L)
- Runoff from Developed Areas	8
- Golf Course Fertilization	8
- Dry Weather Urban Runoff	8
- Other	8

(c) Compliance Monitoring:

This TMDL was established and approved by U.S. EPA and did not include an implementation plan.

(d) Actions and Special Studies required for Malibu Creek MS4 permittees

(1) Extent of algal impairment. EPA recommends studies to investigate the current extent of impairment due to excessive algal growth in the creek by

surveying algal biomass and species composition at multiple sites within the creek.

(2) Limiting factor analysis. EPA recommends further study to assess whether total nitrogen or total phosphorus or other parameters such as flow and light limit algal growth in the Malibu Creek watershed.

(3) Fate of nutrients in Malibu Lagoon. EPA recommends this special study to determine if the expected upstream reductions in nutrient loadings would result in desired improvements in water quality in the lagoon.

2. TMDL for Nitrogen Compounds and Related Effects in Calleguas Creek Watershed

The stormwater permitted discharges were considered minor sources of nitrogen to the Calleguas Creek. Therefore, WLAs are not assigned to storm water permitted discharges. The monitoring program of this TMDL includes data collection to quantify loadings and associated WLAs from these sources.

3. TMDL for Nitrogen Compounds in the Santa Clara River

(a) Waste Load Allocations:

(1) The Ventura County MS4 permittees discharging to the Santa Clara River (the cities of Fillmore and Santa Paula) ("Santa Clara MS4 permittees") shall implement BMPs to achieve the following MS4 wasteload allocations applicable to River Reach 3:

Ammonia nitrogen 30-day average	2.0 mg/L
Ammonia nitrogen 1-hour average	4.2 mg/L
Nitrate + Nitrite nitrogen 30-day average	8.1 mg/L

(b) Compliance Monitoring:

(1) Compliance with the WLAs is to be determined through receiving water monitoring conducted in accordance with the Santa Clara River Nitrogen TMDL Monitoring Program approved by the Executive Officer.

(2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.

(c) Actions and Special Studies required of Santa Clara MS4 permittees:

(1) Annual Progress Reports. Santa Clara River MS4 permittees, either independently or in conjunction with other stakeholders, shall submit an annual progress report with respect to achievement of the WLAs.

4. TMDL for Chloride in Santa Clara River, Reach 3

(a) Waste Load Allocation:

MS4 permittees discharging to Santa Clara River, Reach 3 shall implement BMPs to achieve the following MS4 WLAs:

Chloride (mg/L) 80

- (b) Compliance Monitoring: This TMDL was established and approved by U.S. EPA and did not include an implementation plan.
- (c) Actions and Special Studies required of Santa Clara MS4 permittees:
 - (1) Annual Progress Reports. Santa Clara River MS4 permittees, either independently or in conjunction with other stakeholders, shall submit an annual progress report with respect to achievement of the WLAs.

5. TMDL for Chloride in Upper Santa Clara River

- (a) Waste Load Allocation:
MS4 permittees discharging to Upper Santa Clara River shall implement BMPs to achieve the following WLAs
Chloride (mg/L) 100
- (b) Compliance monitoring:
 - (1) Compliance with the WLAs is to be determined through receiving water monitoring conducted in accordance with the Santa Clara River Chloride TMDL Monitoring Program approved by the Executive Officer.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports and Implementation Plans. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
- (c) Actions and Special Studies required of Santa Clara MS4 permittees:
 - (1) Annual Progress Reports. Santa Clara River MS4 permittees, either independently or in conjunction with other stakeholders, shall submit an annual progress report with respect to achievement of the WLAs.

6. TMDL for Toxicity, Chlorpyrifos, and Diazinon in the Calleguas Creek, its Tributaries and Mugu Lagoon.

- (a) Waste Load Allocations:
 - (1) MS4 permittees discharging to Calleguas Creek, its tributaries and Mugu Lagoon (Ventura County Watershed Protection District, County of Ventura and the cities of Camarillo, Moorpark, Oxnard, Simi Valley and Thousand Oaks) ("Calleguas MS4 permittees") shall implement BMPs to achieve the following MS4 WLAs:

Toxicity WLA	1.0 TUc
Chlorpyrifos WLA	0.014 ug/L
Diazinon WLA	0.10 ug/L
 - (2) Pursuant to the TMDL, the final storm water WLAs for Toxicity, Chlorpyrifos and Diazinon, listed above, are receiving water concentrations measured in-stream at the base of each subwatershed within the Calleguas Creek watershed.
- (b) Compliance Monitoring:

- (1) Compliance with the WLAs is to be determined through the measurement of in-stream water quality at the base of each of the Calleguas Creek subwatersheds, in accordance with the Calleguas Creek Watershed TMDL Monitoring Program approved by the Executive Officer.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
 - (3) If as a result of compliance monitoring and subsequent investigations it is determined that a Calleguas MS4 permittee is responsible for exceedance of the in-stream Toxicity WLA, that permittee shall initiate the TRE/TIE process as outlined in U.S. EPA's "Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications Under the National Pollutant Discharge Elimination System Program" (2000) or the approved Toxicity TMDL monitoring plan, and take appropriate action to eliminate the identified source of the toxicity.
- (c) Actions and Special Studies required of Calleguas MS4 permittees:
- (1) Special Study #1. Together with Calleguas POTW permittees, investigate the pesticides that will replace diazinon and chlorpyrifos in the urban environment, their potential impact on receiving waters and potential control measures. Special Study #1 was completed by March 24, 2008.
 - (2) Special Study #2. Together with Calleguas Agricultural Dischargers, consider results of monitoring of sediment concentrations by source/land use type through the special study required in the Calleguas OC Pesticide, PCB and Siltation TMDL Implementation Plan. Complete within 6 months of completion of the OCs TMDL special study #1.
 - (3) Pesticide Collection Program. Together with Calleguas POTW permittees, develop and implement a collection program for diazinon and chlorpyrifos and an educational program. Collection and education could occur through existing programs such as household hazardous waste collection events. The Pesticide Collection Program is to be implemented by March 24, 2009.
 - (4) Special Study #3. Together with Calleguas Agricultural Dischargers, consider the findings of transport rates developed through the OC Pesticide, PCB and Siltation TMDL Implementation Plan. Complete within 6 months of completion of the OCs TMDL special study #1.
- 7: TMDL for Organochlorine (OC) Pesticides, Polychlorinated Biphenyls (PCBs) and Siltation in the Calleguas Creek, its Tributaries and Mugu Lagoon.
- (a) Waste Load Allocations:
- (1) MS4 permittees discharging to Calleguas Creek, its tributaries or Mugu Lagoon (Ventura County Watershed Protection District, County of Ventura and the cities of Camarillo, Moorpark, and Simi Valley) ("Calleguas MS4 permittees") shall implement BMPs to achieve the interim WLAs listed in Table 12.

Table 12 - Interim Sediment Concentration WLAs (ng/g)

Constituent	Subwatershed					
	Mugu Lagoon	Calleguas Creek	Revolon Slough	Arroyo Las Posas	Arroyo Simi	Conejo Creek
Chlordane	25	17	48	3.3	3.3	3.4
4,4-DDD	69	66	400	290	14.0	5.3
4,4-DDE	300	470	1600	950	170	20
4,4-DDT	39	110	690	670	25	2
Dieldrin	19	3	5.7	1.1	1.1	3
PCBs	180	3800	7600	25700	25700	3800
Toxaphene	22900	260	790	230	230	260

- (2) Pursuant to the TMDL, the interim storm water WLAs for OC Pesticides, PCBs and Siltation, listed above, are annual average, sediment-based concentrations measured in surface waters at the base of each subwatershed within the Calleguas Creek watershed.
- (b) Compliance Monitoring:
 - (1) Compliance with the WLAs is to be determined through the measurement of in-stream water quality at the base of each of the Calleguas Creek subwatersheds, in accordance with the Calleguas Creek Watershed TMDL Monitoring Program approved by the Executive Officer.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
- (c) Actions and Special Studies required of Calleguas MS4 permittees:
 - (1) Pesticide Collection Program. Together with Calleguas POTW permittees, implement a collection program and source control measures pursuant to a work plan approved by the Executive Officer. The Pesticide Collection Program is to be implemented by March 24, 2011.
 - (2) Special Study #1. Together with Calleguas POTW permittees, Calleguas Agricultural Dischargers, and the Point Mugu Naval Base, submit a work plan to quantify sedimentation in the Calleguas Creek Watershed, evaluate management methods to control siltation and contaminated sediment transport to Calleguas Creek, identify appropriate BMPs to reduce sediment loadings and evaluate the effect of sediment on habitat preservation in Mugu Lagoon for approval by the Executive Officer. This special study is also to evaluate the concentration of OC pesticides and PCBs in sediments from various sources/land use types. Special Study #1 is to be completed by March 24, 2014.
 - (3) Special Study #2. Together with Calleguas Agricultural Dischargers, identify areas of high OC concentrations and evaluate the effects of watershed protection and land use practices on water quality. Such practices

include but are not limited to management of sediment reduction practices and structures, streambank stabilization, and other projects related to stormwater conveyance and flood control improvements in the Calleguas Creek watershed. Special Study #2 is to be completed based on the schedule provided in the workplan, submitted in March, 2007

- (4) Special Study #3 – Together with Calleguas POTW permittees, Calleguas Agricultural Dischargers, and the Point Mugu Naval Base, evaluate natural attenuation rates and evaluate methods to accelerate organochlorine pesticide and polychlorinated biphenyl attenuation and examine the attainability of wasteload and load allocations in the Calleguas Creek Watershed. Special Study #3 is to be completed by March 24, 2016.

8. TMDL for Metals and Selenium in the Calleguas Creek, its Tributaries and Mugu Lagoon.

(a) Waste Load Allocations:

- (1) MS4 permittees discharging to Calleguas Creek, its tributaries or Mugu Lagoon (Ventura County Watershed Protection District, County of Ventura and the cities of Camarillo, Moorpark, Oxnard, Simi Valley and Thousand Oaks) (“Calleguas MS4 permittees”) shall implement BMPs to achieve the interim WLAs listed in Table 13 and Table 14.

Table 13 - Interim WLAs for Copper, Nickel and Selenium (ug/L)

Constituent	Calleguas and Conejo Creek (a)			Revolon Slough		
	Dry Daily Maximum (ug/L)	Dry Monthly Average (ug/L)	Daily Maximum (ug/L)	Dry Daily Maximum (ug/L)	Dry Monthly Average (ug/L)	Daily Maximum (ug/L)
Copper	23	19	204	23	19	204
Nickel	15	13	(a)	15	13	(a)
Selenium	(b)	(b)	(b)	14(c)	13(c)	(a)

- (A) The current loads do not exceed the TMDL under wet conditions, interim limits are not required
- (B) Selenium allocations have not been developed for this reach as it is not on the 303(d) list
- (C) Attainment of interim limits will be evaluated in consideration of background loading data, if available
- (2) Pursuant to the TMDL, the interim storm water WLAs for copper, nickel, and selenium are receiving water concentrations measured in-stream at the base of Calleguas Creek and Revolon Slough and in Mugu Lagoon.

Table 14 – Interim Mass-based WLAs for mercury

Annual Cumulative Flow (million gallons per year)	Calleguas Creek (lbs/yr)	Revolon Slough (lbs/yr)
0-15,000	3.3	1.7
15,000-25,000	10.5	4
Above 25,000	64.6	10.2

- (3) Pursuant to the TMDL, the interim storm water WLAs for mercury are suspended sediment loads measured in-stream at the base of Calleguas Creek and Revolon Slough and in Mugu Lagoon.
- (4) Determination of the applicable interim WLA will be determined by calculating the total annual flow (October 1-September 30) in the Calleguas Creek watershed as measured by the flow gage at CSUCI.
- (b) Compliance Monitoring:
 - (1) Compliance with the WLAs is to be determined through the measurement of in-stream water quality and total suspended solids (TSS) at the base of Calleguas Creek, Revolon Slough and in Mugu Lagoon, in accordance with the Calleguas Creek Watershed TMDL Monitoring Program approved by the Executive Officer.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
- (c) Actions and Special Studies required of Calleguas MS4 permittees:
 - (1) Conduct a source control study, develop and submit an Urban Water Quality Management Program (UWQMP) for copper, mercury, nickel, and selenium. Complete by March 26, 2009.
 - (2) Implement the UWQMP within one year of approval by Executive Officer.
 - (3) In cooperation with agricultural dischargers, evaluate the results of the OCs TMDL special study on sediment transport rates for applicability to the metals and selenium TMDL. Complete within 6 months of completion of the OCs TMDL special study #1.
 - (4) In cooperation with agricultural dischargers, include monitoring for copper, mercury, nickel and selenium in the OC pesticides TMDL special study – Monitoring of Sediment by Source and Land Use Type. The special study is to be completed by March 26, 2014.
 - (5) Evaluate the results of the OC Pesticides TMDL Special Study – Effects of BMPs on Sediment and Siltation, to determine the impacts on metals and selenium. Complete within 6 months of completion of the OC Pesticides special study #1.

- (6) Evaluate the effectiveness of BMPs implemented under the UWQMP in controlling metals and selenium discharges. This is to be completed by March 26, 2013.
- (7) Re-evaluate agricultural and urban waste load allocations for copper, mercury, nickel and selenium based on the evaluation of BMP effectiveness. By March 26, 2012, urban dischargers will have a required 25% reduction in the difference between the loadings at the time of the TMDL preparation and the final WLAs effective in 2022.
- (8) In cooperation with POTW permittees and agricultural dischargers, conduct a study to identify selenium contaminated groundwater sources. Special Study is to be completed within one year of the approval of the workplan.
- (9) In cooperation with agricultural dischargers, conduct a study to investigate metals "hot spots" and natural soils concentrations. This special study is to be completed within 2 years of the approval of the workplan.

9. TMDL for Bacteria in Malibu Creek and Lagoon

(a) Waste Load Allocations:

- (1) MS4 permittees discharging to Malibu Creek or its tributaries (Ventura County Watershed Protection District, County of Ventura and the cities of Thousand Oaks and Simi Valley) ("Malibu MS4 permittees") shall achieve the WLAs identified in Resolution 2004-19. These WLAs are expressed as the number of daily or weekly sample days that may exceed the single sample limits or 30-day geometric mean bacteria targets in Resolution 2004-19.

Table 15 - Bacteria Targets

Parameters	Unit	Fresh Water Targets	
		Geometric Mean	Single Sample
E. coli	mg	126/ 100	235/ 100
Fecal coliform	mg	200/ 100	400/ 100

- (2) The summer dry weather wasteload allocations are to be achieved no later than January 24, 2009. The winter dry weather wasteload allocations are to be achieved no later than January 24, 2012.

(b) Compliance Monitoring:

- (1) Achievement of the WLAs is to be determined through receiving water monitoring conducted in accordance with the Malibu Creek and Lagoon Bacteria TMDL Compliance Monitoring Program approved by the Executive Officer.
- (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.

(c) Actions and Special Studies required of Malibu MS4 permittees:

- (1) If TMDL compliance monitoring indicates that the Malibu MS4 permittees are causing or contributing to an exceedance of the WLAs in the receiving waters, the permittees shall conduct a source identification study and implement additional controls sufficient to achieve the WLAs in the receiving waters.
10. TMDL for Trash in Revolon Slough and Beardsley Wash
 - (a) Wasteload Allocations
 - (1) MS4 permittees discharging to Revolon Slough and Beardsley Wash (Ventura County Watershed Protection District, County of Ventura and the cities of Camarillo and Oxnard) shall implement BMPs to achieve the WLAs of zero trash.
 - (b) Compliance Monitoring
 - (1) Responsible jurisdictions will develop a TMRP for Executive Officer approval that describes the methodologies that will be used to assess and monitor trash in Revolon Slough and Beardsley Wash and/or within responsible jurisdiction land areas. The TMRP shall include a plan to establish the trash Baseline WLAs.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
 - (c) Actions and Special Studies required of Revolon Slough and Beardsley Wash MS4 permittees
 - (1) Per the adopted Basin Plan Amendment, compliance with the TMDL may be either through a progressive implementation schedule of full capture devices or implementation of other measures to attain the required trash reduction.
 11. TMDL for Trash in the Ventura River Estuary
 - (a) Wasteload Allocations
 - (1) MS4 permittees discharging to the Ventura River Estuary (Ventura County Watershed Protection District, County of Ventura and the City of Ventura) shall implement BMPs to achieve the WLAs of zero trash.
 - (b) Compliance Monitoring
 - (1) Responsible jurisdictions will develop a TMRP for Executive Officer approval that describes the methodologies that will be used to assess and monitor trash in the Ventura River Estuary and/or within responsible jurisdiction land areas. The TMRP shall include a plan to establish the trash Baseline WLAs.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies

identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.

- (c) Actions and Special Studies required of Revolon Slough and Beardsley Wash MS4 permittees
 - (1) Per the adopted Basin Plan Amendment, compliance with the TMDL may be either through a progressive implementation schedule of full capture devices or implementation of other measures to attain the required trash reduction.

12. TMDL for Boron, Chloride, Sulfate and TDS in Calleguas Creek Watershed

(a) Waste Load Allocation

Table 16 - Interim Dry Weather WLAs for Permitted Stormwater Dischargers

Constituent	Interim Limit 30-day average (mg/L)
Boron Total	1.3
Chloride Total	230
Sulfate Total	1289
TDS Total	1720

Table 17 - Final Dry Weather WLAs for Permitted Stormwater Dischargers

Subwatershed	Critical Condition Flow Rate (mgd)	Chloride Allocation (lb/day)	TDS Allocation (lb/day)	Sulfate Allocation (lb/day)	Boron Allocation (lb/day)
Simi	1.39	1,738	9,849	2,897	12
Las Posas	0.13	157	887	261	N/A
Conejo	1.26	1,576	8,931	2,627	N/A
Camarillo	0.06	72	406	119	N/A
Pleasant Valley (Calleguas)	0.12	150	850	250	N/A
Pleasant Valley (Revolon)	0.25	314	1,778	523	2

(b) Compliance Monitoring

- (1) A monitoring plan will be submitted to the RWQCB for Executive Officer approval on June 2, 2009. Monitoring will begin one year after Executive Officer approval of the monitoring plan to allow time for the installation of automated monitoring equipment.
- (2) Compliance with the WLAs is to be determined through the measurement of in-stream water quality at the base of each of the Calleguas Creek

subwatersheds, in accordance with the Calleguas Creek Watershed TMDL Monitoring Program approved by the Executive Officer.

- (3) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
- (c) Actions and Special Studies required of Calleguas Creek Watershed MS4 permittees

Responsible jurisdictions including MS4 permittees shall submit compliance monitoring plan to the Los Angeles Regional Water Board for Executive Officer approval on June 2, 2009. Monitoring shall begin as outlined in the approved monitoring plan one year after approval of the work plan.

Responsible jurisdictions including MS4 permittees shall demonstrate that implementation actions have reduced the boron, sulfate, TDS, and chloride imbalance by 20%, 40%, 70% by December 2 of 2011, 2015, and 2018 respectively. Stormwater dischargers shall achieve WLAs, which shall be expressed as NPDES mass-based limits specified in accordance with federal regulations and state policy on water quality control by December 2, 2023.

13. TMDL for Bacteria in Harbor Beaches of Ventura County

(a) Waste Load Allocations

- (1) MS4 permittees discharging to the Channel Islands Harbor Beaches (the County of Ventura, the Ventura County Watershed Protection District (VCWPD) and associated Municipal Separate Storm Sewer System (MS4) permittees in the Channel Islands Harbor subwatershed, and the City of Oxnard shall implement BMPs to achieve the interim WLAs listed in Table 18. All WLAs for summer dry-weather single sample bacteria densities at the Harbor Beaches of Ventura County are zero (0) days of allowable exceedances; winter dry weather and wet weather final WLAs are listed in Table 19 below.

The Basin Plan objectives that serve as the numeric targets for this TMDL are (single sample limits):

- a. Total coliform density shall not exceed 10,000/100 ml.
- b. Fecal coliform density shall not exceed 400/100 ml.
- c. Enterococcus density shall not exceed 104/100 ml.
- d. Total coliform density shall not exceed 1,000/100ml,
if the ratio of fecal-to-total coliform exceeds 0.1.

Table 18 - Interim WLAs for Single Sample Exceedance Days

Location	Summer Dry Weather		Winter Dry Weather		Wet Weather	
	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
Kiddie Beach	54	8	23	4	32	5
Hobie Beach	40	6	25	4	38	6

Table 19 - Final Allowable Exceedance Days by Location

Location	Summer Dry-weather		Winter Dry-weather		Wet-weather	
	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
Hobie Beach	0	0	3	1	17	3
Kiddie Beach	0	0	3	1	17	3

- (2) Pursuant to the TMDL, the interim storm water WLAs for bacteria are from samples taken at existing monitoring sites in ankle to knee- high depths.
- (b) Compliance Monitoring
- (1) Compliance and monitoring for Harbor Beaches of Ventura County is based on existing monitoring protocols and locations. Monitoring shall continue at sampling locations (VCEHD 36000 and VCEHD37000) and at the current weekly monitoring frequency, consistent with AB411 compliance monitoring. Monitoring shall be conducted on a year-round basis at the current monitoring locations including the summer months (i.e., April to October) and winter months (i.e., November to March). Bacteria sampling shall be conducted in ankle- to knee-high water, consistent with AB411. However, if additional monitoring stations are added or if changes are made to the sampling frequencies or existing monitoring locations, then submittal of a monitoring plan is required for Executive Officer approval.
 - (2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for enforcement action.
- (c) Actions and Special Studies required of Harbor Beaches of Ventura County MS4 permittees
- (1) Per the adopted Basin Plan Amendment, compliance with the TMDL may be either through structural and non-structural BMPs or implementation of other measures to attain the required source control.
 - (2) Special studies are not required for implementation of the TMDL though conducting special studies is within the discretion of the responsible parties.

PART 6 - DEFINITIONS

The following are definitions for terms in this Order:

Adverse Impact - means a detrimental effect upon water quality or beneficial uses caused by a discharge or loading of a pollutant or pollutants.

Agriculture - means the science, art, and business of cultivating the soil, producing crops, and raising livestock.

Antidegradation Policies - means policies which protect surface and ground waters from degradation, and federal policies, which protect high quality surface waters. In particular, this policy protects waterbodies where existing quality is higher than that necessary for the protection of beneficial uses including the protection of fish and wildlife propagation and recreation on and in the water. (*Statement of Policy with Respect to Maintaining High Quality Water in California*, State Board Resolution No. 68-16; 40 CRF 131.12).

Applicable Standards and Limitations - means all State, interstate, and Federal standards and limitations to which a "discharge" or a related activity is subject under the CWA, including effluent limitations, water quality standards, standards of performance, toxic effluent standards or prohibitions, best management practices, and pretreatment standards under § 301, § 302, § 303, § 304, § 306, § 307, § 308, § 403, and § 404 of CWA.

Areas of Special Biological Significance (ASBS) - means all those areas of this state listed as ASBS, listed specifically within the California Ocean Plan or so designated by the State Board which, among other areas, includes the area from Mugu Lagoon to Latigo Point: Ocean water within a line originating from Laguna Point at 34° 5' 40" north, 119° 6' 30" west, thence southeasterly following the mean high tideline to a point at Latigo Point defined by the intersection of the mean high tide line and a line extending due south of Benchmark 24; thence due south to a distance of 1000 feet offshore or to the 100 foot isobath, whichever distance is greater; thence northwesterly following the 100 foot isobath or maintaining a 1,000-foot distance from shore, whichever maintains the greater distance from shore, to a point lying due south of Laguna Point, thence due north to Laguna Point.

Authorized Discharge - means any discharge that is authorized pursuant to an NPDES permit, waste discharge requirement, conditional waiver from waste discharge requirements, or meets the conditions set forth in this Order.

Automotive Repair Shop - means a facility that is categorized in any one of the following Standard Industrial Classification (SIC) codes: 5013, 5014, 5541, 7532-7534, or 7536-7539.

Automotive Service Facilities - means a facility that is categorized in any one of the following Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes. For inspection purposes, Permittees need not inspect facilities with SIC codes

5013, 5014, 5541, 5511, provided that these facilities have no outside activities or materials that may be exposed to storm water.

SIC Code	Corresponding NAICS Code
5013	425120, 441310, 425110, & 423120
5014	425120, 425110, 423130, & 441320
5511	441110
5541	447110, & 447190
7532	811121
7533	811112
7534	326212, & 811198
7536	811122
7537	811113
7538	811111
7539	811198, & 811118

Bacteria Total Maximum Daily Load (TMDL) Dry Weather - defined in the Bacteria TMDLs as those days with less than 0.1 inch of rainfall and those days occurring more than 3 days after a rain.

Bacteria Total Maximum Daily Load (TMDL) Wet Weather - defined in the Bacteria TMDLs as a day with 0.1 inch or more of rain and 3 days following the rain event.

Basin Plan - means the Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, adopted by the Regional Water Board on June 13, 1994 and subsequent amendments.

Beneficial Uses - means the existing or potential uses of receiving waters in the permit area as designated by the Regional Water Board in the Basin Plan.

Best Management Practices (BMPs) - means methods, measures, or practices designed and selected to reduce or eliminate the discharge of pollutants to surface waters from point and nonpoint source discharges including storm water. BMPs include structural and nonstructural controls, and operation and maintenance procedures, which can be applied before, during, and/or after pollution producing activities.

California Environmental Quality Act (CEQA) - means a California statute that requires state and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible (Reference: California Public Resources Code § 21000 et seq.)

Channel - means an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two waterbodies.

Chronic Toxicity - means a measurement of a sublethal effect (e.g., reduced growth, reproduction) to experimental test organisms exposed to an effluent or ambient waters compared to that of the control organisms.

Commercial Area(s) - means any geographic area of the Permittees' jurisdiction that is not heavy industrial or residential. A commercial area includes, but is not limited to areas surrounding: commercial activity, hospitals, laboratories and other medical facilities, educational institutions, recreational facilities, plant nurseries, car wash facilities, mini-malls and other business complexes, shopping malls, hotels, office buildings, public warehouses and other light industrial complexes.

Commercial Development - means any development on private land that is not heavy industrial or residential. The category includes, but is not limited to: hospitals, laboratories and other medical facilities, educational institutions, recreational facilities, plant nurseries, car wash facilities; mini-malls and other business complexes, shopping malls, hotels, office buildings, public warehouses and other light industrial complexes.

Construction - Construction activity includes any construction or demolition activity, clearing, grading, grubbing, or excavation or any other activity that results in a land disturbance. Construction does not include emergency construction activities required to immediately protect public health and safety or routine maintenance activities required to maintain the integrity of structures by performing minor repair and restoration work, maintain original line and grade, hydraulic capacity, or original purpose of the facility. See "Routine Maintenance" definition for further explanation. Where clearing, grading or excavating of underlying soil takes place during a repaving operation, State General Construction Permit coverage is required if more than one acre is disturbed or the activities are part of a larger plan.

Construction Activities Storm Water General Permit (CASGP) - means the general NPDES permit adopted by the State Board, which authorizes the discharge of storm water from construction activities under certain conditions.

Control - means to minimize, reduce, eliminate, or prohibit by technological, legal, contractual or other means, the discharge of pollutants from an activity or activities.

Critical Sources - means commercial facilities and businesses that have a potential to contribute pollutants to stormwater runoff if effective BMPs are not implemented. Attachment "D" specifies the commercial facilities and businesses that have been identified as Critical Sources.

Dechlorinated/ Debrominated Swimming Pool Discharge - means any swimming pool discharge with a residual chlorine or bromine level of 0.1mg/L or less; and does not contain any detergents, wastes, algaecides, or cyanuric acid in excess of 50 ppm, or any other chemicals including salts from pools commonly referred to as "salt water pools". The term does not include swimming pool filter backwash or swimming pool water containing bacteria.

Development - means any construction, rehabilitation, redevelopment or reconstruction of any public or private residential project (whether single-family, multi-unit or planned unit development); industrial, commercial, retail and any other non-residential projects, including public agency projects; or mass grading for future construction.

Directly Adjacent - means situated within 200 feet of the contiguous zone required for the continued maintenance, function, and structural stability of the environmentally sensitive area.

Directly Discharging - means outflow from a drainage conveyance system that is composed entirely or predominately of flows from the subject, property, development, subdivision, or industrial facility and not commingled with the flows from adjacent lands.

Discharge - means when used without qualification the "discharge of a pollutant."

Discharging Directly - means outflow from a drainage conveyance system that is composed entirely or predominantly of flows from the subject, property, development, subdivision, or industrial facility, and not commingled with the flows from adjacent lands.

Discharge of a Pollutant - means any addition of any "pollutant" or combination of pollutants to "waters of the United States" from any "point source" or, any addition of any pollutant or combination of pollutants to the waters of the "contiguous zone" or the ocean from any point source other than a vessel or other floating craft, which is being used as a means of transportation. The term discharge includes additions of pollutants into waters of the United States from: surface runoff which is collected or channeled by man; discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to a treatment works; and discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works.

Disturbed Area - means any area that is altered as a result of land disturbance. Examples include but are not limited to: clearing, grading, grubbing, stockpiling and/ or excavation, etc...

Dry Day - means a non-wet day for Malibu Creek and Lagoon Bacteria TMDL WLA. A wet day is defined as a day with a 0.1 inch or more of rain and 3 days following the rain event.

Effect Concentration (EC) - means a point estimate of the toxicant concentration that would cause an observable adverse effect (e.g., death, immobilization, or serious incapacitation) in a given percent of the test organisms, calculated from a continuous model (e.g., Probit Model). EC₂₅ is a point estimate of the toxicant concentration that would cause an observable adverse effect in 25 percent of the test organisms.

Effective Impervious Surface - means that portion of the surface area that is hydrologically connected via sheet flow over a hardened conveyance or impervious surface without any intervening medium to mitigate flow volume.

Effluent limitation - means any restriction imposed by the Permitting Authority (PA) on quantities, discharge rates, concentrations, and/ or mass loadings of "pollutants" which are "discharged" from "point sources" into "waters of the United States," the waters of the "contiguous zone," or the ocean.

Emergency - means a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. "Emergency" includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage. (Reference: California Public Resources Code § 21060.3. Emergency).

End-of-Pipe - means the end of the major outfall as defined in 40 CFR 122.26 (b)(5) and 40 CFR 122.26 (b)(6).

Endpoint - means a biological measurement used to quantify the results obtained from analytical methods such as whole effluent toxicity testing [e.g., lethal concentration (LC₅₀); inhibition concentration (IC₂₅); and no observed effect concentration (NOEC)]. Such endpoints are quantitative measurements of the responses of test organisms (e.g., survival, growth, mobility, reproduction, and weight gain or loss) in response to exposure to a serial dilution of effluent.

Environment - means the physical conditions, which exist within the area and which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

Environmentally Sensitive Area (ESA) - means an area "in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which would be easily disturbed or degraded by human activities and developments" (Reference: California Public Resources Code § 30107.5). ESAs will include Clean Water Act 303d Listed Water Bodies in all reaches that are unimproved, all California Coastal Commission's Environmentally Sensitive Habitat Areas as delineated on maps in Local Coastal Plans and Regional Water Quality Control Board's Basin Plan Rare, Threatened or Endangered Species (RARE) and Preservation of Biological Habitats (BIOL) designated waterbodies. The California Department of Fish and Game's Significant Natural Areas map will be considered for inclusion as the department field verifies the designated locations. Watershed restoration projects will be considered for inclusion as the department field verifies the designated locations.

Erosivity Factor - The Erosivity Factor is a criterion that to assess the risk of erosion on disturbed land. It is described in "Predicting soil erosion by water: A guide to conservation planning with the Revised Universal Soil Loss Equation (RUSLE), Agricultural Handbook 703, USDA-ARS, U.S. Government Printing Office, Washington, D.C., 1997 by Renard, K.C., G.R. Foster, G.A. Weesies, D.K. McCool, and D.C. Yoder.

Federal Clean Water Act (CWA) - means (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Public Law 92—500, as amended by Public Law 95—217, Public Law 95—576, Public Law 96—483 and Public Law 77—117, codified at 33 U.S.C. 1251 et seq.

First Storm Event - means the first storm event of the wet season that produces at least 0.25 inches of rain.

Forest Land - means land at least 10 percent stocked with live trees, or land that had this minimum tree stocking in the past and is not currently developed for nonforest use. The minimum area recognized is 1 acre.

Groundwater Dewatering - means the active practice of removing standing water from soil excavations using a pump(s) or other means.

Hillside - means property located in an area with known erosive soil conditions, where the development will result in grading on any slope that is 20% or greater or an area designated by the Municipality under a General Plan or ordinance as a "hillside area".

Horse Stables - means a property where at least one horse is stabled at least part of the year.

Hydromodification - means the alteration away from a natural state of stream flows or the beds or banks of rivers, streams, or creeks, including ephemeral washes, which results in hydrogeomorphic changes.

Illegal Discharge - means any discharge to the municipal separate storm sewer (storm drain system) that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. The term illegal discharge includes all non-storm water discharges not composed entirely of storm water except discharges pursuant to an NPDES permit, discharges that are identified in part 1, "Discharge Prohibitions" of this order, or discharges authorized by the Regional Water Board Executive Officer.

Illicit Connection - means any engineered conveyance that is connected to the storm drain system without a permit or municipal authorization. It also means any engineered conveyance through which discharges of pollutants to the separate storm drainage systems, which are not composed entirely of storm water or are not authorized by an NPDES permit, may occur.

Illicit Discharge - means any discharge to a municipal separate storm sewer (storm drain system) that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. The term illicit discharge includes all non-storm water discharges not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges that are identified in part 1, "Discharge Prohibitions" of this order, or authorized by the Regional Water Board Executive Officer.

Illicit Disposal - means any disposal, either intentionally or unintentionally, of material(s) or waste(s) that can pollute storm water.

Industrial/ Commercial Facility - means any facility involved and/ or used in the production, manufacture, storage, transportation, distribution, exchange or sale of goods and/ or

commodities, and any facility involved and/ or used in providing professional and non-professional services. This category of facilities includes, but is not limited to, any facility defined by either the Standard Industrial Classifications (SIC) or the North American Industry Classification System (NAICS). Facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in this definition.

Industrial Activities Storm Water General Permit (IASGP) - means the general NPDES permit adopted by the State Board, which authorizes the discharge of storm water from certain industrial activities under certain conditions.

Industrial Park - means a land development that is set aside for industrial development. Industrial parks are usually located close to transport facilities, especially where more than one transport modalities coincide: highways, railroads, airports, and navigable rivers. It includes office parks, which have offices and light industry.

Inhibition Concentration (IC) - means a point estimate of the toxicant concentration that would cause a given percent reduction in a non-lethal biological measurement (e.g., reproduction or growth), calculated from a continuous model (i.e., Interpolation Method). IC25 is a point estimate of the toxic concentration that would cause a 25-percent reduction in a non-lethal biological measurement.

Inspection - means entry and the conduct of an on-site review of a facility and its operations, at reasonable times, to determine compliance with specific municipal or other legal requirements. The steps involved in performing an inspection, include, but are not limited to:

1. Pre-inspection documentation research
2. Request for entry
3. Interview of facility personnel
4. Facility walk-through
5. Visual observation of the condition of facility premises
6. Examination and copying of records as required
7. Sample collection (if necessary or required)
8. Exit conference (to discuss preliminary evaluation)
9. Report preparation, and if appropriate, recommendations for coming into compliance

Integrated Pest Management (IPM) - means a sustainable approach to managing pests by combining biological, cultural, physical and chemical tools in a way that minimizes economic, health, and environmental risks.

Large Municipal Separate Storm Sewer System (MS4) - means all MS4s that serve a population greater than 250,000 (1990 Census) as defined in 40 CFR 122.26 (b)(4). The Regional Water Board designated Ventura County as a large MS4 in 1990, based on: (i) the U.S. Census Bureau 1990 population count of 669,016 thousand, and (ii) the interconnectivity of the MS4s in the incorporated and unincorporated areas within the County.

Local SWPPP - means the Local Storm Water Pollution Prevention Plan (LSWPPP) required by the local agency for a project that disturbs one or more acres of land. Shall mean a plan identifying potential pollutant sources from a construction site and describing proposed design, placement and implementation of BMPs, to effectively prevent non-storm water discharges and reduce pollutants in storm water discharges to the storm drain system, during construction activities. Also referred as a Storm Water Pollution Control Plan (SWPCP).

Low Impact Development (LID) – means a design strategy with the goal of maintaining or replicating the pre-development hydrologic regime through the use of design techniques to create a functionally equivalent hydrologic site design. Hydrologic functions of storage, infiltration and ground water recharge, as well as the volume and frequency of discharges are maintained through the use of integrated and distributed micro-scale storm water retention and detention areas, reduction of impervious surfaces, and the lengthening of runoff flow paths and flow time. Other strategies include the preservation/protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable (mature) trees, flood plains, woodlands, and highly permeable soils.

Major Municipal Separate Storm Sewer Outfall (“or major outfall”) - means a major municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of 36 inches or more or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive storm water from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more), as defined in 40 CFR 122.26 (b)(5).

Major Outfall - means a major municipal separate storm sewer outfall, as defined in 40 CFR 122.26 (b)(6).

Maximum Extent Practicable (MEP) – The technology-based permit requirement established by Congress in CWA section 402(p)(3)(B)(iii) that municipal dischargers of storm water must meet. Technology-based requirements, including MEP, establish a level of pollutant control that is derived from available technology or other controls. MEP requires municipal dischargers to perform at maximum level that is practicable. Compliance with MEP may be achieved by emphasizing pollution prevention and source control BMPs in combination with structural and treatment methods where appropriate. The MEP approach is an ever evolving and advancing concept, which considers technical and economic feasibility.

Method Detection Limit (MDL) - means the minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is greater than zero, as defined in 40 CFR 136, Appendix "G" of this Order.

Minimum Level (ML) - means the concentration at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method specified sample weights, volumes, and processing steps have been followed. The ML value represents the lowest quantifiable concentration in a sample based on the proper application of all method-based analytical procedures and the absence of any matrix interferences. Assuming that all method-specific analytical steps are followed, the ML value will also represent, after the appropriate application of method-specific factors, the lowest standard in the calibration curve for that specific analytical technique.

Minimum Significant Difference (MSD) - means a measure of test sensitivity that establishes the minimum difference required between a control and a test treatment in order for that difference to be considered statistically significant.

Municipal Separate Storm Sewer System (MS4) - means a conveyance or system of conveyances (including roads w/ drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains), as defined in 40 CFR 122.26(b)(8):

1. Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under § 208 of the Federal Clean Water Act (CWA) that discharges into waters of the United States
2. Designed or used for collecting or conveying storm water
3. Which is not a combined sewer
4. Which is not part of a Publicly Owned Treatment Works (POTW), as defined in 40 CFR 122.2

NAICS - means North American Industry Classification System.

National Pollutant Discharge Elimination System (NPDES) - means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under CWA § 307, 402, 318, and 405.

Natural Drainage Systems - means unlined or unimproved (not engineered) creeks, streams, rivers or similar waterways.

New Development - means land disturbing activities; structural development, including construction or installation of a building or structure, creation and replacement of impervious surfaces; and land subdivision.

Non-Storm Water Discharge - means any discharge to a storm drain that is not composed entirely of storm water.

No Observed Effect Concentration (NOEC) - means the highest tested concentration of an effluent or toxicant that causes no observable adverse effect on the test organisms (i.e., the highest concentration of toxicant at which the values for the observed responses are not statistically different from the controls).

Nuisance - means anything that meets all of the following requirements: (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; (2) affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; (3) occurs during, or as a result of, the treatment or disposal of wastes.

Nursery - means nursery operations that are generally classified under 4 broad NAICS classification sectors: (a) 111xxx - Crop Production – Agriculture; (b) 424xxx - Merchant Wholesalers, Nondurable Goods; (c) 44xxxx - Retail Trade; and (d) 454xxx - Non-store retailers. Retail nursery operations shall be covered by this Order. This Order does not cover wholesale nursery stock operations or agricultural nursery operations, unless such operations are not covered by another Regional Water Board Order.

- (1) **Retail Nursery Operations** - means Nursery, Garden Center, and Farm Supply Stores typically classified under NAICS Code 444220 and non-store retailers typically classified under NAICS Code 454xxx. Retail nursery operations are primarily engaged in retailing nursery and garden products, such as trees, shrubs, plants, seeds, bulbs, floriculture products and sod, which are predominantly grown elsewhere. These establishments may sell a limited amount of a product they grow themselves.

Open Channel - means a storm drainage channel that is not a natural water course.

Parking Lot - means land area or facility for the parking or storage of motor vehicles used for businesses, commerce, industry, or personal use.

Percent Minimum Significant Difference (PMSD) - means the minimum significant difference divided by the control mean, expressed as a percent (see minimum significant difference).

Permit - means an authorization, license, or equivalent control document issued by U.S. EPA or an "approved State" to implement the requirements of 40 CFR Parts 122, 123, and 124. "Permit" includes an NPDES "general permit" (§ 122.28). Permit does not include any permit, which has not yet been the subject of final agency action, such as a "draft permit" or a "proposed permit."

Permittee(s) - means co-permittee(s) and any agency named in this Order as being responsible for permit conditions within its jurisdiction, as defined by Federal Regulation. Permittees to this Order include the Ventura Water Protection District, Ventura County, and the

cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley and Thousand Oaks.

Point Source - means any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural storm water discharges and return flows from irrigated agriculture.

Point Zero - means in the context of the TMDLs, the point at which water from the storm drain or creek initially mixes with water.

Pollutants - means those "pollutants" defined in CWA § 502(6) (33.U.S.C. § 1362(6)), and incorporated by reference into California Water Code § 13373.

Pollutants of Concern - means constituents that have exceeded Basin Plan Objectives, and CTR- Chronic or Acute Objectives during monitoring at Mass Emission, Receiving Water, and Land Use stations.

Potable Water Sources - means the potable water system for the treatment, distribution, and provision of water for residential, commercial, industrial, or institutional use that meets all California safe drinking water regulatory standards for human consumption.

Pre-Developed Condition - means native vegetation and soils that existed at a site prior to first development. The pre-developed condition may be assumed to be an area with the typical vegetation, soil, and storm water runoff characteristics of open space areas in coastal Southern California unless reasonable historic information is provided that the area was atypical.

Priority Pollutants - means those constituents referred to in 40 CFR 401.15 and listed in the U.S. EPA NPDES Application Form 2C, pp. V-3 through V-9.

Project - means all development, redevelopment, and land disturbing activities. The term is not limited to "Project" as defined under CEQA (Reference: California Public Resources Code § 21065).

Qualified SWPPP Developer or Qualified SWPPP Practitioner – refer to State of California General Construction Stormwater Permit for definition.

Rare, Threatened, or Endangered Species (RARE) - means a beneficial use for waterbodies in the Los Angeles Region, as designated in the Basin Plan (Tables 2-1, 2-3, and 2-4), that supports habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

Redevelopment - means land-disturbing activity that results in the creation, addition, or replacement of 5,000 square feet or more of impervious surface area on an already developed

site. Redevelopment includes, but is not limited to: the expansion of a building footprint; addition or replacement of a structure; replacement of impervious surface area that is not part of a routine maintenance activity; and land disturbing activities related to structural or impervious surfaces. It does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of facility, nor does it include emergency construction activities required to immediately protect public health and safety.

Regional Administrator - means the Regional Administrator of the Regional Office of the U.S. EPA or the authorized representative of the Regional Administrator.

Report of Waste Discharge (ROWD) - means an application for renewal of the NPDES Permit for Waste Discharge Requirements for Municipal Separate Storm Sewer Discharges Within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein.

Restaurant - means a facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC Code 5812).

Restoration - means the reestablishment of predisturbance aquatic functions and related physical, chemical and biological characteristics (Reference: National Research Council. 1992. Restoration of Aquatic Ecosystems: Science, Technology and Public Policy. National Academy Press, Washington, D.C.).

Retail Gasoline Outlet (RGO) - means any facility engaged in selling gasoline and lubricating oils- SIC 5541 and NAICS 447110 & 447190.

1. RGOs: 447190 Other Gasoline Stations:

This industry comprises establishments known as gasoline stations (except those with convenience stores) primarily engaged in one of the following: (1) retailing automotive fuels (e.g., diesel fuel, gasohol, gasoline) or (2) retailing these fuels in combination with activities, such as providing repair services; selling automotive oils, replacement parts, and accessories; and/ or providing food services.

2. RGOs: 447110 Gasoline Stations with Convenience Stores:

Retailing automotive fuels in combination with a convenience store or food mart.

Routine Maintenance – Routine maintenance projects include, but are not limited to projects conducted to:

1. Maintain the original line and grade, hydraulic capacity, or original purpose of the facility.
2. Perform as needed restoration work to preserve the original design grade, integrity and hydraulic capacity of flood control facilities.
3. Includes road shoulder work, regrading dirt or gravel roadways and shoulders and performing ditch cleanouts.
4. Update existing lines* and facilities to comply with applicable codes, standards, and regulations regardless if such projects result in increased capacity.
5. Repair leaks

Routine maintenance does not include construction of new** lines or facilities resulting from compliance with applicable codes, standards and regulations.

* Update existing lines includes replacing existing lines with new materials or pipes.

** New lines are those that are not associated with existing facilities and are not part of a project to update or replace existing lines.

Screening - means using proactive methods to identify illicit connections through a continuously narrowing process. The methods may include: performing baseline monitoring of open channels, conducting special investigations using a prioritization approach, analyzing maintenance records for catch basin and storm drain cleaning and operation, and verifying all permitted connections into the storm drains. Special investigation techniques may include: dye testing, visual inspection, smoke testing, flow monitoring, infrared, aerial and thermal photography, and remote control camera operation.

Sidewalk Rinsing - means only sidewalk rinsing using high pressure and low volume of water with no additives and at an average usage of 0.006 gallons per square foot of surface area to be rinsed. Any waste generated from the activity must be collected and properly and legally disposed of. It does not mean hosing of any sidewalk or street with a garden hose with a pressure nozzle.

Site - means the land or water area where any "facility or activity" is physically located or conducted, including adjacent land used in connection with the facility or activity.

Small Construction - means any soil disturbing activities less than 5 acres.

Smart Growth - development in or near cities intended to lessen or reverse suburban sprawl, decrease the use of automobiles, and shorten daily travel. It uses compact building design to cluster together residential, shopping, and work areas and encourages walking and public transportation. Smart Growth is considered a stormwater BMP in the 2005 publication *Using Smart Growth Techniques as Stormwater Best Management Practices*, EPA 231-B-05-002.

Source Control BMP - means any schedules of activities, prohibitions of practices, maintenance procedures, managerial practices or operational practices that aim to prevent storm water pollution by reducing the potential for contamination at the source of pollution.

Southern California Stormwater Monitoring Coalition (SMC) - means the Stormwater Monitoring Coalition, which is a collaborative research/ monitoring partnership of the Southern California Water Boards, Municipal Storm Water Agencies, and municipalities to develop the methodologies and assessment tools to more effectively understand urban storm water and non-storm water (anthropogenic) impacts to receiving waters and to conduct research/ monitoring through Subsequent Research Implementation Agreements. The first original cooperative agreement was entered into on February 8, 2001.

Stream - means a body of flowing water; natural water course containing water at least part of the year. In hydrology, it is generally applied to the water flowing in a natural channel as distinct from a canal (Reference: US Geological Survey).

Strip Mall - means a commercial development that is a shopping center where the stores are arranged in a row, with a sidewalk in front. Strip malls are typically developed as a unit and have large parking lots in front. They face major traffic arterials and tend to be self-contained with few pedestrian connections to surrounding neighborhoods. It is also called a plaza.

Storm Event Monitoring - means a rainfall event that produces more than 0.25 inch of precipitation and is separated from the previous storm event by at least 1 week of dry weather, for the purpose of monitoring.

Storm Water - means storm water runoff, snow melt runoff, and surface runoff and drainage, as defined in 40 CFR 122.26(b)(13).

Storm Water Discharge Associated with Industrial Activity - means industrial discharge, as defined in 40 CFR 122.26(b)(14).

Storm Water Quality Management Program - means the Ventura Countywide Storm Water Quality Management Plan, which includes descriptions of programs, collectively developed by the Permittees in accordance with provisions of the NPDES Permit, to comply with applicable federal and state law, as the same is amended from time to time.

Structural BMP - means any structural facility designed and constructed to mitigate the adverse impacts of storm water runoff pollution (e.g. canopy, structural enclosure). The category may include both Treatment Control BMPs and Source Control BMPs.

Summer Dry Weather - means dry weather days occurring from April 1 through October 31 of each year.

t-Test (formally Student's t-test) - means a statistical analysis comparing two sets of replicate observations, in the case of WET, only two test concentrations (e.g., a control and 100% effluent). The purpose of this test is to determine if the means of the two sets of observations are different [e.g., if the 100% effluent concentration differs from the control (i.e., the test pass or fails)].

Targeted Employees - means management and staff who perform or direct activities that directly or indirectly have an effect of storm water quality. The employees generally are employed in the following areas: department of public works, engineering, sanitation, storm water maintenance, drainage and flood control, transportation, streets and roads, parks and recreation, public landscaping and corporation yards, planning or community development, code enforcement, building and safety, harbor or port departments, airports, or general services and fleet services.

Total Maximum Daily Load (TMDL) - means the sum of the individual waste load allocations for point sources and load allocations for nonpoint sources and natural background.

Toxicity Identification Evaluation (TIE) - means a set of procedures to identify the specific chemical(s) responsible for toxicity through a process of chemical/ physical manipulations of samples followed by toxicity tests. These procedures are performed in 3 phases (Phase I- Toxicity Characterization Procedure, Phase II- Toxicity Identification Procedure, and Phase III- Toxicity Confirmation Procedure) using aquatic organism toxicity tests.

Toxicity Reduction Evaluation (TRE) - means a study conducted in a step-wise process to identify the causative agents of effluent or ambient toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in toxicity.

Toxicity Test - means a procedure using living organisms to determine whether a chemical or an effluent is toxic. A toxicity test measures the degree of the effect of a specific chemical or effluent on exposed test organisms.

Toxic Unit (TU) - means a measure of toxicity in an effluent as determined by the acute toxicity units (TUa) or chronic toxicity units (TUc) measured. The larger the TU, the greater the toxicity.

Toxic Unit - Chronic (TUc) - means 100 times the reciprocal of the effluent concentration that causes no observable effect on the test organisms in a chronic toxicity test ($TUc = 100/NOEC$ or $100/EC25$) (see NOEC).

Treatment - means the application of engineered systems that use physical, chemical, or biological processes to remove pollutants. Such processes include, but are not limited to, filtration, gravity settling, media absorption, biodegradation, biological uptake, chemical oxidation and UV radiation.

Treatment Control BMP - means any engineered system designed to remove pollutants by simple gravity settling of particulate pollutants, filtration, biological uptake, media absorption or any other physical, biological, or chemical process.

Urbanization - means the process of changing of land use and land patterns from rural characteristics to urban (city-like) characteristics. These changes include (i) the replacement of pervious surfaces with impervious surfaces such as rooftops and buildings, and impervious materials such as asphalt and concrete; and (ii) the conversion of rural land to house new residents, support new businesses; and facilitate vehicular traffic flow.

U.S. EPA Phase I Facilities - means facilities in specified industrial categories that are required to obtain an NPDES permit for storm water discharges, as required by 40 CFR 122.26(c). These categories include:

1. Facilities subject to storm water effluent limitation guidelines, new source performance standards, or toxic pollutant effluent standards (40 CFR N)
2. Manufacturing facilities

3. Oil and gas/ mining facilities
4. Hazardous waste treatment, storage, or disposal facilities
5. Landfills, land application sites, and open dumps
6. Recycling facilities
7. Steam electric power generating facilities
8. Transportation facilities
9. Sewage of wastewater treatment works
10. Light manufacturing facilities

Vehicle Maintenance/ Material Storage Facilities/ Corporation Yards - means any Permittee owned or operated facility or portion thereof that:

1. Conducts industrial activity, operates or stores equipment or materials, and provides services similar to Federal Phase I facilities;
2. Performs fleet vehicle service/ maintenance including repair, maintenance, washing, or fueling;
3. Performs maintenance and/ or repair of machinery/ equipment; or
4. Stores chemicals, raw materials, or waste materials.

Waste Load Allocations (WLAs) - means a portion of a receiving water's Total Maximum Daily Pollutant Load (TMDL) that is allocated to one of its existing or future point sources of pollution (Reference: 40 CFR 130.2(h)).

Water Quality Objectives - means water quality criteria contained in the Basin Plan, the California Ocean Plan, the National Toxics Rule, the California Toxics Rule, and other state or federally approved surface water quality plans. Such plans are used by the Regional Water Board to regulate all discharges, including storm water discharges.

Water Quality Standards - means the State Water Quality Standards, which are comprised of beneficial uses, water quality objectives and the State's Antidegradation Policy.

Waters of the State - means any surface water or groundwater, including saline waters, within boundaries of the state (Reference: California Water Code § 13050).

Waters of the United States or Waters of the US - means:

1. All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters, including interstate "wetlands";
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, "wetlands," sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds where the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:
 - a. Which are or could be used by interstate or foreign travelers for recreational or other purposes
 - b. From which fish or shellfish are or could be taken and sold in interstate or

- foreign commerce; or
- c. Which are used or could be used for industrial purposes by industries in interstate commerce
 4. All impoundments of waters otherwise defined as waters of the United States under this definition;
 5. Tributaries of waters identified in the preceding paragraph (1) through (4) of this definition;
 6. The territorial sea; and
 7. "Wetlands" adjacent to waters (other than waters that are themselves wetlands) identified in the preceding paragraph (1) through (6) of this definition.
(Reference: 33 CFR 328)

Watercourse - means any natural or artificial channel for passage of water, including the VCFCD jurisdictional channels included in the List of Channels within the Comprehensive Plan of the VCFCD, as approved by the Board of Supervisors of the VCFCD on October 4, 1993, and any amendments thereto.

Watershed Management - means approach for water resources protection. It is a strategy for integrating and managing resources, both human and fiscal that focuses on regulation of point sources, to a more regional approach that acknowledges environmental impacts from other activities.

Watershed Management Areas (WMA) - means the geographically-defined watershed areas where the Regional Water Board will implement the watershed approach. These generally involve a single large watershed within which exists smaller subwatersheds but in some cases may be an area that does not meet the strict hydrologic definition of a watershed e.g., several small Ventura coastal waterbodies in the region are grouped together into one WMA.

Wet Season - means the calendar period beginning October 1 through April 15.

Winter Dry Weather - means dry weather days occurring from November 1 - March 31 of each year.

Whole Effluent Toxicity - means the aggregate toxic effect of an effluent measured directly by a toxicity test.

PART 7 - STANDARD PROVISIONS

A. General Requirements

1. The Permittee shall comply with all provisions and requirements of this Order.
2. Should the Permittee discover that it failed to submit any relevant facts or that it submitted incorrect information in a report it shall promptly submit the missing or correct information.

3. The Permittee shall report all instances of non-compliance not otherwise reported at the time monitoring reports are submitted.
4. This Order includes Attachment "I", the Reporting Program, which is a part of this Order and must be complied with.

B. Regional Water Board Review

1. The Regional Water Board may review any formal determinate or approval made by the Regional Water Board Executive Officer pursuant to the provisions of this Order.
 - (a) Permittee(s) or a member of the public may request such review upon petition within 30 day of the effective date of the notification of such decision to the Permittee(s) and interested parties on file at the Regional Water Board.

C. Public Review

1. All documents submitted to the Regional Water Board in compliance with the terms and conditions of this Order shall be made available to members of the public pursuant to the Freedom of Information Act (5 U.S.C. § 552), as amended, and the Public Records Act (California Government Code § 6250 et seq.).
2. All documents submitted to the Regional Water Board Executive Officer for approval shall be made available to the public for a 30-day period to allow for public comment.

D. Duty to Comply [40 CFR 122.41(a)]

1. Each Permittee must comply with all of the terms, requirements, and conditions of this Order. Any violation of this order constitutes a violation of the Clean Water Act, its regulations and the California Water Code, and is grounds for enforcement action, Order termination, Order revocation and reissuance, denial of an application for reissuance, or a combination thereof [40 CFR 122.41(a), Cal. Wat. Code § 13261, 13263, 13265, 13268, 13300, 13301, 13304, 13340, 13350].
2. A copy of these waste discharge specifications shall be maintained by each Permittee so as to be available during normal business hours to Permittee employees and members of the public.
3. Any discharge of wastes at any point(s) other than specifically described in this Order is prohibited, and constitutes a violation of the Order.

E. Duty to Mitigate [40 CFR 122.41 (d)]

1. Each Permittee shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.

F. Inspection and Entry; Investigations; Responsibilities [40 CFR 122.41(i), Cal. Water Code § 13225 and § 13267]

1. The Regional Water Board, U.S. EPA, and other authorized representatives shall be allowed:
 - (a) Entry upon premises where a regulated facility is located or conducted, or where records are kept under conditions of this Order;
 - (b) Access to copy any records, at reasonable times that are kept under the conditions of this Order;
 - (c) To inspect at reasonable times any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order;
 - (d) To photograph, sample, and monitor at reasonable times for the purpose of assuring compliance with this Order, or as otherwise authorized by the CWA and the CAL. WATER CODE;
 - (e) To review any water quality control plan or waste discharge requirements, or in connection with any action relating to any plan or requirement to investigate the quality of any waters of the state within its region; and,
 - (f) To require as necessary any state or local agency to investigate and report on any technical factors involved in water quality control or to obtain and submit analyses of water.

G. Proper Operation and Maintenance [40 CFR 122.41 (e), Cal. Water Code § 13263(f)]

1. The Permittees shall at all times properly operate and maintain all facilities and systems of treatment (and related appurtenances) that are installed or used by the Permittees to achieve compliance with this Order. Proper operation and maintenance includes:
 - (a) Adequate laboratory controls; and
 - (b) Appropriate quality assurance procedures.
2. This provision requires the operation of backup or auxiliary facilities or similar system that are installed by a Permittee only when necessary to achieve compliance with the conditions of this Order.

H. Signatory Requirements [40 CFR 122.41(k) & 122.22]

1. Except as otherwise provided in this Order, all applications, reports, or information submitted to the Regional Water Board shall be signed by the City Manager or Mayor, or authorized designee and certified as set forth in 40 CFR 122.22.

I. Reopener and Modification [40 CFR 122.41(f) & 122.62]

1. This Order may only be modified, revoked, or reissued, prior to the expiration date, by the Regional Water Board, in accordance with the procedural requirements of the Cal. Water Code and CCR Title 23 for the issuance of waste discharge requirements, 40 CFR 122.62, and upon prior notice and hearing, to:
 - (a) Address changed conditions identified in the required reports or other sources deemed significant by the Regional Water Board;
 - (b) Incorporate applicable requirements or statewide water quality control plans adopted by the State Board or amendments to the Basin Plan, including TMDLs;
 - (c) Comply with any applicable requirements, guidelines, and/ or regulations issued or approved pursuant to CWA § 402(p); and/ or,
 - (d) Consider any other federal, or state laws or regulations that became effective after adoption of this Order.

2. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, including, but not limited to:
 - (a) Violation of any term or condition contained in this Order;
 - (b) Obtaining this Order by misrepresentation, or failure to disclose all relevant facts;
or,
 - (c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

3. The filing of a request by the Principal Permittee or Permittees for a modification, revocation and re-issuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any condition of this Order.

4. This Order may be modified to make corrections or allowances for changes in the permitted activity listed in this section, following the procedures at 40 CFR 122.63, if processed as a minor modification. Minor modifications may only:
 - (a) Correct typographical errors; or
 - (b) Require more frequent monitoring or reporting by the Permittee.

J. Severability

1. The provisions of this Order are severable; and if any provision of this Order or the application of any provision of this Order to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this Order shall not be affected.

K. Duty to Provide Information [40 CFR 122.41(h)]

1. The Permittees shall furnish, within a reasonable time, any information the Regional Water Board or U.S. EPA may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order.
2. The Permittees shall also furnish to the Regional Water Board, upon request, copies of records required to be kept by this Order.

L. Twenty-Four Hour Reporting [40 CFR 122.41(l)(6)]¹

1. The Permittees shall report to the Regional Water Board any noncompliance that may endanger health or the environment. Any information shall be provided orally within 24 hours from the time any Permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
2. The Regional Water Board may waive the required written report on a case-by-case basis.

M. Bypass [40 CFR 122.41(m)]²

1. Bypass (the intentional diversion of waste streams from any portion of a treatment facility) is prohibited. The Regional Water Board may take enforcement action against Permittees for bypass unless:
 - (a) Bypass was unavoidable to prevent loss of life, personal injury or severe property damage. (Severe property damage means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.);
 - (b) There were no feasible alternatives to bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that could occur during normal periods of equipment downtime or preventive maintenance;

¹ This provision applies to incidents where effluent limitations (numerical or narrative) as provided in this Order or in the Ventura County SMP are exceeded, and which endanger public health or the environment.

² This provision applies to the operation and maintenance of storm water controls and BMPs as provided in this Order or in the Ventura County SMP.

- (c) The Permittee submitted a notice at least ten days in advance of the need for a bypass to the Regional Water Board; or,
- (d) Permittees may allow a bypass to occur that does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation. In such a case, the above bypass conditions are not applicable. The Permittee shall submit notice of an unanticipated bypass as required.

N. Upset [40 CFR 122.41(n)]¹

- 1. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- 2. A Permittee that wishes to establish the affirmative defense of an upset in an action brought for non compliance shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (a) An upset occurred and that the Permittee can identify the cause(s) of the upset;
 - (b) The permitted facility was being properly operated by the time of the upset;
 - (c) The Permittee submitted notice of the upset as required; and,
 - (d) The Permittee complied with any remedial measures required.
- 3. No determination made before an action for noncompliance, such as during administrative review of claims that non-compliance was caused by an upset, is final administrative action subject to judicial review.
- 4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an upset has the burden of proof.

O. Property Rights [40 CFR 122.41(g)]

- 1. This Order does not convey any property rights of any sort, or any exclusive privilege.

P. Enforcement

- 1. Violation of any of the provisions of the NPDES permit or any of the provisions of this Order may subject the violator to any of the penalties described herein, or any combination thereof, at the discretion of the prosecuting authority; except that only one kind of penalties may be applied for each kind of violation. The CWA provides the following:
 - (a) Criminal Penalties for:

¹ This provision applies to incidents where effluent limitations (numerical or narrative) as provided in this Order or in the Ventura County SMP are exceeded, and which endanger public health or the environment.

(1) Negligent Violations [CWA § 309 (c)(1)(B)]:

The CWA provides that any person who negligently violates permit conditions implementing CWA § 301, 302, 306, 307, 308, 318, or 405 is subject to a fine of not less than \$2,500 nor more than \$25,000 per day for each violation, or by imprisonment for not more than 1 year, or both.

(2) Knowing Violations [CWA § 309 (c)(2)(B)]:

The CWA provides that any person who knowingly violates permit conditions implementing CWA § 301, 302, 306, 307, 308, 318, or 405 is subject to a fine of not less than \$5,000 nor more than \$50,000 per day of violation, or by imprisonment for not more than 3 years, or both.

(3) Knowing Endangerment [CWA § 309 (c)(3)(A)]:

The CWA provides that any person who knowingly violates permit conditions implementing CWA § 301, 302, 307, 308, 318, or 405 and who knows at that time that he is placing another person in imminent danger of death or serious bodily injury is subject to a fine of not more than \$250,000, or by imprisonment for not more than 15 years, or both.

(4) False Statement [CWA § 309 (c)(4)]:

The CWA provides that any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under the Act or who knowingly falsifies, tampers with, or renders inaccurate, any monitoring device or method required to be maintained under the Act, shall upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment for not more than two years, or by both. If a conviction is for a violation committed after a first conviction of such person under this paragraph, punishment shall be by a fine of not more than \$20,000 per day of violation, or by imprisonment of not more than four years, or by both.

(b) Civil Penalties [[CWA § 309 (d)]

The CWA provides that any person who violates a permit condition implementing CWA § 301, 302, 306, 307, 308, 318, or 405 is subject to a civil penalty not to exceed \$27,500 per day for each violation.

2. Violation of any of the provisions of the NPDES permit or any of the provisions of this Order may subject the violator to any of the penalties described herein, or any combination thereof, at the discretion of the prosecuting authority; except that only one kind of penalties may be applied for each kind of violation. The Cal. Water Code §13885 provides the following:

(a) Any person who violates any of the following shall be liable civilly in accordance with this section:

- (1) Section 13375 or 13376.
- (2) Any waste discharge requirements or dredged or fill material permit issued pursuant to this chapter or any water quality certification issued pursuant to, Section 13160.
- (3) Any requirements established pursuant to Section 13383.

- (4) Any order or prohibition issued pursuant to Section 13243 or Article 1 (commencing with Section 13300) of Chapter 5, if the activity subject to the order or prohibition is subject to regulation under this chapter.
- (5) Any requirements of Section 301, 302, 306, 307, 308, 318, 401, or 405 of the Clean Water Act, as amended.
- (6) Any requirement imposed in a pretreatment program approved pursuant to waste discharge requirements issued under Section 13377 or approved pursuant to a permit issued by the administrator.

Q. Need to Halt or Reduce Activity not a Defense [40 CFR 122.41(c)]

1. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order.

R. Termination of Board Order

1. Except for enforcement purposes, Regional Water Board Order No. 09-0057 is hereby terminated.

S. Board Order Expiration Date

1. This Order expires on July 8, 2015. The Permittees must submit a Report of Waste Discharge (ROWD) and a proposed Storm Water Quality Management Program in accordance with CCR Title 23 as application for reissuance of waste discharge requirements no later than 180 days in advance of such date.

T. MS4 Annual Reporting Program [40 CFR 122.42(c)]

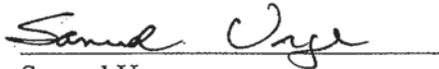
1. The Annual Program Reporting shall include the following information:
 - (a) *Municipal separate storm sewer systems.*

The operator of a large or medium municipal separate storm sewer system or a municipal separate storm sewer that has been designated by the Director under 40 CFR 122.26(a)(1)(v) of this part must submit an annual report by the anniversary of the date of the issuance of the permit for such system. The report shall include:

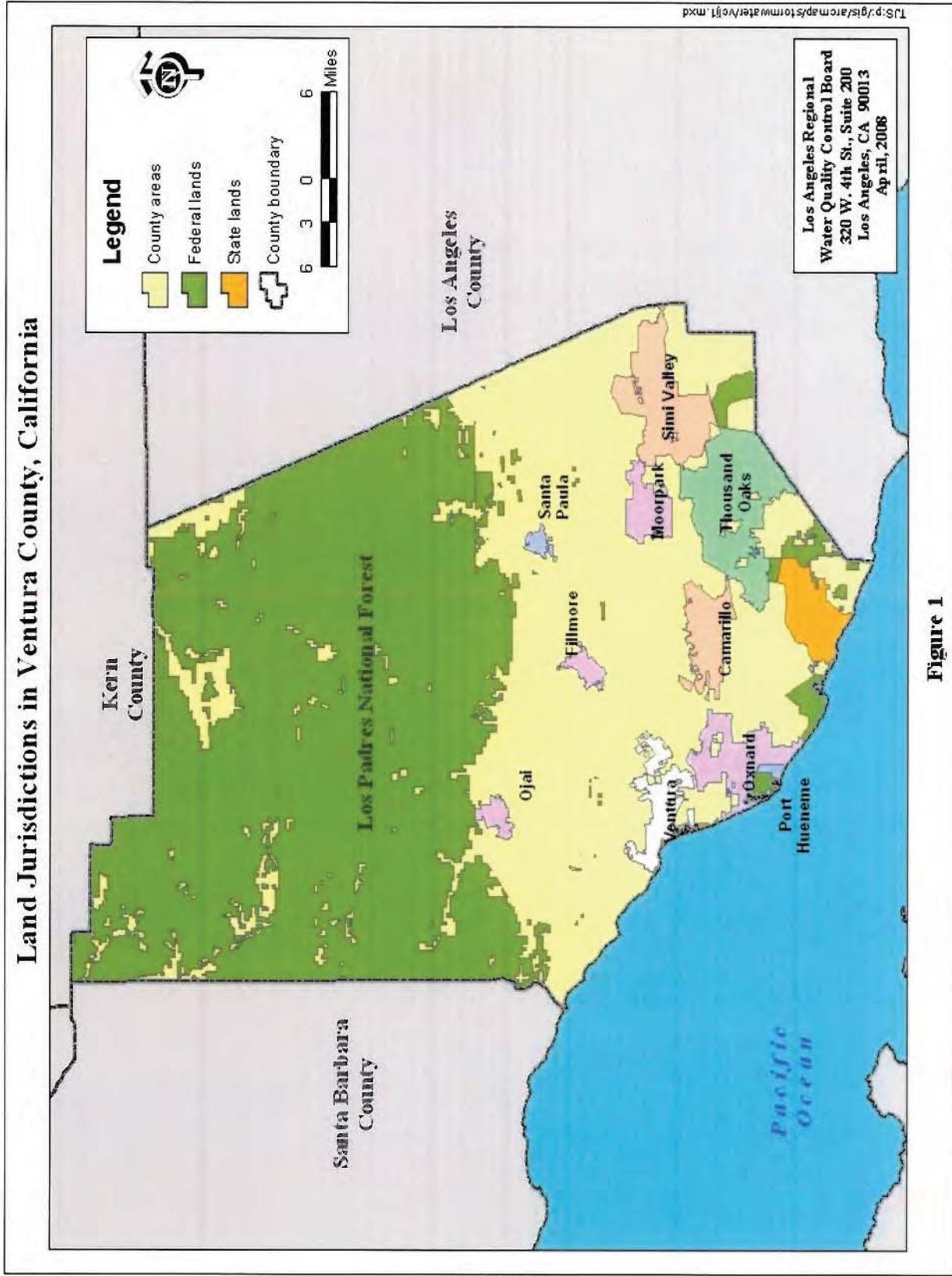
 - (1) The status of implementing the components of the storm water management program that are established as permit conditions;
 - (2) Proposed changes to the storm water management programs that are established as permit condition. Such proposed changes shall be consistent with 40 CFR 122.26(d)(2)(iii) of this part;
 - (3) Revisions, if necessary, to the assessment of controls and the fiscal analysis reported in the permit application under 40 CFR 122.26(d)(2)(iv) and (d)(2)(v) of this part;
 - (4) A summary of data, including monitoring data that is accumulated throughout the reporting year;

- (5) Annual expenditures and budget for year following each annual report;
- (6) A summary describing the number and nature of enforcement actions, inspections, and public education programs; and
- (7) Identification of water quality improvements or degradation.

I, Samuel Unger, Interim Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on July 8, 2010.



Samuel Unger
Interim Executive Officer



ATTACHMENT A

Watershed Management Areas

Watershed Management Area	Hydrologic Units(s)	Major Surface Water Bodies	303(d) Pollutant(s) of Concern	Permittees
Ventura River	402.10	Ventura River	Algae	City of Ojai
	402.20	Ventura River Estuary	Coliform (fecal, total)	City of San Buenaventura
	402.31	Canada Larga	Eutrophic	Ventura County
	402.32	Matilija Creek	Low DO	Watershed Protection District
		Matilija Creek Reservoir	Nitrogen	
	San Antonio Creek	Trash		
Santa Clara River	403.11	Santa Clara River	Algae	City of Fillmore
	403.21	Santa Clara River Estuary	Ammonia	City of Oxnard
	403.22	Brown Barranca/Long Canyon	ChemA* (tissue)	City of San Buenaventura
	403.31	Elizabeth Lake	Chloride	City of Santa Paula
	403.32	Hopper Creek	Coliform	Ventura County
	403.41	Lake Hughes	Enrichment	Watershed Protection District
	403.42	Mint Canyon Creek	Eutrophic	
	403.43	Munz Lake	Fish kills	
	403.44	Piru Creek	Low DO/Organic Enrichment	
	403.51	Pole Creek	Nitrate + Nitrite	
	403.52	Sespe Creek	Odors	
	403.53	Torrey Canyon Creek	pH	
	403.54	Wheeler Canyon/Todd Barranca	Sulfate	
	403.55		Trash	
			Total Dissolved Solids	
		Toxaphene		

ATTACHMENT A
Watershed Management Areas

Watershed Management Area	Hydrologic Units(s)	Major Surface Water Bodies	303(d) Pollutant(s) of Concern	Permittees
Calleguas Creek	403.11 403.12 403.61 403.62 403.63 403.64 403.67 403.66 403.68	Calleguas Creek Calleguas Creek Estuary Arroyo Conejo Arroyo Las Posas Arroyo Simi Beardsley Channel Conejo Creek Fox Barranca Mugu Lagoon Mugu Drain/Oxnard Drain Rio de Santa Clara/Oxnard Drain Revolon Slough Tapo Canyon	Algae Ammonia Boron ChemA* (tissue) Chlordane (tissue, sediment) Chloride Chlorpyrifos (tissue) Coliform, fecal Copper (total, dissolved) Dacthal (sediment) DDT (tissue, sediment) Dieldrin (tissue) Endosulfan (tissue, sediment) Hexachlorocyclohexane (tissue) Mercury Nickel Nitrate + Nitrite Nitrate as Nitrogen (NO3) Nitrogen Organophosphorus Pesticides PCBs (tissue) Sediment Toxicity Sedimentation/Siltation Selenium Sulfate Total Dissolved Solids Toxaphene (tissue, sediment) Toxicity Trash Zinc	City of Camarillo City of Moorpark City of Oxnard City of Simi Valley City of Thousand Oaks Ventura County Watershed Protection District

ATTACHMENT A
Watershed Management Areas

Watershed Management Area	Hydrologic Units(\$)	Major Surface Water Bodies	303(d) Pollutant(s) of Concern	Permittees
Malibu Creek	401.00 403.11 404.21 404.22 404.23 404.24 404.25 404.26 404.47 404.45	Malibu Creek Malibu Creek Lagoon Lake Lindero Lake Sherwood Las Virgenes Creek Liner Creek Malibu Lake Medea Creek Palo Comado Santa Monica Bay Westlake Lake Triunfo Creek	Algae Ammonia Coliform DDT (tissue, sediment) Enteric viruses Eutrophic Lead Low DO/Organic Enrichment Nutrients (algae) PAHs (sediment) PCBs (tissue, sediment) PH Mercury Scum/foam Sedimentation/Siltation Sediment Toxicity Selenium Specific Conductance Trash	City of Simi Valley City of Thousand Oaks Ventura County Watershed Protection District

Ventura County Municipal Separate Storm Sewer System Permit

ATTACHMENT A

Watershed Management Areas

Watershed Management Area	Hydrologic Units(\$)	Major Surface Water Bodies	303(d) Pollutant(s) of Concern	Permittees
Miscellaneous Ventura Coastal	401.00 403.11	Channel Islands Harbor Channel Islands Beach Hobie Beach Mandalay Beach McGrath Lake McGrath Beach Ormond Beach Port Hueneme Harbor Promenade Park Beach Rincon Beach San Buenaventura Beach Santa Clara River Estuary Beach/Surfers Knoll Ventura Harbor: Ventura Keys	Beach closures Coliform (fecal) Chlordane (sediment) DDT (tissue, sediment) Dieldrin (sediment) PCBs (tissue, sediment) Lead (sediment) Sediment Toxicity Zinc (sediment)	City of Oxnard City of Port Hueneme City of San Buenaventura Ventura County Watershed Protection District

ATTACHMENT B

Calleguas Creek Watershed Pollutants of Concern (2003 through 2007)¹

Mass Emission (ME-CC), Receiving Water (W-3 & W-4), and Land Use (A-1) Sites

Wet Weather	
Bacteriological	
E. Coli	
Fecal Coliform	
Conventional	
Residual Chlorine	
TDS	
Metal	
Aluminum - Total	Chromium - Total
Barium -Total	Cooper - Dissolved
Beryllium - Total	Mercury - Total
Cadmium - Total	Nickel - Total
Nutrient	
Nitrate as Nitrogen	
Organic	
Benzo(a)anthracene	
Benzo(a)pyrene	
Benzo(b)fluoranthene	
Benzo(k)fluoranthene	
Bis(2-ethylhexyl)phthalate	
Chrysene	
Dibenz(a,h)anthracene	
Hexachlorobenzene	
Indeno(1,2,3-cd)pyrene	
Pentachlorophenol	
Pesticide	
4,4'-DDD	
4,4'-DDE	

¹ Mass Emission, Receiving Water, and Land Use wet weather monitoring data was compared to Basin Plan Objectives and CTR-Acute Objectives, to obtain exceedences (Pollutants of Concern). Monitoring data is from the Ventura Countywide NPDES Stormwater Monitoring Program Water Quality Monitoring Reports (2003/04 through 2006/07), data for 2000/01 through 2002/03 was either presented with exceedences not analyzed or by percent exceedence, so data could not be compared to 2003/04 through 2006/07 exceedence data. See definitions for Pollutants of Concern

ATTACHMENT B

Santa Clara River Watershed Pollutants of Concern (2003 through 2007)¹

Mass Emission (ME-SCR) and Land Use (I-2 & R-1) Sites

Wet Weather	
Anion	
Chloride	
Bacteriological	
E. Coli	
Fecal Coliform	
Conventional	
Ph	
TDS	
Metal	
Aluminum - Total	Cooper - Dissolved
Arsenic - Total	Mercury - Total
Barium - Total	Nickel - Total
Cadmium - Total	Selenium - Total
Chromium - Total	Zinc - Dissolved
Organic	
Benzo(a)anthracene	
Benzo(a)pyrene	
Benzo(b)fluoranthene	
Benzo(k)fluoranthene	
Bis(2-ethylhexyl)phthalate	
Chrysene	
Dibenz(a,h)anthracene	
Indeno(1,2,3-cd)pyrene	
Pesticide	
4,4'-DDE	

¹ Mass Emission and Land Use wet weather monitoring data was compared to Basin Plan Objectives and CTR-Acute Objectives, to obtain exceedences (Pollutants of Concern). Monitoring data is from the Ventura Countywide NPDES Stormwater Monitoring Program Water Quality Monitoring Reports (2003/04 through 2006/07), data for 2000/01 through 2002/03 was either presented with exceedences not analyzed or by percent exceedence, so data could not be compared to 2003/04 through 2006/07 exceedence data. See definitions for Pollutants of Concern:

ATTACHMENT B

Ventura River Watershed Pollutants of Concern (2003 through 2007)¹

Mass Emission (ME- VR & ME- VR2) Sites

Wet Weather
Anion
Chloride
Bacteriological
E. Coli
Fecal Coliform
Conventional
TDS
Metal
Aluminum - Total
Cadmium - Total
Chromium - Total
Mercury - Total
Nickel - Total
Zinc - Dissolved
Organic
Benzo(a)pyrene
Benzo(b)fluoranthene
Bis(2-ethylhexyl)phthalate
Chrysene
Hexachlorobenzene
Pesticide
4,4'-DDD
4,4'-DDE

¹ Mass Emission wet weather monitoring data was compared to Basin Plan Objectives and CTR-Acute Objectives, to obtain exceedences (Pollutants of Concern). Monitoring data is from the Ventura Countywide NPDES Stormwater Monitoring Program Water Quality Monitoring Reports (2003/04 through 2006/07). Monitoring data for 2000/01 through 2002/03 was either presented with exceedences not analyzed or by percent exceedence, so data could not be compared to 2003/04 through 2006/07 exceedence data. See definitions for Pollutants of Concern.

ATTACHMENT C
Treatment BMP Performance Standards

Effluent Concentrations as Median Values

BMP Category	Total Suspended Solids mg/L	Total Nitrate-Nitrogen mg/L	Total Copper, ug/L	Total Lead, ug/L	Total Zinc, ug/L
Detention Pond	27	0.48	15.9	14.6	58.7
Wet Pond	10	0.2	5.8	3.4	21.6
Wetland Basin	13	0.13	3.3	2.5	29.2
Biofilter	18	0.36	9.6	5.4	27.9
Media Filter	11	0.66	7.6	2.6	32.2
Hydrodynamic Device	23	0.29	11.8	5	75.1

Expected BMP pollutant removal performance for effluent quality was developed from the WERF-ASCE/ U.S. EPA International BMP Database, 2007.

See Part 3.A.3 (Storm Water Quality Management Program Implementation- General Requirements).

ATTACHMENT D
Critical Sources Categories¹

Municipal Landfills (SIC 4953)

Hazardous Waste Treatment, Disposal and Recovery Facilities¹

Facilities Subject to SARA Title III (also known as EPCRA)²

Restaurants³

Wholesale trade (scrap, auto dismantling) (SIC 50)

Automotive service facilities²

Fabricated metal products (SIC 34)

Motor freight (SIC 42)

Chemical/allied products (SIC 28)

Automotive Dealers/Gas Stations (SIC 55)

Primary Metals Products (SIC 33)

Nursery³

Electric/Gas/Sanitary (SIC 49)

Air Transportation (SIC 45)

Water Transportation (SIC 44)

Rubbers/Miscellaneous Plastics (SIC 30)

Local/Suburban Transit (SIC 41)

Railroad Transportation (SIC 40)

Oil & Gas Extraction (SIC 13)

Lumber/Wood Products (SIC 24)

Machinery Manufacturing (SIC 35)

Transportation Equipment (SIC 37)

¹ Non-underlined categories belong to Industrial Facilities.

² Various categories subject to these requirements.

³ See Definition in Part 6. of the Order.

ATTACHMENT D
Critical Sources Categories¹

Stone, Clay, Glass, Concrete (SIC 32)

Leather/Leather Products (SIC 31)

Miscellaneous Manufacturing (SIC 39)

Food and kindred Products (SIC 20)

Mining of Nonmetallic Minerals (SIC 14)

Printing and Publishing (SIC 27)

Electric/Electronic (SIC 36)

Paper and Allied Products (SIC 26)

Furniture and Fixtures (SIC 25)

Laundries (SIC 72)

Instruments (SIC 38)

Textile Mills Products (SIC 22)

Apparel (SIC 23)

¹ Non-underlined categories belong to Industrial Facilities.

ATTACHMENT E
Determination of Erosion Potential

E_p is determined as follows- The *total effective work* done on the channel boundary is derived and used as a metric to predict the likelihood of channel adjustment given watershed and stream hydrologic and geomorphic variables. The index under urbanized conditions is compared to the index under pre-urban conditions expressed as a ratio (E_p). The effective work index (W) is computed as the excess shear stress that exceeds a critical value for streambed mobility or bank material erosion integrated over time and represents the total work done on the channel boundary:

$$W = \sum_{i=1}^n (\tau_i - \tau_c)^{1.5} \cdot V \cdot \Delta t_i \quad (1)$$

Where τ_c = critical shear stress that initiates bed mobility or erodes the weakest bank layer, τ_i = applied hydraulic shear stress, Δt = duration of flows (in hours), and n = length of flow record. The effective work index for presumed stable stream channels under pre-urban conditions is compared to stable and unstable channels under current urbanized conditions. The comparison, expressed as a ratio, is defined as the Erosion Potential (E_p)¹ (McRae (1992, 1996)).

$$E_p = \frac{W_{post}}{W_{pre}} \quad (2)$$

where:

W_{post} = work index estimated for the post-urban condition
 W_{pre} = work index estimated for the pre-urban condition

¹ MacRae, C.R. 1992. The Role of Moderate Flow Events and Bank Structure in the Determination of Channel Response to Urbanization. Resolving conflicts and uncertainty in water management: Proceedings of the 45th Annual Conference of the Canadian Water Resources Association. Shrubsole, D, ed. 1992, pg. 12.1-12.21;
MacRae, C.R. 1996. Experience from Morphological Research on Canadian Streams: Is Control of the Two-Year Frequency Runoff Event the Best Basis for Stream Channel Protection. Effects of Watershed Development and Management on Aquatic Ecosystems, ASCE Engineering Foundation Conference, Snowbird, Utah, pg. 144-162

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING PROGRAM - No. CI 7388
FOR
ORDER R4-2010-0108
NPDES PERMIT NO. CAS004002
WASTE DISCHARGE REQUIREMENTS
MUNICIPAL SEPARATE STORM SEWER SYSTEM DISCHARGES
WITHIN THE
VENTURA COUNTY WATERSHED PROTECTION DISTRICT,
COUNTY OF VENTURA AND THE INCORPORATED CITIES THEREIN.

July 8, 2010



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MONITORING PROGRAM

1. The primary objectives of the Monitoring Program include, but are not limited to:
 - (a) Assessing the chemical, physical, and biological impacts of municipal storm water sewer system discharges on receiving waters.
 - (b) Assessing the overall health and evaluating long-term trends in receiving water quality.
 - (c) Assessing compliance with TMDL targets and water quality objectives.
 - (d) Characterization of the quality of storm water discharges.
 - (e) Identifying sources of pollutants.
 - (f) Measuring and improving the effectiveness of measures implemented under this Order.
2. The results of the monitoring requirements outlined below shall be used to refine BMPs for the reduction of pollutant loading and the protection and enhancement of the beneficial uses of the receiving waters in Ventura County.
3. The Permittees shall implement the Monitoring Program as follows:

CORE MONITORING

A. Mass Emissions

- I. The Principal Permittee shall monitor mass emissions to accomplish the following objectives:
 - i. Estimate the mass emissions from the MS4 to the watershed.
 - ii. Assess trends in the mass emissions over time.
 - iii. Determine if the MS4 is contributing to exceedances of water quality objectives by comparing results to applicable water quality objectives in the Water Quality Control Plan Los Angeles Region (Basin Plan) and the California Toxics Rule (CTR).
1. The Principal Permittee shall monitor mass emissions from the following 3 mass emission stations:
 - (a) ME-VR2 for Ventura River
 - (b) ME-SCR for Santa Clara River
 - (c) ME-CC for Calleguas Creek
2. The Principal Permittee shall monitor the 3 mass emission stations on an annual basis as per A.3. below.

3. The Principal Permittee shall monitor each mass emission station each year as follows:
 - (a) The first storm event of the wet season that produces a 20% or greater increase in base stream flow, and 2 additional storm events; all storm events shall be separated by 7 days of dry weather (less than 0.1 inch of rainfall) from the previously measurable storm event (0.25 inches of rain).
 - (b) A total of 4 monitoring events (3 wet-weather storm events, 1 dry-weather) per mass emission station.
4. Samples for mass emission monitoring may be taken with the same type of automatic sampler used under Order 00-108. Sampling shall be in accordance with USEPA "NPDES Storm Water Sampling Guidance Document, EPA 833-8-92-001, July 1992" or other protocol approved by the Executive Officer.
5. Samplers shall be set to monitor storms that produce a 20% or greater increase in base stream flow.
6. Samples shall be flow-weighted composites, collected during the first 24 hours or for the duration of the storm if it is less than 24 hours.
7. Samples shall be collected from the discharge resulting from a storm event that is 0.25 inches or greater, samples may be analyzed if a predicted storm event produces between 0.15 and 0.24 inches of rain.
8. The flow-weighted composite sample for a storm water discharge shall be taken with a continuous sampler, or it shall be taken as a combination of a minimum of 3 sample aliquots, taken in each hour of discharge for the first 24 hours of the discharge or for the entire discharge if the storm event is less than 24 hours, with each aliquot being separated by a minimum of 15 minutes within each hour of discharge, unless the Regional Water Board Executive Officer approves an alternate protocol.
9. Flow may be estimated using U.S. EPA methods at sites where flow measurement devices are not in place.
10. Grab samples shall be taken only for pathogen indicators, oil & grease, cyanide, and volatile organics. Field measurements shall be taken for pH, temperature, and DO.
11. Each mass emission shall analyze for all of the Pollutants of Concern (POC) in its specific watershed listed in Attachment "B" (Calleguas Creek Watershed, Santa Clara River Watershed, and Ventura River Watershed Pollutants of Concern).

12. Each mass emission station shall screen for all constituents listed in Attachment "G" (Storm Water Monitoring Program's Constituents with Associated Minimum Levels), during the first storm event of the wet season for each year sampled. If a constituent is not detected at the Method Detection Limit (MDL) for its respective test method it need not be further analyzed unless the observed occurrence shows concentrations greater than the state water quality objective, and/ or the California Toxics Rule (CTR) for chronic criteria. If a constituent is detected exceeding a Basin Plan objective, and/ or CTR criteria then the constituent shall be analyzed for the remainder of the Order, at the mass emission station where it was detected.
13. At a minimum, a sufficient sample volume must be collected to perform all of the required biological and chemical tests.
14. When monitoring can not be performed to comply with the requirements of this Order due to circumstances beyond the Permittee's control, then within two working days the following shall be submitted to the Regional Water Board Executive Officer:
 - (a) Statement of situation.
 - (b) Explanation of circumstance(s) with documentation.
 - (c) Statement of corrective action for the future.
15. Monitoring results submitted to the Regional Water Board shall include:
 - (a) Rain totals and hydrographs for monitoring events in both narrative and graphic formats.
 - (b) A narrative description of the date and duration of the storm event(s) sampled, rainfall estimates of the storm event which generated the sampled discharge and the duration between the storm event sampled and the end of the previous measurable storm event.
 - (c) All applicable Standard Monitoring Provisions listed in part "K".
16. Results of monitoring from each mass emission station conducted in accordance with the Standard Operating Procedure submitted under Standard Provision 14 of this Attachment shall be sent electronically to the Regional Water Board's Storm Water site at MS4stormwaterRB4@waterboards.ca.gov, no later than 90 days from sample collection date, highlighting exceedances (Pollutants of Concern, POC) to the Basin Plan objectives for all test results, and the CTR for acute criteria with corresponding sampling dates per mass emission station. The sample data transmitted shall be in the most recent update of the Southern California Municipal Storm Water Monitoring Coalition's (SMC) Standardized Data Transfer Formats (SDTFs).

17. A summary of the annual mass emission monitoring results highlighting exceedances (POC) of the Basin Plan objectives and the CTR for acute criteria, with corresponding sampling dates per mass emission station, shall be included with the Annual Storm Water Report.

B. Major Outfalls

- I. The Principal Permittee shall monitor major storm drain outfalls to accomplish the following objectives:
 - i. Estimate the annual pollutant load of the cumulative discharges to waters of the State.
 - ii. Estimate the event mean concentration of the cumulative discharges to waters of the State.
 - iii. Assess trends in the major outfalls over time.
 - iv. Estimate the annual pollutant load of discharges to Waters of the U.S.
 - v. Estimate the event mean concentration of discharges to Waters of the U.S.
 - vi. Assess trends in the major outfalls over time.
 - vii. Determine if the MS4 is contributing to exceedences of water quality objectives in the Water Quality Control Plan Los Angeles Region (Basin Plan), and the California Toxics Rule (CTR).
1. The Principal Permittee shall monitor:
 - (a) End-of-pipe of major outfalls, identified in Attachment I, transporting representative discharges from each Permittee's Municipal drainage area to:
 - (1) Major outfalls listed in Attachment "T" (Storm Water Monitoring Program's Major Outfall Stations).
 - (b) The first storm event of the wet season that produces at least 0.25 inches of rain, and 2 additional storm events per year, all storm events shall be separated by 7 days of dry weather (less than 0.1 inch) from the previously measurable storm event (0.25 inches).
 - (c) A total of 4 monitoring events (3 wet-weather storm events, 1 dry-weather) shall be sampled per identified major outfall.
 - (d) In the first year after permit adoption, 4 major outfall stations shall be monitored. Thereafter, all major outfall stations listed in Attachment "T" are to be monitored annually according to the schedule above.
2. If an identified monitoring site is found to be unworkable due to immitigable factors the sampling location may be relocated upon Executive Officer's approval of another location. Best professional judgment shall be used to balance the site selection rationale and criteria to determine the most appropriate site. Due to limited potential locations of urban outfalls to be monitored, there may be no sites that satisfy all criteria and rationale. Sites will be selected to satisfy the following criteria:

- (a) Maximize urban runoff contribution;
 - (b) Greater than 60% of catchment shall be Permittee's MS4;
 - (c) Attempt shall be made to avoid outfalls that contain discharge from extra-jurisdictional areas (e.g. agriculture land and other NPDES discharges).
 - (d) Drainage area should contain representative land uses in a ratio of use as similar as reasonably possible to that found in the Permittee's jurisdiction.
 - (e) Drainage areas with a higher percentage of the Permittee's MS4 are preferred;
 - (f) Ability to accurately measure flow
 - (g) Safety of monitoring personnel is the highest priority. Specific location of sampling collection may be upstream of the actual outfall if field safety or accurate flow measurement require it.
3. Samples shall be collected from the discharge resulting from a storm event that is 0.25 inches or greater, samples may be analyzed if a predicted storm event produces between 0.15 inches and 0.24 inches of rain.
 4. Samples shall be collected during the first 24 hours of storm water discharge or for the entire storm water discharge if it is less than 24 hours.
 5. Samples shall be flow-weighted composites and can be collected automatically or manually (see subparts A.7 and A.8) in accordance with U.S. EPA protocol or other procedure approved by the Executive Officer.
 6. Grab samples shall be taken only for pathogen indicators, oil & grease, cyanide, and volatile organics. Field measurements shall be taken for pH, temperature, and DO.
 7. Major outfall samples taken within a subwatershed shall be analyzed for the biological and chemical parameters listed in the preceding subpart B.6.
 8. Each major outfall station shall screen for all constituents listed in Attachment "G" (Storm Water Monitoring Program's Constituents with Associated Minimum Levels) twice per wet season, per year, (1st storm event of the wet season and one other storm event of the wet season). If a constituent is not detected at the Method Detection Limit (MDL) for its respective test method it need not be further analyzed unless the observed occurrence shows concentrations greater than the state water quality objective, and/ or the California Toxics Rule (CTR) acute criteria. If a constituent is detected-exceeding a Basin Plan objective, and/or chronic CTR criteria then the constituent shall be sampled for the remainder of the Order, at the major outfall station where it was detected.

9. At a minimum, a sufficient sample volume must be collected to perform all of the required biological and chemical tests. Sampling shall be in accordance with USEPA "NPDES Storm Water Sampling Guidance Document, EPA 833-8-92-001, July 1992" or other protocol approved by the Executive Officer.
10. When monitoring can not be performed to comply with the requirements of this Order due to circumstances beyond the Permittee's control, then within 2 working days the following shall be submitted to the Regional Water Board Executive Officer:
 - (a) Statement of situation
 - (b) Explanation of circumstance(s) with documentation
 - (c) Statement of corrective action for the future
11. Monitoring results submitted to the Regional Water Board shall include:
 - (a) Rain totals and hydrographs for monitoring events in both narrative and graphic formats.
 - (b) A narrative description of the date and duration of the storm event(s) sampled, rainfall estimates of the storm event which generated the sampled discharge and the duration between the storm event sampled and the end of the previous measurable storm event.
 - (c) All applicable Standard Monitoring Provisions listed in part "K".
12. Results of monitoring from each major outfall station conducted in accordance with the Standard Operating Procedure submitted under Standard Provision 14 of this Attachment shall be sent electronically to the Regional Water Board's Storm Water Site at MS4stormwaterRB4@waterboards.ca.gov, no later than 90 days from sample collection date, highlighting exceedances to the Basin Plan objectives for all test results, and the CTR for acute criteria with corresponding sampling dates per major outfall station. The sample data transmitted shall be in the most recent update of the Southern California Municipal Storm Water Monitoring Coalition's (SMC) Standardized Data Transfer Formats (SDTFs).
13. A summary of the annual major outfall monitoring results, highlighting exceedences (pollutants of concern POC) to the Basin Plan objectives, and the CTR for acute criteria with corresponding sampling dates per major outfall station, shall be included with the Annual Storm Water Report.

C. Dry Weather Analytical Monitoring

- I. The Principal Permittee shall develop and implement a monitoring program to characterize pollutant discharges from representative MS4 outfalls in each municipality and in the unincorporated County area during dry weather. This monitoring program shall be implemented within each jurisdiction and shall begin within the 2010-2011 monitoring year.

1. Dry weather analytical monitoring shall include:
 - (a) Analytical monitoring, field measurements and observations at selected stations.
 - (b) Reports of analytical data in a SWAMP comparable format.

2. Selection of Dry Weather Analytical Monitoring stations: Based upon a review program data, the storm drain system and land uses, the Co-Permittees shall select dry weather analytical monitoring stations within their jurisdiction. At least 5 dry weather analytical monitoring stations need to be identified per Co-Permittee. The dry weather analytical monitoring stations shall be established using the following guidelines and criteria:
 - (a) Stations should be located downstream of municipal land uses where illegal or illicit activity may occur;
 - (b) Stations shall be located at accessible downstream locations within the storm drain system of each municipality or at major outfalls;
 - (c) Hydrological conditions, total drainage area of the site, traffic density, age of the structures or buildings in the area, history of the area, and land use types shall be considered in locating stations;
 - (d) Each Co-Permittee shall determine a primary station and at least 4 alternate stations to be sampled in case primary stations do not have flow in dry weather. The dry weather monitoring may utilize the same outfalls as those used for wet weather monitoring, if such outfalls are found to discharge during dry weather.
 - (e) Fact sheets of general information such as site descriptions (i.e., conveyance type, dominant watershed land uses) shall be created.

3. The Principal and Co-Permittees shall develop and/or update written procedures for dry weather analytical monitoring (these procedures must be consistent with 40 CFR part 136), including field observations, monitoring, and analyses to be conducted. At a minimum, the procedures must meet the following guidelines and criteria:
 - (a) Dry weather analytical monitoring shall be conducted at each identified station at least once between May 1st and September 30th of each year.
 - (b) If flow or ponded runoff is observed at a dry weather analytical monitoring station and there has been at least seventy-two (72) hours of dry weather, make observations and collect at least one (1) grab sample.
 - (c) Record general information such as site descriptions (i.e., conveyance type, dominant watershed land uses), flow estimation (i.e., width of water surface, approximate depth of water, approximate flow velocity, flow rate), and visual observations (i.e., odor, color, clarity, floatables, deposits/stains, vegetation condition, structural condition, and biology).

4. At a minimum, collect samples for analytical laboratory analysis of the following constituents:
 - (a) Total Hardness
 - (b) Total Organic Carbon or Oil and Grease
 - (c) Lead (Dissolved)
 - (d) Zinc (Dissolved)
 - (e) Copper (Dissolved)
 - (f) Total Coliform bacteria
 - (g) E. Coli bacteria
5. Other required field observations include:
 - (a) Flow Estimation
 - (b) Temperature
 - (c) pH
 - (d) Odor
 - (e) Color
 - (f) Turbidity
 - (g) Floatables (foam, oil sheen)
 - (h) Staining
 - (i) Algal growth
6. If the station is dry (no flowing or ponded runoff), make and record all applicable observations and select another station from the list of alternate stations for monitoring.
7. Visually assess the presence of trash in receiving waters and urban runoff. Assessments of trash shall provide information on the spatial extent and amount of trash present, as well as the nature of the types of trash present.
8. Develop and/or update procedures for source identification follow up investigations in the event elevated levels are found. These procedures shall be consistent with procedures required in IC/ID section.

D. Aquatic Toxicity Monitoring

- I. The objective of aquatic toxicity monitoring is to evaluate if storm water (wet weather) discharges are causing or contributing to chronic toxic impacts on aquatic life by the following:
 - i. Toxicity testing at mass emission and major outfall stations to assess impacts on the marine and freshwater environments.
1. The Principal Permittee shall collect and analyze mass emission and major outfall samples for toxicity to evaluate the extent and causes of toxicity in receiving waters. Permittees shall utilize documents such as: Ventura County's

Technical Guidance Manual for Storm Water Quality Control Measures and U.S. EPA's National Management Measures to Control Nonpoint Source Pollution from Urban Areas to implement measures to eliminate or reduce sources of toxicity in storm water.

2. Toxicity samples may be flow-weighted composite samples or grab samples for both wet and dry event sampling (see subparts A.7 and A.8).
3. Volume of sample shall be determined by specific test methods to be used. At a minimum it is suggested to collect 5 gallons for baseline testing, and an additional 5 gallons for TIE studies. Sufficient sample volume shall be collected to perform the required toxicity tests.
4. All toxicity tests shall be conducted as soon as possible following sample collection. The 36-hour sample holding time for test initiation shall be targeted. However, no more than 72 hours shall elapse before initial use of a sample.
5. When toxicity tests can not be performed to comply with the requirements of this Order due to circumstances beyond the Permittee's control, then the following shall be submitted to the Regional Water Board Executive Officer within 2 working days:
 - (a) Statement of situation
 - (b) Explanation of circumstance(s) with documentation
 - (c) Statement of corrective action for the future
6. The Principal Permittee shall conduct critical life stage chronic toxicity tests on undiluted samples in accordance with:
 - (a) U.S. EPA's Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to *West Coast* Marine and Estuarine Organisms, (EPA/600/R-95/136, 1995) for all mass emission stations, and for major outfalls discharging to marine and estuarine environments, or
 - (b) U.S. EPA's Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, October 2002 (EPA/821/R-02/013, 2002) or current version for major outfalls discharging to freshwater environments.
7. The Principal Permittee shall analyze samples for chronic toxicity according to the schedule below:
 - (a) During the first year of the Order, 2 storm events shall be monitored at each mass emission and major outfall station. The first storm event of the wet season that produces at least 0.25 inches of rain, and 1 additional storm event. All storm events shall be separated by 7 days of dry weather (less than 0.1 inch of rain) from the previously measurable storm event.

- (1) During the first year of the Order, all 3 test species shall be used for their respective chronic toxicity test method for the 2 storm events monitored, to determine the most sensitive test species for each monitoring station (see subparts D.8 and D.9 below).
 - (b) During the next 4 years of the Order, the first storm event of the wet season that produces at least 0.25 inches of rain shall be monitored for each mass emission and major outfall station.
 - (1) During the next 4 years of the Order, the most sensitive test species determined from the first year of testing at each mass emission and major outfall station shall be used for its respective chronic toxicity test method (see subpart D.6).
8. Marine and Estuarine Species and Test Methods.
- (a) Marine and estuarine species and short-term test methods for estimating the chronic toxicity of NPDES effluents shall be used and are found in the first edition of *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms* (EPA/600/R-95/136, 1995) and applicable water quality standards; also see 40 CFR Parts 122.41(j)(4) and 122.44(d)(1)(iv).
 - (1) The Permittee shall conduct:
 - (A) A static renewal toxicity test with the topsmelt, *Atherinops affinis* (Larval Survival and Growth Test Method 1006.01)
 - (B) A static non-renewal toxicity test with the giant kelp *Macrocystis pyrifera* (Germination and Growth Test Method 1009.0); and
 - (C) A static non-renewal toxicity test with the purple sea urchin, *Strongylocentrotus purpuratus*, (Fertilization Test Method 1008.0)
 - (b) In no case shall the preceding toxicity test species be substituted with another organism unless written authorization from the Regional Water Board Executive Officer is received.
9. Freshwater Species and Test Methods.
- (a) Species and short-term test methods for estimating the chronic toxicity of NPDES effluent shall be used and are found in the fourth edition of *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms* (EPA/821/R-02/013, 2002; Table IA, 40 CFR Part 136).
 - (1) The Permittee shall conduct
 - (A) A static renewal toxicity test with the fathead minnow, *Pimephales promelas* (Larval Survival and Growth Test Method 1000.0¹)

¹Daily observations for mortality make it possible to calculate acute toxicity for desired exposure periods (i.e., 7-day LC50, 96-hour LC50, etc.).

- (B) A static renewal toxicity test with the daphnid, *Ceriodaphnia dubia* (Survival and Reproduction Test Method 1002.0¹); and
 - (C) A static renewal toxicity test with the green alga, *Selenastrum capricornutum* (also named *Raphidocelis subcapitata*) (Growth Test Method 1003.0)
- (b) In no case shall the preceding toxicity test species be substituted with another organism unless written authorization from the Regional Water Board Executive Officer is received.
10. The test endpoint data is analyzed using a standard t-test approach. Statistical analysis methods shall be consistent with U.S. EPA test method manuals.
 11. If significant toxicity is found then according to paragraph 10.2.6.2 of the U.S. EPA freshwater test methods manual, all chronic toxicity test results from the multi-concentration tests required by this Order must be reviewed and reported according to U.S. EPA guidance on the evaluation of concentration-response relationships found in *Method Guidance and Recommendations for Whole Effluent Toxicity (WET) Testing (40 CFR 136)* (EPA/821/B-00-004, 2000).
 12. Toxic samples shall be immediately subjected to Toxicity Identification Evaluation (TIE) procedures to identify the toxic chemical(s) if toxicity is demonstrated by the standard t-test.
 13. A TIE is to be performed to identify the causes of toxicity using the same species and test method and, as guidance, U.S. EPA test method manuals: *Toxicity Identification Evaluation: Characterization of Chronically Toxic Effluents, Phase I* (EPA/600/6-91/005F, 1992); *Methods for Aquatic Toxicity Identification Evaluations, Phase II Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity* (EPA/600/R-92/080, 1993); *Methods for Aquatic Toxicity Identification Evaluations, Phase III Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity* (EPA/600/R-92/081, 1993); and *Marine Toxicity Identification Evaluation (TIE): Phase I Guidance Document* (EPA/600/R-96-054, 1996).
 14. The Principal Permittee shall complete chronic Phase I (Toxicity Characterization Procedures) TIEs for all sites showing significant toxicity. For the purpose of triggering TIE (Toxicity Characterization Procedures), significant toxicity is defined as at least 50% mortality. The 50% mortality threshold is consistent with the approach recommended in guidance published by USEPA for conducting TIEs (USEPA, 1996), which recommends a minimum threshold of 50% mortality because the probability of completing a successful TIE decreases rapidly for samples with less than this level of toxicity.
-

- (a) The TIE shall be conducted on test species, demonstrating the most sensitive toxicity response at a sampling station. However, a TIE(s) may be conducted on an additional test species with the caveat that once the toxicant(s) has been identified then the most sensitive test species triggering the TIE event needs to be tested additionally to verify that the toxicant has been identified and addressed.
15. A TIE Prioritization Metric may be utilized to rank sites for TIEs.²
16. Toxicity Reduction Evaluation (TRE) when toxicity is identified
- (a) When the same pollutant or class of pollutants is identified through 2 consecutive TIE evaluations, a TRE shall be performed for that identified toxic pollutant.
- (b) The TRE development shall be performed by a neutral third party (retained by the Permittees), in consultation with the Regional Water Board staff.
- (c) The TRE shall include all reasonable steps to identify the source(s) of toxicity and discuss appropriate BMPs to eliminate the causes of toxicity. No later than 30 days after the source of toxicity and appropriate BMPs are identified, the Permittees shall submit the TRE Corrective Action Plan to the Regional Water Board Executive Officer for approval. At a minimum, the Plan shall include a discussion of the following items:
- (1) The potential sources of pollutant(s) causing toxicity.
- (2) A list of municipalities and agencies that may have jurisdiction over sources of pollutant(s) causing toxicity.
- (3) Recommended BMPs to reduce the pollutant(s) causing toxicity.
- (4) Proposed post construction control measures to reduce the pollutant(s) causing toxicity.
- (5) Follow-up monitoring to demonstrate that toxicity has been removed.
- (d) The TRE process shall be coordinated with TMDL development and implementation (i.e., If a TMDL for 4,4'-DDD is being implemented when a TRE for 4,4'-DDD is required, the efforts shall be coordinated to avoid overlap).
17. Results of Toxicity monitoring conducted in accordance with the Standard Operating Procedure under Standard Provision 14 of this Attachment shall be sent to the Regional Board's Storm Water Site at MS4stormwaterRB4@waterboards.ca.gov, no later than 90 days from sample collection date for the initial toxicity test and no more than 30 days from completion of each aspect of the analysis for TIEs/TREs. The sample data transmitted shall be in the most recent update of the Southern California Municipal Storm Water Monitoring Coalition's (SMC) Standardized Data Transfer Formats (SDTFs).

² Appendix 5. SMC Model Monitoring Program.

18. The Annual Storm Water Report shall include:
 - (a) A full laboratory report for all toxicity testing.
 - (b) A summary of the years' mass emission and major outfall monitoring station's toxicity test results reported according to the test methods manual chapter on report preparation and test review.
 - (c) The dates of sample collection and initiation of each toxicity test.
 - (d) All results for effluent parameters monitored concurrently with the toxicity test(s).
 - (e) TIE Phase testing (Phase I, Phase II, and Phase III) that has been or is in the process of being conducted per monitoring station.
 - (f) The development, implementation, and results for each TRE Corrective Action Plan in the Annual Storm Water Report, beginning the year following the identification of each pollutant or pollutant class causing toxicity.

19. When the SMC Standardized Toxicity Testing Guidance is completed, the Regional Water Board Executive Officer may direct Permittees to replace the current toxicity program with the standardized guidance procedure.

SPECIAL STUDIES

E. Pyrethroid Insecticides Study

- I. The Principal Permittee shall perform a Pyrethroid Insecticides study to accomplish the following objectives:
 - i. Establish baseline data for major watersheds
 - ii. Evaluate whether Pyrethroid Insecticide concentrations are at or approaching levels known to be toxic to sediment-dwelling aquatic organisms.
 - iii. Determine if Pyrethroids discovered are from urban sources.
 - iv. Assess any trends over the permit term.

1. The Permittees shall incorporate monitoring for Pyrethroid Insecticides within the Calleguas Creek, Santa Clara River and Ventura River Watersheds according to the following:
 - (a) No later than the second year of this Order, monitoring shall begin.
 - (b) Quality Assurance Project Plan (QAPP) to be submitted to the Regional Board for approval 12 months prior to beginning monitoring.
 - (c) In selecting sites to conduct monitoring for Pyrethroid Insecticides, Permittees shall review existing monitoring programs in the watersheds by other public and private entities, watershed coalitions, and citizen volunteers, so as to complement and not duplicate efforts.
 - (d) Establish at least 2 stations along the mainstems of each major watershed river that are influenced by urban discharges.

- (e) The study shall be repeated every third year following the year monitoring begins.
2. The Principal Permittee shall monitor Pyrethroid Insecticides stations according to the following:
- (a) The Principal Permittee shall monitor 1 sampling event per station per monitoring year.
- (1) Monitoring shall occur after sediment has settled within the waterbody, and safe access can be assured.
- (b) Sufficient sediment is to be collected at each station in a pre-cleaned glass jar by skimming the upper 1 cm of the sediment column with a steel scoop, and held on ice until returned to the laboratory.
- (c) Sediment shall be homogenized in the laboratory by hand mixing, then held at 4 °C (toxicity samples) or -20 °C (chemistry samples).
- (d) All samples taken shall be analyzed for the following Pyrethroids:
- (1) bifenthrin
- (2) cyfluthrin
- (3) cypermethrin
- (4) deltamethrin
- (5) esfenvalerate
- (6) lambda-cyhalothrin
- (7) permethrin
- (8) tralomethrin (if laboratory is capable of analyzing for it)
- (e) Detection limits for all Pyrethroids shall be as close to 1ng/g (dry weight) as reasonably achievable.
- (f) Each sediment sample is to measure the following:
- (1) total organic carbon (TOC).
3. All samples shall be tested for toxicity to 7 to 10 day old *Hyaella azteca* according to standard U.S. EPA testing methods.³
- (a) Use of the approach described in *Aquatic Toxicity Due to Residential Use of Pyrethroid Insecticides*⁴ for toxicity testing shall be used.
4. Analysis by a laboratory that has performed sediment toxicity testing for Pyrethroid Insecticides is preferred.
5. Monitoring results from each station shall be sent electronically to the Regional Board's Storm Water Site at MS4stormwaterRB4@waterboards.ca.gov, no later than 90 days from sample collection date. The sample data transmitted shall be

³ U.S. EPA. *Methods for Measuring the Toxicity and Bioaccumulation of Sediment-Associated Contaminants with Freshwater Invertebrates*; EPA Publication 600/R-99/064; U.S. Environmental Protection Agency: Washington, DC, 2000; 192 pp.

⁴ *Aquatic Toxicity Due to Residential Use of Pyrethroid Insecticides*; Weston, D.P.; Holmes, R.W.; You, J.; Lydy, M.J. *Environ. Sci. Technol.*; (Article); 2005; 39(24); 9780 pp.

in the most recent update of the Southern California Municipal Storm Water Monitoring Coalition's (SMC) Standardized Data Transfer Formats (SDTFs).

6. If toxicity is attributed to Pyrethroids then consultation with staff at U.S. EPA, the California Department of Pesticide Regulations and the California Stormwater Quality Association's (CASQA) pesticides committee (UP3 Project web site), shall be required to obtain relevant information to use in developing the recommendations to mitigate Pyrethroids in the Final Report.
7. Final Report for the Pyrethroid Insecticides study shall contain the following:
 - (a) Executive summary
 - (b) Methods
 - (c) Results (including map depicting monitoring stations)
 - (d) Discussion
 - (e) Recommendations to mitigate Pyrethroids
8. The Final Report shall be completed and submitted to the Executive Officer of the Regional Water Board no later than 8 months after completion of the study.
9. The Pyrethroid Insecticides Study requirement may be satisfied by another tributary monitoring program within the Watershed performing a sediment Pyrethroid Insecticides Study that is monitoring to assess pyrethroid concentrations and sediment toxicity, so as to complement other ongoing programs.

F. Hydromodification Control Study

1. The Principal Permittee shall conduct or participate in special studies to develop tools to predict and mitigate the adverse impacts of Hydromodification, and to comply with hydromodification control criteria. This can be achieved by the following:
 - (a) Develop a mapping and classification system for streams based on their susceptibility to the effects of hydromodification.
 - (b) Establish protocols for ongoing monitoring to assess the effects of hydromodification.
 - (c) Develop dynamic models to assess the effects of hydromodification on stream condition.
 - (d) Develop a series of tools that managers can easily apply to make recommendations or set requirements relative to hydromodification for new development and redevelopment.

2. The Principal Permittee may satisfy this requirement by participating in the 'Development of Tools for Hydromodification Assessment and Management' Project undertaken by the SMC and coordinated by the SCCWRP.
3. The Principal Permittee shall continue to partner with the SMC and collect data or sponsor its collection for the Ventura County sites to reduce statistical uncertainty and/ or improve model predictability.
4. The Principal Permittee shall submit a letter to the Regional Water Board Executive Officer stating how they will satisfy this requirement, no later than 2 months after Order adoption date.

G. Low Impact Development

1. The Principal Permittee shall conduct or participate in a special study to assess the effectiveness of low impact development techniques in semi-arid climate regimes such as in Southern California.
2. The Principal Permittee may satisfy this requirement by participating in the SMC project titled "Quantifying the Effectiveness of Site Design/ Low Impact Development Best Management Practice in Southern California".
3. The Principal Permittee shall submit a letter to the Regional Water Board Executive Officer stating how they are satisfying this requirement, no later than 2 months after deciding to either conduct or participate in special study.

H. Southern California Bight Project

1. The Principal Permittee and Permittees shall participate with other government organizations regulating discharges in southern California in the collaboration to conduct a regional monitoring survey (Southern California Bight Project (SCBP)), which was started in 2008 and to be continued in successive years. The survey's primary objective is to assess the spatial extent and magnitude of ecological disturbances on the mainland continental shelf of the SCB and to describe relative conditions among different regions of the SCBP.
2. The Principal Permittee shall participate on the Steering Committee for the bight-wide monitoring project, and assist with the estuary and nearshore sampling effort requirement of the proposed monitoring project for Ventura County as defined in the SCBP plan.

I. Bioassessment

1. The Principal Permittee consents to participate in the following regional water quality program for watershed management and planning:
 - (a) SMC Regional Monitoring Program
 - (1) Southern California Regional Bioassessment
 - (A) Level of effort per watershed per year
 - (i) Probabilistic sites per watershed
 - (I) Ventura River - Six
 - (II) Santa Clara River - Three
 - (III) Calleguas Creek - Six
 - (ii) Integrator sites per watershed
 - (A) Ventura River - One
 - (B) Santa Clara River - One
 - (C) Calleguas Creek - One
 - (b) Ventura County Bioassessment: Permittees shall conduct bioassessment at one fixed site in each of the watersheds above on an annual basis. Southern California Regional Bioassessment protocols shall be used to conduct the Ventura County Bioassessment program.

J. Volunteer Monitoring Programs

1. The Permittees shall provide limited assistance if requested in the development and implementation of volunteer monitoring programs in the Ventura watersheds. These include, but are not limited to the following:
 - (a) Ventura River - (Ventura Stream Team)
 - (b) Santa Clara River - (Santa Clara River Stream Team)
 - (c) Calleguas Creek - (Calleguas Creek Watershed Quality Monitoring Program)
 - (d) Malibu Creek - (Malibu Creek Watershed Quality Monitoring Program)

K. Standard Monitoring Provisions

- I. All monitoring activities shall meet the following requirements.
 1. Monitoring and Records [40 CFR 122.41(j)(1)]
 - (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
 2. Monitoring and Records [40 CFR 122.41(j)(2)] [CWC §13383(a)]
 - (a) The Principal Permittee and Permittees shall retain records of all monitoring information, including all calibration and maintenance of monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the Report of Waste Discharge (ROWD) and application for this Order, for a period of at least five (5) years from the date

of the sample, measurement, report, or application. This period may be extended by request of the Regional Water Board or U.S. EPA at any time and shall be extended during the course of any unresolved litigation regarding this discharge.

3. Monitoring and Records [40 CFR 122.21(j)(3)]
 - (a) Records of monitoring information shall include:
 - (1) The date, time of sampling or measurements; exact place, weather conditions, and rain fall amount.
 - (2) The individual(s) who performed the sampling or measurements.
 - (3) The date(s) analyses were performed.
 - (4) The individual(s) who performed the analyses.
 - (5) The analytical techniques or methods used.
 - (6) The results of such analyses.
 - (7) The data sheets showing toxicity test results.
4. Monitoring and Records [40 CFR 122.21(j)(4)]
 - (a) All sampling, sample preservation, and analyses must be conducted according to test procedures under 40 CFR Part 136, unless other test procedures have been specified in this Order. If a particular Minimum Level (ML) is not attainable in accordance with procedures set forth in 40 CFR 136, the lowest quantifiable concentration of the lowest calibration standard analyzed by a specific analytical procedure may be used instead.
5. Monitoring and Records [40 CFR 122.21(j)(5)]
 - (a) The CWA provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this Order shall, upon conviction, be punished by a fine of not more than \$10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than \$20,000 per day of violation, or by imprisonment of not more than four years, or both.
6. All chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory:
 - (a) Certified for such analyses by an appropriate governmental regulatory agency.
 - (b) Participated in 'Intercalibration Studies' for storm water pollutant analysis conducted by the SMC.⁵

⁵ The 'Intercalibration Studies' are conducted periodically by the SMC to establish a consensus based approach for achieving minimal levels of comparability among different testing laboratories for storm water samples to minimize analytical procedure bias. Stormwater Monitoring Coalition Laboratory Document, Technical Report 420 (2004) and subsequent revisions and augmentations.

- (c) Which performs laboratory analyses consistent with the storm water monitoring guidelines as specified in, the *Stormwater Monitoring Coalition Laboratory Guidance Document*, 2nd Edition R. Gossett and K. Schiff (2007), and its revisions.
7. For priority toxic pollutants that are identified in the CTR (65 *Fed. Reg.* 31682), the MLs published in Appendix 4 of the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays and Estuaries of California* (SIP) shall be used for all analyses, unless otherwise specified. The MLs from the SIP are incorporated into Attachment "G".
8. The Monitoring Report shall specify the analytical method used, the Method Detection Level (MDL) and the ML for each pollutant. For the purpose of reporting compliance with numerical limitations, performance goals, and receiving water limitations, analytical data shall be reported with 1 of the following methods, as appropriate:
- (a) An actual numerical value for sample results greater than or equal to the ML.
 - (b) "Not-detected (ND)" for sample results less than the laboratory's MDL with the MDL indicated for the analytical method used.
 - (c) "Detected, but Not Quantified (DNQ)" if results are greater than or equal to the laboratory's MDL but less than the ML. The estimated chemical concentration of the sample shall also be reported. This is the concentration that results from the confirmed detection of the substance by the analytical method below the ML value.
9. For priority toxic pollutants, if the Permittee can demonstrate that a particular ML is not attainable, in accordance with procedures set forth in 40 CFR 136, the lowest quantifiable concentration of the lowest calibration standard analyzed by a specific analytical procedure (assuming that all the method specified sample weights, volumes, and processing steps have been followed) may be used instead of the ML listed in Appendix 4 of the SIP. The Principal Permittee must submit documentation from the laboratory to the Regional Water Board Executive Officer for approval prior to raising the ML for any constituent.
10. Monitoring Reports [40 CFR 122.41(I)(4)(ii)]
- (a) If the Principal Permittee monitors any pollutant more frequently than required by the Order using test procedures approved under 40 CFR part 136, unless otherwise specified in the Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Annual Monitoring Reports.

11. Monitoring Reports [40 CFR 122.41(I)(4)(iii)]
 - (a) Calculations for all limitations, which require averaging of measurements, shall utilize an arithmetic mean unless otherwise specified in this Order.
12. If no flow occurred during the reporting period, then the Monitoring Report shall, so state.
13. The Regional Water Board Executive Officer or the Regional Board, consistent with 40 CFR 122.41, may approve changes to the Monitoring Program, after providing the opportunity for public comment, either:
 - (a) By petition of the Principal Permittee or by petition of interested parties after submittal of the Monitoring Report. Such petition shall be filed not later than 60 days after the Monitoring Report submittal date, or
 - (b) As deemed necessary by the Regional Water Board Executive Officer following notice to the Principal Permittee.
14. The Principal Permittee must provide a copy of the Standard Operation Procedures (SOPs) for the Monitoring Program No. CI 7388 to the Regional Water Board upon request. The SOP will consist of five elements: Title page, Table of Contents, Procedures, Quality Assurance/ Quality Control (QA/ QC), and References. Briefly describe the purpose of the work or process, including any regulatory information or standards that are appropriate to the SOP process, and the scope to indicate what is covered. Denote what sequential procedures should be followed, divided into significant sections; e.g., possible interferences, equipment needed personnel qualifications, and safety considerations. Describe QA/ QC activities, and list any cited or significant references.

L. Total Maximum Daily Load (TMDL) Monitoring

1. TMDL monitoring is to determine compliance with the TMDL Waste Load Allocations (WLAs) and numeric targets for the MS4 Permittees that have been adopted by the Regional Water Board and have been approved by the Office of Administrative Law and the U.S. EPA.
2. TMDL monitoring is in accordance with approved TMDLs as discussed in part 5 of the permit. TMDL monitoring for specific watersheds is in accordance with the agreed upon monitoring plans submitted by stakeholders, including MS4 Permittees.

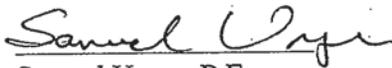
M. Beach Water Quality Monitoring

If funding from state and federal sources is not available for beach water quality monitoring the Principal Permittee shall conduct weekly year-round beach water quality sampling and analysis at a maximum of ten sites in accordance with the procedures and locations used in AB 411 monitoring and listed below:

1. Rincon Beach – 25 yards south of the creek mouth*
2. Oil Piers Beach – south of the drain, bottom of the wood staircase.
3. Faria County Park – south of the drain at the north end of the park*
4. Solimar Beach – south (end of east gate access road)*
5. Emma Wood State Beach – 50 yards south of first drain
6. Oxnard Beach – at J Street drain
7. Surfer's Point at Seaside – end of the access path via wooden gate
8. Promenade Park – Figueroa Street
9. Surfer's Knoll – beach adjacent to the parking lot*
10. San Buenaventura Beach – south of drain at San Jon Road

* Not associated with MS4 discharges.

Ordered by:



Samuel Unger, P.E.
Interim Executive Officer

Date: July 8, 2010

ATTACHMENT G

Storm Water Monitoring Program's Constituents with Associated Minimum Levels (MLs)¹

CONSTITUENTS	MLs
CONVENTIONAL POLLUTANTS	
	mg/L
Oil and Grease	5
Total Phenols	0.1
Cyanide	0.005
pH	0 - 14
Temperature	N/A
Dissolved Oxygen	Sensitivity to 5 mg/L
BACTERIA (single sample limits)	
	MPN/100ml
Total coliform (marine waters)	10,000
Enterococcus (marine waters)	104
Fecal-coliform (marine & fresh waters)	400
E. coli (fresh waters)	235
GENERAL	
	mg/L
Dissolved Phosphorus	0.05
Total Phosphorus	0.05
Turbidity	0.1 NTU
Total Suspended Solids	2
Total Dissolved Solids	2
Volatile Suspended Solids	2
Total Organic Carbon	1
Total Petroleum Hydrocarbon	5
Biochemical Oxygen Demand	2
Chemical Oxygen Demand	20-900
Total Ammonia-Nitrogen	0.1
Total Kjeldahl Nitrogen	0.1
Nitrate-Nitrite	0.1
Alkalinity	2
Specific Conductance	1umho/cm
Total Hardness	2
MBAS	0.5
Chloride	2
Fluoride	0.1
Methyl tertiary butyl ether (MTBE)	1
Perchlorate	4 µg/L

¹ For priority pollutants, MLs published in Appendix 4 of the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays and Estuaries of California (SIP) shall be used for all analyses, unless otherwise specified. Method Detection Levels (MDLs) must be lower than or equal to the ML value, unless otherwise approved by the Regional Board.

ATTACHMENT GStorm Water Monitoring Program's Constituents with Associated Minimum Levels (MLs)¹

METALS (Dissolved & Total)	
	µg/L
Aluminum	100
Antimony	0.5
Arsenic	1
Beryllium	0.5
Cadmium	0.25
Chromium (total)	0.5
Copper	0.5
Hex. Chromium	5
Iron	100
Lead	0.5
Mercury	0.5
Nickel	1
Selenium	1
Silver	0.25
Thallium	1
Zinc	1
SEMIVOLATILE ORGANIC COMPOUNDS	
	µg/L
ACIDS	
	µg/L
2-Chlorophenol	2
4-Chloro-3-methylphenol	1
2,4-Dichlorophenol	1
2,4-Dimethylphenol	2
2,4-Dinitrophenol	5
2-Nitrophenol	10
4-Nitrophenol	5
Pentachlorophenol	2
Phenol	1
2,4,6-Trichlorophenol	10
BASE/NEUTRAL	
	µg/L
Acenaphthene	1
Acenaphthylene	2
Anthracene	2
Benzidine	5
1,2 Benzanthracene	5
Benzo(a)pyrene	2
Benzo(g,h,i)perylene	5
3,4 Benzoflouranthene	10

ATTACHMENT G

Storm Water Monitoring Program's Constituents with Associated Minimum Levels (MLs)¹

BASE/NEUTRAL	µg/L
Benzo(k)flouranthene	2
Bis(2-Chloroethoxy) methane	5
Bis(2-Chloroisopropyl) ether	2
Bis(2-Chloroethyl) ether	1
Bis(2-Ethylhexl) phthalate	5
4-Bromophenyl phenyl ether	5
Butyl benzyl phthalate	10
2-Chloroethyl vinyl ether	1
2-Chloronaphthalene	10
4-Chlorophenyl phenyl ether	5
Chrysene	5
Dibenzo(a,h)anthracene	0.1
1,3-Dichlorobenzene	1
1,4-Dichlorobenzene	1
1,2-Dichlorobenzene	1
3,3-Dichlorobenzidine	5
Diethyl phthalate	2
Dimethyl phthalate	2
di-n-Butyl phthalate	10
2,4-Dinitrotoluene	5
2,6-Dinitrotoluene	5
4,6 Dinitro-2-methylphenol	5
1,2-Diphenylhydrazine	1
di-n-Octyl phthalate	10
Fluoranthene	0.05
Fluorene	0.1
Hexachlorobenzene	1
Hexachlorobutadiene	1
Hexachloro-cyclopentadiene	5
Hexachloroethane	1
Indeno(1,2,3-cd)pyrene	0.05
Isophorone	1
Naphthalene	0.2
Nitrobenzene	1
N-Nitroso-dimethyl amine	5
N-Nitroso-diphenyl amine	1
N-Nitroso-di-n-propyl amine	5
Phenanthrene	0.05
Pyrene	0.05
1,2,4-Trichlorobenzene	1

ATTACHMENT GStorm Water Monitoring Program's Constituents with Associated Minimum Levels (MLs)¹

CHLORINATED PESTICIDES	µg/L
Aldrin	0.005
alpha-BHC	0.01
beta-BHC	0.005
delta-BHC	0.005
gamma-BHC (lindane)	0.02
alpha-chlordane	0.1
gamma-chlordane	0.1
4,4'-DDD	0.05
4,4'-DDE	0.05
4,4'-DDT	0.01
Dieldrin	0.01
alpha-Endosulfan	0.02
beta-Endosulfan	0.01
Endosulfan sulfate	0.05
Endrin	0.01
Endrin aldehyde	0.01
Heptachlor	0.01
Heptachlor Epoxide	0.01
Toxaphene	0.5
POLYCHLORINATED BIPHENYLS	µg/L
Aroclor-1016	0.5
Aroclor-1221	0.5
Aroclor-1232	0.5
Aroclor-1242	0.5
Aroclor-1248	0.5
Aroclor-1254	0.5
Aroclor-1260	0.5
ORGANOPHOSPHATE PESTICIDES	µg/L
Atrazine	2
Chlorpyrifos	0.05
Cyanazine	2
Diazinon	0.01
Malathion	1
Prometryn	2
Simazine	2
HERBICIDES	µg/L
2,4-D	10
Glyphosate	5
2,4,5-TP-SILVEX	0.5

ATTACHMENT H
Storm Water Monitoring Program's Major Outfall Stations

PERMITTEE	STATION ID	LATITUDE	LONGITUDE
City of Camarillo	MO-CAM	34°13'10.00"N	119° 3'58.06"W
City of Fillmore	MO-FIL	34°24'16.51"N	118°55'50.47"W
Unincorporated Ventura County	MO- MEI (Meiners Oaks)	34°26'43.98"N	119°17'25.18"W
City of Moorpark	MO-MPK	34°16'44.29"N	118°54'19.40"W
City of Ojai	MO-OJA	34°26'41.25"N	119°14'28.43"W
City of Oxnard	MO-OXN	34°14'17.38"N	119°11'23.08"W
City of Port Hueneme	MO-HUE	34° 8'29.30"N	119°11'21.09"W
City of Santa Paula	MO-SPA	34°20'54.99"N	119° 3'19.82"W
City of Simi Valley	MO-SIM	34°16'18.59"N	118°47'1.51"W
City of Thousand Oaks	MO-THO	34°12'49.16"N	118°55'16.24"W
City of Ventura	MO-VEN	34°14'35.86"N	119°11'40.86"W

Comment Letter No. L4

Ron Bottorff, Chairman
Friends of the Santa Clara River
660 Randy Drive
Newbury Park, CA 91320

Comment No. L4-1

Friends of the Santa Clara River was formed in 1993 to provide community oversight of issues pertaining to the Santa Clara River Watershed. We particularly review projects that will affect the river and its tributaries in an effort to ensure habitat protection, retention of the natural hydrology, protection of floodplains and continued groundwater recharge.

As a tributary the to [sic] Santa Clara River, Placerita Creek provides an important contribution to the watershed through surface flows, sediment movement and habitat.

Response No. L4-1

This comment provides an overview of the mission of Friends of the Santa Clara River and correctly identifies Placerita Creek, which traverses the Ranch and the proposed Development Area, as a tributary to the Santa Clara River. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-2

Although the County generally provides us with a digital or hard copy of all projects affecting the river and its tributaries, we do not believe we received notice of this project. We would therefore now like to formally request an extension of the time for review of 30 days because of the number and magnitude of the approvals requested with this proposal.

Response No. L4-2

The Notice of Completion and Availability of the Draft EIR and a CD of the Draft EIR in its entirety was mailed to the commentor via U.S. Postal Service on May 7, 2012. An email was subsequently sent to the commentor on May 7, 2012, to request a confirmation of delivery. The commentor replied on May 10, 2012, that the package had been received. Refer to Response No. 14-1.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-3

We wish to begin by expressing our concern that there will be no hearing on the DEIR for this substantial project before the Planning Commission, only a hearing on the Final EIR. This process is contrary to all previous Regional Planning hearing procedures for large projects and particularly inappropriate for a large proposal that includes a Plan Amendment. We request that the Commission hold a hearing on the Draft document so that it has the opportunity to hear from the public and make changes before the Final document is presented.

Response No. L4-3

Refer to Response No. 15-3 regarding the public hearing process for the Project. As indicated therein, the holding of a public hearing by the County Hearing Examiner at a location in proximity to a proposed project site—which occurred on June 4, 2012, within the Project area—is a recently enacted procedure for development projects within the County that is intended to provide increased opportunities for public input, particularly for those members of the public who live or work in proximity to the project or are otherwise considered stakeholders in the project area. The Disney | ABC Studios at The Ranch Project is not the first project for which this procedure has been followed. In accordance with County procedures, following publication of this Final EIR but prior to the requested approval of the Project, additional public hearings will be held by the County Planning Commission and the County Board of Supervisors at which the public will have further opportunities to provide testimony. Thus, as requested in this comment, the public will have an opportunity to voice any concerns or otherwise provide comments to the Planning Commission prior to any action being taken regarding the Project.

Additionally, refer to Response No. 15-2 regarding the requested local plan amendment. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-4

We participated in the One Valley One Vision (OVOV) General Plan update for Santa Clarita and are frankly dismayed that his [sic] proposal for a Plan Amendment change from agriculture to an industrial use is coming before you now when the County update was only recently approved. OVOV purported to meet air quality standards and address climate change by reducing density in the County areas, continuing the green belt around the City and increasing density in the City Center near transportation nodes.

This proposal does none of that. Instead, as was feared by several commentators during the OVOV public process, the County now proposes to increase density in an area zoned for

agricultural use by allowing a heavy industrial, auto-dependant use. We believe this plan amendment change is inappropriate and oppose its approval.

Response No. L4-4

The Project is consistent with the new land use designations for the Ranch that became effective on December 27, 2012 following the recent adoption of the 2012 Area Plan (and following publication of the Draft EIR). However, the Draft General Plan as well as the 2012 Area Plan allow complete project applications filed prior to the effective date of the plans to be reviewed for consistency under the then current adopted General Plan and Area Plan. The County deemed complete the Project's application for a vesting tentative tract map and conditional use permit on May 4, 2010, and thus the Project is subject to the former plans. As such, the Project Applicant seeks an Area Plan amendment in accordance with the 1990 Area Plan. Refer to Response No. 15-2 for further discussion regarding consistency with land use designations and zoning.

As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-5

Project Description

The Project proposes a plan amendment change to provide up to 12 soundstages, production offices, six mills, a warehouse, writers/producers bungalows, a commissary, an administration building, a central utility plant, and an electrical substation on approximately 58 acres located currently [sic] zoned for agriculture. The proposed studio would operate 24 hours per day and employ over 1800 people and have over 2000 parking spaces.

In the process, the project would require removal of 158 oak trees (including 16 heritage oaks) and encroach upon an additional 82 oaks (3 heritage oaks). According to the DEIR, the entire Development Area would be cleared and mass graded at one time, involving approximately 700,000 cubic yards of cut and 350,000 cubic yards of fill within the Ranch, with up to 500,000 cubic yards of soil exported to a landfill. Additional cut and fill of up to 20,000 cubic yards would be required for off site improvements.¹

The project would turn a filming ranch into a massive industrial studio complex with greatly increased traffic and noise in this rural area. It would destroy native vegetation and compromise the view shed in Placerita Canyon.

¹ DEIR, Executive Summary

Response No. L4-5

This comment summarizes various aspects of the Project. The following is provided to correct or clarify certain information presented in the comment:

- As stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch (i.e., including existing employment) on a daily basis.
- As indicated in Figures V.J-2 and V.J-3 on pages V.J-24 and V.J-25 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, the Project would provide at least 1,228 parking spaces within the Development Area under the Soundstage Option and 1,162 parking spaces under the Studio Office Option. Development of the two Conditional Parking Areas, located east of the Development Area, would only occur if LADWP were to revoke the parking license agreement for parking within the transmission corridor (i.e., within the Development Area), as stated on page V.J-23 in Section V.J, Traffic, Access, and Parking, as well as on page II-5 in Section II, Executive Summary, and on page IV-27 in Section IV, Project Description, of the Draft EIR.
- As stated on page II-5 in Section II, Executive Summary, as well as page IV-44 in Section IV, Project Description, of the Draft EIR and discussed throughout relevant analyses, the Project is anticipated to involve approximately 700,000 cubic yards of cut and 350,000 cubic yards of fill within the Ranch, with approximately 350,000 cubic yards of soil export. However, both of these references include a footnote indicating that to be conservative, soil export of up to 500,000 cubic yards was evaluated in relevant sections of the Draft EIR, thus overstating any impacts associated with haul truck trips.

In response to the comment regarding vegetation and viewshed impacts, as stated on page V.F-95 in Section V.F, Biological Resources, of the Draft EIR, with the implementation of the Mitigation Measures and Project Design Features, the Project would have less than significant impacts with respect to biological resources. Additionally, as stated on page V.I-49 in Section V.I, Visual Qualities, of the Draft EIR, Project-level and cumulative impacts on aesthetics/visual qualities and views (as well as light and glare) would be less than significant. Nonetheless, mitigation measures are proposed; see MM I-1 through MM I-3 therein, and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-6

Comments on the Flood Section

Impacts to the Floodplain

We wish to begin our comments on this section by stating that we support the Regional Water Quality Board's efforts to encourage a reduction of hydromodifications to natural streams and rivers. We attach their Resolution 2005-02. It appears this project would not be consistent with this Resolution due to the extensive debris basin and storm drain infrastructure proposed for the project and the hardscaping of the creek channel.

Response No. L4-6

The fact that debris basins and storm drain infrastructure are proposed as part of the Project does not inherently indicate that hydromodification impacts would occur. On the contrary, such infrastructure is designed to minimize hydromodification impacts. As discussed on pages V.B-24 and V.B-25 in Section V.B, Flood Hazards, of the Draft EIR, the Project's potential hydromodification impacts to Placerita Creek were evaluated. Additionally, as discussed on page V.B-30, the Project's drainage systems for the conveyance of both on- and off-site generated flows would ensure post-development peak flow rates would not exceed pre-development peak flow rates, in accordance with County requirements. Specifically, the proposed detention basins would retain stormwater and regulate flows to Placerita Creek. Similarly, any debris basins would catch mud and debris from the surrounding hillsides, thus preventing their discharge to the creek and minimizing sedimentation (i.e., hydromodification) impacts.

In addition, as discussed on page III-3 in Section III, Environmental Setting, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s. The mostly unvegetated slopes of these fill pads are currently eroding into Placerita Creek. As stated on page V.B-16 in Section V.B, Flood Hazards, of the Draft EIR, the reconstructed slopes of Placerita Creek would be stabilized with soil cement (resulting in a trapezoidal channel with a soft bottom) which would be buried to allow surface vegetation. The entire creek channel within the Development Area would be revegetated following Project construction as part of the proposed Habitat Mitigation and Monitoring Program. This mitigation would also serve to improve water quality within the creek.

With respect to the LARWQCB's resolution regarding hydromodification, provided as Attachment 1 to this comment letter (see page III-291 of this Final EIR), the comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As part of the Project, consultation with the LARWQCB has begun and will continue to occur in conjunction with the requested Water Quality Certification pursuant to Clean Water Act Section 401. Thus, the LARWQCB will have ample opportunity to address any of their concerns with the Project Applicant.

Comment No. L4-7

We also have the following additional concerns.

Page V.B-8 the DEIR states:

The County also adopted a floodplain and floodway for the Ranch area in October 2005. The proposed areas to be developed within the Ranch are outside the County's adopted floodway. However, approximately the northern third of the southern portion of the Development Area east of the southern fill pad, the northern Conditional Parking Area, and a portion of the southern Conditional Parking Area are within the County's adopted floodplain.

First, it appears from the Floodway Maps included in the DEIR (and attached to this comment letter) that the above is not an entirely accurate statement. Portions of the buildings seem to be in the floodway and can only be removed by bank protection and fill that artificially narrows the creek further than its current hydrological configuration². We request that the developer downsize the project by removing structures from the flood plain and next to the creek so that the natural floodplain can be maintained.

² *As discussed above, following grading for the Project, no structures would be placed within the 100-year floodplain. [emphasis added], DEIR p. V.B-29*

Response No. L4-7

The referenced maps are not “Floodway Maps,” as indicated in the comment. Draft EIR Figures V.B-2 and V.B-4, included as attachments to this comment letter (provided on pages III-292 and III-293 of this Final EIR), and as originally provided on pages V.B-7 and V.B-28 in Section V.B, Flood Hazards, of the Draft EIR, depict the floodplain area designated as Zone A by the Federal Emergency Management Agency (FEMA), based on FEMA’s most current Flood Insurance Rate Map (FIRM) for the general Project vicinity, as explained on pages V.B-6 and V.B-27. FEMA’s Zone A, defined as areas with a one percent annual chance of flooding (i.e., the 100-year flood zone), is not the same as the County’s adopted floodway or floodplain. The FEMA floodplain area designated as Zone A is based on a 100-year flow rate that is published in the Flood Insurance Study and is equal to 3,550 cubic feet per second (ft^3/s). This flow rate is used to assess areas that may require flood insurance for existing structures. FEMA’s Zone A represents a floodplain, not the actual floodway. In contrast, the County’s currently adopted floodplain and floodway, which were adopted on October 22, 1985, are based on flow rates that range from 7,050 ft^3/s to 7,880 ft^3/s for a “Capital Flood,” which would be produced by a 50-year frequency storm falling on saturated soil.³ Based on the substantially higher flow rates used by the County, the County floodplain is broader than FEMA’s Zone A. These different FEMA- and County-designated areas are illustrated on Sheet 100 of the approved Drainage Concept, provided as Appendix C of the Draft EIR. As shown, no structures are proposed within the County floodway as part of the Project.

As also discussed on page V.B-27 of the Draft EIR, the Applicant would obtain a Conditional Letter of Map Revision (CLOMR) from FEMA for the proposed change to Zone A. The analysis on page V.B-27 then goes on to separately address proposed changes to the County adopted floodway and floodplain as follows:

Project grading would change the County adopted floodway and floodplain. A conceptual floodway map revision would be adopted at the time of Project approval for the proposed alteration to the County adopted floodway and floodplain limits. The two Conditional Parking Areas, if developed, would be located outside the current and proposed County floodway, in accordance with LACDPW requirements. However, as mentioned above, a portion of the

³ However, during preparation of the Project’s Drainage Concept/SUSMP/LID Plan, provided as Appendix C of the Draft EIR, the County Department of Public Works’ Water Resources Division established revised flow rates for the Capital Flood based on its 2006 Hydrology Manual. These flow rates range from 5,214.8 ft^3/s to 6,011.7 ft^3/s . As a result, the County required re-evaluation of the Placerita Creek floodplain and floodway as part of the Project analysis.

northern Conditional Parking Area would be within the proposed County floodplain, while all but the northernmost corner of the southern Conditional Parking Area would be outside the proposed County floodplain. Grading for these lots would maintain existing drainage patterns, and the lots would be designed such that no increase in peak flows would occur, through the use of porous paving materials and vegetated drainage swales located around the parking areas. Further, Project construction would not subject any adjacent properties to flooding since all floodplain changes would occur within the Ranch, with no effect on downstream floodplain contours.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L4-8

Second, we understand that FEMA is updating several flood maps in the Santa Clarita area and elsewhere. Please address whether the maps referred to above are the most up to date for flood information. If newer maps have been approved, those maps should be used for the purposes of this project.

Response No. L4-8

The analysis of flood hazards provided in Section V.B, Flood Hazards, was based on the most current FIRM at the time the Draft EIR was prepared. Specifically, as stated on page V.B-6 therein, the FIRM (FIRM 06037C0840 F, Panel 840, FIRM 06037C1075 F, Panel 1075, and FIRM 06037C0820 F, Panel 820) was effective as of September 2008. FEMA FIRMs are typically updated every 10 to 12 years and involve a CLOMR to reflect any changes to the Zone A floodplain. LACDPW has confirmed the current FIRM contains the most up to date information in effect. As discussed in Response No. L4-7, the Applicant would obtain a CLOMR from FEMA for the proposed change to Zone A.

Comment No. L4-9

Page V-B-27 states that

“Prior to the commencement of construction, the Applicant would obtain a Conditional Letter of Map Revision (CLOMR) from FEMA for the proposed change to Zone A, the 100- year [sic] flood zone, per the FIRM, which would be provided to the satisfaction of LACDPW as required as a CUP condition of approval and a condition of the vesting tentative tract map.”

Previous County projects have been required to receive this CLOMAR letter during the EIR process as it is our understanding that it involves a check of flood calculations by FEMA to at least preliminarily ensure their accuracy. This CLOMAR letter should be required of this developer also.

Response No. L4-9

The Project would be required to obtain the requested CLOMR, which is an administrative approval, not discretionary, in accordance with FEMA requirements. The CLOMR process typically occurs prior to grading, as any calculations for the CLOMR must be based on final Project design plans (i.e., construction-level drawings), which are not typically available until well into or after the environmental review process. The FEMA-issued CLOMR must be obtained prior to processing the request to re-align the County floodway/floodplain map boundary. To that end, LACDPW has conducted a preliminary review of the hydrological calculations prepared for the Project; as indicated on page V.B-1 in Section V.B, Flood Hazards, of the Draft EIR, the Drainage Concept, provided as Appendix C of the Draft EIR, was approved by the County of Los Angeles Department of Public Works, Land Development Division, Storm Drain and Hydrology Section on August 22, 2011.

Comment No. L4-10

Further, throughout the flood section, the DEIR refers to evaluations of only a 50-year event, not a 100 or 500 year event. Evaluation of larger flood events should be required.

Response No. L4-10

As stated on page V.B-10 in Section V.B, Flood Hazards, of the Draft EIR, drainage and flood control in the vicinity of the Ranch, including the local and regional drainage facilities, are regulated by LACDPW. As noted in the LACDPW Hydrology Manual, a Department of Public Works memorandum dated March 31, 1986 established the policy on levels of flood protection. Facilities that are constructed in or that intercept flood waters from natural watercourses (and which are not under State of California jurisdiction), culverts under major and secondary highways, and facilities that drain natural depressions or sumps are required to meet the Capital Flood level of protection. Drainage facilities in developed areas not covered under the Capital Flood protection conditions must meet the Urban Flood level of protection. The Capital Flood is the runoff by a 50-year frequency design storm falling on a saturated watershed and requires adding the effects of fires and erosion under certain conditions. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed. The County also limits the allowable discharge into existing storm drain facilities. Any proposed drainage improvements of County/Flood Control District-owned storm drain facilities, such as catch basins and storm

drain lines, require review and approval from the appropriate entity of the County. Accordingly, as stated on page V.B-12 of the Draft EIR, based on the methodology specified in the LACDPW 2006 Hydrology Manual, a 50-year hydrology analysis was performed for the Project. However, the Capital Flood typically yields greater flow rates than FEMA's 100-year storm event given the different methodologies used by each agency (refer to Response No. L4-7 for additional discussion). The design flow rate to be used for this facility is the 50-year Capital Flood, which is more conservative than the 100-year storm utilized by FEMA and some other public agencies. Furthermore, the Project's analysis is based on the County's hydrology data for Placerita Creek. In addition, the Drainage Concept provided as Appendix C of the Draft EIR includes an evaluation of impacts relative to FEMA's 100-year floodplain, referred to as Zone A, as previously discussed in Response Nos. L4-7 through L4-9.

Comment No. L4-11

According to the DEIR "Project grading would change the County adopted floodway and floodplain. A conceptual floodway map revision would be adopted at the time of Project approval for the proposed alteration to the County adopted floodway and floodplain limits." (p. V.B-27). This change requires a County Permit that doesn't seem to be listed in the entitlements in the NOP or Hearing Notice? Is this change going to be granted in a separate permit? If so, we believe such a bifurcation of the process would constitute piecemealing of the project. We urge the County to include any permit application for floodway changes in this document so that the impacts of the whole project are reviewed at the same time.

The DEIR continues with the conclusion "...no significant flood impacts would result during Project construction, including flooding resulting from the alteration of the course of a stream or river." This statement cannot be made without at least a review of the CLOMAR letter and a review of the application for floodway map changes which the DEIR illegally defers to a later date.

Response No. L4-11

A list of discretionary approvals required for implementation of the Project is provided in Section IV, Project Description, of the Draft EIR. As stated on page IV-54 therein, the Project would require a re-alignment of the County floodway/floodplain boundary. This approval is also addressed in Section V.B, Flood Hazards, of the Draft EIR, as quoted in this comment. It is anticipated the Board of Supervisors will approve or disapprove the re-alignment of the County floodway/floodplain boundary along with its decisions on the other requested entitlements for the Project. As such, there is no "a bifurcation of the [environmental review] process," and any allegations of "piecemeal" documentation are unfounded. The impacts associated with changing the FEMA Zone A

area and the County-adopted floodway and floodplain are analyzed in the Draft EIR in Section V.B, Flood Hazards, of the Draft EIR and further discussed in the approved Drainage Concept, provided as Appendix C of the Draft EIR. Accordingly, even if the Board of Supervisors were to approve the re-alignment of the County floodway/floodplain map boundary after its decisions on the other requested entitlements for the Project, there would be no “piecemealing” of different aspects of the Project. Furthermore, EIRs do not typically include copies of permit applications.

FEMA approval is not required in order to evaluate or confirm a Project’s hydrology impacts, as that falls under the jurisdiction of the County. Moreover, the significance of Project impacts with respect to flooding is based on the hydrology analysis provided in the Drainage Concept, not any permit applications which may be submitted based on the analysis provided therein. As previously indicated, LACDPW has already reviewed and approved the Drainage Concept. Moreover, FEMA’s approval of the requested CLOMR is an administrative action, not discretionary, and both this process as well as the requested County floodway/floodplain map revision are currently underway. Refer to Response No. L4-10 for further discussion.

Comment No. L4-12

Flooding

According to the DEIR (V.B-12) *“A 50-year hydrology analysis was performed for the Project using the analysis methods specified in the LACDPW 2006 Hydrology Manual.”* All storm drains and other flood facilities were [sic] designed to the fifty year event.

Why is only a 50-year analysis used? This time span is not sufficient to provide accurate flood predictions. The DEIR should re-calculate flood flows using at least the 100 year flood event. Also, climate change is predicted to cause heavier single rain events although overall rainfall may be reduced. It appears that this scenario was not addressed. Heavier rainfall events should be included in the DEIR hydrology calculations.

Response No. L4-12

Refer to Response No. L4-10, above. The County does not require the analysis of 100-year or 500-year storm events as part of its approval process, and the Project has complied with current County requirements and methodologies.

Comment No. L4-13

Page V.B-29 of the DEIR states:

“...following grading for the Project, no structures would be placed within the 100-year floodplain. Further, the average water surface elevation in Placerita Creek during a County 50-year storm event is far below the future elevations within the Development Area. Accordingly, the Development Area would lie outside the floodplain for Placerita Creek and would not be subject to inundation. ... **Therefore, no significant impacts associated with flooding would result from buildout of the Project, including flooding resulting from the alteration of the course of a stream or river.**” [emphasis added]

With changes to the floodplain that have not received final FEMA or County approval, as well as only using a 50-year flood event, we believe it is premature and inaccurate to state that there will be no flooding impacts associate with the proposed hydrological changes.

Response No. L4-13

Refer to Response Nos. L4-9 and L4-10, above. As previously indicated, LACDPW has already conducted a preliminary review of the hydrological calculations prepared for the Project.

Comment No. L4-14

As for off-site flooding, the DEIR states on page V.B-30:

“With respect to downstream flooding, impacts would be less than significant since the Project’s drainage systems for the conveyance of both on- and off-site generated flows would ensure post-development peak flow rates would not exceed pre-development peak flow rates.”

However, again, this appears to only be calculated on a 50-year event, not a sufficient evaluation of the flood potential, especially in light of the heavier rainfall events predicted to occur as a result of climate changes. One hundred and five hundred-year events should be included in this calculation.

Response No. L4-14

Refer to Response No. L4-10, above. The County does not require the analysis of 100-year or 500-year storm events as part of its approval process, and the Project has complied with current County requirements and methodologies.

Comment No. L4-15

The DEIR continues:

“Additionally, the Project’s potential hydromodification impacts to Placerita Creek were evaluated. As part of this study, sediment transport analyses were conducted under pre- and post-Project conditions for various storm events to determine the long-term impacts to the streambed. ...Such increases in streambed elevation would not impact the creek’s capacity, which could experience a peak flow rate of approximately 5,800 cfs during a County 50-year storm event (bulk and burned) from a tributary watershed of almost 6 square miles, as runoff would still be contained within the natural channel. Thus, the sediment load transported downstream of the SR-14 culvert that abuts the Development Area after Project construction would not adversely impact streambed elevations and would not result in adverse impacts to downstream properties. Therefore, no significant impacts associated with hydromodification or associated downstream flooding would result from buildout of the Project.”

Again, only the 50-year event is analyzed. No potential Venturi effect caused by increased flood-flows through the culvert under Highway 14 is discussed.

Response No. L4-15

The Venturi effect is the reduction in fluid pressure (and associated increase in velocity) that results when a fluid flows through a constricted section of pipe. With respect to the Project site, the control mechanism for flows in Placerita Creek is the culvert under SR-14. However, there is no requirement for analysis of the Venturi effect, nor is there any evidence that it would have an effect on downstream flows. Nonetheless, the Venturi effect is accounted for in hydraulic modeling software. The calculations contained in Sub-Appendix 1-C of the County-approved Drainage Concept (Appendix C of the Draft EIR) indicate the hydraulic parameters at the downstream and upstream end, defined by Section 9.076 and Section 700.65, respectively, are identical in the pre-Project and post-Project conditions.

With respect to analysis of a 50-year storm, refer to Response No. L4-10. The County does not require the analysis of 100-year or 500-year storm events as part of its approval process, and the Project has complied with current County requirements and methodologies.

Comment No. L4-16

The DEIR claims that the I-14 [sic] culvert is large enough to handle any additional run-off and increased floodflows that will result from project changes to the flood plain, but there is no confirming letter from CalTrans to that affect.

We urge the County to contact CalTrans and urge them to review the sufficiency of the culvert to handle the proposed changes to the hydrology of Placerita Creek.

Response No. L4-16

Based on the County-approved Drainage Concept (Appendix C of the Draft EIR), the Project includes detention basins that would mitigate increased runoff rates from the Development Area. Therefore, the 50-year storm frequency (Capital Flood) peak flow rate for Placerita Creek would not increase. As a result, the capacity of the culvert at SR-14 would not be impacted, and modifications to the culvert are not proposed as part of the Project. Furthermore, the Applicant has consulted with Caltrans and will continue to do so, as required, regarding those proposed improvements over which Caltrans has jurisdiction, notably the proposed roadway improvements at the SR-14/Placerita Canyon Road interchange. Thus, Caltrans is well aware of the Project and its impacts and has reviewed and commented on the Draft EIR. (Refer to Letter No. 2, submitted by Caltrans, and the associated responses in this Final EIR.)

Comment No. L4-17

Insufficient LID Analysis

While the DEIR lists the County's Low Impact Development requirements on page V.B-11, it does not describe how the project will comply with LID or where these features will be in the project. Instead, storm drains and catch basin locations, all draining to Placerita Creek, are described in detail.

For instance the DEIR states on page Pg. [sic] V.B-14:

"With the grading changing the topography of the Development Area, the Project would require new on-site storm drain facilities to convey stormwater flows from the developed portions of the Development Area as well as from off-site areas that drain to the Development Area. Through a combination of sheet flow, concentrated drainage swales, localized catch basin inlets, and storm drain pipes, all stormwater runoff from the Development Area would flow to Placerita Creek. Surface runoff would be collected by a series of grate inlets designed and located to maximize interception and then conveyed by a combination of surface gutters and underground lines to on-site detention basins. Similarly, building downspouts would direct stormwater to the streets and storm drain system for discharge into on-site detention basins. The Project's storm drain system would be designed and sized to ensure that post-development peak flow rates would not exceed pre-development peak flow rates so as to prevent off-site downstream flooding caused by the Project.

Again at page Pg.[sic] V.B-15:

“Surface flows from the southern lot would be directed to the west to underground drainage lines that would drain into the other on-site detention basin (Det-04) further west. The final design of these improvements would be determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final Project design.”

Page V.B- 17:

“Off-site stormwater runoff that flows to the northern portion of the Development Area would be intercepted by drainage ditches and directed around the Development Area south to Placerita Creek. Energy dissipators and/or velocity reducers would be used at outlets in Placerita Creek, as determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final design drawings. “ [sic]

“One of these debris basins (DB-05) would be 16 feet deep with side slopes of 2:1 to allow for containment of approximately 10,258 cubic yards of debris flows and runoff from Subareas Off-1a and Off-7a. The other debris basin (DB-06) would be 14 feet deep with side slopes of 2:1 and would be able to contain approximately 6,467 cubic yards of debris flows and runoff from Subareas Off-2a and Off-8a. Stormwater from these two basins would then flow north in a proposed underground storm drain system through the Development Area to Placerita Creek. Subarea Off-site 3a would continue to drain to Placerita Creek, but a debris desilting inlet may be constructed on the southern side of Placerita Canyon Road to intercept the tributary debris flows. Refer to Figure 8 within the Drainage Concept for an illustration of the debris basins. The placement of these improvements would maintain the existing off-site drainage patterns as much as possible. While the on- and off-site systems would be separate, flows from each would be routed to the same creek outlets so as to minimize the number of outlets and disturbance to the creek banks. The final design of these improvements, including the debris basin slopes and the design of terrace drains, would be determined in the Final Hydrology and Hydraulics Study approved by LACDPW for the final Project design.

We note that each of the paragraphs above describe storm drains in detail but defer other required details of LID and SUSMP compliance to a *Final Hydrology and Hydraulics Study* that is not available and, according to the EIR, will not even be completed until after the EIR is certified.

This hydrology study has apparently not yet been completed because the developer has not yet decided what the project will actually be.

Response No. L4-17

A complete and accurate description of the Project is provided in Section IV, Project Description, of the Draft EIR, and as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR, in accordance with CEQA.

Pages V.D-21 through V.D-24 in Section V.D, Water Quality, of the Draft EIR indicate a number of SUSMP BMPs and LID BMPs, or equivalent, that would be implemented as part of the Project, including non-structural and structural BMPs, treatment control BMPs, source control BMPs, downspout connections, vegetated swales, and riparian buffers. Furthermore, SUSMP and LID compliance are fully addressed in Appendices 2 and 3, respectively, in the County-approved Drainage Concept (Appendix C of the Draft EIR), which also contain discussions of the BMPs to be implemented as part of the Project. As indicated on page V.B-1 in Section V.B, Flood Hazards, of the Draft EIR, the Drainage Concept, was approved by the County of Los Angeles Department of Public Works, Land Development Division, Engineering and Survey Branch, Storm Drain and Hydrology Section on August 22, 2011. Accordingly, evaluation of compliance with LID and SUSMP requirements are not deferred.

Certain engineering elements of a Project, as well as certain LID measures, are based on final Project design plans (i.e., construction-level drawings), which are not typically available until well into or after the environmental review process. For example, some LID measures pertain to the specific building materials to be used, such as the precise type of paving, which is determined much later in the planning process. Therefore, the Project will be conditioned to require implementation of appropriate LID measures in order to comply with County standards.

Comment No. L4-18

In a cover letter to Matrix Environmental included in Appendix C, the Study preparer of the preliminary Hydrology and Hydraulics Plan states:

“As indicated in Mitigation Measure B-1 in the Draft EIR, a final Hydrology and Hydraulics study based on final project design and plans and demonstrating impacts will remain less than significant will be submitted to County of Los Angeles Department of Public Works for review and approval”

The same letter further states:

“While the approved Drainage Concept/SUSMP/LID Plan may reflect slightly different project conditions than indicated in the Draft EIR, the modifications do not impact the conclusions in our report, and, with the mitigation measures set forth in the Draft EIR, impacts on the environment would remain less than significant”

How can we know that the impacts will be less than significant when the impacts in the Drainage Plan are different than those described in the DEIR? What are the differences? What aren't the correct impacts stated in the DEIR as required by law?

Response No. L4-18

The commentor has misinterpreted the referenced cover letter included with the Drainage Concept included as Appendix C of the Draft EIR. As indicated in the quote provided above, the Drainage Concept reflects “slightly different project conditions than indicated in the Draft EIR” (emphasis added), not different impacts (as stated by the commentor). In fact, prior to the excerpt presented in this comment, the cover letter provides a detailed description of the minor modifications that were made to the Project following completion and approval of the Drainage Concept and demonstrates that such Project changes would not change any of the analysis or impact conclusions contained within the report. As stated, “[t]he following are the minor modifications made to the [P]roject and the reasons the Drainage Concept/SUSMP/LID Plan analyses still support the updated [P]roject design:

(1) The elevation of the southern portion of the Development Area (i.e., south of Placerita Creek) was increased by approximately five feet to improve circulation through the Development Area. The vertical change was made uniformly across the southern portion of the Development Area. As a result, drainage patterns, flow lengths and drainage areas remain identical to those analyzed in the previous study. Since the vertical change did not change the hydrological characteristics of the southern portion of the Development Area, the prior analyses and conclusions remain valid;

(2) The footprint of the debris basins, the creek bank protection, and the creek access roads were modified slightly. To offset the impact of the five-foot vertical change in the southern portion of the Development Area, the debris basin invert was elevated five feet. This change did not impact the debris basin storage volume capacity. The updated cross section of the creek bank protection (see attached) was revised to show the soil cement sloped at 1:1 with an earthen fill at a 2:1 slope located on top of the soil cement. The hydraulic model evaluated the conveyance of Placerita Creek using a 2:1 finished surface. The finished surface in the hydraulic model is

identical to the 2:1 earthen fill slope located on top of the soil cement. The revised access roads were located outside the conveyance limits of the hydraulic model previously prepared. As a result, the conclusions in the hydraulic model remain valid; and

(3) A debris desilting inlet may be constructed on the south side of Placerita Canyon Road to intercept potential debris flows from Subarea Off-site 3a. Based on the storage volume capacity of the inlet, the potential debris volume from area “Off-site 3A” can be stored within the inlet. Therefore, directing the debris from area “Off-site 3A” to a debris desilting inlet will not impact the conclusions in the report.”

Furthermore, this cover letter was reviewed and approved for use by LACDPW and all statements contained therein were verified. Thus, the Draft EIR appropriately evaluates the Projects impacts, as required under CEQA and in accordance with County requirements and standards.

Comment No. L4-19

The County cannot decide whether the impacts are less than significant or not based on a deferred report for a nebulous and changing project. Inaccurate descriptions as well as deferral of the project description, determination of impacts and inadequate and deferred description of mitigation measures makes it obvious that this DEIR fails to meet the requirements of the California Environmental Quality Act. Nor will such vague and deferred project analysis meet the requirements of the other permits that this project will be required to obtain.

Response No. L4-19

Refer to Response No. L4-17 and No. L4-18 regarding the complete and accurate description of the Project and Mitigation Measures provided in the Draft EIR. Accordingly, the Project Description, impact analysis, and Mitigation Measures are not deferred. Also refer to Response No. L4-9 regarding the County’s approval of the Drainage Concept, and Response No. L4-11 regarding permits sought as part of the Project.

Comment No. L4-20

Where are the stormwater retention structures required to retain the first flush rainfall flows on site? The DEIR describes vegetation swales, but does not discuss their location in detail or evaluate their adequacy to retain first flush runoff on site as required by stormwater rules. Instead it merely states swales will be placed “where appropriate”. [sic]

Response No. L4-20

A thorough description of the proposed vegetated swales, including their location, is provided on page V.B-16 in Section V.B, Flood Hazards, of the Draft EIR. As stated therein:

“Stormwater runoff from the two parking areas within the LADWP transmission corridor would be intercepted within six landscaped islands approximately 5 feet wide and 1 foot deep located between the parking rows, which would function as vegetated drainage swales. Surface flows from the northern lot would be directed to the west to underground drainage lines and then would be conveyed north to a vegetated drainage swale approximately 8 feet wide and 1 foot deep running west approximately 500 feet along the top of the southern slope embankment of Placerita Creek to an aboveground and underground detention basin (Det-03), which would drain to Placerita Creek through an outlet structure east of the proposed bridge across Placerita Creek. These vegetated swales would incorporate stormwater treatment features and would function as water quality BMPs. Surface flows from the southern lot would be directed to the west to underground drainage lines that would drain into the other on-site detention basin (Det-04) further west.”

A description of the swales to be introduced within the Conditional Parking Areas, if developed, is provided at the bottom of page V.B-22: “If developed, the Conditional Parking Areas would be paved with permeable pavement to allow infiltration, with bioswales introduced on the downstream sides of the lots to intercept and treat sheet flows prior to discharge to Placerita Creek.”

Additionally, each of these vegetated swales is depicted in Figure V.B-3 on page V.B-15 in Section V.B, Flood Hazards, of the Draft EIR. Specifically, refer to the “Vegetated Swale” listed in the legend and the corresponding green lines throughout the Project site in the locations described above.

Comment No. L4-21

Although page V.B-19 describes BMPs to address water run-off problems, again it is merely a list without specificity of their use on the project or even a precise definition of what is meant. For instance “Roof run-off controls” – what controls, where will they be placed? “Efficient irrigation” – exactly what does this mean? ER controlled sprinklers/ drip lines? Gray water recycling?

Response No. L4-21

Many of the Best Management Practices (BMPs) listed in the Draft EIR are standard SUSMP measures, which, as stated at the bottom of page V.B-19 in Section V.B, Flood Hazards, are discussed further in Section V.D, Water Quality, of the Draft EIR. For example, page V.D-23 therein includes a description of roof runoff control (“[r]oof drain downspouts would drain to concrete gutters or would be directly connected to the proposed on-site underground drain pipe system.”) Similar descriptions are provided for other proposed BMPs, including vegetated swales, detention basins, irrigation system maintenance, downspout connections, riparian buffers, etc. Moreover, the Drainage Concept/SUSMP/LID Plan, provided as Appendix C to the Draft EIR, provides further discussion, as indicated throughout Section V.B, Flood Hazards, and Section V.D, Water Quality, of the Draft EIR.

Comment No. L4-22**Buffer of the Riparian Zone**

The DEIR states that “The existing riparian buffer adjacent to Placerita Creek would be expanded as part of the Project after stabilization of the fill pad slopes.” (V.B-18) But it does [sic] specify what the original buffer is or by how much it would be increased. Thus, no evaluation of the impact or lack thereof can be made.

Response No. L4-22

A detailed analysis of Project impacts on riparian vegetation and the increase in the riparian buffer that would result from implementation of the proposed Habitat Mitigation and Monitoring Program is provided in Section V.F, Biological Resources, of the Draft EIR. As stated on page V.F-44 therein, within the defined study area, jurisdictional areas comprise approximately 3,127 linear feet of streambed, with 0.40 acre of ACOE/RWQCB jurisdictional “waters of the U.S./waters of the State” (0.38 acre within the Development Area, less than 0.01 within the Water Tank Area, less than 0.01 acre within the Trail Area, and 0.01 acre associated with the Off-Site Infrastructure Improvement Areas), and 3.30 acres of CDFW jurisdictional streambed and associated riparian habitat (3.24 acre within the Development Area, 0.01 acre within the Water Tank Area, and 0.05 acre associated with the Off-Site Infrastructure Improvement Areas). Figure V.F-23 on page V.F-85 of the Draft EIR depicts the creek restoration plan, which, as explained on pages V.F-81 and V.F-86, reflects a multi-pronged approach that would include restoration, enhancement, establishment, and preservation. Restoration is defined as the return of areas that have been temporarily impacted by construction activities to pre-construction conditions. Enhancement improves the functions and values of existing habitat/jurisdictional waters, while establishment involves creating riparian habitat/jurisdictional waters where they do not occur under existing conditions. The restoration/enhancement/establishment areas are collectively referred to as mitigation areas. Preservation is also an important component of the mitigation program and involves the management and

protection of existing communities (in this case, within Placerita Creek) in combination with the adjacent restoration areas, resulting in increased functions and values for both the preserved areas and mitigation areas. Together with the Project's bank stabilization improvements, this mitigation program would provide a net gain in functions and services both for the ACOE/RWQCB jurisdictional creek bottom and CDFW-only jurisdictional riparian and upland buffers in terms of geomorphic stability, nutrient processing/recycling, and wildlife habitat. Additionally, a net gain of 1.58 acres of CDFW jurisdictional habitat would be created due to new establishment areas within the upland portions of the creek.

Comment No. L4-23

According to the [sic] **Jurisdictional Waters Report** provided in the DEIR Appendix F-7 (pg. 6):

"The creek and its two tributary systems mapped in the study area, likely would be considered jurisdictional "waters of the U.S." under Sections 404 and 401 of the Clean Water Act (CWA), and are jurisdictional "waters of the State" under the Porter Cologne Water Quality Control Act and Section 1600 of the California Fish and Game Code (FGC). Therefore, all of these drainage features are regulated by all three agencies. A final Jurisdictional Determination must be completed by the ACOE. Any proposed impacts to these features likely would require permit approvals by the various resource agencies."

Thus, one must ask if this proposal will even comply with the Army Corps of Engineers 404 permit and others that must be obtained for this project? Due to the lack of specific details in the DEIR, there is no way of knowing.

Response No. L4-23

As stated on page IV-54 in Section IV, Project Description, of the Draft EIR, the Project would require the following permits from the three referenced regulatory agencies: a U.S. Army Corps of Engineers Permit pursuant to Clean Water Act Section 404, a Streambed Alteration Agreement from the California Department of Fish and Wildlife pursuant to the Fish and Game Code Section 1603, and a Water Quality Certification from the Regional Water Quality Control Board pursuant to Clean Water Act Section 401. These permits are also discussed throughout Section V.F, Biological Resources, of the Draft EIR, where appropriate. This permitting process is currently underway, and consultation with

the regulatory agencies is ongoing.⁴ Refer to Letter No. 1 of this Final EIR for comments provided by the CDFW and the associated responses thereto. As previously indicated, EIRs do not typically include copies of permit applications.

Comment No. L4-24

Cumulative Impacts

On page V.B-32 the DEIR purports to analyze the cumulative impacts for this project, but looks only at the watershed of Placerita Creek without looking at the whole watershed of the Santa Clara River. While this project is only a small percentage of the Upper Watershed, a large number of projects have been approved or are proposed in the Santa Clarita Valley area that cumulatively will reduce the flood plain of the Santa Clara River and its tributaries, reduce surface flow through ground water pumping and loss of ground water recharge and generally affect the natural function of the river. This section does not discuss any of the impacts of local and regional projects on the various functions of a healthy watershed. It is not a sufficient discussion or disclosure of impacts to enable decision makers to address the potential issues.

Although the DEIR states that “Related Projects that are anticipated to be developed within the vicinity of the Development Area, could subject people and property to flood hazards if either located within areas subject to flooding or if downstream flooding results.” It does not look at whether residences in Placerita Canyon are already in a floodway that would be aggravated by this project. This analysis should be required and downstream homeowners notified if the project will require changes to their flood way and subsequent increases in flood insurance. hazards [sic] would be less than significant. Pg. v.b-32

Response No. L4-24

The Santa Clara River watershed encompasses approximately 1,030 square miles; the Upper Santa Clara River watershed comprises approximately 786 square miles within County of Los Angeles limits, with approximately 243 square miles within Ventura County and 1 square mile within Kern County.⁵ Thus, the Santa Clara River watershed extends well beyond the Santa Clarita Valley. However, as indicated on page III-40 in Section III, Environmental Setting, of the Draft EIR, the Related Projects list, which was approved by the County and the City of Santa Clarita, includes all known development projects that are

⁴ The CDFW deemed complete the Applicant's application for a Section 1603 Streambed Alteration Agreement on August 8, 2012.

⁵ County of Los Angeles Department of Public Works website, <http://ladpw.org/wmd/watershed/sc/>, accessed August 7, 2012.

either proposed, approved, or under construction in the vicinity of the Ranch, as provided by the County and the City of Santa Clarita. The Draft EIR's focus of the cumulative flood hazard/hydrology analysis on the Placerita Creek watershed is entirely appropriate since: (1) no impacts would or could occur upstream, either within Placerita Creek, the Santa Clara River, or its other tributaries; and (2) any downstream impacts identified as resulting from the Project would be limited in scope and geographic range (i.e., within the immediately downstream areas of Placerita Creek), as evaluated in Section V.B, Flood Hazards, and the associated Drainage Concept provided as Appendix C of the Draft EIR

With respect to downstream flooding, as discussed throughout Section V.B, Flood Hazards, of the Draft EIR and specifically stated on page V.B-30 therein under the heading "Off-Site Flooding," impacts would be less than significant since the Project's drainage systems for the conveyance of both on- and off-site generated flows would ensure post-development peak flow rates would not exceed pre-development peak flow rates. The analysis continues with discussion of the Project's hydromodification impacts to Placerita Creek, previously addressed in Response No. L4-6 above, and concludes no significant impacts associated with hydromodification or associated downstream flooding would result from buildout of the Project. Furthermore, all floodway and floodplain changes resulting from the Project would occur within the Ranch, upstream of the SR-14 culvert. Thus, any downstream properties, regardless of their location within or outside of an existing floodway, would not be significantly impacted.

Comment No. L4-25

Insufficient Mitigation measures

The Flood Section only proposes two mitigation measures:

***MM B-1:** Prior to the issuance of a grading permit, the Applicant shall submit to the County of Los Angeles Department of Public Works for review and approval the final Hydrology and Hydraulic Study based on final Project designs in compliance with the County's codes and policies, including the County of Los Angeles Department of Public Works Hydraulic Design Manual, Sedimentation Manual, Low Impact Development Standards Manual, and consistent with the approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR. The final Hydrology and Hydraulic Study shall demonstrate that relevant Project impacts remain less than significant.*

***MM B-2:** Project design and construction shall comply with applicable County codes and policies and the final Hydrology and Hydraulic Study.*

Given the magnitude of impacts to the habitat and Placerita Creek that would be incurred by the narrowing of the creek flood channel, reduction of the flood plain, hardscaping of the of the project site and removal of 158 native oaks, including many heritage trees, the above mitigation is certainly insufficient.

Further, these proposed mitigation measures are, in fact, legal requirements with which the developer must comply. They are not mitigation for impacts.

We therefore ask that in addition to that described above, the developer comply with the requirements of the Ventura County MS-4 Permit (attached). We also recommend that the project proponent consult with the Regional Water Quality Control Board for compliance with Resolution 2005-02.

Response No. L4-25

Refer to Response No. L4-7 regarding floodplain/floodway changes. Although MM B-1 and MM B-2 represent legal requirements, the County has required their inclusion in the EIR and specifically in the MMRP provided in Section V of this Final EIR, so as to provide a legal and logistical mechanism for monitoring and enforcement. This is a common practice in many jurisdictions. Moreover, following the analysis provided in Section V.B, Flood Hazards, of the Draft EIR, it is stated on page V.B-36 that although that Project-level impacts on surface water hydrology would be less than significant, Mitigation Measures are proposed to ensure such impacts remain less than significant. In other words, mitigation is not required under CEQA, but is provided nonetheless. As impacts would be less than significant, additional Mitigation Measures would not be required.

With respect to the referenced Ventura County MS-4 Permit, provided as Attachment 3 to the comment letter and included on page III-301 of this Final EIR, the Project would not be subject to this permit as the Project site is located in Los Angeles County, not Ventura County. The Project will comply with applicable permit requirements established for or by Los Angeles County. Refer to Response No. L4-6 regarding the Applicant's ongoing consultation with the LARWQCB.

Comment No. L4-26

Conclusion

At a time when Santa Clarita has just completed its updated General Plan, it seems untoward that the County would immediately propose a Plan Amendment and one that would require increased parking permits, thus indicating increased commuting. The One Valley One Vision Plan was supposed to encourage increased density in the City Center and discourage auto-oriented sprawl development in the surrounding green areas. Already

with the first large project proposal before you, your department is proposing to amend the plan to allow an intensive industrial use in a rural area. We believe this violates the letter and the spirit of the just approved OVOV Plan.

Attachments

1. RWQCB Resolution #2005-02
2. Two flood Maps from the DEIR
3. Ventura County MS4 permit

Response No. L4-26

Refer to Response No. 15-2 regarding the requested parking permit as well as the proposed local plan amendment. As a matter of clarification, the Project is consistent with the new land use designations for the Ranch that became effective on December 27, 2012 following the recent adoption of the 2012 Area Plan. However, the Draft General Plan as well as the 2012 Area Plan allow complete project applications filed prior to the effective date of the plans to be reviewed for consistency under the then current adopted General Plan and Area Plan. The County deemed complete the Project's application for a vesting tentative tract map and conditional use permit on May 4, 2010, and thus the Project is subject to the former plans. As such, the Project Applicant seeks an Area Plan amendment in accordance with the 1990 Area Plan. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The attachments referenced in this comment are provided with the original comment letter and are discussed in Comment Nos. and Response Nos. L4-6, L4-7, and L4-25, respectively.

From: Judith McClure [r-j_mcclure@msn.com]
Sent: Tuesday, July 17, 2012 10:24 PM
To: Christina Tran
Subject: Disney - ABC Studios at the Ranch Project

July 17, 2012

Christina Tran
Los Angeles County Department of Regional Planning
Special Projects Section, Room 1362
320 West Temple Street
Los Angeles, California 90012

Re: Disney/ABC Studios at the Ranch Project Draft Environmental Impact Report Comments, SCH No. 2010011010, County Project No. TR071216-(5), Plan Amendment No. 200900010, Zone Change No. 200900012, VTT 071216, CUP No. 200900041, Oak Tree Permit and all associated permits

Dear Ms. Tran:

Thank you very much for allowing me a 30-day extension for comments on this project (per your email to me of 6/4/12). As a 40-year resident of Santa Clarita and docent at Placerita Canyon Nature Center for nearly ten years, I appreciate this opportunity to add my comments to those of others concerning the above stated project. I am writing on behalf of myself only and am not representing any organization.

L5-1

The plans by Golden Oak Ranch Properties (Disney) to expand its existing 890-acre film production facility in Placerita Canyon greatly concern me. The changes that will occur will drastically change the environment and viewshed, and the very best mitigation possible won't alter this. 60-foot tall buildings and parking spaces for 2000 vehicles will clearly demonstrate this environmental impact upon all of us. For many of us who love the "ruralness" of the area, the substantial zone change from agriculture and open space to industrial frightens us. After this project gets underway, what next? Will the employees demand a Starbucks or a McDonalds at the entrance to The Studios as they come to work? And then what?

The applicant states that it is in Disney's interest to keep the remaining open space open for film back drops and to provide habitat for the planted mitigated oak trees, but nowhere in the text of the proposed project nor in any DEIR alternative does the applicant offer a single acre of permanently protected open space. I respectfully request that the remainder of the Studios at The Ranch undeveloped land be placed in a conservation easement as a condition precedent to any permit issuance. The easement holder must be a public agency accountable to the public - such as SCWRCA, MRCA, or DMCA. Disney must agree, in writing, to this voluntary project condition that no permanent development of any type takes place without the consent of the public agency conservation easement holder. I feel strongly that only with this commitment will Disney deserve the public trust. And only with this commitment will state-protected golden eagles and the coastal California gnatcatcher have a chance for survival in this area.

L5-2

But there is more that the applicant can do to improve the proposal and limit the negative effects of this project on the environment. To dispel the uncertainty of many, Disney should commit to build with LEED certified standards - preferably to the Platinum level but not less than LEED Gold

L5-3

level. We do not understand the term used in the EIR "LEED equivalent" and hope we will be satisfied with the explanation in the FEIR. The use of solar power should be encouraged within the entire project (lowering GHG emissions) as well as energy efficient LED lighting.

L5-3
Cont.

Air quality should be of great concern to the applicant - especially small particle dust. The steady rise in Santa Clarita's asthma rates for school-age children is alarming, and the additional truck traffic, traffic congestion and commuter traffic generated by the conduct of business following construction will surely impact the local air quality and make it worse. The inference that long-term air quality impacts will be less than significant simply is wrong. The DEIR must be changed to "significant" and proper mitigation measures to reduce air quality impacts be addressed.

L5-4

Disney should commit to the use of van pools and car-pooling of its employees. Disney should provide ride-share programs with good incentives to participate. Natural gas and electric vehicles, including trucks, should be required to be used within the facility.

L5-5

Finally, the issue of roadway safety must be addressed. I believe I understand the traffic-flow changes that will be made at SR 14 freeway and entries into The Studios, but I am also concerned with the speed of vehicles traveling east and west on Placerita Canyon Road. Exiting Placerita Canyon Nature Center (an uphill driveway) now requires extreme caution as many vehicles traveling Placerita Canyon Road exceed the posted speed limit - some greatly exceeding the limit. There will be many issues as speeding vehicles approach the newly proposed entries to The Studios at The Ranch and its 3,000 employees coming and going, and I for one want to feel that Disney has my safety in mind as I travel Placerita Canyon Road as well. Much more study of the issue of roadway safety is necessary, including an evacuation plan for Disney employees and the surrounding neighbors as this area has experienced many local wild fires (The Foothill Fire of 2004, the Walker Fire of 2006, etc.).

L5-6

Thank you for considering my comments.

Sincerely,

(Mrs.) Judith McClure
29111 Lotusgarden Drive
Canyon Country, California 91387
r-j_mcclure@msn.com

Comment Letter No. L5

Judith McClure
r-j_mcclure@msn.com

Comment No. L5-1

Thank you very much for allowing me a 30-day extension for comments on this project (per your email to me of 6/4/12). As a 40-year resident of Santa Clarita and docent at Placerita Canyon Nature Center for nearly ten years, I appreciate this opportunity to add my comments to those of others concerning the above stated project. I am writing on behalf of myself only and am not representing any organization.

The plans by Golden Oak Ranch Properties (Disney) to expand its existing 890-acre film production facility in Placerita Canyon greatly concern me. The changes that will occur will drastically change the environment and viewshed, and the very best mitigation possible won't alter this. 60-foot tall buildings and parking spaces for 2000 vehicles will clearly demonstrate this environmental impact upon all of us. For many of us who love the "ruralness" of the area, the substantial zone change from agriculture and open space to industrial frightens us. After this project gets underway, what next? Will the employees demand a Starbucks or a McDonalds at the entrance to The Studios as they come to work? And then what?

Response No. L5-1

This comment summarizes certain elements of the Project. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

View impacts are evaluated in Section V.I, Visual Qualities, of the Draft EIR. While the portion of the Ranch nearest the SR-14 freeway will undoubtedly change thus altering views of that limited area, as indicated on page V.I-38 of the Draft EIR, the Project would not have a substantial adverse effect on a scenic vista or substantially alter views from a public trail, and view impacts would be less than significant. As also discussed, the proposed buildings would be simple in form, function, and architectural design with the intent of complementing the surrounding rural setting. The new buildings would be integrated into the topography of the site with rounded roofs on the soundstage buildings to blend the new development with the surrounding mountains. Substantial landscaping would also be provided throughout the Development Area, including along adjacent roadways, so as to obscure views from off-site.

As a matter of clarification, as indicated in Figures V.J-2 and V.J-3 on pages V.J-24 and V.J-25 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, the Project would provide at least 1,228 parking spaces within the Development Area under the Soundstage Option and 1,162 parking spaces under the Studio Office Option. Development of the two Conditional Parking Areas, located east of the Development Area, would only occur if LADWP were to revoke the parking license agreement for parking within the transmission corridor (i.e., within the Development Area).

Refer to Response No. 15-2 regarding the requested local plan amendment. As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s, and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

The Project includes all new development and the continuation of existing uses on the Ranch, as well as all associated off-site improvements, currently contemplated by the Applicant. No additional future use or development of the Ranch beyond the currently proposed new development, ongoing existing outdoor filming operations, the construction of temporary filming sets, and intermittent agricultural and oil drilling operations is envisioned at this time. The Project includes a commissary which would provide food service and amenities for Project employees and guests.

Comment No. L5-2

The applicant states that it is in Disney's interest to keep the remaining open space open for film back drops and to provide habitat for the planted mitigated oak trees, but nowhere in the text of the proposed project nor in any DEIR alternative does the applicant offer a single acre of permanently protected open space. I respectfully request that the remainder of the Studios at The Ranch undeveloped land be placed in a conservation easement as a condition precedent to any permit issuance. The easement holder must be a public agency accountable to the public - such as SCWRCA, MRCA, or DMCA. Disney must agree, in writing, to this voluntary project condition that no permanent development of any type takes place without the consent of the public agency conservation easement holder. I feel strongly that only with this commitment will Disney deserve the public trust. And only with

this commitment will state-protected golden eagles and the coastal California gnatcatcher have a chance for survival in this area.

Response No. L5-2

Refer to Response No. L2-4 regarding the Applicant's commitments to record use restrictions, which will run with the land in perpetuity over a total of approximately 13.68 acres of the Ranch.

Comment No. L5-3

But there is more that the applicant can do to improve the proposal and limit the negative effects of this project on the environment. To dispel the uncertainty of many, Disney should commit to build with LEED certified standards - preferably to the Platinum level but not less than LEED Gold level. We do not understand the term used in the EIR "LEED equivalent" and hope we will be satisfied with the explanation in the FEIR. The use of solar power should be encouraged within the entire project (lowering GHG emissions) as well as energy efficient LED lighting.

Response No. L5-3

As stated throughout the Draft EIR, including on page IV-9 in Section IV, Project Description, the Project would implement green building design and construction practices capable of achieving Leadership in Energy and Environmental Design (LEED™) certification and LEED™ Silver certification for many buildings within the Development Area in compliance with the County's Green Building ordinance. Specifically, the soundstages, production offices, and administration building would comply with the County's Green Building Standards and achieve LEED™ Silver Certification. The commissary would comply with the County's Green Building Standards and achieve LEED™ Certification. The writers/producers bungalows would comply with the County's Green Building Standards. While the mills and the warehouse are exempt from County Code Sections 22.52.2130.C.1 and 22.52.2130.D regarding energy conservation and third party rating systems, they would comply with the other applicable sections of the County's Green Building ordinance and achieve equivalency of LEED™ Certification. The substation and central utility plant would be exempt from the County's Green Building ordinance. Furthermore, as stated on pages IV-20 to IV-21 of the Draft EIR, the Project would incorporate a variety of sustainability features that would include, among others, photovoltaic technology (i.e., solar panels) on selected roofs and the use of highly efficient electric and heating, ventilation, and air-conditioning (HVAC) equipment (housed in a central utility plant), or equivalent measures designed to achieve the same results.

LEED™ Certification equivalency refers to the implementation of LEED™ measures capable of achieving certification from the U.S. Green Building Council, without going through the actual certification process. Many jurisdictions accept LEED™ equivalency as compliance with local green building standards.

Comment No. L5-4

Air quality should be of great concern to the applicant - especially small particle dust. The steady rise in Santa Clarita's asthma rates for school-age children is alarming, and the additional truck traffic, traffic congestion and commuter traffic generated by the conduct of business following construction will surely impact the local air quality and make it worse. The inference that long-term air quality impacts will be less than significant simply is wrong. The DEIR must be changed to "significant" and proper mitigation measures to reduce air quality impacts be addressed.

Response No. L5-4

Refer to Response No. L3-7 regarding air quality impacts. As discussed therein, the significance of operational air quality impacts is based on significance thresholds derived in part from Appendix G of the State CEQA Guidelines, as well as federal and state air quality standards, relevant plans adopted by the SCAQMD and/or the County, and SCAQMD thresholds of potential significance. In accordance with the established thresholds, it was determined in Section V.E.1, Air Resources—Air Quality, of the Draft EIR that operational air quality impacts would be less than significant.

Comment No. L5-5

Disney should commit to the use of van pools and car-pooling of its employees. Disney should provide ride-share programs with good incentives to participate. Natural gas and electric vehicles, including trucks, should be required to be used within the facility.

Response No. L5-5

Refer to Response No. L3-7 regarding the proposed TDM program, which is detailed in PDF J-1 as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. As discussed therein, TDM measures would include a rideshare/vanpool/carpool matching program, preferred parking for carpool/vanpool vehicles, and preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles among other measures.

Comment No. L5-6

Finally, the issue of roadway safety must be addressed. I believe I understand the traffic-flow changes that will be made at SR 14 freeway and entries into The Studios, but I am also concerned with the speed of vehicles traveling east and west on Placerita Canyon Road. Exiting Placerita Canyon Nature Center (an uphill driveway) now requires extreme caution as many vehicles traveling Placerita Canyon Road exceed the posted speed limit - some greatly exceeding the limit. There will be many issues as speeding vehicles approach the newly proposed entries to The Studios at The Ranch and its 3,000 employees coming and going, and I for one want to feel that Disney has my safety in mind as I travel Placerita Canyon Road as well. Much more study of the issue of roadway safety is necessary, including an evacuation plan for Disney employees and the surrounding neighbors as this area has experienced many local wild fires (The Foothill Fire of 2004, the Walker Fire of 2006, etc.).

Thank you for considering my comments.

Response No. L5-6

All drivers along local roadways are subject to posted speed limits. With respect to travel along Placerita Canyon Road near the entrance to Placerita Canyon Nature Center, as shown on Figure 9 on page 30 of the Traffic Study, provided as Appendix I of the Draft EIR, 1 percent of Project-related vehicle trips are expected to travel on Placerita Canyon Road east of the Project site. Based on the estimated daily trip generation associated with the Project, this translates to approximately 33 to 35 vehicles travelling near or past the Placerita Canyon Nature Center driveway throughout the course of an entire day.

As discussed on page V.J-50 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, at the request of LACDPW, a sight distance analysis was conducted for the three Project site access locations: the intersection at SR-14 Northbound Off-Ramp/Placerita Canyon Road, the current Ranch main entrance/Placerita Canyon Road, and the emergency access driveway along Placerita Canyon Road. Based on the intersection characteristics and Caltrans' 2000 Highway Capacity Manual (HCM) methodology, the required sight distances at the three proposed access points would be 620 feet in either direction. As discussed in the Traffic Study and illustrated in Figures 31, 32, and 33 therein, the Development Area and access locations would be designed to provide the required sight distances. Therefore, impacts would be less than significant.

As a matter of clarification, as stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with

Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch (i.e., including existing employment) on a daily basis.

Refer to Response No. 23-1 regarding the Project's emergency response plan, specified in PDF K.2-4 on page V.K.2-25 in Section V.K.2, Public Services—Fire Protection, of the Draft EIR, and the resulting less than significant impacts on emergency evacuation/response. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.



Placerita Canyon Nature Center Associates

19152 Placerita Canyon Road, Newhall, CA 91321 • (661) 259-7721 • www.placerita.org

July 17, 2012

Ms. Christina Tran, Senior Planner
Impact Analysis Section
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Dear Ms. Tran

Subject : DISNEY | ABC STUDIOS AT THE RANCH PROJECT DEIR

The Placerita Canyon Nature Center Associates (PCNCA) has reviewed the above referenced document and has the following comments.

L6-1

Traffic

The road improvements proposed for the vicinity of the entrance to the project at SR 14 and Sierra Highway should mitigate day-to-day traffic congestion issues, but we have a concern about the impact of the additional 3,000 employees in the area in case of a fire. The Foothill Fire of 2004 and the Walker Fire of 2006 required evacuation of the Placerita Canyon Nature Center live animal collection and valuables. Fortunately, both evacuations happened at non-peak hours and were done quickly without any traffic tie ups on Placerita Canyon Road. The evacuation caravan exited the nature center and went west on Placerita Canyon Road to Sierra Highway.

Our concern is that in the future would such evacuations be slowed down by the 3,000 employees of the new Disney studios leaving the premises and blocking access to SR 14 and Sierra Highway? While the DEIR addresses fire suppression, it does not provide a plan for evacuation in case of traffic congestion due to Disney Ranch business being conducted during a wild fire event funneling along Placerita Canyon. We recommend that such a plan be prepared and included in the final EIR.

Placerita Canyon Road will need to be widened to accommodate a left turn lane for crew members traveling eastbound from the freeway to enter the second (crew) driveway. How long that left-turn lane needs to be has not been identified; however, it should be long enough so that it provides sufficient queuing of cars that will need to make that maneuver without impacting through traffic heading to Placerita Canyon Natural Area and points beyond. The length of this

L6-2

lane should be identified and sized to accommodate projected traffic volumes. It's interesting to note that left turns from eastbound Placerita Canyon Road into the main entrance driveway will be prohibited according to the DEIR.

L6-2
Cont.

It is likely that even though a traffic signal is proposed for the crew driveway it may never be installed, which could cause problems for local traffic. Traffic volumes on a public street have to become high enough to warrant installation of a traffic signal OR sufficient accidents have to occur at an intersection. The traffic study should identify at what point it would become necessary to install a traffic signal. Possibly a better solution would be to widen Placerita Canyon Road to accommodate two travel lanes in each direction between the freeway and the crew driveway, or perhaps a westbound acceleration lane for those exiting this driveway. That way, through traffic in both directions would less likely be impacted by operations at the Ranch or during emergency evacuations.

Biological Resources

The analysis consistently minimizes the project's impacts on displacement of wildlife and loss of habitat, including potential foraging by State-protected Golden Eagles by stating that the animals can simply "move into adjacent suitable habitat," or in other instances by comparing the amount of habitat acreage lost as a result of development of the project to the total amount of land left intact in the easterly areas of the Ranch, when those areas are not part of the project. It goes so far as to state that "project development would be clustered in the western portion of the Ranch so as to preserve the vast majority of rural open space and minimize impacts to environmentally sensitive areas." If the easterly areas of the Ranch are to be used to explain how development of the project would preserve natural resources, it would be appropriate to explain how these resources will be maintained in the future, such as granting a conservation easement or deed restriction to prohibit future development from encroaching into these areas.

L6-3

Placerita Canyon Trail Connector

Regarding the new Placerita Canyon Connector Trail, the DEIR states that this new trail alignment would eliminate the planned County Placerita Creek Connector Trail. It is unclear if the impact of replacing this trail would represent a significant gap in future overall trail connections for this area. The DEIR is proposing a modification to the adopted County trails plan, but this amendment has not been included in the project description (it's just in the Executive Summary) so it has not been evaluated in the DEIR. A clarification of this issue would be appreciated.

L6-4

Thank you for your consideration of these comments. If you require any further information regarding this subject, please feel free to contact me at (661) 644-2369 or at ron.kraus@placerita.org

Very truly yours,



Ronald Kraus,
Vice President
Placerita Canyon Nature Center Associates

Comment Letter No. L6

Ronald Kraus, Vice President
Placerita Canyon Nature Center Associates
19152 Placerita Canyon Road
Newhall, CA 91321

Comment No. L6-1

The Placerita Canyon Nature Center Associates (PCNCA) has reviewed the above referenced document and has the following comments.

Traffic

The road improvements proposed for the vicinity of the entrance to the project at SR 14 and Sierra Highway should mitigate day-to-day traffic congestion issues, but we have a concern about the impact of the additional 3,000 employees in the area in case of a fire. The Foothill Fire of 2004 and the Walker Fire of 2006 required evacuation of the Placerita Canyon Nature Center live animal collection and valuables. Fortunately, both evacuations happened at non-peak hours and were done quickly without any traffic tie ups on Placerita Canyon Road. The evacuation caravan exited the nature center and went west on Placerita Canyon Road to Sierra Highway.

Our concern is that in the future would such evacuations be slowed down by the 3,000 employees of the new Disney studios leaving the premises and blocking access to SR 14 and Sierra Highway? While the DEIR addresses fire suppression, it does not provide a plan for evacuation in case of traffic congestion due to Disney Ranch business being conducted during a wild fire event funneling along Placerita Canyon. We recommend that such a plan be prepared and included in the final EIR.

Response No. L6-1

Refer to Response No. 23-1 regarding the Project's emergency response plan, specified in PDF K.2-4 on page V.K.2-25 in Section V.K.2, Public Services—Fire Protection, of the Draft EIR, and the resulting less than significant impacts on emergency evacuation/response.

As a matter of clarification, as stated on page IV-13 in Section IV, Project Description, of the Draft EIR, the number of employees associated with the Project would vary based on filming schedules and demand, with up to 1,240 persons associated with Development Area activities potentially present each day, for a total of up to 1,840 persons potentially present on the Ranch (i.e., including existing employment) on a daily basis.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L6-2

Placerita Canyon Road will need to be widened to accommodate a left turn lane for crew members traveling eastbound from the freeway to enter the second (crew) driveway. How long that left-turn lane needs to be has not been identified; however, it should be long enough so that it provides sufficient queuing of cars that will need to make that maneuver without impacting through traffic heading to Placerita Canyon Natural Area and points beyond. The length of this lane should be identified and sized to accommodate projected traffic volumes. It's interesting to note that left turns from eastbound Placerita Canyon Road into the main entrance driveway will be prohibited according to the DEIR.

It is likely that even though a traffic signal is proposed for the crew driveway it may never be installed, which could cause problems for local traffic. Traffic volumes on a public street have to become high enough to warrant installation of a traffic signal OR sufficient accidents have to occur at an intersection. The traffic study should identify at what point it would become necessary to install a traffic signal. Possibly a better solution would be to widen Placerita Canyon Road to accommodate two travel lanes in each direction between the freeway and the crew driveway, or perhaps a westbound acceleration lane for those exiting this driveway. That way, through traffic in both directions would less likely be impacted by operations at the Ranch or during emergency evacuations.

Response No. L6-2

As correctly indicated in this comment, Mitigation Measure MM J-7 presented on page V.J-61 in Section V.J, Traffic, Access, and Parking, of the Draft EIR calls for a left-turn only lane on eastbound Placerita Canyon Road at the current Ranch main entrance. However, to clarify, Placerita Canyon Road would not be physically widened as there is sufficient right-of-way to accommodate the additional lane; rather, the roadway would be restriped as indicated in MM J-7. The length of that turn lane would be determined by LACDPW in accordance with their roadway standards and specifications, which take into account anticipated queuing needs based on projected traffic volumes so as to minimize interruptions to traffic flows. As also stated in MM J-7, the Project Applicant would install a traffic signal at the intersection. Detailed striping/signing and traffic signal plans would be submitted to LACDPW for review and approval prior to implementation.

In addition, as correctly indicated in the comment above, left turns would be prohibited from eastbound Placerita Canyon Road into the new Project entrance directly across from the SR-14 northbound off-ramp so as to avoid conflicts with exiting freeway

traffic. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L6-3

Biological Resources

The analysis consistently minimizes the project's impacts on displacement of wildlife and loss of habitat, including potential foraging by State-protected Golden Eagles by stating that the animals can simply "move into adjacent suitable habitat," or in other instances by comparing the amount of habitat acreage lost as a result of development of the project to the total amount of land left intact in the easterly areas of the Ranch, when those areas are not part of the project. It goes so far as to state that "project development would be clustered in the western portion of the Ranch so as to preserve the vast majority of rural open space and minimize impacts to environmentally sensitive areas." If the easterly areas of the Ranch are to be used to explain how development of the project would preserve natural resources, it would be appropriate to explain how these resources will be maintained in the future, such as granting a conservation easement or deed restriction to prohibit future development from encroaching into these areas.

Response No. L6-3

In accordance with CEQA, the entire Ranch plus the off-site areas where Project-related infrastructure (e.g., utility and roadway improvements) is proposed are collectively considered the Project site for purposes of CEQA. Similarly, the CUP for Ranch operations covers the entire Ranch. Accordingly, as stated on page IV-18 of Section IV, Project Description, of the Draft EIR, new development within the Ranch would be limited to less than 10 percent of the total Ranch area. As such, it is entirely appropriate to refer to the 832 acres of the Ranch within which new development would not occur as containing suitable habitat that could continue to be used by wildlife. The Project includes all new development and the continuation of existing uses on the Ranch, as well as all associated off-site improvements, currently contemplated by the Applicant. The Project would retain the existing outdoor filming uses on 195 acres within the Ranch and protect 637 acres of surrounding hillsides used as a filming backdrop. No additional future use or development of the Ranch beyond the currently proposed new development, ongoing existing outdoor filming operations, the construction of temporary filming sets, and intermittent agricultural and oil drilling operations is envisioned at this time. In addition, refer to Response No. L2-4 regarding the Applicant's commitments to record use restrictions which will run with the land in perpetuity over a total of approximately 13.68 acres of the Ranch.

Comment No. L6-4

Placerita Canyon Trail Connector

Regarding the new Placerita Canyon Connector Trail, the DEIR states that this new trail alignment would eliminate the planned County Placerita Creek Connector Trail. It is unclear if the impact of replacing this trail would represent a significant gap in future overall trail connections for this area. The DEIR is proposing a modification to the adopted County trails plan, but this amendment has not been included in the project description (it's just in the Executive Summary) so it has not been evaluated in the DEIR. A clarification of this issue would be appreciated.

Thank you for your consideration of these comments. If you require any further information regarding this subject, please feel free to contact me at (661) 644-2369 or at ron.kraus@placerita.org

Response No. L6-4

As stated on page IV-33 in Section IV, Project Description, and further discussed on page V.N-29 in Section V.N, Land Use, of the Draft EIR, the Placerita Creek Connector Trail is a proposed trail designated within the Santa Clarita Valley Area Plan's Trails Plan, as well as the new Conservation and Open Space Element. The Placerita Canyon Connector Trail that would be constructed would replace that designated trail and would provide connectivity to existing trails in the area. The alignment of the proposed Placerita Canyon Connector Trail meets the intent of the adopted Santa Clarita Valley Trail Plan. Specifically, as shown in Figure IV-12 on page IV-34 of the Draft EIR, the Placerita Canyon Connector Trail would provide a direct connection to the Firebreak Trail, which in turn connects to other existing and future trails in the area. No local plan amendment would be required for the trail.

In addition to Section II, Executive Summary, of the Draft EIR, the trail is described in detail in Section IV, Project Description, and evaluated thoroughly in Section V.N, Land Use, of the Draft EIR. Further, the impacts of both temporary construction and permanent use of the Placerita Canyon Connector Trail on biological resources, including vegetation (habitat) and jurisdictional water courses, are evaluated in Section V.F, Biological Resources, of the Draft EIR.

SCOPE

Santa Clarita Organization for Planning and the Environment
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



7-17-12

Christina Tran
Los Angeles County Regional Planning Dept.
320 W. Temple St.
Los Angeles, CA 90012

Via email to: ctran@planning.lacounty.gov

Re: Additional DEIR Comments - Disney Studio Sound stage Project in Placerita Canyon County Project TR071216 – (5), Plan Amendment 200100010, Zone Change 20090012, VTT 071216, CUP 200900126, Oak Tree Permit, Parking Permit, etc.

Dear Ms. Tran:

We continue to object to the substitution of a hearing officer for a full hearing before the Commission on this proposal, and request that the Commission hold a hearing. Since this is a “Special Project” funded by the developer (please see attached Supplemental Fee Agreement and charge sheet), we believe it is especially important that the County ensure and promote public fairness.

L7-1

While we appreciated the County’s effort to hold a hearing on a project that will substantially change the character of the east side canyons in Santa Clarita, we and the public need to speak directly to the decision maker, i.e. the Commissioners. Ex parte rules rightly discourage interaction with Commission members, so speaking to them during the hearing process is the only time that the public has the opportunity to air their concerns and have them addressed by the commissioners.

Not following the long time procedure of a public hearing before the Commission on the DEIR, while it might expedite the process to benefit the developer as specified in the time schedule attached to the “Supplement Agreement“, precludes the public from suggesting changes to the Commission that might improve the project, and the Commission from hearing and acting on those changes in a timely manner.

Further, while the Supplement Agreement makes specific reference to “processing and/or implementation (if approved)”¹, the attached time schedule ending with the 30 day challenge period after Board approval, implicitly suggests that the Board will approve the project. Such implicit approval undermines the CEQA process and the County approval process.

L7-2

¹ Page one of the Supplemental Agreement, attached

Project Description – The project description is vague. Instead of proposing one project, it seems to propose two, one a sound-stage complex, the other an office complex. That may become the project if Disney changes its mind at a later date. Which is it? CEQA requires a detailed project description so that the public may know what to expect if the project is approved and may suggest changes for improvement. Not knowing what is really proposed makes analysis of the proposal difficult or impossible.

L7-3

Oak Tree Removals and Mitigation

We ask that Disney provide an alternative to oak removals, especially for heritage oak removals and those that will be removed for the catchment basin that we understand to be located off the Disney property.

L7-4

We continue to express the need for an biological evaluation guarantees sufficient and biologically adequate soil and location for any proposed mitigation plantings. This information is not available

Water Supply and the Further Spread of the Whittiker Bermite Pollution Plume

The Water Supply Assessment provided by Newhall County Water District fails to provide a detailed analysis of whether the wells in the area can supply this project or what other source of water will be used. Instead it describes supplies available to all water agencies for the whole valley.

L7-5

There is no discussion as to how the water line will traverse the highway 14 freeway.

The DEIR does not include an analysis of whether this project would draw down individual water well levels in the Placerita Canyon area, a rural community where many use their own wells to serve their homes or horses. Nor is there a discussion of whether it would impact surface flows.

It also appears that the chart from NCWD's Water Supply Assessment on Page V.L.1-18 fails to reduce water supply calculations to meet the mandated 20% water demand reductions by 2020. Water demand must be re-calculated to clearly include these mandated reductions.

Disney is already using water for the filming ranch irrigation in this area, but fails to disclose the amount. It also apparently provides water for the 500,000-gallon water tank for County fire purposes. (pg. V-L.1-17). The amount of this pumping should be disclosed in the DEIR.

In April of 2012, yet another Valencia Water Well (well 205)² was closed down due to the presence of Volatile Organic Compounds (VOCs), seeming to indicate the further westerly spread of the Whittiker Bermite pollution plume. Levels of Ammonium perchlorate in Valencia Water Well 201 continue to test above health standards and this well also remains closed This information was not publicly disclosed until recently although it was known to the Water Agency several months ago. It was not included in the Water Supply Assessment for this project, nor was an analysis made of how this might affect the regional water supply.

L7-6

² Dept of Health Services correspondence attached

While the project before you will not be supplied by Valencia Water Co., the apparent spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire Santa Clarita Valley, will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

L7-6
Cont.

Solid Waste

As a partner in the fight to save Elsmere Canyon from becoming a landfill because it is a backdrop for their movie ranch, Disney should now walk the walk and do a better job of solid waste recycling. Instead, they will now base their waste calculations on being able to send their trash to another community's canyons (Chiquita Canyon or Antelope Valley) after a future expansion approval for those facilities. (DEIR p. V.L.3-5 and 18)

L7-7

Disney finds their project will cause less than significant impacts to solid waste even though there is currently a short fall of County landfill space because they will only contribute a small additional amount to the waste stream (V.L-3-23). As Disney and the County is fully aware, only adding a little bit more when there is already not enough capacity still constitutes a significant impact. The DEIR must be changed to reflect this fact.

This Disney's impacts are significant, they must make all feasible attempts to reduce their solid waste for construction and operation of the facility. They have not described any mitigation measures other than meeting AB939 50% diversion levels and County required 75% diversion for construction waste. The EIR should list specific actions which it will take to reduce waste so that commentors can ensure that all mitigation has been incorporated in the conditions to reduce this significant impact.

Biological Resources

We will be providing additional comments on this section in the future.

L7-8

Sincerely,



David Lutness
Secretary of the Board

Attachments

1. Supplemental Fee Agreement
2. Developer charges for county review services
3. Emails from the Dept. of Health Services regarding Valencia Well 201 and 205

L7-8
Cont.

SUPPLEMENTAL FEE AGREEMENT

L7-8
Cont.

This Supplemental Fee Agreement ("Agreement") is made and entered into as of the Execution Date (as defined below), by and between Golden Oak Ranch Properties ("Developer") and the COUNTY OF LOS ANGELES ("County") (sometimes referred to individually as "Party" and collectively, the "Parties").

RECITALS

A. Developer is currently engaged in the development process for a major land use project to be located at 19802 Placerita Canyon Road, Newhall, California 91321 in the vicinity of the City of Santa Clarita in Los Angeles County.

B. The Los Angeles County Department of Regional Planning ("Planning Department") intends to process the Developer's land use applications in connection with the project entitled Disney | ABC Studios at The Ranch ("Project") in the unincorporated area in the vicinity of the City of Santa Clarita in Los Angeles County. Such Project applications covered by this Agreement include, but are not limited to a conditional use permit, vesting tentative subdivision map, zone change, an area plan amendment, an oak tree permit, and accompanying environmental documents, as well as implementation of said applications (if approved) collectively referred to hereinafter as the "Major Project."

C. Pursuant to Title 22, Chapter 22.70, Sections 22.70.010 through 22.70.040 of the Los Angeles County Code ("County Code"), the County has established a Major Projects Review Trust Fund ("Trust Fund") as a mechanism to provide additional human and physical resources to the County, solely to process discretionary land use actions, including associated environmental review. This Agreement is consistent with the County's Strategic Plan goals of Service Excellence and Fiscal Responsibility. This Agreement will improve service delivery to Developer as a major project applicant as well as improve other ongoing planning responsibilities of the County. The Agreement will recover costs associated with providing additional resources for the Major Project.

D. The Planning Department Director has determined pursuant to Section 22.70.010 of the County Code that the Project described in Section B above qualifies as a Major Project within the meaning of that section.

E. The County, through the Planning Department, is responsible for planning for, processing, and/or implementing (if approved) the Major Project.

F. Major projects place an increased burden on the County's resources and interfere with ongoing planning responsibilities as well as timely review of other projects. The County has a need for additional human and physical resources in order to plan for and process the Major Project without disruption to its other responsibilities. The Trust Fund mechanism will allow the County to be compensated by the Developer for the actual costs incurred in planning for, processing, and/or implementing (if approved) the Major Project. The amounts paid into the Trust Fund by the Developer will provide the

County with additional resources that will enable it, without impairment of its general planning responsibilities, to plan for and/or process the Major Project in a manner that ensures independent scrutiny by the County and timely performance by the County.

G. The deposits submitted by Developer pursuant to this Agreement are intended to be in addition to, and not in lieu of, standard processing fees to compensate the County for its actual costs to process certain discretionary actions and related environmental review. Under current applicable laws, policies, and procedures, the County assesses fees as compensation for the actual costs incurred in conducting the necessary environmental review for all projects consistent with CEQA. The Trust Fund mechanism is necessary in order to provide the County with sufficient resources to ensure timely performance by the County of its obligations in connection with the Major Project without interfering with the County's ongoing planning responsibilities for the timely review of other projects. Therefore, it is the intent of the Parties that the deposits paid by Developer pursuant to this Agreement be utilized to compensate the County for actual costs, in excess of those covered by its standard processing fees, incurred in processing the Major Project in a timely fashion.

H. It is the intent of the Parties that the planning for and/or processing of the Major Project take place in accordance with the processing schedule set forth as Appendix A (the "Schedule").

I. The Parties desire to enter into this Agreement whereby the County will establish a Trust Fund account into which the Developer will deposit funds to the County that, together with the standard processing fees for the Major Project, will compensate the County for the actual costs of the County's resources allocated to planning for and processing the Major Project.

AGREEMENT

NOW, THEREFORE, in consideration of the foregoing recitals and the mutual promises and covenants contained in this Agreement, the Parties hereby agree as follows:

1. Deposit of Fees

(a) Deposit of Standard Processing Fees. All standard processing fees hereafter paid by the Developer in connection with the Major Project to the Planning Department shall be deposited into the Trust Fund and disbursed in accordance with the provisions of this Agreement and County accounting procedures. For the purpose of this Agreement, the Trust Fund shall be inclusive of all deposit accounts in connection with this Agreement and the Major Project.

(b) Non-Processing Fees and Surcharges. The Developer shall be required to pay all other fees or surcharges, as applicable, which are normally collected by any of

the agencies or other County Departments for any processing services for the Major Project. Such fees shall not be subject to this Agreement and shall not be deposited into the Trust Fund.

2. Deposit of Funds. Within ten (10) business days after the Execution Date, the Developer shall deposit the sum of \$10,000.00 into the Trust Fund ("Initial Deposit"). The County shall accept such deposit and establish a separate interest bearing account(s) known as the ABC Studios Major Project Account (the "Account"), interest on which shall be credited to and become part of the Account when received, for the sole purpose of compensating the County in accordance with the terms of this Agreement for certain costs and expenses incurred in connection with processing the Major Project ("Processing Expenses"). The Parties hereby authorize the Planning Department to administer and maintain the accounting record for the Account pursuant to customary accounting procedures accepted by the County. All funds in the Account and any interest accrued on such funds shall hereinafter be collectively referred to as the "Funds."

3. Processing Services. In order to process the Major Project in accordance with the Schedule, the Planning Department shall provide the services described in Appendix B ("Processing Services"). The cost of the Processing Services for Dedicated Positions on an annual basis shall not exceed \$117,929.01 as set forth in Appendix C ("Cost Estimate") unless otherwise agreed to in writing by the Parties. This Cost Estimate does not include the costs of Processing Services provided by As-Needed Positions and by other County departments including, but not limited to, their necessary work and environmental document reviews associated with the Major Project as more fully described in subsection 7(b).

4. Disbursement of Funds.

(a) The County may disburse Funds from the Account at its discretion in accordance with the terms of this Agreement.

(b) The Developer shall deposit funds into the Account on a quarterly basis in an amount estimated by the Parties as provided below as sufficient to pay for the cost of providing Processing Services for the following quarterly period. No later than ten (10) business days after the beginning of each quarterly period during the term of this Agreement, the Parties shall meet and review the amount of Funds remaining in the Account, and review, re-evaluate, and negotiate in good faith the number and type of employees necessary to accomplish the Processing Services for the current quarterly period and the estimated costs thereof. No later than seven (7) business days after the end of each quarterly period during the term of this Agreement, the Planning Department shall provide to the Developer a signed and dated Processing Expense Report in the form attached hereto as Appendix D.

(c) No later than twenty-five (25) business days after the beginning of each quarterly period during the term of this Agreement, provided that the County shall have

provided the information described in subsection 4(b) above in a timely manner, the Developer shall deposit the agreed upon estimated costs for such quarterly period into the Account. Funds remaining in the Account at the end of each quarterly period shall be taken into account in determining the amount of the deposit for the next quarterly period.

(d) If at any time during the term of this Agreement the Planning Department determines that the amount of Funds in the Account will be exhausted prior to the end of the then-current quarterly period, the Planning Department shall promptly advise the Developer of the amount of such shortfall and the Developer shall, within thirty (30) days, deposit additional funds into the Account in the amount that the Planning Department determines necessary to cover the projected shortfall for such quarterly period. Notwithstanding the foregoing requirement for an additional deposit, if the Developer questions the need for or the amount of such additional Funds, the Parties shall convene a meeting to be held within ten (10) business days of such notice of shortfall, at which all Parties will negotiate in good faith in order to determine the amount of Funds necessary to compensate the County for the anticipated Processing Expenses for such quarterly period. The Developer shall promptly thereafter deposit the agreed upon amount.

5. Independent Control of Employees by County. Nothing in this Agreement shall preclude or restrict the County from allocating to the preparation and/or evaluation of the Major Project, any resource, to be provided by the County at the County's or another's expense, in addition to the resources provided by the Trust Fund under the terms of this Agreement. The County has the sole discretion to direct the work of any County employee or expert consultant retained as needed to evaluate or to assist with the preparation of the Major Project. Such employee(s) or consultant(s) shall report to and be under the direct supervision of County managers. The compensation of any such employee or consultant shall be exclusively determined by the County, however, the County shall consult with the Developer concerning the compensation of any consultant to be paid by funds from deposits submitted pursuant to Section 2 herein prior to engaging their services. This Agreement is not contingent upon the hiring of any specific employee or the retention of any specific consultant.

6. Independent Control and Review by County. Notwithstanding anything to the contrary in this Agreement, this Agreement shall not control, limit, or influence any County approval, disapproval or condition of the Major Project. The Hearing Officer, the Regional Planning Commission, and the Board of Supervisors shall retain full discretionary authority with respect to their actions on the Major Project.

7. Allocated Positions. The number and type of personnel that the County shall assign and dedicate to process the Major Project ("Allocated Position") are set forth in Appendix C. The County shall have the sole discretion to determine which employees are assigned to fill the Allocated Positions and to replace any employee assigned to an Allocated Position provided, however, that the Allocated Positions shall be filled with senior personnel who are qualified, competent, and available to perform the Processing

Services. Allocated Positions consist of two types of positions, Dedicated Positions and As-Needed Positions, as described in Subsections 7(a) and 7(b). Allocated Positions can include both internal (Planning Department personnel) and external (Consultant personnel) personnel. Upon mutual agreement of the Parties, the number and type of Allocated Positions may be increased or decreased, to correspond to the demands of the Major Project. All costs associated with an increase in Allocated Positions shall be the responsibility of the Developer.

(a) Dedicated Positions. Dedicated Positions are the percentage of positions allocated exclusively to provide processing services to the Major Project and shall not be assigned to any other unrelated projects, unless the Parties mutually agree otherwise. Except as otherwise provided herein, during periods when Processing Services are not required, the Dedicated Positions are held in reserve for work related to the Major Project but may work on other unrelated assignments. These are the primary position(s) for the Planning Department to perform the Processing Services. The allocated percentage of full wages based on the current approved Billing Rates by the Los Angeles County Auditor Controller for the Dedicated Positions shall be fully reimbursed by the Developer. The Planning Department shall assign at least one part-time or full-time dedicated Planning Department employee to fill the Dedicated Position(s). During the Term of the Agreement the Planning Department employee may be transferred to other Planning Department Divisions or projects within the Planning Department. If the Planning Department employee is transferred or reassigned, a suitable qualified, competent Planning Department employee shall be provided as a replacement within a reasonable time. During this replacement process, the Developer shall not be responsible for any costs associated with the transferred or reassigned Planning Department employee.

(b) As-Needed Positions. As-Needed Positions are the positions allocated only when there is need to require more staff or consultants performing the Processing Services for the Major Project. These positions shall be in addition to the Dedicated Positions. The Developer shall fully reimburse the Planning Department for costs associated with the As-Needed Position(s). The Planning Department may assign one or more employees, either internal Planning Department staff or external (consultant) personnel with special expertise to fill each of the As-Needed Positions. For the purpose of this agreement, external personnel with special expertise may include, but not limited to firms or individual with qualified experience in the area of biology, environmental impact assessment and mitigation monitoring. The County shall not engage the services of any personnel for any As-Needed Positions unless mutually agreed by both Parties.

8. Processing Expenses. The Processing Expenses payable from the Funds shall consist solely of the personnel and other costs to the County that are directly associated with the Processing Services, as provided below, and are documented according to the procedures set forth the Appendix D ("Processing Expense Report") and include:

(a) the costs of the wages, including estimated overtime, for each of the Allocated Positions based on the applicable billing rates multiplied by the Processing Services hours and the costs of retaining experts as necessary to assist in providing Processing Services or implementation of the Major Project pursuant to the consultant contract;

(b) the costs of certain material, equipment, and office/administrative or communications services expenses included in the supplemental costs described on Appendix C;

(c) all reasonable out-of-pocket expenses incurred in connection with the performance of Processing Services pursuant to this Agreement by any employee assigned to an Allocated Position provided that the employee would not incur the expenses but for working on the Major Project and the Developer does not object to such expenditures; and

(d) as a commitment for timely processing of the Major Project, the Planning Department, in consultation with the Developer, may arrange with other County departments to secure the expedited provision of services for the Major Project. The Planning Department shall consult with, inform, and obtain agreement from the Developer about these services prior to incurring expenses related to these services. The Developer shall cover the costs for these services with appropriate deposits into the Account.

9. Record Management and Review. Prior to the Execution Date, the County will implement, and throughout the term of this Agreement shall maintain, accounting procedures that document the Processing Expenses in a manner sufficient to comply with the reporting requirements of Appendix D. The Planning Department shall keep records of all disbursements from the Account, all deposits to the Account, and all expense reports. Each employee or consultant assigned to an Allocated Position shall make a daily record of any time spent processing the Major Project in increments not less than one-half hour. Such record shall include a brief description of the task(s) performed during such time. The Planning Department shall obtain receipts for or other evidence of the cost of all acquisitions of material and equipment and other expenditures that it invoices or debits as Processing Expenses. During the term of this Agreement and for a period of two years thereafter, the Planning Department shall retain these records. The Developer or its representatives, from time to time and upon reasonable advance notice, may examine and copy such records during normal business hours. The Developer shall reimburse any reasonable costs incurred by the County as a result of any copying of such records.

10. Term of Agreement. This Agreement shall commence upon execution by all Parties ("Execution Date"), and shall terminate two (2) years from the Execution Date, ("Termination Date") unless sooner terminated as provided below or in Section 12, provided, however, that the Parties may mutually agree in writing to extend the term of this Agreement by negotiating such extension at least ninety (90) days prior to the

Termination Date. Notwithstanding anything to the contrary contained in this Agreement, in no event shall the term of this Agreement extend beyond the end of the calendar year quarter in which the County has completed the processing and implementation of the Major Project, which includes action as required by the Board of Supervisor. Unless the Agreement is extended, all provisions of this Agreement shall terminate on the Termination Date, and the County shall promptly return to the Developer any Funds, plus accrued interest, remaining in the Account (less any Processing Expenses thereto incurred but not yet charged to the Account).

11. Schedule. The Parties agree to use best efforts to comply with the timing set forth in the attached schedule (Appendix A). The Parties shall negotiate in good faith any changes in the Schedule. The parties shall meet quarterly or as often as necessary to review and make changes or adjustments, if necessary, to the Schedule. Unless the Parties fail to act in good faith, failure to meet the time periods designated in the Schedule within the control of the Planning Department or the Developer shall not constitute a breach of this Agreement.

12. Termination. Prior to the Termination Date, either the Developer or the County may terminate its rights and obligations under this Agreement, with or without cause, upon sixty (60) days' notice given to the other party. Upon receipt of notice of termination from the Developer, the County will stop processing all requested entitlements covered by this Agreement within 5 days so as to avoid incurring additional Processing Expenses.

13. Effect of Termination. Upon termination pursuant to Section 12 of this Agreement, the County's and Developer's obligations under this Agreement shall terminate, and the County shall return to the Developer any Funds, plus accrued interest, remaining in the Account less any Processing Expenses incurred in due course through the effective date of the termination, but not yet charged to the Account.

14. Notices. Unless otherwise provided herein, any notice, request, consent, instruction, or other document to be given hereunder by any Party to the others shall be in writing and delivered in person or by courier, telegraphed, telexed, or by facsimile transmission (with confirmed receipt) or mailed by first-class mail, postage prepaid (each such notice to be effective on the date received), as follows:

If to Developer: Golden Oak Ranch Properties
 c/o The Walt Disney Company
 500 South Buena Vista Street
 Burbank, California 91521
 Attention: Dan McBrearty

Golden Oak Ranch Properties
c/o The Walt Disney Company
500 South Buena Vista Street
Burbank, California 91521
Attention: Deanna Detchemendy, Esq.

With a copy to: Kathleen O'Prey Truman, Esq.
Truman & Elliott LLP
626 Wilshire Boulevard, Suite 550
Los Angeles, California 90017

If to County: Department of Regional Planning
County of Los Angeles
320 West Temple Street -Room 1390
Los Angeles, California 90012
Attention: Jon Sanabria

or to such other place and with such other copies as any Party may designate as to itself by written notice to the other Party.

15. Entire Agreement. This Agreement constitutes the entire agreement among the Parties pertaining to the subject matter hereof and supersedes all prior agreements, understandings, negotiations, and discussions, whether oral or written, of the Parties. No supplement, modification, or waiver of this Agreement shall be binding unless executed in writing by both Parties.

16. Counterparts. This Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute a single agreement.

17. Severability. If any one or more of the provisions contained in this Agreement shall be found to be invalid, illegal, or unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions contained herein shall not, in any way, be affected or impaired thereby.

18. Governing Law. This Agreement shall be construed in accordance with and governed by the laws of the State of California.

19. Headings and Captions. The headings and captions to the various articles, sections, subsections, subdivisions, and other provisions of this Agreement have been inserted for convenient reference only, and shall not have the effect of amending or changing the express terms and provisions of any such article, section, subsection, subdivision, or other such provisions thereof.

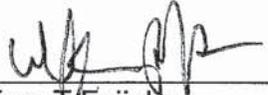
20. Public Record. This Agreement and all written documents pursuant hereto shall be maintained as a public record.

L7-8
Cont.

21. No Third-Party Beneficiaries. The Parties agree that this Agreement is solely for their benefit, and it does not, nor is it intended to, create any rights in favor of or obligation owing to any third parties.

IN WITNESS WHEREOF, the Parties have hereunto caused this Agreement to be executed and delivered, as of the date first appearing above, by their duly authorized officers.

COUNTY OF LOS ANGELES

By: 
William Fujioka
Chief Executive Officer

Date: 10-30-09

Approved as to Form:

OFFICE OF COUNTY COUNSEL

By: 
Patricia Keane
Deputy County Counsel

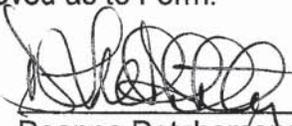
Date: 9/15/09

DEVELOPER

By: 
GOLDEN OAK RANCH PROPERTIES
Edward A. Chuchla
President

Date: 8/27/09

Approved as to Form:

By: 
Deanna Detchemendy, Esq.
The Walt Disney Company
Counsel for Golden Oak Ranch Properties

Date: 8/26/09

**Appendix A
Preliminary Schedule
Disney | ABC Studios at The Ranch**

L7-8
Cont.

<u>ACTION</u>	<u>DATE</u>
File application materials with County	Wed 10/28/09
County review of application materials/finalize NOP & Initial Study	Wed 10/28/09 - Tue 1/5/10
Circulation of NOP	Tue 1/5/10 – Thu 2/4/10
Public scoping meeting	Date TBD by County
Prepare technical reports to support Draft EIR	Thu 1/1/09 - Fri 5/14/10
Prepare first screencheck Draft EIR	Thu 10/22/09 – Wed 3/31/10
County DRP review first screencheck Draft EIR	Thu 4/1/10 – Wed 5/12/10
Revisions/Prepare second screencheck Draft EIR	Thu 5/13/10 – Wed 6/2/10
County DRP review second screencheck Draft EIR (Note: Additional screencheck DEIR may be required by County prior to County Agency Review)	Thu 6/3/10 – Wed 6/23/10
Revisions/Prepare third screencheck Draft EIR for County Agency review	Thu 6/24/10 – Wed 7/14/10
Subdivision Committee Meetings (Tract Map and Exhibit Map)	Thu 6/24/10 – Wed 9/15/10 (Specific Date TBD by County)
Development Review Committee Meeting (CUP)	Thu 6/24/10 – Wed 8/4/10 (Specific Date TBD by County)
County agency review of Draft EIR	Thu 7/15/10 – Wed 8/25/10
Revisions based on County Agency review	Thu 8/26/10 - Wed 9/15/10
Final County DRP review/revisions to Draft EIR	Thu 9/16/10 – Wed 10/6/10
Publish Draft EIR/Prepare mailing	Thu 10/7/10 - Mon 10/18/10
NOC filed with OPR/NOA dist to public	Mon 10/18/10
45-day public review period of DEIR and entitlements	Mon 10/18/10 - Mon 12/6/10
Prepare first draft Final EIR and Mitigation Monitoring & Reporting Program (MMRP)	Tue 12/7/10 - Mon 1/31/11
County DRP review Final EIR and MMRP/revisions (Note: Additional screencheck FEIR may be required by County)	Tue 2/1/11 - Mon 2/28/11
Prepare Final EIR for printing/prepare mailing	Tue 3/1/11 - Thu 3/10/11
Publish Final EIR	Thu 3/10/11
Planning Commission hearing (re: EIR, CUP, VTTM, Plan Amend., ZC and Oak Tree Permit)	Mon 3/14/11 - Fri 6/3/11 (Specific Date TBD by County)
Board of Supervisors hearing (re: ZC and PA and potential consideration of other actions at Board discretion or on appeal)	Mon 6/6/11 - Fri 8/26/11 (Specific Date TBD by County)
File NOD (start 30-day challenge period on EIR)	Mon 8/29/11
30-day challenge period	Mon 8/29/11 - Wed 9/28/11

APPENDIX B

L7-8
Cont.

Processing Services

1. Processing Services. Processing services applicable to this Agreement refer to those Planning Department, consultant, and legal services necessary to process the Major Projects discussed above in Paragraph B of the Recitals, and as outlined on the Schedule in Appendix A. These processing services shall include all work performed by the Planning Department staff, its consultants, and County Counsel to process those cases filed for the Major Projects. The primary intent of the processing services covered under this Agreement is for the Planning Department to take all necessary actions, and prepare all necessary reports required to conduct public hearings before the Hearing Officer, the Regional Planning Commission, and the Board of Supervisors on the Major Projects, and to undertake necessary work to ensure timely project implementation upon project approval from the Hearing Officer or Regional Planning Commission or Board of Supervisors. Project implementation would include, but is not limited to, final map clearances and processing of exhibit maps, development plans, landscape plans, and mitigation monitoring report reviews.
2. Time Period. This Agreement establishes a time frame of two years to complete the Major Project activities outlined in the Schedule in Appendix A. Under no circumstances shall the Schedule or any other provisions of this Agreement presuppose a commitment on the part of the County to approve the Discretionary Actions within a specified time period, since such action is not within the control of the Planning Department. Responsibility for timely completion of much of the initial work required for processing of the Discretionary Actions as outlined in the Schedule belongs to the Developer. Should delays be experienced in the preparation of documents needed by the County to fulfill its obligations under this Agreement, the Parties shall renegotiate the time of the Schedule and/or modify the terms of the Agreement to reflect such delays.
3. Quarterly Reports and Payments. According to Sections 3 and 4 of the Agreement, payments to the County and disbursement of funds by the County shall be performed on a quarterly basis to fund the personnel as set forth in Appendix C.

APPENDIX C (Cost Estimate For Impact Analysis Section of EIR Review)

DISNEY GOLDEN OAKS RANCH ALLOCATED POSITIONS COST ESTIMATE	DEDICATED REGULAR HOURS	OVERTIME HOURS ESTIMATE	REGULAR HOURLY RATES	OVERTIME RATES	TOTALS
REGIONAL PLANNING POSITION					
Dedicated Position					
1 Senior Regional Planning Assistant (25%)	440.50	88.10	\$ 103.77	\$ 155.66	\$ 59,423.89
1 Regional Planning Assistant II (25%)	440.50	88.10	\$ 98.28	\$ 147.42	\$ 56,280.04
Total Hours of Dedication (Dedicated Positions)	440.50	88.10			528.60
Total Overtime Costs at 20%(Dedicated Positions)					\$ 26,700.91
Subtotal (Dedicated Positions)					\$ 89,003.03
¹Supplemental Costs (2.5% of subtotal cost)					\$ 2,225.08
TOTAL FY 09/10 (Dedicated Positions)					\$ 117,929.01
As-Needed Position²					
1 Regional Planning Assistant II (20%)	352.40	52.86	\$ 98.28	\$ 147.42	\$ 42,426.49
Total Hours of Dedication (As-Needed Position)	352.40	52.86			405.26
Total Overtime Costs at 15%(As-Needed Position)					\$ 7,792.62
Subtotal (As-Needed Position)					\$ 42,426.49
TOTAL FY 09/10 (As-Needed Position)					\$ 50,219.11

¹Includes cost from DRP Budget Section

²The Developer shall only be responsible for the costs of an As-Needed Position if such position has been consented to pursuant to Section 7(b) of the Agreement.

L7-8
Cont.

**APPENDIX D
MAJOR PROJECTS REVIEW TRUST FUND - PROCESSING EXPENSE REPORT**

L7-8
Cont.

Date:
Quarter:

(SAMPLE)

Initial Deposit into the Account: Balance of deposits & interests from FY2007-08

Quarterly Deposits into the Account: (Including Interest)

a. FY: 2007/2008 1st Quarter
 2nd Quarter
 3rd Quarter
 4th Quarter

Interest Distributed

Account Balance:

Quarterly Disbursements from the Account

a. FY: 2007/2008 1st Quarter
 2nd Quarter
 3rd Quarter
 4th Quarter

Total Disbursements:

Account Balance After Disbursements:

(a) - (b)

(c)

\$0.00

Processing Expenses Disbursed During Present Quarter:

	Employee	Hours	x	Rate	=	Wages
i.	<input type="text"/>	<input type="text"/>	x	<input type="text"/>	=	<input type="text"/>
ii.	<input type="text"/>	<input type="text"/>	x	<input type="text"/>	=	<input type="text"/>
iii.	<input type="text"/>	<input type="text"/>	x	<input type="text"/>	=	<input type="text"/>
iv.	<input type="text"/>	<input type="text"/>		<input type="text"/>		<input type="text"/>
v.	<input type="text"/>	<input type="text"/>		<input type="text"/>		<input type="text"/>
vi.	<input type="text"/>	<input type="text"/>		<input type="text"/>		<input type="text"/>
vii.	<input type="text"/>	<input type="text"/>		<input type="text"/>		<input type="text"/>

- a. Total Staff Wages for Processing Services;
- b. Material & Equipment: (Itemize On Separate Sheet)
- c. Reimbursables: (Itemize On Separate Sheet)
- d. Consultants: (Itemize On Separate Sheet)
- e. Total Processing Exp Disbursed During Present Quarter:

6. Account Balance:

7. Project Processing Expense Through Next Quarter:

8. Project Account Balance Through Next Quarter:

9. Other:

10. Balance Due To Fully Fund Processing Expenses Through Next Quarter:

(c) - (d)

(d)

\$0.00

\$0.00

\$0.00

Notes: I hereby certify that the Processing Expenses itemized on this Processing Expense Report are documented in accordance with the Documentation Procedures for Processing Expenses as set forth in the Supplemental Fee Agreement for this project.

By:
Title:
Date:

* Interest distributed for:

1st Quarter FY07-08
2nd Quarter FY07-08
3rd Quarter FY07-08
4th Quarter FY07-08

\$0.00

**APPENDIX C
DISNEY/ABC STUDIOS MAJOR PROJECT REVIEW TRUST FUND (S8W) - PROCESSING EXPENSE REPORT**

Date: April 30, 2012
 Quarter: 3rd Quarter for FY 2011-12 (Jan. - Mar. 2012)

Carried Forward Balance FY10-11 \$27,170.97

Initial Deposit into the Account:

Quarterly Deposits into the Account: (Including Interest)

a. FY: 2011-2012	1st Quarter				52.42
	2nd Quarter				74.53
	3rd Quarter				36.18
	4th Quarter				
				(a)	\$27,334.10

Account Balance:

Quarterly Disbursements from the Account

a. FY: 2011-2012	1st Quarter				\$10,867.42
	2nd Quarter				\$2,064.68
	3rd Quarter				\$16,777.05
	4th Quarter				

Total Disbursements:

(b) \$29,709.15

Account Balance After Disbursements:

(c) (\$2,375.05)

Processing Expenses Disbursed During Present Quarter:

	Employee	Hours		Rate		Wages
1	Christina Tran	89.5	x	\$104.11	=	\$9,317.85
2	Christina Tran (OT)	20.0	x	\$156.17	=	\$3,123.40
3	Jose Decruyenaere	50.0	x	\$80.82	=	\$4,041.00
4	Christoph Morneau	1.5	x	\$104.11	=	\$156.17
5	Christine Lee	2.0	x	\$69.32	=	\$138.64
6					=	
7			x		=	
8			x		=	
9			x		=	

- a. Total Staff Wages for Processing Services; \$16,777.05
- b. Material & Equipment: (Itemize On Separate Sheet)
- c. Reimbursables: (Itemize On Separate Sheet) (Mileage)
- d. Consultants: (Itemize On Separate Sheet)
- e. Fund Transfer to TR071216
- f. **Total Processing Exp Disbursed During Present Quarter:** \$16,777.05

6. Account Balance:

7. Project Processing Expense Through Next Quarter:	
8. Project Account Balance Through Next Quarter:	
9. Other:	
10. Balance Due To Fully Fund Processing Expenses Through Next Quarter:	

Notes: I hereby certify that the Processing Expenses itemized on this Processing Expense Report are documented in accordance with the Documentation Procedures for Processing Expenses as set forth in the Supplemental Fee Agreement for this project.

By: Christine Lee
 Title: Accountant III
 Date: April 30, 2012

* Interest distributed for:

1st Quarter	\$52.42
2nd Quarter	\$74.53
3rd Quarter	\$36.18
4th Quarter	\$163.13

Department of Regional Planning
Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund	Project No	Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
S8W		DISNEY/ABC STUDIOS										
			12/31/2009		Anthony Curzi (Time Exp 1209)		0.00	0.00	1.00	92.35	92.35	(\$92.35)
			12/31/2009		Christina Tran (Time Exp 1209)		0.00	0.00	20.00	97.50	1,950.00	(\$1,950.00)
			1/13/2010	JVCT 10*2564	Deposit		10,000.00	0.00	0.00	0.00	0.00	\$10,000.00
			1/25/2010	JVCT10*2775	Transfer to TR071216		0.00	0.00	0.00	0.00	5,000.00	(\$5,000.00)
			1/31/2010		Christina Tran (Time Exp 0110)		0.00	0.00	13.50	97.50	1,316.25	(\$1,316.25)
			1/31/2010		Jeffrey Juarez (Time Exp 0110)		0.00	0.00	3.00	135.53	406.59	(\$406.59)
			1/31/2010		Jeffrey Juarez (Time Exp 0110)		0.00	0.00	22.00	92.35	2,031.70	(\$2,031.70)
			2/28/2010		Christina Tran (Time Exp 0210)		0.00	0.00	9.00	97.50	877.50	(\$877.50)
			2/28/2010		Christine Lee (Time Exp 1209-0210)		0.00	0.00	9.00	62.81	565.29	(\$565.29)
			2/28/2010		Jeffrey Juarez (Time Exp 0210)		0.00	0.00	14.00	92.35	1,292.90	(\$1,292.90)
			3/1/2010	eCAPS	Interest 0210		0.00	1.00	0.00	0.00	0.00	\$1.00
			3/18/2010	JVCT 10*	Deposit		15,000.00	0.00	0.00	0.00	0.00	\$15,000.00
			3/31/2010		Christina Tran (Time Exp 0310)		0.00	0.00	3.50	97.50	341.25	(\$341.25)

Department of Regional Planning

Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund No	Project Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
		3/31/2010		Christine Lee (Time Exp 0310)		0.00	0.00	3.00	62.81	188.43	(\$188.43)
		4/1/2010	eCAPS	Interest 0310		0.00	3.92	0.00	0.00	0.00	\$3.92
		4/30/2010		Christina Tran (Time Exp 0410)		0.00	0.00	1.00	97.50	97.50	(\$97.50)
		4/30/2010		Christine Lee (Time Exp 0410)		0.00	0.00	3.00	62.81	188.43	(\$188.43)
		5/1/2010	eCAPS	Interest 0410		0.00	9.97	0.00	0.00	0.00	\$9.97
		5/31/2010		Christine Lee (Time Exp 0510)		0.00	0.00	1.50	62.81	94.22	(\$94.22)
		6/1/2010	eCAPS	Interest 0510		0.00	11.20	0.00	0.00	0.00	\$11.20
		6/30/2010		Christine Lee (Time Exp 0610)		0.00	0.00	2.00	62.81	125.62	(\$125.62)
		7/1/2010	eCAPS	Interest 0610		0.00	23.52	0.00	0.00	0.00	\$23.52
		7/31/2010		Christina Tran (Time Exp 0710)		0.00	0.00	0.50	100.86	50.43	(\$50.43)
		8/1/2010	eCAPS	Interest 0710		0.00	10.69	0.00	0.00	0.00	\$10.69
		8/31/2010		Christina Tran (Time Exp 0710)		0.00	0.00	0.25	100.86	25.22	(\$25.22)
		9/1/2010	eCAPS	Interest 0810		0.00	13.65	0.00	0.00	0.00	\$13.65
		9/30/2010		Christine Lee (Time Exp 0910)		0.00	0.00	2.00	66.93	133.86	(\$133.86)
		10/1/2010		Interest 0910		0.00	13.04	0.00	0.00	0.00	\$13.04

Department of Regional Planning

Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund No	Project Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
		11/1/2010	eCAPS	Interest 1010		0.00	14.93	0.00	0.00	0.00	\$14.93
		12/1/2010	eCAPS	Interest 1110		0.00	7.22	0.00	0.00	0.00	\$7.22
		12/31/2010		Christine Lee (Time Exp 1210)		0.00	0.00	2.00	66.93	133.86	(\$133.86)
		1/1/2011		Interest 1210		0.00	12.29	0.00	0.00	0.00	\$12.29
		1/31/2011		Christina Tran (Time Exp 0111)		0.00	0.00	15.00	100.86	1,512.90	(\$1,512.90)
		1/31/2011		Wesley Colvin (Time Exp 0111)		0.00	0.00	8.50	78.30	665.55	(\$665.55)
		2/1/2011		Interest 0111		0.00	10.83	0.00	0.00	0.00	\$10.83
		2/28/2011		Christina Tran (Time Exp 0211)		0.00	0.00	8.00	151.29	1,210.32	(\$1,210.32)
		2/28/2011		Christina Tran (Time Exp 0211_OT)		0.00	0.00	22.00	78.30	1,722.60	(\$1,722.60)
		2/28/2011		Mileage Claim 0211		0.00	0.00	0.00	0.00	30.40	(\$30.40)
		2/28/2011		Wesley Colvin (Time Exp 0211)		0.00	0.00	20.00	100.86	2,017.20	(\$2,017.20)
		3/1/2011	eCAPS	Interest 0211		0.00	10.82	0.00	0.00	0.00	\$10.82
		3/31/2011		Christina Tran (Time Exp 0311)		0.00	0.00	6.00	100.86	605.16	(\$605.16)
		3/31/2011		Christine Lee (Time Exp 0311)		0.00	0.00	2.00	66.93	133.86	(\$133.86)

Department of Regional Planning
Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund No	Project Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
		4/1/2011	eCAPS	Interest 0311		0.00	11.79	0.00	0.00	0.00	\$11.79
		4/30/2011		Christina Tran (Time Exp 0411)		0.00	0.00	0.50	100.86	50.43	(\$50.43)
		5/1/2011	eCAPS	Interest 0411		0.00	7.50	0.00	0.00	0.00	\$7.50
		5/9/2011		Deposit (Receipt #43307)		25,000.00	0.00	0.00	0.00	0.00	\$25,000.00
		6/1/2011	eCAPS	Interest 0511		0.00	2.28	0.00	0.00	0.00	\$2.28
		6/30/2011		Christine Lee (Time Exp 0611)		0.00	0.00	2.00	66.93	133.86	(\$133.86)
		7/1/2011	eCAPS	Interest 0611		0.00	18.15	0.00	0.00	0.00	\$18.15
		7/31/2011		Anthony Curzi (Time Exp 0711)	PC	0.00	0.00	1.00	98.61	98.61	(\$98.61)
		7/31/2011		Christina Tran (Time Exp 0711)	PC	0.00	0.00	2.00	104.11	208.22	(\$208.22)
		7/31/2011		Christina Tran (Time Exp 0711)	PR	0.00	0.00	2.50	104.11	260.28	(\$260.28)
		7/31/2011		Wesley Colvin (Time Exp 0711)	PC	0.00	0.00	1.50	80.82	121.23	(\$121.23)
		7/31/2011		Wesley Colvin (Time Exp 0711)	PR	0.00	0.00	33.50	80.82	2,707.47	(\$2,707.47)
		8/1/2011	eCAPS	Interest 0711		0.00	16.22	0.00	0.00	0.00	\$16.22
		8/31/2011		Christina Tran (Time Exp 0811)	PC	0.00	0.00	2.50	104.11	260.28	(\$260.28)
		8/31/2011		Christina Tran (Time Exp 0811)	PR	0.00	0.00	10.00	104.11	1,041.10	(\$1,041.10)

Department of Regional Planning

Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund	Project No	Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
			8/31/2011		Christina Tran (Time Exp 0811_OT)	PR	0.00	0.00	16.00	156.17	2,498.72	(\$2,498.72)
			8/31/2011		Wesley Colvin (Time Exp 0811)	PC	0.00	0.00	7.00	80.82	565.74	(\$565.74)
			9/1/2011	eCAPS	Interest 0811		0.00	18.05	0.00	0.00	0.00	\$18.05
			9/30/2011		Christina Tran (Time Exp 0911)	PC	0.00	0.00	0.50	104.11	52.06	(\$52.06)
			9/30/2011		Christina Tran (Time Exp 0911)	PR	0.00	0.00	28.00	104.11	2,915.08	(\$2,915.08)
			9/30/2011		Christine Lee (Time Exp 0911)	PC	0.00	0.00	2.00	69.32	138.64	(\$138.64)
			10/1/2011	eCAPS	Interest 0911		0.00	33.18	0.00	0.00	0.00	\$33.18
			10/31/2011		Christina Tran (Time Exp 1011)	PC	0.00	0.00	4.00	104.11	416.44	(\$416.44)
			11/1/2011	eCAPS	Interest 1011		0.00	24.71	0.00	0.00	0.00	\$24.71
			11/30/2011		Christina Tran (Time Exp 1111)	PR	0.00	0.00	1.00	104.11	104.11	(\$104.11)
			11/30/2011		Christina Tran (Time Exp 1111)	PC	0.00	0.00	6.50	104.11	676.72	(\$676.72)
			12/1/2011	eCAPS	Interest 1111		0.00	16.64	0.00	0.00	0.00	\$16.64
			12/31/2011		Christina Tran (Time Exp 1211)	PC	0.00	0.00	7.00	104.11	728.77	(\$728.77)
			12/31/2011		Christine Lee (Time Exp 1211)	PC	0.00	0.00	2.00	69.32	138.64	(\$138.64)

Department of Regional Planning

Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund No	Project Fund Name	Date	Reference No	Description	Activity Code	Deposits and Beg. Bal.	Interest	Hour	Rate	Expense	Total
		1/1/2012	eCAPS	Interest 1211		0.00	18.09	0.00	0.00	0.00	\$18.09
		1/31/2012		Christina Tran (Time Exp 0112)	PR	0.00	0.00	23.00	104.11	2,394.53	(\$2,394.53)
		1/31/2012		Christina Tran (Time Exp 0112_OT)	PR	0.00	0.00	20.00	156.17	3,123.40	(\$3,123.40)
		1/31/2012		Jose Decruyenaere (Time Exp 0112)	PC	0.00	0.00	3.00	80.82	242.46	(\$242.46)
		1/31/2012		Jose Decruyenaere (Time Exp 0112)	FW	0.00	0.00	6.00	80.82	484.92	(\$484.92)
		1/31/2012		Jose Decruyenaere (Time Exp 0112)	PR	0.00	0.00	24.00	80.82	1,939.68	(\$1,939.68)
		2/1/2012	eCAPS	Interest 0112		0.00	11.31	0.00	0.00	0.00	\$11.31
		2/29/2012		Christina Tran (Time Exp 0212)	PR	0.00	0.00	4.00	104.11	416.44	(\$416.44)
		2/29/2012		Christina Tran (Time Exp 0212)	PC	0.00	0.00	16.00	104.11	1,665.76	(\$1,665.76)
		2/29/2012		Jose Decruyenaere (Time Exp 0212)	PC	0.00	0.00	12.00	80.82	969.84	(\$969.84)
		3/1/2012	eCAPS	Interest 0212		0.00	6.78	0.00	0.00	0.00	\$6.78
		3/31/2012		Christina Tran (Time Exp 0312)	PR	0.00	0.00	46.50	104.11	4,841.12	(\$4,841.12)

Department of Regional Planning
Major Trust Accounts Detail Report for Disney/ABC Studios-S8W

Period Ending: March 31, 2012

Trust Fund	Project No	Fund Name	Date	Reference No	Description	Activity Code	Deposit and Beg. Bal.	Interest	Hour	Rate	Expense	Total
			3/31/2012		Christine Lee (Time Exp 0312)	PC	0.00	0.00	2.00	69.32	138.64	(\$138.64)
			3/31/2012		Christoph Morneau (Time Exp 0312)	PH	0.00	0.00	1.50	104.11	156.17	(\$156.17)
			3/31/2012		Jose Decruyenere (Time Exp 0312)	PR	0.00	0.00	5.00	80.82	404.10	(\$404.10)
						SubTotal:	50,000.00	327.78	484.25		52,702.85	(\$2,375.07)
						Grand Total:	50,000.00	327.78			52,702.85	(\$2,375.07)

Tasks for Activity Codes

Activity Code	Activity	Description
FW	Field Work	Only site visits
PC	Project Coordination	Inter-office; between agencies; preparation of cases; phone calls or meeting with applicant; SCM meeting; contact with BOS
PH	Public Hearing	Any preparation for hearing including library & hearing packages; GIZMO; mailing
PQ	Public Inquiries	Questions from the public about the case
PR	Project Review	Reviewing map; writing SCM report; SCM review

Sample Date	Perchlorate (ug/L)
1/24/2011	10
2/17/2011	8.6
3/24/2011	5.7
4/28/2011	12
5/26/2011	12
6/23/2011	13
7/28/2011	14
8/25/2011	14
9/29/2011	15
10/27/2011	15
11/28/2011	13
12/22/2011	14
1/26/2011	14
2/23/2012	15
3/29/2012	14

VOC monitoring was last performed on 12/22/2011 and all results were ND.

Pump and motor were pulled in April to complete work by Army Corps. As soon as the work is complete, pump and motor will be re-installed to allow for sampling.

ORGANIC CHEMICAL ANALYSIS (11/07)

L7-8
Cont.

Date of Report: 6/1/2012

Sample ID No.: 201205250133 - 397849

Laboratory Name: MWH Laboratories

Name of Sampler: _____

Employed by: _____

Date/Time Sample Collected: 5/22/2012 0908

Date/Time Received @Lab: 05/24/2012

Date Analyses Completed: 5/25/2012

System Name: VALENCIA WATER CO.

System Number: 1910240

Variable ID: _____

COC ID: Well 205

Name or Number of Sample Source: WELL 205

User ID: <u>4th</u>	Station number: <u>1910240-048</u>
Date/Time of Sample: <u>12 05 22 0908</u> YY MM DD TTTT	Laboratory Code: <u>9151910</u>
	Date Analyses completed: <u>12 05 25</u> YY MM DD
Submitted by: <u>James Saenz</u>	Phone# <u>661-295-6579</u>

TEST METHOD	CHEMICAL	ENTRY #	ANALYSES RESULTS	MCL ug/L	DLR ug/L
	ALL CHEMICALS EXCEPT 2,3,7,8 TCDD (DIOXIN) reported uG/L				

REGULATED ORGANIC CHEMICALS

524.2	Total Trihalomethane(TTHMs)	ug/L	82080	<0.500	80	
524.2	Bromodichloromethane	ug/L	32101	<1.0		1.0
524.2	Bromoform	ug/L	32104	<1.0		1.0
524.2	Chloroform(Trichloromethane)	ug/L	32106	<1.0		1.0
524.2	Dibromochloromethane	ug/L	32105	<1.0		1.0
524.2	Benzene	ug/L	34030	<0.5	1	0.5
524.2	Carbon Tetrachloride	ug/L	32102	<0.5	0.5	0.5
524.2	1,2-Dichlorobenzene (o-DCB)	ug/L	34536	<0.5	600	0.5
524.2	1,4-Dichlorobenzene (p-DCB)	ug/L	34571	<0.5	5	0.5
524.2	1,1-Dichloroethane (1,1-DCA)	ug/L	34496	<0.5	5	0.5
524.2	1,2-Dichloroethane (1,2-DCA)	ug/L	34531	<0.5	0.5	0.5
524.2	1,1-Dichloroethylene (1,1-DCE)	ug/L	34501	<0.5	6	0.5
524.2	cis-1,2-Dichloroethylene (c-1,2-DCE)	ug/L	77093	<0.5	6	0.5
524.2	trans-1,2-Dichloroethylene	ug/L	34546	<0.5	10	0.5
524.2	Dichloromethane(Methylene Chloride)	ug/L	34423	<0.5	5	0.5
524.2	1,2-Dichloropropane	ug/L	34541	<0.5	5	0.5
524.2	cis-1,3-Dichloropropene	ug/L	34704	<0.5	0.5	0.5
524.2	trans-1,3-Dichloropropene	ug/L	34699	<0.5	0.5	0.5
524.2	Total 1,3-Dichloropropene	ug/L	34561	<0.5	0.5	0.5
524.2	Ethyl Benzene	ug/L	34371	<0.5	300	0.5
524.2	Methyl Tert-Butyl Ether (MTBE)	ug/L	46491	<3.0	13	3.0
524.2	Monochlorobenzene (Chlorobenzene)	ug/L	34301	<0.5	70	0.5

TEST METHOD	CHEMICAL ALL CHEMICALS EXCEPT 2,3,7,8 TCDD (DIOXIN) reported ug/L	ENTRY #	ANALYSES RESULTS	MCL ug/L	DLR ug/L
524.2	Styrene	ug/L 77128	<0.5	100	0.5
524.2	1,1,2,2-Tetrachloroethane	ug/L 34516	<0.5	1	0.5
524.2	Tetrachloroethylene (PCE)	ug/L 34475	<0.5	5	0.5
524.2	Toluene	ug/L 34010	<0.5	150	0.5
524.2	1,2,4-Trichlorobenzene	ug/L 34551	<0.5	5	0.5
524.2	1,1,1-Trichloroethane(1,1,1-TCA)	ug/L 34506	<0.5	200	0.5
524.2	1,1,2-Trichloroethane(1,1,2-TCA)	ug/L 34511	<0.5	5	0.5
524.2	Trichloroethylene (TCE)	ug/L 39180	0.83	5	0.5
524.2	Trichlorofluoromethane (FREON 11)	ug/L 34488	<5	150	5
524.2	Trichlorotrifluoroethane(Freon113)	ug/L 81611	<10.0	1200	10.0
524.2	Vinyl Chloride (VC)	ug/L 39175	<0.5	0.5	0.5
524.2	m,p-Xylene	ug/L A-014	<0.5		0.5
524.2	o-Xylene	ug/L 77135	<0.5		0.5
524.2	Total Xylenes (m,p, & o)	ug/L 81551	<0.500	1750	

UNREGULATED ORGANIC CHEMICALS

524.2	Bromobenzene	ug/L 81555	<0.5		0.5
524.2	tert-Amyl-Methyl Ether (TAME)	ug/L A-034	<3.0		3.0
524.2	Bromochloromethane	ug/L A-012	<0.5		0.5
524.2	Bromomethane (Methyl Bromide)	ug/L 34413	<0.5		0.5
524.2	n-Butylbenzene	ug/L A-010	<0.5		0.5
524.2	tert-Butylbenzene	ug/L 77353	<0.5		0.5
524.2	Chloroethane	ug/L 34311	<0.5		0.5
524.2	Di-isopropyl Ether (DIPE)	ug/L A-036	<3.0		3.0
524.2	Chloromethane (Methyl Chloride)	ug/L 34418	<0.5		0.5
524.2	2-Chlorotoluene	ug/L A-008	<0.5		0.5
524.2	4-Chlorotoluene	ug/L A-009	<0.5		0.5
524.2	Dibromomethane	ug/L 77596	<0.5		0.5
524.2	m-Dichlorobenzene (1,3-DCB)	ug/L 34566	<0.5		0.5
524.2	1,3-Dichloropropane	ug/L 77173	<0.5		0.5
524.2	2,2-Dichloropropane	ug/L 77170	<0.5		0.5
524.2	1,1-Dichloropropene	ug/L 77168	<0.5		0.5
524.2	Dichlorodifluoromethane (Freon 12)	ug/L 34668	<0.5		0.5
524.2	Ethyl-tert-Butyl Ether (ETBE)	ug/L A-033	<3.0		3.0
524.2	Hexachlorobutadiene	ug/L 34391	<0.5		0.5
524.2	Isopropylbenzene (Cumene)	ug/L 77223	<0.5		0.5
524.2	p-Isopropyltoluene	ug/L A-011	<0.5		
524.2	sec-Butylbenzene	ug/L 77350	<0.5		0.5
524.2	Naphthalene	ug/L 34696	<0.5		0.5
524.2	n-Propylbenzene	ug/L 77224	<0.5		0.5
524.2	1,1,1,2-Tetrachloroethane	ug/L 77562	<0.5		0.5
524.2	1,2,3-Trichlorobenzene	ug/L 77613	<0.5		0.5
524.2	1,3,5-Trimethylbenzene	ug/L 77226	<0.5		0.5
524.2	1,2,4-Trimethylbenzene	ug/L 77222	<0.5		0.5

TEST METHOD	CHEMICAL ALL CHEMICALS EXCEPT 2,3,7,8 TCDD (DIOXIN) reported ug/L	ENTRY #	ANALYSES RESULTS	MCL ug/L	DLR ug/L
524.2	Methyl ethyl ketone (MEK, Butanone)	ug/L 81595	<5.0		5.0
524.2	Methyl isobutyl ketone (MIBK)	ug/L 81596	<5.0		5.0
524.2	Carbon Disulfide	ug/L 77041	<0.5		0.5

Comment Letter No. L7

David Lutness, Secretary of the Board
Santa Clarita Organization for Planning and the Environment
Post Office Box 1182
Santa Clarita, CA 91386

Comment No. L7-1

We continue to object to the substitution of a hearing officer for a full hearing before the Commission on this proposal, and request that the Commission hold a hearing. Since this is a “Special Project” funded by the developer (please see attached Supplemental Fee Agreement and charge sheet), [provided on page III-515 of this Final EIR] we believe it is especially important that the County ensure and promote public fairness.

While we appreciated the County’s effort to hold a hearing on a project that will substantially change the character of the east side canyons in Santa Clarita, we and the public need to speak directly to the decision maker, i.e. the Commissioners. Ex parte rules rightly discourage interaction with Commission members, so speaking to them during the hearing process is the only time that the public has the opportunity to air their concerns and have them addressed by the commissioners.

Not following the long time procedure of a public hearing before the Commission on the DEIR, while it might expedite the process to benefit the developer as specified in the time schedule attached to the “Supplement Agreement”, [sic] precludes the public from suggesting changes to the Commission that might improve the project, and the Commission from hearing and acting on those changes in a timely manner.

Response No. L7-1

Refer to Response No. 15-3 regarding the public hearing process for the Project. As indicated therein, the holding of a public hearing by the County Hearing Examiner at a location in proximity to a proposed project site – which occurred on June 4, 2012, within the Project area – is a recently enacted procedure for development projects within the County that is intended to provide increased opportunities for public input, particularly for those members of the public who live or work in proximity to the project or are otherwise considered stakeholders in the project area. The Disney | ABC Studios at The Ranch Project is not the first project for which this procedure has been followed. In accordance with County procedures, following publication of this Final EIR but prior to the requested approval of the Project, additional public hearings will be held by the County Planning Commission and the County Board of Supervisors at which the public will have further

opportunities to provide testimony. Thus, as requested in this comment, the public will have an opportunity to voice any concerns or otherwise provide comments to the Planning Commission prior to any action being taken regarding the Project.

With respect to the referenced attachment, the Supplemental Fee Agreement and associated documents, the comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L7-2

Further, while the Supplement Agreement makes specific reference to “processing and/or implementation (if approved)”¹, [sic] the attached time schedule ending with the 30 day challenge period after Board approval, implicitly suggests that the Board will approve the project. Such implicit approval undermines the CEQA process and the County approval process.

¹ Page one of the Supplemental Agreement, attached

Response No. L7-2

Appendix A of the referenced attachment, Supplemental Fee Agreement (see page III-524 of this Final EIR), provides a preliminary schedule for the entirety of the Project’s environmental review process. Approval of the Project by the County Board of Supervisors is neither inferred nor specifically indicated. Rather, the projected timeline for the environmental review process includes those actions or tasks that would occur following Board approval should the Project be approved. This preliminary schedule has been used for internal planning purposes by the Department of Regional Planning staff and has no bearing on the Board of Supervisors’ ultimate decision regarding the Project.

Comment No. L7-3

Project Description – The project description is vague. Instead of proposing one project, it seems to propose two, one a sound-stage complex, the other an office complex. That may become the project if Disney changes its mind at a later date. Which is it? CEQA requires a detailed project description so that the public may know what to expect if the project is approved and may suggest changes for improvement. Not knowing what is really proposed makes analysis of the proposal difficult or impossible.

Response No. L7-3

The Draft EIR provides an accurate and detailed Project Description of the Project, which includes an option to develop the northern portion of the Development Area with

studio office uses instead of four soundstages, two production offices, and two mills. It is not uncommon for projects to include options or alternatives so as to provide development flexibility and respond to market demands, particularly in light of evolving economic conditions. The Project's development option, referred to as the Studio Office Option, is initially discussed on page IV-10 in Section IV, Project Description, of the Draft EIR, described in more detail on pages IV-13 and IV-15, depicted in Figure IV-7 on page IV-16, and summarized in terms of floor area in Table IV-2 on page IV-17. In addition, the Studio Office Option is evaluated throughout the Draft EIR where appropriate so as to provide a conservative analysis (i.e., whenever impacts associated with the Studio Office Option would be greater than those of the proposed Soundstage Option, the former is evaluated). This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L7-4

Oak Tree Removals and Mitigation

We ask that Disney provide an alternative to oak removals, especially for heritage oak removals and those that will be removed for the catchment basin that we understand to be located off the Disney property.

We continue to express the need for an biological evaluation guarantees sufficient and biologically adequate soil and location for any proposed mitigation plantings. This information is not available [sic]

Response No. L7-4

An analysis of various alternatives to the Project is provided in Section VI, Project Alternatives, of the Draft EIR. As described beginning on page VI-64 therein, the Alternative Design with Reduced Program Alternative, Alternative 4, was developed to reduce the number of oak trees removed within the Development Area. As discussed on page VI-71, impacts to both regulated oak trees and associated oak woodland would be less under Alternative 4 in comparison with the Project. Like the Project, Alternative 4 would be required to mitigate any tree or woodland losses, and an oak tree planting program would be implemented as part of an OTWMMP. Impacts to oak trees and oak woodland would be less than significant and less as compared to the Project.

As a matter of clarification, the Project does not involve the construction of any off-site "catchment basin" or debris basin. A portion of the eastern debris basin proposed north of Placerita Canyon Road, which lies within LADWP's transmission corridor, is included within the 58-acre Development Area analyzed in the Draft EIR. Impacts on oaks within this portion of the eastern debris basin are analyzed in Section V.F, Biological

Resources, and the associated County Oak Tree Report provided in Appendix F.4 of the Draft EIR.

Refer to Response No. 15-6 regarding the suitability of soils in the potential oak woodland expansion and restoration areas.

Comment No. L7-5

Water Supply and the Further Spread of the Whittiker Bermite Pollution Plume

The Water Supply Assessment provided by Newhall County Water District fails to provide a detailed analysis of whether the wells in the area can supply this project or what other source of water will be used. Instead it describes supplies available to all water agencies for the whole valley.

There is no discussion as to how the water line will traverse the highway 14 freeway.

The DEIR does not include an analysis of whether this project would draw down individual water well levels in the Placerita Canyon area, a rural community where many use their own wells to serve their homes or horses. Nor is there a discussion of whether it would impact surface flows.

It also appears that the chart from NCWD's Water Supply Assessment on Page V.L.1-18 fails to reduce water supply calculations to meet the mandated 20% water demand reductions by 2020. Water demand must be re-calculated to clearly include these mandated reductions.

Disney is already using water for the filming ranch irrigation in this area, but fails to disclose the amount. It also apparently provides water for the 500,000-gallon water tank for County fire purposes. (pg. V-L.1-17). The amount of this pumping should be disclosed in the DEIR.

Response No. L7-5

The Water Supply Assessment (WSA) prepared by NCWD, provided in Appendix K.1 of the Draft EIR, was prepared in compliance with Senate Bill (SB) 610 and demonstrates NCWD can supply the Project while still serving its existing customers. The information supplied therein is supplemented by the information provided in Section V.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR. As discussed, water supplies for the NCWD service area are derived from several sources, including imported water, additional reliability supplies, and groundwater from the Alluvial Aquifer and the Saugus Formation. Neither the private well within Golden Oak Ranch nor those on other properties in the surrounding area would be used to supply the Project (existing

development to remain on the Ranch outside of the Development Area would continue to use the existing well system, as under current conditions). Furthermore, the WSA concludes on page 31 that “NCWD's total projected water supplies available during the ensuing twenty years will meet the projected water demands associated with the Proposed Project, Disney/ABC Studios at The Ranch and existing and other planned uses within NCWD's service area.”

With respect to Table V.L.1-7 on page V.L.1-18 in Section V.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, which is based on Table 4-4 on page 22 of the WSA, the latter indicates the data is from NCWD's 2005 UWMP, a formally adopted document. As stated on page V.L.1-15 of the Draft EIR, the demand figures in the WSA were not adjusted to reflect the water demand reduction requirements of SBX7-7 (i.e., a 20 percent reduction by 2020), so the WSA provides a conservative view of future demand.

With respect to the comment regarding how the water line will traverse SR-14, the line would be installed underground within existing Caltrans right-of-way in Placerita Canyon Road beneath the freeway overpass, similar to installation of the remainder of the off-site water line alignment, described (among other places in the Draft EIR) on page IV-36 in Section IV, Project Description. Additional details regarding construction of the off-site water line are provided on pages IV-45 and IV-51 of the Draft EIR.

As discussed on page V.L.1-17 in Section V.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, an existing private well is located on the Ranch and used to supply existing buildings on the Ranch with domestic water and irrigation. The approximate amount of well water used each year is reported to the State Water Resources Control Board. In addition, a 500,000-gallon water tank is located on the eastern side of the Ranch for use by the County Fire Department for emergency firefighting purposes. The use of this water is an existing condition which will not be affected by new development in the Development Area. As discussed on page V.L.1-22 in Section V.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, the Development Area will be served by Newhall County Water District through a new water supply system to be constructed as part of the Project. The impacts of construction and operation of this water system are analyzed throughout the relevant sections of the Draft EIR. With respect to any resulting impacts on the water levels of existing wells in the area, NCWD has addressed impacts associated with the operation of its extraction wells as part of its UWMP.

Surface flows relate to hydrology and are evaluated in Section V.B, Flood Hazards, of the Draft EIR.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L7-6

In April of 2012, yet another Valencia Water Well (well 205)² was closed down due to the presence of Volatile Organic Compounds (VOCs), seeming to indicate the further westerly spread of the Whittiker Bermite pollution plume. Levels of Ammonium perchlorate in Valencia Water Well 201 continue to test above health standards and this well also remains closed [sic] This information was not publicly disclosed until recently although it was known to the Water Agency several months ago. It was not included in the Water Supply Assessment for this project, nor was an analysis made of how this might affect the regional water supply.

While the project before you will not be supplied by Valencia Water Co., the apparent spread of the pollution plume further into the Saugus Aquifer, one of the major water supplies for the entire Santa Clarita Valley, will affect all the water companies' ability to supply their customers. Therefore, the Water Supply Assessment for this project must be re-evaluated.

² *Dept of Health Services correspondence attached*

Response No. L7-6

Refer to Response No. 15-7.

Comment No. L7-7**Solid Waste**

As a partner in the fight to save Elsmere Canyon from becoming a landfill because it is a backdrop for their movie ranch, Disney should now walk the walk and do a better job of solid waste recycling. Instead, they will now base their waste calculations on being able to send their trash to another community's canyons (Chiquita Canyon or Antelope Valley) after a future expansion approval for those facilities. (DEIR p. V.L.3-5 and 18)

Disney finds their project will cause less than significant impacts to solid waste even though there is currently a short fall of County landfill space because they will only contribute a small additional amount to the waste stream (V.L-3-23). As Disney and the County is fully aware, only adding a little bit more when there is already not enough capacity still constitutes a significant impact. The DEIR must be changed to reflect this fact.

This [sic] Disney's impacts are significant, they must make all feasible attempts to reduce their solid waste for construction and operation of the facility. They have not described any mitigation measures other than meeting AB939 50% diversion levels and County required 75% diversion for construction waste. The EIR should list specific actions which it will take

to reduce waste so that commentors can ensure that all mitigation has been incorporated in the conditions to reduce this significant impact.

Response No. L7-7

The Project Applicant has committed to a 75 percent diversion rate for construction-related solid waste (in excess of the 65 percent recycling rate required by the County Code) and a 50 percent diversion rate for operational waste, as ensured via implementation of PDF L.3-1 and PDF L.3-2 listed on page V.L.3-23 in Section V.L.3, Utilities and Service Systems—Solid Waste, of the Draft EIR. The waste generation estimates provided in the Draft EIR are considered conservative in that these diversion rates were not accounted for in the impact analysis. In any event, implementation of the diversion programs, along with the other Project Design Features specified in the Draft EIR, would be ensured via compliance with the MMRP provided in Section V, Mitigation Monitoring and Reporting Program, of this Final EIR.

As stated on page V.L.3-5 in Section V.L.3, Utilities and Service Systems—Solid Waste, the Santa Clarita Valley is served primarily by the Chiquita Canyon, Antelope Valley, and Sunshine Canyon Landfills. Further, as indicated on page V.L.3-2 and discussed further throughout the analysis, the Los Angeles County Integrated Waste Management Plan (CoIWMP) 2009 Annual Report anticipates future disposal needs can be adequately met through the next 15 years (i.e., 2023) through a variety of scenarios. In accordance with the significance thresholds based in part on Appendix G of the State CEQA Guidelines, the Project would result in a less than significant impact with respect to solid waste. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. L7-8

Biological Resources

We will be providing additional comments on this section in the future.

Attachments

1. Supplemental Fee Agreement
2. Developer charges for county review services
3. Emails from the Dept. of Health Services regarding Valencia Well 201 and 205

Response No. L7-8

To date, no additional comments regarding biological resources have been received from the commentor.

The referenced attachments, provided on pages III-515, III-528, and III-536 of this Final EIR, are noted for the record and will be forwarded to the decision-makers for review and consideration.

IV. Responses to Oral Testimony



IV. RESPONSES TO ORAL TESTIMONY

A. INTRODUCTION

A public hearing was held by the County of Los Angeles Hearing Examiner on June 4, 2012, at Hart Hall within William S. Hart Museum and Park, located at 24151 Newhall Avenue, Newhall, California 91321. Notice of the hearing was provided through a variety of means pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, including: (1) signs posted at multiple locations along Placerita Canyon Road near the Ranch; (2) electronic posting on the County Department of Regional Planning website; (3) newspaper notices published in The Signal and La Opinion on May 3, 2012; and (4) notifications sent via mail and email to: (a) all persons, organizations, and agencies who requested notification or who previously commented on the Project; (b) identified stakeholders in the surrounding area such as homeowners groups, business associations, and local environmental organizations; (c) property owners located within a 1,000-foot radius of the Ranch; and (d) two local libraries. The hearing was held on Day 31 of the formal 45-day public comment period that began on May 4, 2012, and ended on June 18, 2012. The holding of a public hearing by the County Hearing Examiner at a location in proximity to a proposed project site is a recently enacted procedure for development projects within the County that is intended to provide increased opportunities for public input, particularly for those members of the public who live or work in proximity to the project or are otherwise considered stakeholders in the project area.

At the Hearing Examiner public hearing, the general public was invited to provide oral comments regarding the Draft EIR and the proposed Project, the transcript of which is included and responded to in this section. A total of 20 members of the public provided oral testimony, as summarized in Table IV-1 on page IV-2. The environmental issues addressed by each individual, generally corresponding to the sections of the Draft EIR, are also indicated within Table IV-1. As the comments presented herein were taken from oral testimony and provided by a court reporter, grammatical and other errors have not been denoted.

IV. RESPONSES TO ORAL TESTIMONY

B. RESPONSES TO COMMENTS RECEIVED DURING THE HEARING EXAMINER HEARING ON JUNE 4, 2012

1. COMMENTS FROM PUBLIC SPEAKERS

Table IV-1
Comment Matrix—Public Testimony

TRANSCRIPT No.	SUMMARY OF WRITTEN COMMENTS FROM PUBLIC SPEAKERS	GENERAL SUPPORT	I. INTRODUCTION	II. EXECUTIVE SUMMARY	III. ENVIRONMENTAL SETTING	IV. PROJECT DESCRIPTION	V.A. GEOTECHNICAL HAZARDS	V.B. FLOOD HAZARDS	V.C. NOISE	V.D. WATER QUALITY	V.E.1 AIR RESOURCES—AIR QUALITY	V.E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE	V.F. BIOLOGICAL RESOURCES	V.G. CULTURAL AND PALEONTOLOGICAL RESOURCES	V.H. AGRICULTURAL AND FORESTRY RESOURCES	V.I. VISUAL QUALITIES	V.J. TRAFFIC, ACCESS, AND PARKING	V.K.1 PUBLIC SERVICES—LAW ENFORCEMENT	V.K.2 PUBLIC SERVICES—FIRE PROTECTION	V.L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY	V.L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL	V.L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE	V.L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY	V.M. ENVIRONMENTAL SAFETY/FIRE HAZARDS	V.N. LAND USE	VI. PROJECT ALTERNATIVES	VII. OTHER ENVIRONMENTAL CONSIDERATIONS	OTHER
T1	Bob Kellar	X																										X
	Sandra Cattell																			X					X			
	Terri Crain	X																										X
	Calvin Hedman	X																										X
	Jim Coffey	X																										X
	Joe Shelton	X				X																						X
	Jonas Peterson	X																										X
	Alan Cameron										X	X																X
	Hunt Braly	X																										X
	Jim Harris	X											X															X
	Ron Kraus																											X
	Tim Crissman	X																										X
	Bruce Aronson																X											
	Lea Tantoy	X																										X
	Diane Trautman												X				X											X
	Jon Collard	X																										X
	Michele Jenkins	X											X															X
	Lynne Plambeck														X	X												X
	Ben Curtis	X																										X
	Gregory Jenkins	X																										X

HEARING EXAMINER HEARING
DISNEY/ABC STUDIOS AT THE RANCH

MEETING PLACE: WILLIAM S. HART MUSEUM AND PARK

HART HALL

24151 NEWHALL AVENUE

NEWHALL, CA 91321

TRANSCRIPT OF PROCEEDINGS

NEWHALL, CALIFORNIA

MONDAY, JUNE 4, 2012

REPORTED BY:
DANA D. FORBES, CSR NO. 8095

DANA D. FORBES
COURT REPORTING
25766 ALTA DRIVE
VALENCIA, CA 91355
(661) 904-5117

1 Transcript of Proceedings, taken at 24151 Newhall
2 Avenue, Newhall, California, commencing at 6:45 p.m. on
3 Monday, June 4, 2012, heard before Paul McCarthy,
4 Hearing Examiner, reported by DANA D. FORBES, CSR No.
5 8095.

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1 APPEARANCES:

2

3 Hearing Examiner Paul McCarthy

4 STAFF Sam Dea
 Rosie O'Ruiz

5

6 DEPARTMENT OF REGIONAL Kim Szalay
7 PLANNING, SPECIAL
8 PROJECTS SECTION

7

8 WALT DISNEY COMPANY Adam Gilbert

8

9 PUBLIC SPEAKERS:

PAGE

10 Bob Kellar 26

11 Sandra Cattell 28

12 Terri Crain 29

13 Calvin Hedman 31

14 Jim Coffey 32

15 Joe Shelton 34

16 Jonas Peterson 35

17 Alan Cameron 37

18 Hunt Braly 39

19 Jim Harris 42

20 Ron Kraus 42

21 Tim Crissman 44

22 Bruce Aronson 46

23 Lea Tantoy 48

24 Diane Trautman 49

25 Jon Collard 49

1	<u>PUBLIC SPEAKERS (continued):</u>	PAGE
2	Michele Jenkins	52
3	Lynne Plambeck	54
4	Ben Curtis	57
5	Gregory Jenkins	58
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1 the proposed C-M-DP, A-2-1 and A-2-2 (Heavy
2 Agricultural-Two Acres Minimum Lot Area) zones.

3 e. Oak Tree Permit No. 200900041
4 To authorize removal of 158 oak trees (including
5 16 heritage trees) in the A-2-1 zone and
6 encroachment into the protected zone of 82 oak
7 trees (including 3 heritage trees) in the A-2-1
8 and A-2-2 zones.

9 f. Parking Permit No. 201000002
10 To authorize tandem parking, reciprocal parking
11 within the 44 acres associated with VTTM No.
12 071216, off-site parking, and surplus parking
13 area without paving and striping in the A-2-1
14 and A-2-2 zones.

15 g. Environmental Assessment No. 200900112
16 The Initial Study determined that an EIR was
17 required. A Draft Environmental Impact Report
18 has been prepared pursuant to CEQA reporting
19 requirements.

20 PART III - PUBLIC COMMENT:

21 3. Public comment pursuant to Section 54954.3 of the
22 Government Code
23
24
25

1 NEWHALL, CALIFORNIA, MONDAY, JUNE 4, 2012

2 6:45 P.M. - 7:27 P.M.

3 ----000----

4
5 MR. MCCARTHY: Okay. If we can have your
6 attention, we're going to start the meeting. I know we
7 have some more people coming in. I see more cars in the
8 parking lot. We'll try to get some of the introductory
9 material out of the way here before we start with the
10 testimony.

11 My name is Paul McCarthy, and I'm the Hearing
12 Examiner for the Los Angeles County Department of
13 Regional Planning. And, of course, I think as most of
14 you know, the purpose of tonight's public hearing is to
15 review the Disney ABC Studios at the Ranch project.

16 And we have an Environmental Impact Report which
17 has been prepared, and you will be allowed -- we have
18 two purposes for the meeting tonight. And one purpose,
19 of course, is to allow the members of the community to
20 give oral testimony on the Draft EIR.

21 Now, the full terminology is Draft Environmental
22 Impact Report. In order for us to get home before
23 sunrise, if you want to just say EIR, that's fine.
24 We'll know you mean the Draft Environmental Impact
25 Report.

1 And we will be giving you a staff presentation and
2 a presentation from the applicants. I believe they have
3 a Power Point to give folks, who may not be totally
4 familiar with what is actually being proposed, a
5 background on that; so a staff presentation from county
6 staff and from the applicant staff.

7 And at that point we will get into the
8 presentations from yourselves. We'll get into more
9 detail on that in just a second.

10 First of all, let's start the meeting with the
11 Pledge of Allegiance if we can stand and face the flag.

12 (Pledge of Allegiance.)

13 MR. MCCARTHY: Now, all of you who do wish to
14 testify -- and I hope you know, if you wish to testify,
15 you have to sign one of the sign in sheets that's with
16 Sam. You have to fill that in, and then we'll call your
17 name. If you haven't filled that in, we won't know that
18 you want to testify. So please fill that in if you wish
19 to speak.

20 what we would normally do is call a number of names
21 and then you can line up here by the mike so that, as
22 one person completes his or her remarks, the following
23 person is there. We don't have to lose a lot of time
24 waiting for other people to come from the back of the
25 room. So if we call three or four names, please all

1 come up and stand in line in the order in which you were
2 called or your name was called.

3 We will have a time limit. There will be three
4 minutes per speaker. And unless I interrupt you for
5 some reason, that would not be counted against your
6 time.

7 Normally, if I interrupt, it's strictly for the
8 purposes of asking for point of clarification. If
9 you've made a comment and I don't understand the remark,
10 I may ask you to clarify it. But we're here to listen
11 to you and do as little interrupting as possible.

12 Now, when you do speak, what you want to remember
13 is -- and this is very important -- we want you to give
14 your name before you do anything else. Give your name,
15 and then spell it out alphabetically because this is
16 being tape recorded and there is going to be a
17 transcript made. So the transcript wants to depict
18 exactly who it is who said what.

19 And if we have people with similar sounding names,
20 we could get the testimony of party A confused with the
21 testimony of party B in the official record; so be sure
22 to spell your name clearly before you start to speak.

23 Again, this testimony will be produced as a
24 transcript just as you would in a court document, and
25 that becomes a part of the Final EIR. So remember a

1 moment ago we mentioned the Draft EIR. That's what we
2 have here tonight, the Draft EIR.

3 The Final EIR will incorporate all of the comments
4 that you make here today and written comments that may
5 be sent in, and there will be responses to those
6 comments. So if you make a comment tonight and you ask
7 a question, there will be a response to that comment
8 within the Final EIR.

9 Now, the final day for written testimony, supposing
10 someone here says something that jogs something in your
11 mind and you say, "Gee, I wish I'd commented on that,"
12 don't worry. You're still free, even if you testify
13 here tonight, you're still free to go home, prepare a
14 letter and send it on in. And as long as it's
15 postmarked by June 18, June 18, it will be in the Final
16 EIR and it will receive a comment.

17 Then there will be a public hearing downtown in
18 downtown Los Angeles conducted by the full Planning
19 Commission. They will be given the Final EIR sometime
20 in advance of the public hearing. The public hearing
21 will be advertised and be given new notice.

22 And with regard to the public hearings downtown,
23 remember they are broadcast live on our website, the
24 department's website, and you can look at them live.
25 You can go back later that evening or on the weekend and

1 see a replay of it on your computer.

2 So we're going to now start with the swearing in of
3 the testifiers. Will everyone who is thinking of
4 testifying, you've filled out the card and you want to
5 testify or even if you're thinking you might want to,
6 please stand up to raise your right hand and be sworn
7 in.

8 MR. DEA: Do each of you swear or affirm under the
9 penalty of perjury that the testimony you may give in
10 the matters now pending before the Hearing Examiner
11 shall be the truth, the whole truth, and nothing but the
12 truth?

13 (In unison, all say yes.)

14 MR. DEA: Thank you. Please be seated.

15 MR. MCCARTHY: Now we'll start with our staff
16 presentation by Mr. Kim Szalay from the Department of
17 Regional Planning, Special Projects Section.

18 MR. SZALAY: Good evening. The Department of
19 Regional Planning has -- let me start over here. Is
20 this -- there we go. Okay. All right.

21 I'll be presenting tonight about an overview of the
22 Disney ABC Studios at the Ranch project as it's analyzed
23 in the Draft EIR. And I do need to list the numbers off
24 for the oral audio recording. The project number is
25 TR071216 located in the Fifth Supervisorial District.

1 Entitlements requested are Plan Amendment No. 200900010,
2 Zone Change No. 200900012, Vesting Tentative Tract Map
3 No. 071216, and Conditional Use Permit No. 200900126,
4 Oak Tree Permit No. 200900041, Parking Permit No.
5 201000002, and Environmental Review No. 200900112.

6 The project is surrounded by the City of Santa
7 Clarita. To the north and the west is Whitney Canyon
8 Park. To the south is Angeles National Forest, and
9 Placerita Canyon State and County Park to the east.

10 The existing on-site land use designations are
11 Hillside Management, Floodplain and Floodway and Open
12 Space National Forest. The plan amendment for
13 commercial land use designation is requested at the
14 western most 44 acres adjacent to State Route 14 where
15 the big C is.

16 The entire site is zoned heavy agricultural, and a
17 zone change for Commercial Manufacturing Development
18 Program -- that's CMDP -- is requested for the same
19 western most 44 acres adjacent to State Route 14.

20 The existing Golden Oak Ranch is comprised of four
21 main areas of use. As you can see in the blue area
22 there, that's the 195-acre filming ranch area, and
23 that's surrounded by the filming backdrop area.
24 Outlined in small red near the freeway are existing dirt
25 pads that are left over from Caltrans freeway

1 construction currently used for overflow parking. In
2 yellow are the Los Angeles Department of Water & Power
3 transmission line corridors.

4 The Golden Oak Ranch Properties is requesting a
5 conditional use permit for the construction, operation,
6 and maintenance of the ABC Studios at the Ranch project
7 which proposes to develop property within an
8 approximately 58-acre development area, and that's the
9 area that you see -- I'll show a more detailed picture
10 in a minute. But over by the freeway there you'll see
11 the development area. And they'll continue existing
12 filming ranch uses within the larger 890-acre property
13 that you can see outlined there.

14 And the overall site plan includes new uses
15 proposed on site as follows: The development area for
16 indoor sound stages is the main area with related
17 support facilities that include parking and other
18 support facilities.

19 The water tank area will be south. There's a trail
20 area. There's a caretaker mobile home relocation area
21 for the foreman's mobile home, conditional parking areas
22 for overflow parking and existing filming ranch.

23 An oak tree permit for the removal of 158 trees and
24 encroachment into the protected zone of 82 trees to
25 facilitate flood control basins and the clustering of

1 new development at the westernmost edge of the site and
2 a parking permit for tandem parking and use of off-site
3 parking and use of conditional parking lots for overflow
4 parking are also requested. So that summarizes the core
5 parts of the project.

6 The top part of the development area there is where
7 the vesting -- and actually there are two parts there
8 that you can see on each side of the creek. That's
9 where the tract map is proposed, and it includes a
10 soundstages option, which is the option you see right
11 now, proposing 12 sound stages plus the supporting
12 production offices, mill, warehouse, utilities, and
13 commissary facilities for a total of 551,000 square feet
14 of new development.

15 And then alternatively you'll see that a top half
16 is a single building now, and that's a studio office
17 option which includes eight soundstages and other
18 supporting facilities plus a major studio office
19 building instead of four soundstages and other
20 supporting facilities.

21 The on site trail is a little bit hard to see
22 there, but it's just above that dashed trail. And
23 that's existing trail is the dashed trail. The new
24 trail would connect to that.

25 Construction of the off-site sewer connections are

1 in the community west of the ranch and west of the
2 freeway, which could create some minor short-term
3 impacts to the local neighborhood streets during that
4 construction period.

5 And then the two million gallon water tank is
6 proposed on-site to serve the project and future
7 community water supply. Two optional routes are
8 proposed for connecting the tank to the city water
9 supply infrastructure. There's A up above and then B
10 below, and they are just two different routes for
11 routing that water project.

12 And then these are views that show the existing
13 site looking toward the ranch from opposite directions,
14 one from the south, one from the north as indicated and
15 then this is a view from the northbound freeway off-ramp
16 at Placerita Canyon Road showing the existing site and a
17 rendering of the proposed development. You get a sense
18 of how that would look.

19 The view is from above the ranch on the northbound
20 freeway itself in this shot; so it's a little different
21 angle showing the existing site and rendering and
22 proposed development.

23 The Department of Regional Planning has determined
24 that the Environmental Impact Report was necessary for
25 the project, and the next three slides are going to show

1 19 areas that were analyzed by the Draft EIR. I'll just
2 click through these quickly. You can see what they are.

3 Of all the areas analyzed, only noise had an
4 operational impact due to cumulative increased traffic
5 volumes, and air quality and traffic had significant
6 unavoidable impacts only during construction.

7 The traffic construction impact is only if project
8 construction is concurrent with one other related
9 project. Otherwise, there was no traffic impact in that
10 regard during construction. A statement of overriding
11 considerations would be requested by the applicant for
12 all of these remaining impacts.

13 All other areas were determined to have less than
14 significant impacts from the project when approximately
15 111 required mitigation measures and project design
16 features would be implemented and monitored by the
17 county's mitigation, monitoring, and reporting program.

18 The environmental initial study considered that
19 these areas do not require further analysis, these four
20 areas: mineral, education, population, and parks.

21 And the community does need to be aware that there
22 is an ongoing history of the site. A conditional permit
23 was authorized in 1979 for filming ranch uses, and the
24 conditional use permit was reauthorized in 2007. And
25 the applicant applied for the current entitlements in

1 2009, and this year public hearings have begun.

2 I'd like to conclude by summing up the planning
3 processes that remain for the final action to take place
4 on the project. In addition, the letters received to
5 date along with today's oral testimony, further public
6 and other agency comments on the Draft EIR will be
7 received through June 18, 2012, when the Draft EIR
8 public comment period closes.

9 A Final EIR and responses to public agency comments
10 will be prepared for the Planning Commission's
11 consideration. Additional written comments on the
12 entitlement request will be received up to the time of
13 the Regional Planning Commission hearing to be set at a
14 future date. That's separate testimony on the project,
15 not on the Draft EIR.

16 Additional oral testimony on the permits may be
17 given at the Commission's hearing, and the Hearing
18 Examiner would make a recommendation to the Commission
19 for consideration and the Commission would make a
20 recommendation to the Board of Supervisors pertaining to
21 final action on the EIR and project entitlements by the
22 Board. And that completes my presentation, and the
23 applicant will have a short presentation as well.

24 MR. MCCARTHY: The applicant's representative can
25 come forward and give us your name and address and,

1 again, spell your name.

2 ADAM GILBERT: Good evening. My name is Adam
3 Gilbert, spelled A-d-a-m G-i-l-b-e-r-t, and I'm with
4 Walt Disney Company, which is at 500 South Buena Vista
5 Street in Burbank, California.

6 Thank you very much for coming out tonight. We
7 appreciate your time. And thanks for coming out in the
8 interest of the project. Hearing Examiner McCarthy,
9 regional planning staff, and members of the public, my
10 name is Adam Gilbert, and I'm a director of the Walt
11 Disney Company and project manager for the Disney ABC
12 Studios at the Ranch project.

13 I appreciate the opportunity to add further detail
14 to the project as provided by Mr. Szalay. Hopefully we
15 won't be too repetitive. My apologies if I am.

16 The Walt Disney Productions first leased portions
17 of the Golden Oak Ranch in 1955 for Adventures of Spin
18 and Marty segments of the Mickey Mouse Club. Because of
19 its varied settings and filming opportunities, Disney
20 bought a portion of the ranch in 1959. Over the years
21 Disney added to the property, eventually bringing the
22 total acreage to 890 acres.

23 Today the Golden Oak Ranch sees over 300 days of
24 filming activity a year. The ranch also grows
25 vegetables served in our Disney studio commissaries and

1 has hay that is shipped to the stables at Disneyland.

2 The entertainment industry is a major \$40 billion
3 economic engine to the State of California and plays a
4 critical role in the economic vitality of Los Angeles
5 County.

6 Santa Clarita has been an important filming
7 destination in the county for generations. Because of
8 the efforts of many, the Santa Clarita Valley has become
9 one of the most important destinations in the 30-mile
10 zone better known as the TMZ.

11 With most studios now working at capacity, Disney
12 and ABC saw an opportunity to invest in this unique
13 property in a thoughtful way that will strengthen the
14 local filming community.

15 Today the ranch offers rustic settings, outdoor
16 sets, sweeping vistas, and the ability to build large
17 scale sets within the TMZ.

18 Disney ABC Studios at the Ranch brings together on
19 one property the advantages of outdoor filming ranch and
20 the control and efficiencies of state-of-the-art
21 soundstages while protecting the natural backdrop in the
22 surrounding hills.

23 The project's 58-acre development area is bordered
24 by State Route 14 to the west, Placerita Canyon Road to
25 the south, and the City of Santa Clarita to the north,

1 and the remainder of the 890-acre to the north and east.
2 The ranch consists of a 639-acre natural backdrop area
3 highlighted here in green. Hopefully everyone here can
4 see that area in green. That allows film crews to get
5 unhindered world shots.

6 For decades the Walt Disney Company's protected the
7 surrounding hillsides from development. The project
8 will continue to protect 637 acres of these hillsides.
9 The 225-acre outdoor movie ranch highlighted in blue is
10 where most of the filming at the ranch takes place while
11 a wide variety of locations at the ranch take advantage
12 of the natural settings including the ranch's oak
13 woodlands, manmade water features, agricultural
14 features, and outdoor sets. Here are some of the images
15 of outdoor sets. You can't quite read Outdoor Movie
16 Ranch on the top. The project will retain 195 acres of
17 the outdoor movie ranch.

18 For more than 50 years the Walt Disney Company has
19 been committed to maintaining the balance between
20 community, filming operations, and the environment at
21 the Golden Oak Ranch. We used the same balanced
22 approach to select the site for the Disney ABC Studios
23 at the Ranch project.

24 During the selection process we balanced a variety
25 of important environmental and business factors

1 including traffic, flood plains, creeks, agricultural
2 resources, views, oak trees, and maintain the attributes
3 of the ranch that make it an important outdoor
4 production location such as unobstructed long views.
5 That is not our best long view we have.

6 In the end we selected what we believe is our best
7 site. This is a video of a 360 degree view of the site.
8 That represents seven percent of the overall ranch and
9 focuses the development on the westernmost portion of
10 the ranch next to State Route 14.

11 A substantial portion of the project will be built
12 on two large mostly barren fill pads that you see dumped
13 on each side of Placerita Creek by Caltrans in the early
14 1970's during the construction of State Route 14.

15 Overall the site enables us to maintain the
16 integrity of the ranch and limit impacts on the
17 important environmental features of the ranch including
18 the oaks, creeks, and canyon vistas.

19 Disney ABC Studios at the Ranch will have six pairs
20 of soundstages -- this is the same image that Mr. Szalay
21 showed earlier -- highlighted and identified in blue,
22 production offices with each soundstage identified in
23 light blue, talent bungalows shown in purple, production
24 shops and storage shown in green, and administrative
25 offices and commissary shown in the dark red and a

1 central plant and power facility shown in orange.

2 Again, here's a current view of the project site
3 from State Route 14 -- and, again, we apologize for the
4 repetition here -- from northbound off-ramp to Placerita
5 Canyon Road, and this is the rendering of the same area
6 after construction of the project.

7 The project will transform a largely barren site
8 using world class design including extensive landscaping
9 that will respect and enhance Placerita Creek -- that's
10 the current -- and maintain the grand views of Placerita
11 Canyon.

12 The project will create an efficient indoor studio
13 that will allow indoor filming and close proximity to
14 the valley outdoor filming portions of the ranch.

15 As Mr. Szalay discussed, the Draft Environmental
16 Impact Report is now available for public review. We
17 appreciate the hard work by the County of Los Angeles,
18 the top experts in the field of traffic, geotechnical
19 engineering, water quality, biological resources who
20 have helped study the issues and prepare the Draft EIR.

21 The Draft EIR studied 14 sections, as Mr. Szalay
22 identified, in different study areas and identified only
23 the following significant impacts after mitigation.
24 One, the project and cumulative construction noise
25 impacts cumulative and cumulative operational traffic

1 noise; two, project and cumulative construction air
2 impacts; and, third, a cumulative impact during
3 construction to the extent the project haul trips
4 coincide with the haul trips from the proposed Kellstrom
5 project.

6 A number of measures will be implemented to ensure
7 that these short-term impacts are minimized such as
8 noise shielding and muffling devices on construction
9 equipment.

10 We appreciate that the Golden Oak Ranch is a unique
11 property with important features that we want to ensure
12 remain for many generations. The project will implement
13 restoration and expansion, projects for Placerita Creek,
14 and the ranch's oak woodlands that demonstrate our
15 continued commitment and dedication to address the
16 project impacts and maintain the overall integrity of
17 the natural beauty of the ranch.

18 As previously mentioned, when Caltrans built State
19 Route 14 in the 1970's, it dumped an estimated 23 acres
20 of fill on both sides of Placerita Creek. You can see
21 on the image here. In some cases it exceeds 60 feet
22 deep.

23 Today the slopes are slowly eroding into the creek
24 impacting water quality downstream and limiting habitat
25 at the bottom and slopes of the creek. The project will

1 not only stabilize the slopes but create riparian
2 woodland habitat at the bottom of the creek with a mix
3 of native trees and shrubs and native upland habitat on
4 the slopes of the creek.

5 In the end, we will have improved and restored the
6 creek to conditions it hasn't seen in over 40 years and
7 expand the native riparian and upland habitat that as a
8 result will improve surface water quality.

9 Disney has a long history of caring for oak trees
10 at the Golden Oak Ranch including a two-decade long
11 voluntary oak tree planting program. There are more
12 than 3,000 oak trees on the ranch and over 90 acres of
13 oak woodlands.

14 The project will remove 158 oaks including 16
15 heritage and will encroach upon an additional 82 Oaks
16 including three heritage. It will also remove 4.4 acres
17 of the 90 acres of oak woodland.

18 When we understood this project would have an
19 impact on oak trees, our goal was to set a new standard
20 oak tree and oak restoration based upon the advice from
21 expert arborists. The project will preserve 95 percent
22 of the oak trees on the ranch and, when completed, will
23 expand the oak woodlands on the ranch by an additional
24 11 acres.

25 While the county regulations require that we plant

1 only 442 oaks to address the removed trees, we are
2 committed to planting at least 1,600 oaks on the ranch
3 with a 70 percent survival rate after seven years. This
4 is a 10-to-1 replacement for heritage oaks and a 9-to-1
5 replacement ratio for jurisdictional trees and more than
6 double the number required by county regulations.

7 In addition, we are using acorns collected on the
8 ranch and have already planted around 460 seedlings in
9 the proposed restoration areas on the property. We are
10 pleased to be able to restore oak woodlands on our own
11 property from native acorns collected on the ranch.

12 In addition, we are placing the new oak trees in
13 areas of the ranch where previous oak woodlands have
14 been lost due to fire as well as to restoring the under
15 story of the new oak woodlands to enhance habitat.

16 We are proud of the project and the benefits it
17 brings the local entertainment community and the county
18 of Los Angeles. The benefits from the creation of the
19 Disney ABC Studios at the Ranch are substantial. The
20 project will create \$533 million in annual economic
21 activity in Los Angeles County, \$26 million in new
22 revenues every year to the State of California, and \$1.3
23 million in new revenues every year to Los Angeles
24 County. It will create 3,100 new jobs during
25 construction and over 2,800 jobs at full operation.

1 We just want to conclude. I want to say thank you
2 very much for giving us the opportunity to speak to you
3 and the public today about the Disney ABC Studios at the
4 Ranch project. We've enjoyed meeting with several
5 public stakeholders regarding the project and look
6 forward to continuing to work with them and with the Los
7 Angeles County. So with that I want to say thank you
8 very much for your time.

9 MR. MCCARTHY: Now, as you come up -- we're going
10 to be calling names in a minute -- you'll see in front
11 of you there where you are standing, you'll see the red
12 light come on. You can watch that be your time. It's
13 just like a traffic light. Green, your all set; orange,
14 you're running out of time; and red, you're out of time.
15 And, again, a three-minute time limit per speaker. And
16 we will be calling -- how many names do you want to call
17 at one time, Sam?

18 MR. DEA: Two at a time.

19 MR. MCCARTHY: We'll be calling two names at a
20 time. When we call them come up, stand at the mike and
21 one can come in right after the other. The first names
22 will be?

23 MR. DEA: Bob Kellar, Sandra Cattell.

24 MR. KELLAR: My name is Bob Kellar; Bob, standard
25 spelling, Kellar, K-e-l-l-a-r. And I have the privilege

T1-1

1 of being the mayor pro tem for Santa Clarita. Thank you
2 for this opportunity to address this very, very
3 important project proposed by Disney and ABC.

4 I've taken some notes here. The overview was
5 excellent. I really am going to open up my comments by
6 referencing I think the last slide, the economical
7 impacts to this community, to the county, and to the
8 state. I submit that this is a win, win all the way
9 around, a win for Disney ABC and certainly a win for the
10 Santa Clarita Valley and right on up throughout the
11 State of California.

12 I have had the privilege of personally touring the
13 Disney Ranch on a number of occasions over the years. I
14 have always been extremely impressed with the
15 professional management of the ranch from every aspect,
16 particularly when we talk about the environmental
17 sensitivity with the management that takes place at the
18 ranch. And I know from a recent opportunity to see the
19 plans on the mitigation for the oak trees is
20 unbelievable. It is 21st century textbook plus in
21 moving forward with this project.

22 Once again, I want to make comment that the City of
23 Santa Clarita strongly supports this project going
24 forward as proposed. We have found that the economic
25 impacts to our city as a result of filming, which we

1 consider a target industry in Santa Clarita city and
2 valley to be huge. We work cooperatively with the
3 filming industry throughout this city and have every
4 intent to continue to have this industry grow for our
5 citizens as it brings so many well paying jobs and
6 opportunities for our community.

7 Once again, I want to emphasize the city strongly
8 supports this project and thanks Disney ABC for coming
9 forward with this project. Thank you very much.

10 MR. MCCARTHY: Thank you.

11 MS. CATTELL: Good evening. Sandra Cattell,
12 C-a-t-t-e-l-l.

13 MR. MCCARTHY: You want to pull the mike a little
14 bit closer.

15 MS. CATTELL: Yes. I'm a resident of the Placerita
16 Canyon on the west side of the freeway. And I am here
17 to voice a concern about the development. Developments
18 need sewers, and the probable alignment is scheduled to
19 go through Placerita Canyon and, in fact, it will go in
20 front of my house. We have rather limited access in our
21 community, and this will be a bit of an inconvenience no
22 matter how quickly you work.

23 And so I have a request. In the past Placerita
24 residents have used the Placerita Creek tunnel as an
25 access to the national forest and the national forest

T1-1
Cont.

T1-2

T1-3

T1-4

1 trails. This access crossed the Disney property. I
2 would appreciate Disney working with L.A. County and the
3 City of Santa Clarita to find and facilitate an
4 alternate trail access for all trail users. Thank you
5 very much.

6 MR. MCCARTHY: Thank you.

7 MR. DEA: Terri Crain, Calvin Hedman.

8 MS. CRAIN: Good evening. It's T-e-r-r-i, Crain,
9 C-r-a-i-n. I'm the C.E.O. of the Santa Clarita Valley
10 Chamber of Commerce. The chamber applauds the County of
11 Los Angeles for the dedicated research and analysis that
12 went into the DEIR for Disney ABC Studios at the Ranch.
13 With the guidance of this document, I know this is the
14 type of project that will thrive in the Santa Clarita
15 Valley and benefit the larger valley.

16 The Santa Clarita Valley has a long history of
17 filming in the area and continues to be committed to the
18 filming industry in Los Angeles. The DEIR confirms this
19 is the kind of project we want to see in our community,
20 and I applaud the work of the county and the countless
21 experts who put together such a complete report.

22 The Chamber of Commerce supports industry, and with
23 industry comes jobs. The Chamber was pleased to learn
24 that the EIR concluded that this project will create
25 thousands of jobs and further Los Angeles County's

T1-4
Cont.

T1-5

1 economic recovery. In fact, at full build out over
2 2,800 full and part-time jobs will be created as a
3 result of this project.

4 Additionally, the EIR confirmed that the ranch will
5 result in \$533 million in economic activity, and we look
6 forward to that kind of investment in our community.

7 With our economy still in an important recovery
8 stage, the EIR concludes that this project a major
9 economic engine for Los Angeles County investing in an
10 important Santa Clarita Valley industry and, again,
11 providing much needed jobs.

12 As for the environmental impact of this project, we
13 are glad to see that Disney is taking great steps to
14 improve Placerita Creek and restore it to the conditions
15 it hasn't experienced since before construction of State
16 Route 14.

17 The EIR also shows that this project is a
18 thoughtful one restoring important environmental
19 features of the Ranch including creating a woodland
20 habitat at the bottom of the creek with a mix of native
21 trees and bushes and other plants that are more tolerant
22 of seasonal changes.

23 It is clear that Disney ABC Studios at the Ranch
24 has taken great consideration of the environment during
25 the construction period, and we are pleased to see the

1 steps they are going to in order to protect bird nesting
2 and habitats as well as planting the 1,600 native oaks
3 on the property in addition to maintaining the 637-acre
4 natural backdrop area.

5 It is clear that Disney ABC Studios has taken great
6 consideration of the environment during the construction
7 period, and we are pleased to see these steps. Disney
8 has proven themselves to be good community stewards by
9 the time and effort and thoughtful planning they put
10 into this project. The Santa Clarita Valley welcomes
11 the Ranch and the 2,800 jobs and increased economic
12 activity to our area this project will bring. Thank
13 you.

14 MR. MCCARTHY: Thank you.

15 MR. HEDMAN: My name is Calvin Hedman, C-a-l-v-i-n
16 H-e-d-m-a-n. I'm a local business owner and co-chair of
17 the Santa Clarita Valley Economic Development
18 Corporation. I'm in support of this project. The Draft
19 EIR confirms that Disney ABC Studios at the Ranch will
20 be a major economic investment in the Santa Clarita
21 valley and will create and retain jobs here in our
22 valley, county, and state.

23 As you may know, many entertainment jobs have left
24 to other states. The most recent San Fernando Valley
25 Business Journal dated May 28, 2012, includes an article

T1-5
Cont.

T1-6

1 entitled "Productions Flee to Other States. Crew
2 Workers Follow." This outflow of jobs has to stop, and
3 this project will have a big impact on keeping jobs
4 here.

5 In addition, this project will create other jobs
6 from supporting other companies moving into the valley.
7 The Santa Clarita Valley Economic Development
8 Corporation has already received inquiries from other
9 media and other entertainment support companies with
10 respect to this project and the possibility of creating
11 jobs in our valley. I encourage the approval of this
12 project and thank you for the opportunity to speak with
13 you today. Thank you.

14 MR. MCCARTHY: Thank you. Mr. Dea?

15 MR. DEA: The next two new speakers: Jim Coffey,
16 Joe Shelton.

17 MR. COFFEY: My name is Jim Coffey. First name
18 spelled standard, last name C-o-f-f-e-y. I am speaking
19 to you as a resident of Placerita Canyon in the special
20 standard district just a few miles from this site. In
21 addition, I've been fortunate enough in the
22 approximately last five years to be a vendor from time
23 to time on this site; so I have personally witnessed
24 what's gone on on the site through multiple construction
25 projects as of late.

1 That personal experience has shown me that, while
2 we once thought we had clientele that were fairly strict
3 and fairly regulated about what they did on and with
4 their properties, they all fairly well pale in
5 comparison. Disney is ultra protective of everything
6 that has to do on that property and every person that
7 goes on that property: people that film there, people
8 that construct there.

9 We have watched them construct things and take up
10 land. And every little piece of the land that was left
11 when they were done was put back, every blade of grass,
12 every piece of tree. Every piece of anything that was
13 removed or even disturbed during that period of time was
14 absolutely put back.

15 I've watched them create riparian creeks and
16 manufacture things that weren't even there before just
17 because they could and they should.

18 This is a great project. I have no concerns as a
19 resident. As I said, I am just a few miles on Placerita
20 Canyon Road from this site. I have absolutely no
21 concerns about this construction from the beginning to
22 the end, no concerns that it will affect my neighborhood
23 which I care a great deal about and I'm highly
24 protective of. This is a great project, and I urge you
25 to support it very much. Thank you.

1 MR. MCCARTHY: Thank you.

2 MR. SHELTON: Joe Shelton, J-o-e S-h-e-l-t-o-n.
3 Good evening. I live on Fairgate, which is just north
4 of the project, pretty close. I also own a portable
5 toilet company, Mission Valley Sanitation, who actually,
6 like other businesses, have provided services to the
7 ranch.

8 I've noticed that we have vehicles that drive, and
9 they are very particular on staying on the roads and
10 staying off of the public or -- not the public but the
11 grounds, you know, where the oak trees are. You're not
12 allowed to drive under them because of the roots. And
13 so they are real particular about protecting those
14 trees. I think the project is a wonderful opportunity
15 for the entire Santa Clarita Valley, and I wanted to be
16 present tonight to express that.

17 As the Draft EIR points out, the project will
18 utilize just 58 acres of the 890 acres at Golden Oak
19 Ranch, and the majority of the acreage that will be used
20 consists of barren, unsightly fill that we pass by every
21 time we drive here to work and from home to the market
22 and stuff. And the property is clearly visible from the
23 freeway.

24 The construction of the new studio will transform
25 the property into a beautiful economically beneficial

1 new business that will employ many of the area's
2 residents directly at the ranch but also indirectly at
3 local businesses as my own and others that will be able
4 to supply not only high paying jobs but entry level
5 jobs, as you know, like Home Depot gets more business
6 for different projects and stuff like that. You have
7 your entry level jobs that are important too as our kids
8 start to come up in the job world.

9 And Santa Clarita touts itself as an important area
10 of filming, and approval of the Disney ABC Studios ranch
11 will ensure that the filming and production continue to
12 thrive in our neighborhoods. Thank you. Have a nice
13 day.

14 MR. MCCARTHY: Thank you. Mr. Dea?

15 MR. DEA: Jonas Peterson, Alan Cameron.

16 MR. PETERSON: Good evening. My name is Jonas
17 Peterson, J-o-n-a-s P-e-t-e-r-s-o-n. I'm the president
18 and C.E.O. of the Santa Clarita Valley Economic
19 Development Corporation. The organization is made up of
20 public and private sector leaders, major employers
21 throughout the Santa Clarita valley that have come
22 together to support regional economic development, and
23 we could not be more supportive of the Disney ABC
24 Studios at the Ranch project.

25 I believe, if you look at the level of detail that

1 went into the Environmental Impact Report, you can see
2 how far Disney ABC has gone to ensure that this project
3 is not only the right fit for their companies but also
4 for the Santa Clarita valley.

5 Our organization recently completed a target
6 industry analysis where we looked at the types of
7 industries that are expected to fit well and thrive in
8 the Santa Clarita valley over the next five to 10 years.
9 The digital media and entertainment industry was right
10 at the top of that list.

11 Based on that study, based on what's been laid out
12 by Disney ABC Studios, I think you see a project that
13 fits well and also will deliver a huge economic impact
14 to our valley. It's already been stated multiple times,
15 but I think it's worthy of stating over and over again
16 that this project will deliver \$533 million per year in
17 economic activity, over 2,800 construction jobs, over
18 3,000 permanent high wage full-time positions once the
19 project is completed.

20 The ranch project fits in our growth plans. It
21 fits our economic development plans. I applaud the
22 efforts of the county, of Disney ABC that went into this
23 project and on behalf of the Santa Clarita Valley
24 Economic Development Corporation, I strongly encourage
25 approval.

1 MR. MCCARTHY: Thank you.

2 MR. CAMERON: Good evening. Alan Cameron. I first
3 learned about the contemplated development --

4 MR. MCCARTHY: Spell your last name, sir.

5 MR. CAMERON: My apologies. Certainly.

6 C-a-m-e-r-o-n. Thank you for correcting me. I first
7 learned of the development contemplated on this site 27
8 years ago when I was a member of the City of Santa
9 Clarita (inaudible) Committee. We opened up a very
10 constructive dialogue with the Disney organization
11 regarding everything that had to do with their
12 significant holdings here. The City of Santa Clarita
13 (inaudible) Committee is gloriously defunct because our
14 goal was achieved 25 years ago. And I'm aware that the
15 company has been contemplating this kind of use again
16 for decades.

17 Certainly everything you've heard thus far would be
18 accurate. A couple of quick questions. And I
19 apologize. I'm not as scholarly on the concept as I
20 should be. I think it would be appropriate at some
21 point before you go to hearing to disclose if there's a
22 manufacturers' tax base increment increase with the
23 project. There may be. If it is, it could be a
24 significant source of additional revenue in the project
25 profile.

T1-10

T1-11

1 In addition, there is an opportunity on this large
2 site without compromising any of the things you are
3 contemplating for the installation of solar power
4 generating ability and possibly wind turbine in small
5 decentralized units, wind turbine power generating. If
6 that has not been contemplated in the current proposal,
7 I certainly wouldn't want to delay what's underway, but
8 I would suggest that a study of the feasibility and
9 hopefully the implementation of solar and wind would be
10 undertaken at the earliest possible feasible
11 opportunity.

12 Also, from the standpoint of the environmental
13 effect, we human beings particularly in the United
14 States are guilty of short-term thinking about things.
15 In Europe there are Cathedrals that have been under
16 construction for 500 years. 200 years ago everything
17 here was essentially still very, very under utilized by
18 the people who were here then, i.e. native Americans.

19 I bring that up because your oak tree removal and
20 your replacement are significant. Short term you are
21 going to have heavy bio mass reduction. There's no
22 question about that. But moderately long term 10, 20,
23 30, 40, 50, 60 years you will have a significant bio
24 mass increase and attendant greenhouse gas reductions as
25 part of that.

T1-12

T1-13

1 Also, your local jobs will also conceivably have a
2 significant greenhouse gas reduction component. And I
3 apologize for not being aware of whether your
4 environmental studies have done a longer term projection
5 regarding the short-term and long-term effect on bio
6 mass and on greenhouse gas production and savings
7 because you hold out the possibility of offering a
8 substantial greenhouse gas reduction because of multiple
9 possibilities.

10 In conclusion, I will hopefully become better
11 informed than I am this evening. I'd also like to
12 commend the county for this innovation bringing the
13 hearing here so we can generate less greenhouse gases
14 going down there. I thank you.

15 MR. MCCARTHY: Thank you. Mr. Dea?

16 MR. DEA: Hunt Braly, Jim Harris. And can each of
17 you come up so we have the second party in line.

18 MR. BRALY: Good evening. I'm Hunt Braly, a local
19 resident of the Santa Clarita Valley, local attorney,
20 and vice president of the board of the Santa Clarita
21 Valley Chamber of Commerce. You've already heard from
22 our president and C.E.O. this evening.

23 Let me add some additional perspective from the
24 Chamber of Commerce and the business community's outlook
25 on this. The key thing that we would urge the county to

1 do through this process is remember the word balance,
2 balance of protecting the environment but also balance
3 of the economic vitality that this project brings and to
4 understand that when you create a project like this on a
5 small footprint of an almost 900-acre piece of land
6 where Disney has for decades, as has already been shown
7 and testified, done a tremendous job protecting that
8 area, this will provide the ability for them to continue
9 to protect that area, not only because now they can
10 provide a significant economic benefit out of a portion
11 of the property that has been already -- quite honestly
12 is an eyesore based on what Caltrans did in the 70's
13 when they built the freeway but also with the
14 protections that you will put in through probably your
15 final approval, provide additional protections, as
16 you've already heard, on oak trees, the waterways,
17 habitat, and other areas.

18 One thing that I would urge the county to consider
19 as you go forward is the surrounding areas that will
20 benefit from this economic engine that we call the
21 Disney Ranch ABC. Just less than a mile away, maybe a
22 little bit longer is the Gate King Industrial Project,
23 over four million square feet approved in the early
24 2000's by the City of Santa Clarita held up by both
25 litigation, which has been resolved, and now the economy

1 but clearly an approved project, also provides a lot of
2 habitat protection. That would be a natural place for
3 other businesses that are in the film industry that can
4 support this project.

5 There's also approved projects along Sierra Highway
6 on Newhall Road that also can now be built with the
7 potential of the impact this will have. So it's not
8 just the jobs that will be created and the environmental
9 benefits this will create when you approve it and it
10 gets built. It's the other benefits that will happen in
11 the immediate surrounding areas.

12 So, again, we urge you to give this careful
13 consideration and remember the word balance, understand
14 the economic benefits, protections that are provided to
15 the environment, and give it your swift approval so they
16 can start construction as soon as possible. Thank you.

17 MR. MCCARTHY: Could you spell your last name for
18 the record again. I don't believe we got that.

19 MR. BRALY: You didn't. I apologize. I guess I
20 didn't follow Mr. Cameron's lead. First name H-u-n-t,
21 last name B-r-a-l-y.

22 MR. MCCARTHY: Thank you. Mr. Dea? The next
23 speaker. I'm sorry.

24 MR. HARRIS: I'm Jim Harris, H-a-r-r-i-s, and I'm a
25 board member of the Placerita Canyon Nature Center, and

1 we're the next door neighbors of the ABC Disney Ranch.

2 And just from my tour and from reading the EIR
3 plan, it seems that it's very unusual that you would
4 have a development that would have such a positive
5 impact on the environment. And that's our big concern,
6 the environment, of course, especially the benefit to
7 the Placerita Creek. The replanting of native oaks on a
8 10 to 1 ratio, I just find that to be outstanding
9 balance and a contribution.

10 I like this former suggestion for solar and wind
11 usage possibilities on the ranch. I don't know if that
12 could be done at this point in their plans, but I like
13 that idea. I had not thought about it. Perhaps
14 soundstages and the ancillary buildings could be used
15 for that purpose. It seems to fit in with that Disney
16 commitment to the environment. Thank you very much.

17 MR. MCCARTHY: Thank you. Mr. Dea?

18 MR. DEA: Ron Kraus, Tim Crissman.

19 MR. KRAUS: I'm Ron Kraus, K-r-a-u-s, and I'm vice
20 president of the Placerita Canyon Nature Center
21 Associates. We're the volunteer organization that helps
22 the county operate school tours and programs at the
23 nature center.

24 My main concern is we've put together a committee
25 to respond to the EIR, and to be frank we're a little

1 overwhelmed. It's 5,200 pages, and we want to give it a
2 good look. And we have had some concerns from our
3 organization, some of our members about traffic and some
4 other issues. But we'd really like sufficient time to
5 review the document, you know, give you some good
6 comments.

7 And I have a question. I got an e-mail back from
8 Christina Tran. Is she here tonight? No. Because I
9 don't understand her letter here, and I'd like maybe
10 some clarification on this. We asked for a 30-day
11 extension because, again, we're volunteers. This is a
12 busy time of year, vacations and graduations and things
13 of that sort.

14 So I got a letter back from her saying, "Although
15 we will not be able to extend the formal 45-day public
16 review for the project period which ends on June 18,
17 2012, we would be happy to accept a late comment letter
18 from Placerita Canyon Nature Center Associates within
19 the requested 30-day extension period, and those
20 comments will be addressed in the Final EIR. "

21 So I'm a little confused. Do we get to July 18 to
22 submit a letter? So if we could get some clarification
23 on that.

24 MR. MCCARTHY: I'll let Mr. Dea respond to that.

25 MR. DEA: Just a point of clarification, in

1 Christina's e-mail or letter to you, we are not formally
2 extending the comment period for the Draft EIR.

3 However, if we receive late comment letters, to the
4 extent possible, we will include and address it in the
5 Final EIR in the response to comments.

6 Any late comment letters that we are unable to
7 address will be provided to the planning commission as
8 part of the administrative record.

9 MR. KRAUS: Okay. So we should try to get our
10 comments in by June 18.

11 MR. DEA: Again, if your letter is late, if it's
12 possible, if it's a few days, few weeks late, if we have
13 adequate time to respond to it, we will include it in
14 the Final EIR.

15 MR. KRAUS: Okay. I think I understand that. But
16 I would like to say we are supportive of Disney.
17 They've been very good neighbors to us. They've helped
18 us on a lot of projects. The Disney officials working
19 in the project have given us tours of the facilities.
20 We're not necessarily opposed to this, but we're just
21 overwhelmed by the amount of information. Thank you.

22 MR. MCCARTHY: Thank you.

23 MR. CRISSMAN: My name is Tim Crissman, standard
24 Tim, C-r-i-s-s-m-a-n. I am the chairman of the Old Town
25 Newhall Association, which is right here across the

T1-18

T1-19

T1-20

1 street basically. And our organization exists for the
2 revitalization of Old Town Newhall both as a historical
3 center and as an arts and entertainment district here in
4 the City of Santa Clarita.

5 It's very interesting with the loss of
6 redevelopment here statewide, it has created some
7 concerns as it relates to the momentum that has been
8 created by virtue of what the city has done and what our
9 organization has done in order to create opportunities
10 here in an area that has extreme historical significance
11 to the valley in both the film industry.

12 This particular project in itself is going to have
13 a stimulus effect long and far wide here throughout the
14 valley, and we see this as an extremely great
15 opportunity to increase the amount of traffic for Old
16 Town Newhall mainly along Main Street here but, as other
17 speakers have mentioned, it also brings into the
18 probability that some of the other projects that have
19 been approved in proximity to this particular area are
20 also going to come to fruition much, much quicker.

21 I think that we can't say enough about jobs. And I
22 think that the stewardship that Disney has demonstrated
23 as it relates to both care of the property and creating
24 a project that we can all be very proud of having here
25 right in our backyard goes without saying.

1 The current site, of course, is somewhat of an
2 eyesore. It looks more like a scar than it does a pad
3 now. And Disney's plan to restore the riparian habitat
4 and create more aesthetics immediately along that
5 corridor are very well noted.

6 Moreover, I think that, in looking at good and well
7 planned development, infrastructure is a very important
8 aspect as well. The fact of the matter is this project
9 fronts a freeway; so it is not going to have any
10 significant impact on the interior part of the
11 community. And yet it's going to provide a very easy
12 means for people to go to work and return without any
13 hindrance here for the rest us.

14 But my focus really is on what it's going to do
15 here in this area immediately around us. And I think
16 that both during construction and long after it is going
17 to help replace what we have lost by virtue of the lost
18 redevelopment and the slowdown that's going to create;
19 so I would only ask one thing. Hurry up.

20 MR. MCCARTHY: Thank you. Mr. Dea?

21 MR. DEA: Bruce Aronson, Lea Tantoy.

22 MR. ARONSON: My name is Bruce Aronson. That's
23 B-r-u-c-e. Aronson is A-r-o-n-s-o-n. I live at 25132
24 Running Horse Road, Newhall, which is located off
25 Placerita Canyon just across the Los Angeles Nature

1 Center, which is adjacent to this Disney Studio
2 property.

3 I wish the EIR to address the increased traffic
4 along Placerita Canyon. If the additional traffic comes
5 from off the 14 or city traffic from the north side of
6 the 14 freeway, I have no problem with this project and
7 would welcome it.

8 If increased traffic to this project comes through
9 Placerita Canyon Road south of the 14 freeway from this
10 project, they need to provide widening of this roadway
11 as required.

12 The current traffic use along Placerita Canyon just
13 south of the 14 freeway is extremely limited for both
14 pedestrian and bicycle use due to there is no paved road
15 use beyond the paved asphalt road, which is only large
16 enough to serve one vehicle per lane of which there is
17 only one lane in each direction.

18 At present driving and the use of bicycles or
19 pedestrians at the same time is very dangerous. The
20 dangers are due to vehicles needing to cross over the
21 double yellow median lines into the opposing traffic to
22 avoid either bicycles or pedestrians. There is no
23 designated bypass area for cars to pass other vehicles,
24 and the canyon road has limited visibility.

25 I would ask the EIR report to address the increased

1 use of Placerita Road through this canyon. If
2 additional traffic is generated through this canyon
3 road, I would ask the Disney Studios ABC Company to make
4 upgrades to this roadway by widening this road.

5 I personally am scared of getting hit when either
6 walking or riding my bicycle through this canyon road
7 and hope that Los Angeles (inaudible) will take a hard
8 look increasing safety along with the increased use.

9 MR. MCCARTHY: Thank you.

10 MS. TANTOY: Good evening. My name is Lea Tantoy,
11 and that's spelled L-e-a T-a-n-t-o-y. I've been a
12 resident of Santa Clarita since 1997. My husband and I
13 live four miles away from the proposed Disney Studios at
14 the Golden Oak Ranch. I cannot think of a more socially
15 and environmentally conscious company than Disney to
16 build in our neighborhood. The extensive mitigation
17 measures and planning detail in the Draft EIR
18 demonstrate that the Walt Disney Company continues to
19 believe in our value.

20 They have gone the extra mile to protect the
21 environment both during construction and ongoing
22 operations. Water and sewer infrastructure
23 improvements, measures to limit noise and dust during
24 construction and several traffic improvements will all
25 minimize project impacts.

1 The Walt Disney company has a great history in our
2 valley. I, for one, welcome the proposed improvements
3 and continued process in our community for years to
4 come. Most importantly, I welcome the 3,000 or so jobs
5 that will be created and its positive impact on the
6 local economy. Thank you.

7 MR. MCCARTHY: Thank you very much.

8 MR. DEA: Diane Trautman, Jon Collard.

9 MS. TRAUTMAN: Good evening. My name is Diane
10 Trautman. That's D-i-a-n-e T-r-a-u-t-m-a-n. Thank you
11 for the opportunity to speak. Disney ABC brings a
12 tremendous value to our valley. We certainly welcome
13 the jobs and the economic value locally for the county
14 and the state.

15 My concerns include preservation of the oak
16 woodlands, Placerita Creek, and surrounding canyons.
17 Residents in our valley have fought long and hard to
18 preserve and maintain these areas.

19 And I'd also be concerned because I've heard
20 residents talk about traffic. And the gentleman who
21 just spoke, I would like to ask that you consider adding
22 bike lanes and certainly roadway upgrades as needed to
23 preserve the safety of people driving on that roadway.

24 And I also agree with the statement by Mr. Cameron
25 that we encourage you to use and incorporate solar power

T1-22
Cont.

T1-23

T1-24

T1-25

T1-26

1 and possibly incorporate any other green technologies.
2 I haven't had a chance to read the DEIR; so I don't know
3 if you've included those in the buildings themselves,
4 but I certainly appreciate that.

5 And, you know, while I'm hesitant to endorse the
6 removal of heritage oaks, the applicant's presentation
7 has answered my questions on that issue and many of the
8 other issues and I agree that Disney has exercised good
9 stewardship on the property to date and I expect that
10 the company will continue to do so.

11 So I thank you for the opportunity to speak, and I
12 encourage you to look at other ways to improve green
13 technology and roadway safety. Thank you so much.

14 MR. MCCARTHY: Thank you.

15 MR. COLLARD: Good evening. My name is Jon, J-o-n,
16 Collard, C-o-l-l-a-r-d, just like collard greens if any
17 of you happen to be from the south. I am a local
18 business owner. I am president of American Tax
19 Incentives. We specialize in implementing the
20 (inaudible) project which we have been fortunate enough
21 to receive here locally.

22 I am also a board member of the Santa Clarita
23 Valley Economic Development Corporation. I'd like to
24 speak in support of this project. I believe that Disney
25 and ABC has proven to be a great example of appropriate

1 and enhanced caretaking of land.

2 Secondly, I'd like to discuss the jobs that are
3 coming to the area. I've also listed jobs and, lastly,
4 jobs to the area. In this room we're surrounded by
5 movie posters, which is really exciting and encouraging.
6 But unfortunately, as we know, filming has moved to
7 Canada. Filming has moved to Utah, Oklahoma, Michigan,
8 all kinds of places.

9 Bringing in 3,000 new jobs, close to 3,000 new
10 permanent jobs has a multiplier effect that three
11 minutes would not allow me time to address. But the
12 multiplier effect will increase business attraction,
13 increase local revenue, and the most important thing
14 that Disney tends to provide and that is quality of
15 life. Thank you for your time.

16 MR. MCCARTHY: Thank you. Mr. Dea?

17 MR. DEA: Okay. We have four more speakers, and
18 these last speakers have not been sworn in. So if I
19 call your name, please stand and raise your right hand.
20 Eric Beck, Michele Jenkins, Lynne Plambeck, Gregory
21 Jenkins. So if I call your name, please stand and raise
22 your right hand.

23 Do each of you swear or affirm under the penalty of
24 perjury that the testimony you may give in the matters
25 now pending before the Hearing Examiner shall be the

1 truth, the whole truth, and nothing but the truth.

2 (In unison, all say yes.)

3 MR. DEA: So we have Eric Beck and Michele Jenkins.
4 Eric Beck? We'll move on to Michele Jenkins.

5 MS. JENKINS: Good evening. My name is Michele,
6 M-i-c-h-e-l-e, Jenkins, J-e-n-k-i-n-s. My address is
7 25243 Running Horse Road, Newhall. I'm here to speak in
8 two roles really. First, I live in the Placerita
9 Chaparral tract, which is the immediately adjacent
10 property to the ranch, and I want to testify to the fact
11 that Disney has always been wonderful neighbors to our
12 neighborhood and I fully support the project.

13 The ranch managers always express concern when
14 there's been fires in the area, check on our
15 neighborhood. So for years I've had that experience; so
16 I speak highly of the Disney Company and their care for
17 the property.

18 I am also an elected board member for the Santa
19 Clarita Community College District. I've been on the
20 board of trustees for 25 years. And I'd like to address
21 some issues with the college district.

22 I appreciate the fact that the Disney Company
23 reached out to our neighborhood, held an informational
24 meeting for our neighborhood down at the site to go over
25 the plans over a year ago, and they also reached out to

T1-28

1 the college district and met with the college district.

2 This is important because of the fact that the
3 college has a media arts program that we at any one time
4 we enroll -- about 2,100 students are enrolled in the
5 various programs within that media arts program; so I
6 believe that there's an opportunity for partnerships
7 with the college and for students who are working in the
8 fields. We have very new equipment, and students need
9 the opportunity to be able to work in real life
10 situations; so I'm sure that Disney would be receptive
11 to that.

12 Another issue I'd like to address to the Disney
13 officials that are here and to the project manager, if
14 you need assistance with your oak trees -- I know you
15 are removing a number of them -- and if you would give
16 consideration to donating them to the college district,
17 we have a number of available sites where we could use
18 oak trees.

19 We have two campuses. Our campus in Canyon Country
20 on Sierra Highway alone could take about 160 trees, and
21 we've had other organizations donate trees to us when
22 they've needed to move them. And so I would like for
23 you to give that consideration.

24 I don't know if you the project manager have met
25 with -- if you're one of the people that met with the

1 college officials, but I know they would be glad to meet
2 with you and discuss how that could be facilitated. I
3 think that would be a win for Disney ABC Studios and
4 certainly a win for the college district. Thank you
5 very much.

6 MR. MCCARTHY: Thank you.

7 MR. DEA: Okay. I'm going to call the last three
8 speakers. Lynne Plambeck, Gregory Jenkins, Ben Curtis.

9 MS. PLAMBECK: Lynne Plambeck, L-y-n-n-e
10 P-l-a-m-b-e-c-k, speaking for the Santa Clarita
11 Organization for Planning in the Environment. I think
12 the Disney Corporation really made brownie points when
13 they worked so hard to help our community, Elsmere
14 Canyon and the view shed and also Whitney Canyon.

15 And so here now we're into Placerita Canyon and
16 some of the view shed issues they would want to destroy
17 if we're looking at big soundstages off the freeway
18 although maybe the creek is a point that's a problem. I
19 don't think the rest of the project is going to be
20 enhanced by the view shed that we're now going to see
21 from this.

22 I wanted to talk a little bit about this process.
23 It's very interesting that we had the 21,000 unit
24 Newhall Ranch project that Sam Dea was, in fact, the
25 planner on and we never had a hearing out here like

T1-28
Cont.

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T1-30

1 this. I've never come to a hearing where the applicant
2 has turned around and given a speech to the audience
3 rather than to the Hearing Officer; So I'm really
4 wondering about the process here.

5 And although I think all of us appreciate having a
6 hearing out here, I'm also wondering why we're having a
7 hearing before the Hearing Officer when this is
8 obviously a plan amendment change that's going to have
9 to go all the way to the board of supervisors.

10 When is the regional planning commission? Where
11 are the regional planning commissioners? Where is the
12 staff person on this? If Christina Tran is the staff
13 person, she's not even at the hearing?

14 Was this for the applicant? Is this a presentation
15 by the applicant in the guise of a public hearing?
16 Because I'm really pretty concerned. I have never seen
17 an applicant speak from behind the podium with the
18 county symbol on it turned towards the audience. So I'm
19 just wondering what's going on here?

20 Also, I was interested in the chamber's
21 presentation that the EIR confirms there's going to be
22 jobs. There's no job analysis in the EIR. Did she read
23 it? Has anybody here read it? I mean it's a pretty
24 huge document. We haven't started analyzing it yet. I
25 love this idea of jobs. And Disney's great, and I love

1 the movie industry. However, there needs to be
2 guarantees that these jobs are really going to happen.

3 You know, Moreno Valley got these huge warehouse
4 places. They were going to bring 3,000 jobs. They've
5 got like 160 or something out of it.

6 There needs to be guarantees that these are
7 actually jobs, they're not going to be transferred from
8 Burbank so that now we have a bunch of commuters going
9 back and forth.

10 Obviously, if you've got to get parking waivers and
11 put in extra parking for something, you're planning on
12 everybody driving. We have a really crowded freeway
13 now. We have severe air pollution problems in the Santa
14 Clarita Valley.

15 If Disney is going to bring their jobs from Burbank
16 here, then they need to provide some kind of public
17 transportation where that's going to happen where people
18 aren't driving back and forth on the freeway. We're
19 trying to reduce greenhouse gases, not increase them
20 with more commuting.

21 There's a really good studio facility in Burbank
22 and, you know, I don't know why they're needing to
23 expand. I haven't read their business plan. But the
24 EIR, if we're going to approve all this industry
25 facility in a rural area, there needs to be some

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T1-33

1 financial substantiation that jobs, in fact, are really
2 going to be created. There's nothing in the EIR.

3 MR. MCCARTHY: You need to wrap up. You are
4 running out of time.

5 MS. PLAMBECK: All right.

6 MR. MCCARTHY: Next speaker?

7 MR. CURTIS: Good afternoon. My name is Ben,
8 B-e-n, Curtis, C-u-r-t-i-s. I'm a nearly 40-year
9 resident of Placerita Canyon, which is directly west of
10 the project. We are a partially gated community. We
11 have a very active property owners association whose
12 interest is in protecting our rural lifestyle.

13 Most of you that -- most of the people here that
14 live in the community are familiar with the unique
15 characters of the Placerita Canyon west of the ranch,
16 and our main concern is to protect that.

17 That being said, I have to add my voice to the
18 course of those in support of this project. We've had a
19 couple of presentations by Disney at our board meetings
20 and public meetings in our canyon. I don't know that
21 I've heard one voice of negativity at any of those
22 meetings.

23 We're very excited about the potential of a nice
24 revenue and job producing neighbor east of us and would
25 really like to see this project fast tracked as much as

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Cont.

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1 possible. Thank you.

2 MR. MCCARTHY: Thank you.

3 MR. JENKINS: Hello. My name is Greg Jenkins,
4 G-r-e-g J-e-n-k-i-n-s. I want to thank you for letting
5 me have a moment up here. I've been a resident of Santa
6 Clarita since 1966. I have been in my present house
7 next door to the Disney Ranch since 1983. All the time
8 that we've been living up on Running Horse Road, the
9 Disney Ranch has been very, very good neighbors.

10 When we had the last huge forest fire, they helped
11 us put new trees in and do some reforestation projects.
12 Also, they have improved the Placerita Canyon entrance
13 with the extra lanes and the turn lane; so I think that
14 has been really helpful.

15 But the whole Disney community, the Disney Ranch
16 community, have been very, very supportive of our
17 neighborhood. They've helped us. They've gone through
18 talks with us when we had questions, and I'm just in
19 favor of the project. Thank you.

20 MR. MCCARTHY: Thank you.

21 MR. DEA: Last call for Eric Beck.

22 MR. MCCARTHY: Okay. I believe Mr. Beck has left.
23 I just want to comment briefly here. This is a
24 relatively new procedure, my position as a Hearing
25 Examiner in these proceedings. I do function as a

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T1-36

1 Hearing Officer. In fact, tomorrow morning I'll be
2 functioning as a Hearing Officer downtown.

3 But as a Hearing Examiner, we're taking testimony
4 on the EIR and the matter will be referred to the entire
5 Planning Commission, which will hold additional hearings
6 downtown. So the Planning Commission certainly is not
7 out of the picture.

8 What we have set up in the department and the
9 county recently is this opportunity to give persons an
10 opportunity to come before the county and testify
11 without having to take time off to go downtown. And, as
12 we all know, that is a lengthy drive between here and
13 Santa Clarita. You've got your gas. You've got your
14 parking fees. So this is a convenience to many people,
15 and we've gotten a positive response generally from the
16 areas where we have indeed held these hearings.

17 We've had one hearing at the Pepperdine campus. We
18 had another at Universal Studios. There was another
19 project at Marina Del Rey. So I think you're only about
20 the fourth hearing to be held so far under this new
21 Hearing Examiner concept. So that's why it has not been
22 held previously.

23 With regard to how a particular speaker was
24 positioned during this evening's presentation, this is
25 ad hoc. We don't have a permanent hearing room here,

1 obviously, and it didn't appear too easy for him to run
2 the Power Point from that podium; so we let him use this
3 podium. And I don't think it compromised the speaker's
4 presentation.

5 So we do, every time we go to one of these meetings
6 in the community in the evening, it's ad hoc in the
7 sense that we have to adjust to a new facility and
8 adjust our facilities for it.

9 But, again, this is an opportunity, it has been an
10 opportunity for you to give the testimony, and it will
11 be bundled up in the form of a transcript and sent to
12 the people who will respond within the EIR to all of the
13 comments.

14 Now, we have an opportunity if the applicant
15 representatives wish to give a rebuttal or make any
16 comments. Do you wish to proceed with that, or do you
17 want to forfeit that?

18 MR. GILBERT: I think we'll forfeit that. We just
19 want to thank everyone for coming out tonight.

20 MR. MCCARTHY: Just give your name at that podium
21 and indicate you're forfeiting.

22 MR. GILBERT: My name is Adam Gilbert, and we'll
23 forfeit our time for the rebuttal. We just want to
24 thank the county for scheduling the meeting and allowing
25 me to be up here and thank everyone for coming out with

1 their busy schedules to come up and provide their
2 testimony. So thank you very much.

3 MR. MCCARTHY: Thank you. And with that the
4 hearing is closed. Thank you all for coming tonight.
5 Good night.

6 (Whereupon proceedings were concluded at 7:27 P.M.)
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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES)

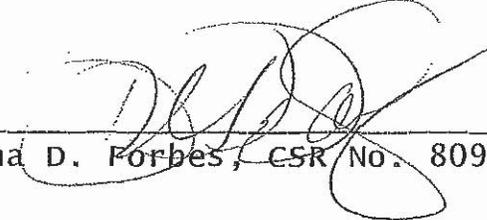
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I, Dana D. Forbes, Certified Shorthand Reporter,
Certificate No. 8095, within and for the State of
California, hereby certify the following:

I am officer who stenographically recorded the
testimony in the foregoing hearing;

he foregoing transcript is a true record of the
testimony given.

Dated: June 19, 2012, Valencia, California.



Dana D. Forbes, CSR No. 8095

Transcript No. T1

Bob Kellar

Comment No. T1-1

My name is Bob Kellar; Bob, standard spelling, Kellar, K-e-l-l-a-r. And I have the privilege of being the mayor pro tem for Santa Clarita. Thank you for this opportunity to address this very, very important project proposed by Disney and ABC.

I've taken some notes here. The overview was excellent. I really am going to open up my comments by referencing I think the last slide, the economical impacts to this community, to the county, and to the state. I submit that this is a win, win all the way around, a win for Disney ABC and certainly a win for the Santa Clarita Valley and right on up throughout the State of California.

I have had the privilege of personally touring the Disney Ranch on a number of occasions over the years. I have always been extremely impressed with the professional management of the ranch from every aspect, particularly when we talk about the environmental sensitivity with the management that takes place at the ranch. And I know from a recent opportunity to see the plans on the mitigation for the oak trees is unbelievable. It is 21st century textbook plus in moving forward with this project.

Once again, I want to make comment that the City of Santa Clarita strongly supports this project going forward as proposed. We have found that the economic impacts to our city as a result of filming, which we consider a target industry in Santa Clarita city and valley to be huge. We work cooperatively with the filming industry throughout this city and have every intent to continue to have this industry grow for our citizens as it brings so many well paying jobs and opportunities for our community.

Once again, I want to emphasize the city strongly supports this project and thanks Disney ABC for coming forward with this project. Thank you very much.

Response No. T1-1

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Sandra Cattell

Comment No. T1-2

Good evening. Sandra Cattell, C-a-t-t-e-l-l.

Response No. T1-2

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-3

Yes. I'm a resident of the Placerita Canyon on the west side of the freeway. And I am here to voice a concern about the development. Developments need sewers, and the probable alignment is scheduled to go through Placerita Canyon and, in fact, it will go in front of my house. We have rather limited access in our community, and this will be a bit of an inconvenience no matter how quickly you work.

Response No. T1-3

As discussed on page IV-45 in Section IV, Project Description, of the Draft EIR, construction of the proposed sewer line would proceed at a rate of approximately 75 to 100 linear feet per day (excavated and installed), depending on the trenched depth. Consequently, for those residences located along the proposed alignment, direct access would be constricted for a few days at most. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-4

And so I have a request. In the past Placerita residents have used the Placerita Creek tunnel as an access to the national forest and the national forest trails. This access crossed the Disney property. I would appreciate Disney working with L.A. County and the City of Santa Clarita to find and facilitate an alternate trail access for all trail users. Thank you very much.

Response No. T1-4

With respect to local trail access, the culvert under SR-14 is designed for stormwater flows, not pedestrian access, and the Ranch is private property. Public access to the trails in the surrounding hillsides is provided at a number of trailheads and staging areas, including within Placerita Canyon Nature Center. As part of the Project, the Applicant

would dedicate a variable-width, 12- to 20-foot-wide easement for a proposed trail, referred to as the Placerita Canyon Connector Trail, which would be constructed as a public, multi-use trail for hiking, mountain-biking, and equestrian use and would connect to existing trails within Angeles National Forest, as described on pages IV-33 through IV-35 in Section IV, Project Description, of the Draft EIR. As indicated therein, the trail would begin near the SR-14 northbound off-ramp adjacent to Placerita Canyon Road and would include a trailhead/staging area near an existing access road just to the east of the SR-14 northbound off-ramp. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Terri Crain

Comment No. T1-5

Good evening. It's T-e-r-r-i, Crain, C-r-a-i-n. I'm the C.E.O. of the Santa Clarita Valley Chamber of Commerce. The chamber applauds the County of Los Angeles for the dedicated research and analysis that went into the DEIR for Disney ABC Studios at the Ranch. With the guidance of this document, I know this is the type of project that will thrive in the Santa Clarita Valley and benefit the larger valley.

The Santa Clarita Valley has a long history of filming in the area and continues to be committed to the filming industry in Los Angeles. The DEIR confirms this is the kind of project we want to see in our community, and I applaud the work of the county and the countless experts who put together such a complete report.

The Chamber of Commerce supports industry, and with industry comes jobs. The Chamber was pleased to learn that the EIR concluded that this project will create thousands of jobs and further Los Angeles County's economic recovery. In fact, at full build out over 2,800 full and part-time jobs will be created as a result of this project.

Additionally, the EIR confirmed that the ranch will result in \$533 million in economic activity, and we look forward to that kind of investment in our community.

With our economy still in an important recovery stage, the EIR concludes that this project a major economic engine for Los Angeles county investing in an important Santa Clarita Valley industry and, again, providing much needed jobs.

As for the environmental impact of this project, we are glad to see that Disney is taking great steps to improve Placerita Creek and restore it to the conditions it hasn't experienced since before construction of State Route 14.

The EIR also shows that this project is a thoughtful one restoring important environmental features of the Ranch including creating a woodland habitat at the bottom of the creek with a mix of native trees and bushes and other plants that are more tolerant of seasonal changes.

It is clear that Disney ABC Studios at the Ranch has taken great consideration of the environment during the construction period, and we are pleased to see the steps they are going to in order to protect bird nesting and habitats as well as planting the 1,600 native oaks on the property in addition to maintaining the 637-acre natural backdrop area.

It is clear that Disney ABC Studios has taken great consideration of the environment during the construction period, and we are pleased to see these steps. Disney has proven themselves to be good community stewards by the time and effort and thoughtful planning they put into this project. The Santa Clarita Valley welcomes the Ranch and the 2,800 jobs and increased economic activity to our area this project will bring. Thank you.

Response No. T1-5

This comment expresses general support for the Project and cites some of the some of the Project's features, benefits, and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. Some of the economic data presented in the comment is based on the economic and fiscal impact analysis provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). In particular, the number of new jobs cited in the comment includes direct, indirect, and induced employment to be generated both on-site and in the greater area as a result of the Project, as discussed further in Appendix N. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Calvin Hedman

Comment No. T1-6

My name is Calvin Hedman, C-a-l-v-i-n H-e-d-m-a-n. I'm a local business owner and co-chair of the Santa Clarita Valley Economic Development Corporation. I'm in support of this project. The Draft EIR confirms that Disney ABC Studios at the Ranch will be a major economic investment in the Santa Clarita Valley and will create and retain jobs here in our valley, county, and state.

As you may know, many entertainment jobs have left to other states. The most recent San Fernando Valley Business Journal dated May 28, 2012, includes an article entitled "Productions Flee to Other States. Crew Workers Follow." This outflow of jobs has to stop, and this project will have a big impact on keeping jobs here.

In addition, this project will create other jobs from supporting other companies moving into the valley. The Santa Clarita Valley Economic Development Corporation has already received inquiries from other media and other entertainment support companies with respect to this project and the possibility of creating jobs in our valley. I encourage the approval of this project and thank you for the opportunity to speak with you today. Thank you.

Response No. T1-6

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Jim Coffey

Comment No. T1-7

My name is Jim Coffey. First name spelled standard, last name C-o-f-f-e-y. I am speaking to you as a resident of Placerita Canyon in the special standard district just a few miles from this site. In addition, I've been fortunate enough in the approximately last five years to be a vendor from time to time on this site; so I have personally witnessed what's gone on on the site through multiple construction projects as of late.

That personal experience has shown me that, while we once thought we had clientele that were fairly strict and fairly regulated about what they did on and with their properties, they all fairly well pale in comparison. Disney is ultra protective of everything that has to do on that property and every person that goes on that property: people that film there, people that construct there.

We have watched them construct things and take up land. And every little piece of the land that was left when they were done was put back, every blade of grass, every piece of tree. Every piece of anything that was removed or even disturbed during that period of time was absolutely put back.

I've watched them create riparian creeks and manufacture things that weren't even there before just because they could and they should.

This is a great project. I have no concerns as a resident. As I said, I am just a few miles on Placerita Canyon Road from this site. I have absolutely no concerns about this construction from the beginning to the end, no concerns that it will affect my neighborhood which I care a great deal about and I'm highly protective of. This is a great project, and I urge you to support it very much. Thank you.

Response No. T1-7

This comment expresses general support for the Project and describes the speaker's experience working with the Applicant on the Ranch. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Joe Shelton

Comment No. T1-8

Joe shelton, J-o-e S-h-e-l-t-o-n.

Good evening. I live on Fairgate, which is just north of the project, pretty close. I also own a portable toilet company, Mission Valley Sanitation, who actually, like other businesses, have provided services to the ranch.

I've noticed that we have vehicles that drive, and they are very particular on staying on the roads and staying off of the public or -- not the public but the grounds, you know, where the oak trees are. You're not allowed to drive under them because of the roots. And so they are real particular about protecting those trees. I think the project is a wonderful opportunity for the entire Santa Clarita Valley, and I wanted to be present tonight to express that.

As the Draft EIR points out, the project will utilize just 58 acres of the 890 acres at Golden Oak Ranch, and the majority of the acreage that will be used consists of barren, unsightly fill that we pass by every time we drive here to work and from home to the market and stuff. And the property is clearly visible from the freeway.

The construction of the new studio will transform the property into a beautiful, economically beneficial new business that will employ many of the area's residents directly at the ranch but also indirectly at local businesses as my own and others that will be able to supply not only high paying jobs but entry level jobs, as you know, like Home Depot gets more business for different projects and stuff like that. You have your entry level jobs that are important too as our kids start to come up in the job world.

And Santa Clarita touts itself as an important area of filming, and approval of the Disney ABC Studios ranch will ensure that the filming and production continue to thrive in our neighborhoods. Thank you. Have a nice day.

Response No. T1-8

This comment expresses general support for the Project, describes the speaker's experience working with on the Ranch, and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Jonas Peterson

Comment No. T1-9

Good evening. My name is Jonas Peterson, J-o-n-a-s P-e-t-e-r-s-o-n. I'm the president and C.E.O. of the Santa Clarita Valley Economic Development Corporation. The organization is made up of public and private sector leaders, major employers throughout the Santa Clarita Valley that have come together to support regional economic development, and we could not be more supportive of the Disney ABC Studios at the Ranch project.

I believe, if you look at the level of detail that went into the Environmental Impact Report, you can see how far Disney ABC has gone to ensure that this project is not only the right fit for their companies but also for the Santa Clarita Valley.

Our organization recently completed a target industry analysis where we looked at the types of industries that are expected to fit well and thrive in the Santa Clarita Valley over the next five to 10 years. The digital media and entertainment industry was right at the top of that list.

Based on that study, based on what's been laid out by Disney ABC Studios, I think you see a project that fits well and also will deliver a huge economic impact to our valley. It's already been stated multiple times, but I think it's worthy of stating over and over again that this project will deliver \$533 million per year in economic activity, over 2,800 construction jobs, over 3,000 permanent high wage full-time positions once the project is completed.

The ranch project fits in our growth plans. It fits our economic development plans. I applaud the efforts of the county, of Disney ABC that went into this project and on behalf of the Santa Clarita Valley Economic Development Corporation, I strongly encourage approval.

Response No. T1-9

This comment expresses general support for the Project and cites some of the Project's benefits. Some of the economic data presented in the comment is based on the economic and fiscal impact analysis provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Alan Cameron

Comment No. T1-10

Good evening. Alan Cameron. I first learned about the contemplated development --

Response No. T1-10

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-11

My apologies. Certainly. C-a-m-e-r-o-n. Thank you for correcting me. I first learned of the development contemplated on this site 27 years ago when I was a member of the City of Santa Clarita (inaudible) Committee. We opened up a very constructive dialogue with the Disney organization regarding everything that had to do with their significant holdings here. The City of Santa Clarita (inaudible) Committee is gloriously defunct because our goal was achieved 25 years ago. And I'm aware that the company has been contemplating this kind of use again for decades.

Certainly everything you've heard thus far would be accurate. A couple of quick questions. And I apologize. I'm not as scholarly on the concept as I should be. I think it would be appropriate at some point before you go to hearing to disclose if there's a manufacturers' tax base increment increase with the project. There may be. If it is, it could be a significant source of additional revenue in the project profile.

Response No. T1-11

This comment expresses general support for the Applicant and cites potential Project benefits. The Project will generate substantial tax revenues, including property tax, sales and use tax, payroll tax, income tax, and utility usage tax, as discussed further in the Economic & Fiscal Impact Analysis provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-12

In addition, there is an opportunity on this large site without compromising any of the things you are contemplating for the installation of solar power generating ability and possibly wind turbine in small decentralized units, wind turbine power generating. If that has not

been contemplated in the current proposal, I certainly wouldn't want to delay what's underway, but I would suggest that a study of the feasibility and hopefully the implementation of solar and wind would be undertaken at the earliest possible feasible opportunity.

Response No. T1-12

As stated throughout the Draft EIR, including on page IV-9 in Section IV, Project Description, the Project would implement green building design and construction practices. Furthermore, as stated on pages IV-20 to IV-21 of the Draft EIR, the Project would incorporate a variety of sustainability features that would include, among others, photovoltaic technology (i.e., solar panels) on selected roofs and the use of highly efficient electric and heating, ventilation, and air-conditioning (HVAC) equipment (housed in a central utility plant), or equivalent measures designed to achieve the same results.

Comment No. T1-13

Also, from the standpoint of the environmental effect, we human beings particularly in the United States are guilty of short-term thinking about things. In Europe there are cathedrals that have been under construction for 500 years. 200 years ago everything here was essentially still very, very under utilized by the people who were here then (i.e., Native Americans).

I bring that up because your oak tree removal and your replacement are significant. Short term you are going to have heavy bio mass reduction. There's no question about that. But moderately long term 10, 20, 30, 40, 50, 60 years you will have a significant bio mass increase and attendant greenhouse gas reductions as part of that.

Also, your local jobs will also conceivably have a significant greenhouse gas reduction component. And I apologize for not being aware of whether your environmental studies have done a longer term projection regarding the short-term and long-term effect on bio mass and on greenhouse gas production and savings because you hold out the possibility of offering a substantial greenhouse gas reduction because of multiple possibilities.

In conclusion, I will hopefully become better informed than I am this evening. I'd also like to commend the county for this innovation bringing the hearing here so we can generate less greenhouse gases going down there. I thank you.

Response No. T1-13

Project impacts related to greenhouse gases (GHGs) are evaluated in Section V.E.2, Air Resources—Global Climate Change, of the Draft EIR. Included on pages V.E.2-22 through V.E.2-28 therein is further discussion of the sustainability features to be implemented as part of the Project that would serve to minimize GHGs and climate change impacts. As concluded in the Draft EIR, the Project would have a less than significant impact on the environment with respect to GHG emissions. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Hunt Braly

Comment No. T1-14

Good evening. I'm Hunt Braly, a local resident of the Santa Clarita Valley, local attorney, and vice president of the board of the Santa Clarita Valley chamber of Commerce. You've already heard from our president and C.E.O. this evening.

Let me add some additional perspective from the Chamber of Commerce and the business community's outlook on this. The key thing that we would urge the county to do through this process is remember the word balance, balance of protecting the environment but also balance of the economic vitality that this project brings and to understand that when you create a project like this on a small footprint of an almost 900-acre piece of land where Disney has for decades, as has already been shown and testified, done a tremendous job protecting that area, this will provide the ability for them to continue to protect that area, not only because now they can provide a significant economic benefit out of a portion of the property that has been already -- quite honestly is an eyesore based on what Caltrans did in the 70's when they built the freeway but also with the protections that you will put in through probably your final approval, provide additional protections, as you've already heard, on oak trees, the waterways, habitat, and other areas.

One thing that I would urge the county to consider as you go forward is the surrounding areas that will benefit from this economic engine that we call the Disney Ranch ABC. Just less than a mile away, maybe a little bit longer is the Gate King Industrial project, over four million square feet approved in the early 2000's by the City of Santa Clarita held up by both litigation, which has been resolved, and now the economy but clearly an approved project, also provides a lot of habitat protection. That would be a natural place for other businesses that are in the film industry that can support this project.

There's also approved projects along Sierra Highway on Newhall Road that also can now be built with the potential of the impact this will have. So it's not just the jobs that will be created and the environmental benefits this will create when you approve it and it gets built. It's the other benefits that will happen in the immediate surrounding areas.

So, again, we urge you to give this careful consideration and remember the word balance, understand the economic benefits, protections that are provided to the environment, and give it your swift approval so they can start construction as soon as possible. Thank you.

Response No. T1-14

This comment expresses general support for the Project and cites some of the some of the Project's features, benefits, and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-15

You didn't. I apologize. I guess I didn't follow Mr. Cameron's lead. First name H-u-n-t, last name B-r-a-l-y.

Response No. T1-15

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Jim Harris

Comment No. T1-16

I'm Jim Harris, H-a-r-r-i-s, and I'm a board member of the Placerita Canyon Nature Center, and we're the next door neighbors of the ABC Disney Ranch.

And just from my tour and from reading the EIR plan, it seems that it's very unusual that you would have a development that would have such a positive impact on the environment. And that's our big concern, the environment, of course, especially the benefit to the Placerita Creek. The replanting of native oaks on a 10 to 1 ratio, I just find that to be outstanding balance and a contribution.

I like this former suggestion for solar and wind usage possibilities on the ranch. I don't know if that could be done at this point in their plans, but I like that idea. I had not thought about it. Perhaps soundstages and the ancillary buildings could be used for that purpose. It seems to fit in with that Disney commitment to the environment. Thank you very much.

Response No. T1-16

This comment expresses general support for the Project and cites some of the Project features and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. Refer to Response No. T1-12 regarding the Project's sustainability features, including photovoltaic technology (i.e., solar panels) on selected roofs. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Ron Kraus

Comment No. T1-17

I'm Ron Kraus, K-r-a-u-s, and I'm vice president of the Placerita Canyon Nature Center Associates. We're the volunteer organization that helps the county operate school tours and programs at the nature center.

My main concern is we've put together a committee to respond to the EIR, and to be frank we're a little overwhelmed. It's 5,200 pages, and we want to give it a good look. And we have had some concerns from our organization, some of our members about traffic and some other issues. But we'd really like sufficient time to review the document, you know, give you some good comments.

And I have a question. I got an e-mail back from Christina Tran. Is she here tonight? No. Because I don't understand her letter here, and I'd like maybe some clarification on this. We asked for a 30-day extension because, again, we're volunteers. This is a busy time of year, vacations and graduations and things of that sort.

So I got a letter back from her saying, "Although we will not be able to extend the formal 45-day public review for the project period which ends on June 18, 2012, we would be happy to accept a late comment letter from Placerita Canyon Nature Center Associates within the requested 30-day extension period, and those comments will be addressed in the Final EIR."

So I'm a little confused. Do we get to July 18 to submit a letter? So if we could get some clarification on that.

Response No. T1-17

Refer to Response No. 14-1. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-18

Okay. So we should try to get our comments in by June 18.

Response No. T1-18

Refer to Response No. 14-1 . This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-19

Okay. I think I understand that. But I would like to say we are supportive of Disney. They've been very good neighbors to us. They've helped us on a lot of projects. The Disney officials working in the project have given us tours of the facilities. We're not necessarily opposed to this, but we're just overwhelmed by the amount of information. Thank you.

Response No. T1-19

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Tim Crissman

Comment No. T1-20

My name is Tim Crissman, standard Tim, C-r-i-s-s-m-a-n. I am the chairman of the Old Town Newhall Association, which is right here across the street basically. And our organization exists for the revitalization of Old Town Newhall both as a historical center and as an arts and entertainment district here in the City of Santa Clarita.

It's very interesting with the loss of redevelopment here statewide, it has created some concerns as it relates to the momentum that has been created by virtue of what the city has done and what our organization has done in order to create opportunities here in an area that has extreme historical significance to the valley in both the film industry.

This particular project in itself is going to have a stimulus effect long and far wide here throughout the valley, and we see this as an extremely great opportunity to increase the amount of traffic for Old Town Newhall mainly along Main Street here but, as other speakers have mentioned, it also brings into the probability that some of the other projects that have been approved in proximity to this particular area are also going to come to fruition much, much quicker.

I think that we can't say enough about jobs. And I think that the stewardship that Disney has demonstrated as it relates to both care of the property and creating a project that we can all be very proud of having here right in our backyard goes without saying.

The current site, of course, is somewhat of an eyesore. It looks more like a scar than it does a pad now. And Disney's plan to restore the riparian habitat and create more aesthetics immediately along that corridor are very well noted.

Moreover, I think that, in looking at good and well planned development, infrastructure is a very important aspect as well. The fact of the matter is this project fronts a freeway; so it is not going to have any significant impact on the interior part of the community. And yet it's going to provide a very easy means for people to go to work and return without any hindrance here for the rest us.

But my focus really is on what it's going to do here in this area immediately around us. And I think that both during construction and long after it is going to help replace what we have lost by virtue of the lost redevelopment and the slowdown that's going to create; so I would only ask one thing. Hurry up.

Response No. T1-20

This comment expresses general support for the Project and cites some of the some of the Project's features, benefits, and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Bruce Aronson

Comment No. T1-21

My name is Bruce Aronson. That's B-r-u-c-e. Aronson is A-r-o-n-s-o-n. I live at 25132 Running Horse Road, Newhall, which is located off Placerita Canyon just across the Los Angeles Nature Center, which is adjacent to this Disney Studio property.

I wish the EIR to address the increased traffic along Placerita Canyon. If the additional traffic comes from off the 14 or city traffic from the north side of the 14 freeway, I have no problem with this project and would welcome it.

If increased traffic to this project comes through Placerita Canyon Road south of the 14 freeway from this project, they need to provide widening of this roadway as required.

The current traffic use along Placerita Canyon just south of the 14 freeway is extremely limited for both pedestrian and bicycle use due to there is no paved road use beyond the paved asphalt road, which is only large enough to serve one vehicle per lane of which there is only one lane in each direction.

At present driving and the use of bicycles or pedestrians at the same time is very dangerous. The dangers are due to vehicles needing to cross over the double yellow median lines into the opposing traffic to avoid either bicycles or pedestrians. There is no designated bypass area for cars to pass other vehicles, and the canyon road has limited visibility.

I would ask the EIR report to address the increased use of Placerita Road through this canyon. If additional traffic is generated through this canyon road, I would ask the Disney Studios ABC company to make upgrades to this roadway by widening this road.

I personally am scared of getting hit when either walking or riding my bicycle through this canyon road and hope that Los Angeles (inaudible) will take a hard look increasing safety along with the increased use.

Response No. T1-21

Traffic impacts, including impacts along portions of Placerita Canyon Road, are evaluated in Section V.J, Traffic, Access, and Parking, of the Draft EIR and addressed in more detail in the Traffic Study provided in Appendix I of the Draft EIR. The Traffic Study determined that widening of Placerita Canyon Road would not be necessary, as there is sufficient right-of-way to accommodate a new turn lane into the current main Ranch

entrance; rather, the roadway would be restriped as indicated in MM J-7. With respect to travel along Placerita Canyon Road east of the Ranch, as shown on Figure 9 on page 30 of the Traffic Study, 1 percent of Project-related vehicle trips are expected to travel on Placerita Canyon Road to the east. Based on the estimated daily trip generation associated with the Project, this translates to approximately 33 to 35 vehicles daily.

In addition, as discussed on page V.J-50 in Section V.J, Traffic, Access, and Parking, of the Draft EIR, at the request of LACDPW, a sight distance analysis was conducted for the three Project site access locations: the intersection at SR-14 Northbound Off-Ramp/Placerita Canyon Road, the current Ranch main entrance/Placerita Canyon Road, and the emergency access driveway along Placerita Canyon Road. Based on the intersection characteristics and Caltrans' 2000 Highway Capacity Manual (HCM) methodology, the required sight distances at the three proposed access points would be 620 feet in either direction. As discussed in the Traffic Study and illustrated in Figures 31, 32, and 33 therein, the Development Area and access locations would be designed to provide the required sight distances. Therefore, impacts would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Lea Tantoy

Comment No. T1-22

Good evening. My name is Lea Tantoy, and that's spelled L-e-a T-a-n-t-o-y. I've been a resident of Santa Clarita since 1997. My husband and I live four miles away from the proposed Disney Studios at the Golden Oak Ranch. I cannot think of a more socially and environmentally conscious company than Disney to build in our neighborhood. The extensive mitigation measures and planning detail in the Draft EIR demonstrate that the Walt Disney company continues to believe in our value.

They have gone the extra mile to protect the environment both during construction and ongoing operations. Water and sewer infrastructure improvements, measures to limit noise and dust during construction and several traffic improvements will all minimize project impacts.

The Walt Disney company has a great history in our valley. I, for one, welcome the proposed improvements and continued process in our community for years to come. Most importantly, I welcome the 3,000 or so jobs that will be created and its positive impact on the local economy. Thank you.

Response No. T1-22

This comment expresses general support for the Project and cites some of the some of the Project's features, benefits, and mitigation measures proposed to enhance the natural resources of the Ranch and reduce environmental impacts. Some of the economic data presented in the comment is based on the economic and fiscal impact analysis provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Diane Trautman

Comment No. T1-23

Good evening. My name is Diane Trautman. That's D-i-a-n-e T-r-a-u-t-m-a-n. Thank you for the opportunity to speak. Disney ABC brings a tremendous value to our valley. We certainly welcome the jobs and the economic value locally for the county and the state.

Response No. T1-23

This comment cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-24

My concerns include preservation of the oak woodlands, Placerita Creek, and surrounding canyons. Residents in our valley have fought long and hard to preserve and maintain these areas.

Response No. T1-24

Biological impacts are evaluated in Section V.F, Biological Resources, of the Draft EIR. As indicated on page V.F-95 therein, with the implementation of the proposed Mitigation Measures and Project Design Features, the Project would have less than significant impacts with respect to biological resources. Specifically, impacts on vegetation and jurisdictional waters within Placerita Creek and impacts to oak trees would be fully mitigated via implementation of the Habitat Mitigation and Monitoring Program and the Oak Tree and Woodland Mitigation and Monitoring Plan (see Mitigation Measures MM F-1 and MM F-3, as modified in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR).

Comment No. T1-25

And I'd also be concerned because I've heard residents talk about traffic. And the gentleman who just spoke, I would like to ask that you consider adding bike lanes and certainly roadway upgrades as needed to preserve the safety of people driving on that roadway.

Response No. T1-25

The Project would include roadway improvements at nearby intersections, including at Placerita Canyon Road/SR-14 Northbound Off-Ramp, current Ranch main

entrance/Placerita Canyon Road, Sierra Highway/Placerita Canyon Road, and Sierra Highway/SR-14 Southbound Ramps. Refer to Response No. T1-21 regarding the Traffic Study and the sight distance analysis conducted at each of the Development Area access locations and the resulting less than significant impacts.

Comment No. T1-26

And I also agree with the statement by Mr. Cameron that we encourage you to use and incorporate solar power and possibly incorporate any other green technologies. I haven't had a chance to read the DEIR; so I don't know if you've included those in the buildings themselves, but I certainly appreciate that.

And, you know, while I'm hesitant to endorse the removal of heritage oaks, the applicant's presentation has answered my questions on that issue and many of the other issues and I agree that Disney has exercised good stewardship on the property to date and I expect that the company will continue to do so.

So I thank you for the opportunity to speak, and I encourage you to look at other ways to improve green technology and roadway safety. Thank you so much.

Response No. T1-26

Refer to Response No. T1-12 regarding the Project's sustainability features, including photovoltaic technology (i.e., solar panels) on selected roofs. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Jon Collard

Comment No. T1-27

Good evening. My name is Jon, J-o-n, Collard, C-o-l-l-a-r-d, just like collard greens if any of you happen to be from the south. I am a local business owner. I am president of American Tax Incentives. We specialize in implementing the (inaudible) project which we have been fortunate enough to receive here locally.

I am also a board member of the Santa Clarita Valley Economic Development Corporation. I'd like to speak in support of this project. I believe that Disney and ABC has proven to be a great example of appropriate and enhanced caretaking of land.

Secondly, I'd like to discuss the jobs that are coming to the area. I've also listed jobs and, lastly, jobs to the area. In this room we're surrounded by movie posters, which is really exciting and encouraging. But unfortunately, as we know, filming has moved to Canada. Filming has moved to Utah, Oklahoma, Michigan, all kinds of places.

Bringing in 3,000 new jobs, close to 3,000 new permanent jobs has a multiplier effect that three minutes would not allow me time to address. But the multiplier effect will increase business attraction, increase local revenue, and the most important thing that Disney tends to provide and that is quality of life. Thank you for your time.

Response No. T1-27

This comment expresses general support for the Project and cites some of the some of the Project's benefits. Some of the economic data presented in the comment is based on the economic and fiscal impact analysis provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Michele Jenkins

Comment No. T1-28

Good evening. My name is Michele, M-i-c-h-e-l-e, Jenkins, J-e-n-k-i-n-s. My address is 25243 Running Horse Road, Newhall. I'm here to speak in two roles really. First, I live in the Placerita Chaparral tract, which is the immediately adjacent property to the ranch, and I want to testify to the fact that Disney has always been wonderful neighbors to our neighborhood and I fully support the project.

The ranch managers always express concern when there's been fires in the area, check on our neighborhood. So for years I've had that experience; so I speak highly of the Disney company and their care for the property.

I am also an elected board member for the Santa Clarita Community College District. I've been on the board of trustees for 25 years. And I'd like to address some issues with the college district.

I appreciate the fact that the Disney company reached out to our neighborhood, held an informational meeting for our neighborhood down at the site to go over the plans over a year ago, and they also reached out to the college district and met with the college district.

This is important because of the fact that the college has a media arts program that we at any one time we enroll -- about 2,100 students are enrolled in the various programs within that media arts program; so I believe that there's an opportunity for partnerships with the college and for students who are working in the fields. We have very new equipment, and students need the opportunity to be able to work in real life situations; so I'm sure that Disney would be receptive to that.

Another issue I'd like to address to the Disney officials that are here and to the project manager, if you need assistance with your oak trees I know you are removing a number of them -- and if you would give consideration to donating them to the college district, we have a number of available sites where we could use oak trees.

We have two campuses. Our campus in Canyon Country on Sierra Highway alone could take about 160 trees, and we've had other organizations donate trees to us when they've needed to move them. And so I would like for you to give that consideration.

I don't know if you the project manager have met with -- if you're one of the people that met with the college officials, but I know they would be glad to meet with you and discuss how

that could be facilitated. I think that would be a win for Disney ABC Studios and certainly a win for the college district. Thank you very much.

Response No. T1-28

This comment expresses general support for the Project, describes the speaker's experience with Ranch staff, and cites some of the Project benefits. Refer to Response No. 34-1 regarding the potential relocation of oak trees. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Lynne Plambeck

Comment No. T1-29

Lynne Plambeck, L-y-n-n-e P-l-a-m-b-e-c-k, speaking for the Santa Clarita Organization for Planning in the Environment. I think the Disney corporation really made brownie points when they worked so hard to help our community, Elsmere Canyon and the view shed and also Whitney Canyon.

And so here now we're into Placerita Canyon and some of the view shed issues they would want to destroy if we're looking at big soundstages off the freeway although maybe the creek is a point that's a problem. I don't think the rest of the project is going to be enhanced by the view shed that we're now going to see from this.

Response No. T1-29

As discussed in Section IV, Project Description, of the Draft EIR, the Project would create soundstages on the 58-acre Development Area adjacent to SR-14, while continuing less intensive existing outdoor filming uses on 195 acres further east within the Ranch and protecting 637 acres of surrounding hillsides used as a filming backdrop. As discussed on page III-3 in Section III, Environmental Setting, and page IV-7 of Section IV, Project Description, of the Draft EIR, approximately 23.6 acres of the Development Area contain two fill pads created when Caltrans deposited dirt and gravel from grading during construction of SR-14 in the early 1970s and over 10 acres of the Development Area lie in an area previously used to cultivate agricultural crops under transmission lines owned by the LADWP. The Project would transform these areas with a studio design that respects the rural setting of the Ranch and allows views of Placerita Creek and the surrounding hillsides of Placerita Canyon.

View impacts are evaluated in Section V.I, Visual Qualities, of the Draft EIR. While the portion of the Ranch nearest the SR-14 freeway will undoubtedly change thus altering views of that limited area, as indicated on page V.I-38 of the Draft EIR, the Project would not have a substantial adverse effect on a scenic vista or substantially alter views from a public trail, and view impacts would be less than significant. As also discussed, the proposed buildings would be simple in form, function, and architectural design with the intent of complementing the surrounding rural setting. The new buildings would be integrated into the topography of the site with rounded roofs on the soundstage buildings to blend the new development with the surrounding mountains. Substantial landscaping would also be provided throughout the Development Area, including along adjacent roadways, so as to obscure views from off-site. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-30

I wanted to talk a little bit about this process. It's very interesting that we had the 21,000 unit Newhall Ranch project that Sam Dea was, in fact, the planner on and we never had a hearing out here like this. I've never come to a hearing where the applicant has turned around and given a speech to the audience rather than to the Hearing Officer; so I'm really wondering about the process here.

And although I think all of us appreciate having a hearing out here, I'm also wondering why we're having a hearing before the Hearing Officer when this is obviously a plan amendment change that's going to have to go all the way to the board of supervisors.

When is the regional planning commission? Where are the regional planning commissioners? Where is the staff person on this? If Christina Tran is the staff person, she's not even at the hearing?

Was this for the applicant? Is this a presentation by the applicant in the guise of a public hearing? Because I'm really pretty concerned. I have never seen an applicant speak from behind the podium with the county symbol on it turned towards the audience. So I'm just wondering what's going on here?

Response No. T1-30

This comment expresses similar concerns as Comment No. 15-3 by SCOPE. Refer to Response No. 15-3 regarding the public hearing process for the Project. Also refer to a direct response from the Hearing Examiner provided within the hearing transcript.

Comment No. T1-31

Also, I was interested in the chamber's presentation that the EIR confirms there's going to be jobs. There's no job analysis in the EIR. Did she read it? Has anybody here read it? I mean it's a pretty huge document. We haven't started analyzing it yet. I love this idea of jobs. And Disney's great, and I love the movie industry. However, there needs to be guarantees that these jobs are really going to happen.

You know, Moreno Valley got these huge warehouse places. They were going to bring 3,000 jobs. They've got like 160 or something out of it.

There needs to be guarantees that these are actually jobs, they're not going to be transferred from Burbank so that now we have a bunch of commuters going back and forth.

Response No. T1-31

This comment expresses similar concerns as Comment No. 15-5 by SCOPE. Refer to Response No. 15-5 regarding Project employment, which was eliminated from further review in the EIR during the Initial Study process. In analyzing impacts on the environment, a Draft EIR considers physical impacts on the environment, not economic impacts. Nonetheless, the economic benefits of the Project provide a justification for the Statement of Overriding Considerations required per CEQA Guidelines Section 15093. Economic data regarding the Project is provided in Appendix N (added to the Draft EIR in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR and accordingly appended to this Final EIR). This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-32

Obviously, if you've got to get parking waivers and put in extra parking for something, you're planning on everybody driving. We have a really crowded freeway now. We have severe air pollution problems in the Santa Clarita Valley.

Response No. T1-32

This comment expresses similar concerns as Comment No. 15-2 by SCOPE. Refer to Response No. 15-2 regarding the requested parking permit. Traffic impacts are addressed in Section V.J, Traffic, Access, and Parking, and air quality impacts are addressed in Section V.E.1, Air Resources—Air Quality, of the Draft EIR. Refer to Response No. 23-1 for a summary of traffic impacts, all of which would be less than significant following mitigation. As discussed on pages V.E.1-62 and V.E.1-63 of the Draft EIR, Project-related and cumulative regional construction emissions (specifically NO_x and VOC emissions) would result in a significant short-term impact even with the implementation of mitigation measures. The Project's operational air quality impacts would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-33

If Disney is going to bring their jobs from Burbank here, then they need to provide some kind of public transportation where that's going to happen where people aren't driving back and forth on the freeway. We're trying to reduce greenhouse gases, not increase them with more commuting.

There's a really good studio facility in Burbank and, you know, I don't know why they're needing to expand. I haven't read their business plan. But the EIR, if we're going to

approve all this industry facility in a rural area, there needs to be some financial substantiation that jobs, in fact, are really going to be created. There's nothing in the EIR.

Response No. T1-33

Refer to Response No. L3-7 regarding the proposed TDM program, which is detailed in PDF J-1 as amended in Section II, Corrections, Clarifications, and Additions to the Draft EIR, of this Final EIR. As discussed therein, TDM measures would include a rideshare/vanpool/carpool matching program, preferred parking for carpool/vanpool vehicles, and preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles among other measures.

Project impacts related to greenhouse gases (GHGs) are evaluated in Section V.E.2, Air Resources—Global Climate Change, of the Draft EIR. As concluded in the Draft EIR, the Project would have a less than significant impact on the environment with respect to GHG emissions.

Refer to Response No. 15-5 regarding Project employment, as well as Response No. T1-31. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. T1-34

All right.

Response No. T1-34

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Ben Curtis

Comment No. T1-35

Good afternoon. My name is Ben, B-e-n, Curtis, C-u-r-t-i-s. I'm a nearly 40-year resident of Placerita Canyon, which is directly west of the project. We are a partially gated community. We have a very active property owners association whose interest is in protecting our rural lifestyle.

Most of you that -- most of the people here that live in the community are familiar with the unique characters of the Placerita Canyon west of the ranch, and our main concern is to protect that.

That being said, I have to add my voice to the course of those in support of this project. We've had a couple of presentations by Disney at our board meetings and public meetings in our canyon. I don't know that I've heard one voice of negativity at any of those meetings.

We're very excited about the potential of a nice revenue and job producing neighbor east of us and would really like to see this project fast tracked as much as possible. Thank you.

Response No. T1-35

This comment expresses general support for the Project and cites some of the Project's benefits. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Gregory Jenkins

Comment No. T1-36

Hello. My name is Greg Jenkins, G-r-e-g J-e-n-k-i-n-s. I want to thank you for letting me have a moment up here. I've been a resident of Santa Clarita since 1966. I have been in my present house next door to the Disney Ranch since 1983. All the time that we've been living up on Running Horse Road, the Disney Ranch has been very, very good neighbors.

When we had the last huge forest fire, they helped us put new trees in and do some reforestation projects. Also, they have improved the Placerita Canyon entrance with the extra lanes and the turn lane; so I think that has been really helpful.

But the whole Disney community, the Disney Ranch community, have been very, very supportive of our neighborhood. They've helped us. They've gone through talks with us when we had questions, and I'm just in favor of the project. Thank you.

Response No. T1-36

This comment expresses general support for the Project and describes the speaker's experience with the Applicant. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

V. Mitigation Monitoring and Reporting Program



V. MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

CEQA requires a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of project approval and development. The Draft EIR prepared for the Disney | ABC Studios at The Ranch Project identified mitigation measures, where appropriate, to avoid or substantially reduce the environmental impacts associated with the Project. This MMRP is designed to monitor the implementation of those mitigation measures. Accordingly, this MMRP has been prepared in compliance with the requirements of CEQA Section 21081.6 and CEQA Guidelines Section 15097.

The MMRP that follows lists each of the proposed Project Design Features (PDFs) and required Mitigation Measures (MMs) and identifies the corresponding action required for proof of compliance, the mitigation timing, the party responsible for implementation, and the monitoring agency or party responsible for ensuring each measure is adequately implemented.

**Mitigation Monitoring and Reporting Program
Disney | ABC Studios at The Ranch Project
Project No. TR071216-(5)**

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
A. GEOTECHNICAL HAZARDS				
<p>PDF A-1: The Applicant shall implement appropriate erosion control and drainage devices as specified in the Project’s Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan.</p>	<p>A. Submit LSWPPP, WVECP, State SWPPP, NOI, and grading plans incorporating adequate SUSMP and erosion control devices for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW—Grading Plans, LSWPPP, WVECP • LARWQCB—State SWPPP, NOI
	<p>B. Implement approved grading/erosion control plans</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW
	<p>C. Maintain appropriate erosion control and drainage devices</p>	<p>During operation</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
<p>PDF A-2: Excavation and grading activities shall be scheduled during dry weather periods to the extent feasible. If grading occurs during the rainy season (October 15 through April 1), appropriate erosion control measures shall be implemented in accordance with the approved Wet Weather Erosion Control Plan.</p>	<p>A. Incorporate appropriate erosion control devices into WVECP and submit for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>B. Implement approved grading/erosion control plans</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW
<p>PDF A-3: Stockpiled soil shall be covered with secured tarps or plastic sheeting or sprayed with a soil stabilizer when not in active use.</p>	<p>Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM A-1: Prior to the issuance of a grading permit(s), the Applicant shall submit to the County of Los Angeles Department of Public Works for review and approval a final Geotechnical Investigation Report based on final Project designs prepared by a registered civil engineer and certified engineering geologist, in compliance with the County’s codes and policies, including GS051.0 and GS063.0 of the County of Los Angeles Department of Public Works Manual for Preparation of Geotechnical Reports, and consistent with the Preliminary Geotechnical Investigation Reports contained in Appendices B.1 and B.2 of the Draft EIR.</p>	<p>Submit final Geotechnical Investigation Report for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>MM A-2: Project design and construction shall comply with all applicable building codes and standards, including those established by the California Geological Survey’s “Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication No. 117;” the Uniform Building Code as adopted by the County of Los Angeles; State and County laws, ordinances and Code requirements; and the recommendations set forth in the final Geotechnical Investigation Report.</p>	<p>A. Submit building plans for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>B. Construct structures in accordance with approved building plans</p>	<p>Prior to issuance of certificate of occupancy</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW
<p>MM A-3: Prior to issuance of a grading permit, the Applicant shall submit a grading plan to the County of Los Angeles Department of Public Works for verification of compliance with County codes and policies.</p>	<p>Submit grading plan for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
B. FLOOD HAZARDS				
<p>PDF B-1: The Project’s storm drain system shall be designed and sized to ensure that post-development peak flow rates will not exceed pre-development peak flow rates to prevent off-site downstream flooding caused by the Project.</p>	<p>A. Submit final Hydrology and Hydraulic Study for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>B. Submit storm drain plans and/or grading plans, as applicable in accordance with approved final Hydrology and Hydraulic Study for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>PDF B-2: Flows from on- and off-site drainage systems shall be routed to the same creek outlets so as to minimize the number of outlets and disturbance to the Placerita Creek banks.</p>	<p>Submit storm drain plans and/or grading plans, as applicable in accordance with approved final Hydrology and Hydraulic Study for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>PDF B-3: In compliance with County of Los Angeles Department of Public Works requirements, a variety of construction best management practices shall be specified in the Project’s Stormwater Pollution Prevention Plan and implemented during construction.</p>	<p>A. Submit LSWPPP, State SWPPP, NOI, and WVECP for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW—LSWPPP, WVECP • LARWQCB—State SWPPP, NOI
	<p>B. Implement approved grading/erosion control plans</p>	<p>During construction</p>	<p>Applicant/Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>In compliance with County of Los Angeles Department of Public Works requirements, a variety of operational best management practices shall be depicted in the Project’s Standard Urban Stormwater Mitigation Plan, specified on improvement plans, and constructed to allow infiltration and treat stormwater runoff.</p>	<p>C. Submit SUSMP for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>D. Submit grading plans and/or storm drain plans, as applicable, specifying SUSMP devices in accordance with approved SUSMP plan for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>E. Construct operational BMP’s in accordance with approved plans</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW
<p>MM B-1: Prior to the issuance of a grading permit, the Applicant shall submit to the County of Los Angeles Department of Public Works for review and approval the final Hydrology and Hydraulic Study based on final Project designs in compliance with the County’s codes and policies, including the County of Los Angeles Department of Public Works Hydraulic Design Manual, Sedimentation Manual, Low Impact Development Standards Manual, and consistent with the approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR. The final Hydrology and Hydraulic Study shall demonstrate that relevant Project impacts remain less than significant.</p>	<p>Submit final Hydrology and Hydraulic Study for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM B-2: Project design and construction shall comply with applicable County codes and policies and the final Hydrology and Hydraulic Study.</p>	<p>A. Submit grading/storm drain plans in accordance with approved Hydrology and Hydraulic Study for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>B. Implement approved grading/storm drain plans</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW
<p>C. NOISE</p>				
<p>PDF C-1: The majority of Project construction-related truck trips shall be scheduled outside of the A.M. peak (7:00 A.M. to 9:00 A.M.) and P.M. peak (4:00 P.M. to 6:00 P.M.) traffic hours.</p>	<p>Maintain log of truck arrivals and exit times demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDRP
<p>PDF C-2: To expedite soil export activities, a second work shift from approximately 7:00 or 8:00 P.M. to approximately 2:00 or 3:00 A.M. may occur if appropriate permits/exemptions are granted. Activities scheduled during this night shift shall be limited to loading trucks with soil and hauling and Applicant shall ensure no noise disturbance at any residential property line would occur due to these night shift activities.</p>	<p>A. Request and obtain approval for exemption from County Engineer to authorize second work shift activities</p>	<p>Prior to commencement of second work shift</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • LACDPH Health Officer—for support/referral
	<p>B. Obtain associated hauling permit for second shift hauling</p>	<p>Prior to commencement of second work shift</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>PDF C-3: Building mechanical/electrical equipment shall be designed to meet the noise limit requirements of Los Angeles County Code, Chapter 12.08—Noise Control and the City of Santa Clarita Municipal Code Section 11.44.040, as applicable.</p>	<p>A. Submit acoustical report demonstrating building design compliance with applicable noise standards</p>	<p>Prior to issuance of relevant building permit</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer • SCCDD—as applicable

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	B. Construct structures in compliance with noise limit requirements of applicable County and City codes	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACDPH Health Officer—for support/referral • SCCDD—as applicable
	C. Submit post-construction noise measurements verifying compliance upon request	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral
<p>PDF C-4: Mechanical equipment buildings (e.g., the central plant) shall be designed to meet the noise limit requirements of Los Angeles County Code, Chapter 12.08—Noise Control.</p>	A. Submit acoustical report demonstrating building design compliance with County noise standards	Prior to issuance of relevant building permit	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer
	B. Construct structures in compliance with noise limit requirements of applicable County codes	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACDPH Health Officer—for support/referral
	C. Submit post-construction noise measurements verifying compliance upon request	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral
<p>MM C-1: With the exception of short-term nighttime hauling activities during the grading phase (if an exemption is obtained from the County Engineer, as applicable) and work by Caltrans and Southern California Edison, exterior</p>	A. Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACDPH Health Officer—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
noise-generating construction activities shall be limited to Monday through Friday from 7:00 A.M. to 7:00 P.M., and from 8:00 A.M. to 6:00 P.M. on Saturdays. No construction activities shall occur on Sundays or any legal holidays.	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACDPH Health Officer—for support/referral
MM C-2: Power construction equipment shall be equipped with noise shielding and muffling devices. All equipment shall be properly maintained in accordance with manufacturers' specifications to assure that no additional noise, due to worn or improperly maintained parts is generated.	Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral
MM C-3: At least 72 hours prior to the construction of the off-site water and sewer improvements, the Applicant shall provide written notification to residences within a 100-foot radius of the construction zone of these improvements.	A. Provide notice to residences and each monitoring agency	Prior to construction of off-site water and sewer improvements	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral • SCPWD
	B. Maintain log demonstrating compliance	Prior to construction of off-site water and sewer improvements	Applicant	<ul style="list-style-type: none"> • LACDRP
MM C-4: The central utility plant shall be designed and constructed such that exterior noise levels do not exceed 82 dBA at a distance of 50 feet from the utility plant in compliance with County noise standards.	A. Submit acoustical report demonstrating building design compliance with applicable noise standards	Prior to issuance of relevant building permit	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer
	B. Construct structures in compliance with noise limit requirements of applicable County codes	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACDPH Health Officer—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	C. Submit post-construction noise measurements verifying compliance upon request	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral
<p>MM C-5: The booster pump station associated with the water infrastructure improvements shall be designed and constructed such that noise levels at the nearest residential receptor do not exceed the City of Santa Clarita’s ambient noise limits of 55 dBA during nighttime hours (between 10:00 P.M. and 7:00 A.M.) and 65 dBA during daytime hours (between 7:00 A.M. and 10:00 P.M.) or the lowest measured ambient noise level.</p>	Submit building plans and specifications for review and approval	Prior to issuance of relevant building permit	Applicant	<ul style="list-style-type: none"> • SCCDD
<p>MM C-6: For construction of segments of the proposed off-site utility lines located within the jurisdiction of the County of Los Angeles or the City of Santa Clarita, construction shall be permitted from 7:00 A.M. to 7:00 P.M. Monday through Friday and 8:00 A.M. to 6:00 P.M. on Saturday. For applicable segments under Caltrans’ jurisdiction, construction hours shall be from 11:00 P.M. to 5:00 A.M. Monday through Friday.</p>	A. Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral • SCPWD • Caltrans
	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPH Health Officer—for support/referral • SCPWD
D. WATER QUALITY				
<p>PDF D-1: The Applicant shall prepare and implement a Stormwater Pollution Prevention Plan in compliance with the National Pollutant Discharge Elimination System Construction General Permit.</p>	A. Submit LSWPPP, State SWPPP, and NOI for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW—LSWPPP • LARWQCB—State SWPPP, NOI

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	B. Implement LSWPPP/ State SWPPP	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDPW— LSWPPP • LARWQCB—State SWPPP, NOI
<p>PDF D-2: The Applicant shall implement a Standard Urban Stormwater Mitigation Plan to address water quality issues during ongoing operation of the Project, consistent with the approved Drainage Concept/LID Plan/SUSMP Plan contained in Appendix C of the Draft EIR.</p>	Implement approved grading/storm drain plans in accordance with approved SUSMP	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDPW
<p>PDF D-3: In accordance with the County’s Low Impact Development Manual, low impact development best management practices shall be implemented to promote infiltration and to complement, or be a part of, the Standard Urban Stormwater Mitigation Plan best management practices.</p>	A. Submit grading plans and/or storm drain plans, as applicable, specifying LID/SUSMP devices in accordance with approved SUSMP/ LID plan for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW
	B. Implement approved grading/storm drain plans in accordance with approved SUSMP/LID Plan	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDPW
<p>MM D-1: Prior to the issuance of any building permit/installation of any on-site wastewater treatment system, the Applicant shall submit a feasibility report in conformance with the requirements outlined in the County of Los Angeles Department of Public Health’s guidelines “A Professional Guide to Requirements and Procedures for Onsite Wastewater Treatment System (OWTS)” to the Environmental Health section of the County of Los Angeles Department of Public Health for review and approval and</p>	Submit final OWTS feasibility report for review and approval	Prior to issuance of building permit/ installation of OWTS	Applicant	<ul style="list-style-type: none"> • LACDPH

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
demonstrate that the Potential Mobile Home Relocation Areas are capable of supporting the installation of an on-site wastewater treatment system.				
MM D-2: The design and installation of the on-site wastewater treatment system shall conform to the rules, regulations and requirements of the County of Los Angeles Department of Public Health and other applicable regulatory agencies, including the Regional Water Quality Control Board, as applicable.	A. Submit final OWTS feasibility report for review and approval	Prior to issuance of building permit/ installation of OWTS	Applicant	<ul style="list-style-type: none"> • LACDPH • LARWQCB—as applicable
	B. Site inspection	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDPH
E.1 AIR RESOURCES—AIR QUALITY				
PDF E.1-1: During construction, the Project shall comply with the South Coast Air Quality Management District’s Rule 403 regarding fugitive dust control. The following control measures shall be implemented to control fugitive dust: <ul style="list-style-type: none"> • Watering active construction areas twice daily unless visibly moist to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind. • Covering stockpiled soil with secured tarps or plastic sheeting or spraying with a soil stabilizer when not in active use. • Securing loads by trimming, watering or other appropriate means to prevent spillage and dust. • Maintaining soil stabilization of inactive construction areas with exposed soil via water, non-toxic soil stabilizers, or replaced vegetation. 	A. Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • SCAQMD
	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • SCAQMD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<ul style="list-style-type: none"> • Suspending earthmoving operations or applying additional watering to meet Rule 403 criteria if wind gusts exceed 25 miles per hour; • Covering all haul trucks or maintaining at least 6 inches of freeboard; • Minimizing track-out emissions using the methods provided for in Rule 403; and • Limiting vehicle speeds to 15 miles per hour or less in staging areas and on haul roads. 				
<p>MM E.1-1: All equipment shall be properly tuned and maintained in accordance with manufacturer’s specifications. Verification documentation shall be provided to the County of Los Angeles Department of Regional Planning upon request within five business days.</p>	Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • SCAQMD
<p>MM E.1-2: During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions.</p>	Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • SCAQMD
<p>MM E.1-3: Outdoor construction activities shall be discontinued during second-stage smog alerts.</p>	Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • SCAQMD
<p>MM E.1-4: After rough grading of the Project site is completed, construction activity shall utilize electricity from power poles on or adjacent to the Ranch rather than temporary diesel power generators and/or gasoline power generators when electricity with adequate circuit capacity is available from power poles in proximity to construction areas.</p>	A. Maintain documentation demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP
	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP
<p>MM E.1-5: During Project construction, all internal combustion engines/construction equipment operating on the Project site shall</p>	A. Submit operating permit(s), as required	Prior to commencement of construction	Applicant	<ul style="list-style-type: none"> • SCAQMD • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>meet United States Environmental Protection Agency-Certified Tier 3 emissions standards or higher, according to the following:</p> <ul style="list-style-type: none"> • Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations. • Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations. • A copy of each unit's certified tier specification, Best Available Control Technologies documentation, and California Air Resources Board or South Coast Air Quality Management District operating permit shall be provided at the time of mobilization of each applicable unit of equipment. 	<p>B. Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDRP • SCAQMD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<ul style="list-style-type: none"> Encourage construction contractors to apply for South Coast Air Quality Management District “SOON” funds. Incentives could be provided for those construction contractors who apply for “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. (More information on this program can be found at the following website: www.aqmd.gov/tao/Implementation/SOONProgram.htm.) 				
<p>MM E.1-6: Project buildings shall be designed to minimize the need for the application of architectural coatings. Where the application of architectural coatings is necessary on-site, the Applicant shall comply with the South Coast Air Quality Management District’s Rule 1113 regarding the use of low and zero volatile organic compound coatings.</p>	A. Submit contractor’s specifications for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> LACDRP
	B. Maintain documentation demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> LACDRP
<p>MM E.1-7: Mass grading shall be limited to 10 acres per day.</p>	A. Submit revised Exhibit A incorporating language regarding grading limitation for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> LACDRP
	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> LACDRP LACDPW—for support/referral
<p>MM E.1-8: Construction of the proposed Placerita Canyon Connector Trail shall be scheduled so as not to occur concurrently with Project-related grading activities within the Ranch.</p>	A. Submit revised Exhibit A incorporating language regarding trail construction schedule restriction for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> LACDRP LACDPW—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	B. Maintain documentation demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
	C. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
MM E.1-9: During soil export activities, the selected contractor shall provide remote dispatch for haul trucks to minimize queuing on Placerita Canyon Road immediately adjacent to the site.	Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP
MM E.1-10: During soil export activities, the selected contractor shall use diesel haul trucks that meet the United States Environmental Protection Agency’s 2007 model year emissions requirements for nitrogen oxides (NO _x).	Maintain log demonstrating compliance	During construction	Applicant/ Contractor	<ul style="list-style-type: none"> • LACDRP
E.2 AIR RESOURCES—GLOBAL CLIMATE CHANGE				
PDF E.2-1: The Project shall comply with the County’s Green Building ordinance.	A. Submit building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral
The Project shall comply with the County’s Low Impact Development ordinance.	B. Submit grading plans for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral
The Project shall comply with the County’s Drought-Tolerant Landscaping ordinance.	C. Submit landscape plan for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP/LACDPW/ LACFD—Approval of landscape plan, mutual support/referral
PDF E.2-2: The Project shall comply with the 2010 or latest edition of the California Green Building Standards Code, as applicable, which	A. Submit building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
contains requirements for construction site selection, stormwater control during construction, construction solid waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation.	B. Implement approved building plans	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDPW
F. BIOLOGICAL RESOURCES				
<p>PDF F-1: In accordance with the County’s Drought-Tolerant Landscaping ordinance, at least 75 percent of the Project’s landscaped area shall contain plants from the Los Angeles County Drought-Tolerant Plant List.</p>	A. Submit landscape plan for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP/LACDPW/LACFD—Approval of landscape plan, mutual support/referral
	B. Implement approved landscape plan	Upon completion of each major phase of Project development (see CUP revised Exhibit A phasing schedule)	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACFD— for support/referral
<p>MM F-1: The Project shall implement the requirements of the final approved Habitat Mitigation and Monitoring Program, consistent with the preliminary Habitat Mitigation and Monitoring Program contained in Appendix F.11 of the Draft EIR, to mitigate impacts to U.S. Army Corps of Engineers/Regional Water Quality Control Board “waters of the U.S./waters of the State” and California Department of Fish and Wildlife jurisdictional streambeds. As part of the</p>	A. Submit final HMMP for review and approval	Prior to issuance of grading permit(s)	Applicant/ Qualified Biologist	<ul style="list-style-type: none"> • LACDRP • USACOE • LARWQCB • CDFW
	B. Implement approved HMMP	During construction	Applicant/ Construction Manager/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP • USACOE • LARWQCB • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>Habitat Mitigation and Monitoring Program, which shall restore and expand the riparian habitat along Placerita Creek following temporary impacts to stabilize the fill pad slopes, the Project shall mitigate for the impact to the southern willow scrub community and the mixed willow riparian woodland in the Development Area at a minimum of a 1:1 mitigation-to-impact ratio.</p> <p>The Habitat Mitigation and Monitoring Program restoration efforts shall include the grading and recontouring of the existing fill pad slopes along Placerita Creek within the Development Area and the revegetation with native riparian species by planting and seeding. The Habitat Mitigation and Monitoring Program shall identify appropriate mitigation objectives, performance standards, planting and monitoring/reporting requirements to ensure successful restoration and enhancement of the mitigation area. The Habitat Mitigation and Monitoring Program shall also contain contingency measures identifying corrective actions required in the event that the performance standards are not met. A minimum of 4.04 acres of riparian habitat shall be established, restored, enhanced, and/or preserved, resulting in a net gain in California Department of Fish and Wildlife jurisdictional area. Maintenance (i.e., weeding, pest control, irrigation system maintenance, trash removal, etc.) and monitoring of the mitigation area shall be conducted for a minimum of five years and until such time as the Habitat Mitigation and Monitoring Program performance standards are achieved to ensure success of the plan. The final Habitat Mitigation and Monitoring</p>	<p>C. Site inspection</p>	<p>During five-year HMMP monitoring period and until such time as performance standards are achieved</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>Program shall be submitted to and approved by the County of Los Angeles Department of Regional Planning, the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife, in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code 1602 and supporting regulations, prior to issuance of a grading permit.</p>				
<p>MM F-2: Project construction-related activities likely to have the potential of disturbing suitable bird nesting habitat shall be prohibited from February 1 through August 31, unless a biological monitor acceptable to the Director of the County of Los Angeles Department of Regional Planning surveys the project area prior to disturbance to confirm that disturbance to habitat will not result in the failure of active nests on-site or immediately adjacent to the area of disturbance. Disturbance shall be defined as any activity that physically removes and/or damages vegetation or habitat, any action that may cause disruption of nesting behavior such as noise exceeding 90 dB from equipment, or direct artificial night lighting. Surveys shall be conducted on the subject property within 500 feet of disturbance areas no earlier than three days prior to the commencement of disturbance. If ground disturbance activities are delayed, then additional pre-disturbance surveys shall be conducted such that no more than three days will have elapsed between the survey and ground disturbance activities. The Applicant or the Project's Construction Manager shall provide the biologist with plans detailing the extent of proposed ground disturbance prior to the survey effort.</p>	<p>A. Submit pre-construction surveys</p>	<p>Within 14 days of completion of the pre-construction surveys</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP • CDFW
	<p>B. Construction monitoring by qualified biologist</p>	<p>During construction (February 1 through August 31)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>C. Obtain take permit(s), as necessary</p>	<p>During construction</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • CDFW • USFWS
	<p>D. Submit construction monitoring documentation</p>	<p>During construction (February 1 through August 31)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP • CDFW
	<p>E. Site inspection as needed</p>	<p>During construction (February 1 through August 31)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>If active nests are found, clearing and construction shall be postponed or halted within a buffer area established by the biological monitor that is suitable to the particular location of the nest (typically 300 feet for most birds and 500 feet for raptors) and acceptable to the Director of the County of Los Angeles Department of Regional Planning, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of any further attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with highly visible construction fencing, and construction personnel shall be instructed on the sensitivity of nest areas. Occupied nests within the buffer established by the biological monitor and adjacent to the construction site shall also be avoided to ensure nesting success. A qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. The results of the surveys, including graphics showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the County of Los Angeles Department of Regional Planning and California Department of Fish and Wildlife within 14 days of completion of the pre-construction surveys to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p> <p>If any state or federally listed bird species (e.g., coastal California gnatcatcher, southwestern willow flycatcher) are detected during the course of pre-construction nesting bird surveys, all</p>				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>construction-related activity shall be postponed, and the Applicant shall consult with appropriate agencies (California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) and obtain any necessary take permits prior to the commencement of any construction-related activity. If any state or federally listed species are detected within the limits of construction during construction that were not detected during the pre-construction nesting bird surveys, construction-related activity shall cease, and the Applicant shall consult with appropriate agencies and obtain any necessary take permit before resuming any work. In addition to any take permit conditions that may be required by California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service, mitigation of occupied coastal California gnatcatcher habitat shall be provided at a minimum of 3:1 mitigation-to-impact ratio. Proof of habitat mitigation in keeping with the 3:1 requirement shall be provided to the County of Los Angeles before any construction-related activity can commence or resume.</p>				
<p>MM F-3: The Project shall implement the requirements of the approved Oak Tree and Woodland Mitigation and Monitoring Program to mitigate impacts to oak trees protected under the Los Angeles County Oak Tree Ordinance and impacts to oak woodlands protected under California Public Resources Code 21083.4. As part of the Oak Tree and Woodland Mitigation and Monitoring Program, which shall restore and</p>	<p>A. Submit use restriction language for mitigation areas for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP
	<p>B. Record use restriction for mitigation areas</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP
	<p>C. Implement approved OTWMMP</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>expand existing oak woodlands on the project site, the Project shall mitigate for the impact to oak woodlands with at least a 2.4-acre to 1-acre mitigation-to-impact ratio.</p> <p>The Project's Oak Tree and Woodland Mitigation and Monitoring Program shall include the following components:</p> <ul style="list-style-type: none"> • Planting of at least 1,600 oak trees within or adjacent to existing oak woodlands on the Ranch shall be completed prior to the issuance of a building permit; • Minimization of impacts by avoiding approximately 95 percent of the oak trees and oak woodlands on the Ranch; • Restoration of fire-damaged oak woodlands through oak tree seedling planting; • Enhancement of oak woodland regeneration through oak seedling planting in areas with limited natural recruitment; • Increased habitat connectivity through oak tree planting in areas between existing woodlands and along Placerita Creek, excluding reaches within proposed Los Angeles County Flood Control District easement limits; • Planting of native understory species within oak woodland restoration areas in order to provide a more complete suite of oak woodland values apart from those provided by trees alone; and • Implementation of a seven-year monitoring, documentation, and reporting program. <p>In addition, prior to the issuance of a building permit, the Applicant shall record a use restriction</p>	D. Maintain log demonstrating compliance	Until performance standards are achieved	Applicant	<ul style="list-style-type: none"> • LACDRP • LACFD
	E. Site inspection	Until performance standards are achieved	Applicant	<ul style="list-style-type: none"> • LACDRP • LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>which shall run with the land in perpetuity over the planted mitigation areas in which oak woodland planting, restoration, and enhancement occurs to protect these areas for purposes of oak woodland conservation, restoration and enhancement. The use restriction shall recognize the Applicant’s ability to allow filming within these areas, provided the oaks are protected. The use restriction language shall be submitted to the County of Los Angeles Department of Regional Planning for review and approval prior to recordation with the Los Angeles County Registrar-Recorder/County Clerk.</p>				
<p>MM F-4: During project construction, the Applicant shall implement all measures to protect the oak trees that are encroached upon, as indicated in the approved Oak Tree and Woodland Mitigation and Monitoring Program.</p>	<p>A. Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP • LACFD
	<p>B. Site inspection as needed</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP • LACFD
<p>MM F-5: Prior to issuance of a grading permit, the Project Applicant shall prepare and submit to the U.S. Army Corps of Engineers for verification a “Preliminary Delineation Report for Waters of the U.S.” and a Streambed Alteration Notification package to the California Department of Fish and Wildlife for alterations to Placerita Creek and its on-site jurisdictional tributaries. A Clean Water Act Section 404 permit shall be obtained from the U.S. Army Corps of Engineers, and the Applicant shall comply with the permit conditions. A Streambed Alteration Agreement shall be entered into with the California Department of</p>	<p>A. Submit “Preliminary Delineation Report for Waters of the U.S.” and Streambed Alteration Notification package</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • USACOE • CDFW
	<p>B. Obtain Section 404 permit</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • USACOE
	<p>C. Execute Streambed Alteration Agreement</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • CDFW
	<p>D. Obtain Section 401 Water Quality Certification</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LARWQCB

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Fish and Wildlife under Section 1602 of the California Fish and Game Code, and the Applicant shall comply with the associated conditions. A Clean Water Act Section 401 Water Quality Certification shall be obtained from the Regional Water Quality Control Board, and the Applicant shall comply with the certification conditions. Mitigation for unavoidable impacts shall be provided through conservation or restoration of U.S. Army Corps of Engineers and California Department of Fish and Wildlife jurisdictional features (on- and off-site) at a minimum of a 1:1 mitigation-to-impact ratio.	E. Site inspection as needed	Prior to issuance of first certificate of occupancy	Applicant/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP
MM F-6: Nighttime construction lighting, if needed, shall be situated at least 50 feet away from Placerita Creek and any retained oak woodlands, shielded, and directed towards the interior of the Development Area, away from native habitat.	A. Maintain log demonstrating compliance	During construction	Applicant/Construction Manager	<ul style="list-style-type: none"> • LACDRP
	B. Site inspection as needed	During construction	Applicant/Construction Manager	<ul style="list-style-type: none"> • LACDRP
MM F-7: Prior to issuance of a grading permit, a qualified biologist shall be retained by the Applicant as the biological monitor, subject to the approval of the County of Los Angeles Department of Regional Planning. The biological monitor shall ensure that impacts to biological resources (inclusive of special-status plants) are minimized and shall conduct pre-grading field surveys for special-status plant and animal species that may be affected and/or eliminated as a result of grading and/or site preparation activities. During earthmoving activities, the biological monitor shall be present to relocate any vertebrate species potentially impacted by Project construction to an appropriate off-site location of similar habitat. The biological monitor shall be	A. Submit biologist qualifications for review and approval	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP
	B. Submit pre-grading field surveys	During construction	Applicant/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP
	C. Biological monitoring and relocate vertebrates	During earthmoving activities	Applicant/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP
	D. Maintain log demonstrating compliance	During construction	Applicant/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP
	E. Site inspection as needed	During construction	Applicant/Qualified Biologist	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>authorized to stop specific grading activities if he or she suspects violations of Mitigation Measures MM F-1 through MM F-9 or any local, state, or federal laws regarding biological resources.</p>				
<p>MM F-8: Work areas shall be surveyed for special-status reptile species prior to and during construction activities. Any special-status reptiles occurring within the work area prior to the start of work shall be collected and relocated to areas outside of the designated work zones. If ongoing biological monitoring of construction activities reveals the presence of any special-status reptiles within an active work area, then work shall be temporarily halted within that area until the animals can be collected and relocated to areas outside of the designated work zone(s).</p>	<p>A. Submit field surveys</p>	<p>Prior to and during construction</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>B. Biological monitoring</p>	<p>During construction</p>	<p>Applicant/Construction Manager/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>C. Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/Construction Manager/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>D. Site inspection as needed</p>	<p>During construction</p>	<p>Applicant/Construction Manager/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
<p>MM F-9: The Applicant shall submit the Project landscape plan to the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, and Los Angeles County Department of Public Works, as required, for review and approval prior to issuance of a building permit. The landscape plan shall show the size, type and location of all plants and watering facilities, consistent with the County's established codes and procedures. Where feasible, native plants shall be used for landscaping. The landscape plan shall also</p>	<p>A. Submit landscape plan for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP/LACDPW/LACFD—Approval of landscape plan, mutual support/referral
	<p>B. Implement approved landscape plan</p>	<p>Upon completion of each major phase of Project development (see CUP revised Exhibit A phasing schedule)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACFD— for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>specify the type and location of 8-foot high decorative fencing to be installed along those portions of the Project site perimeter visible to the public along SR-14 and Placerita Canyon Road. The Project shall comply with all requirements of the approved landscape plan, and landscaping shall be installed upon completion of each major phase of Project development.</p>	<p>C. Site inspection</p>	<p>Upon completion of each major phase of Project development (see CUP revised Exhibit A phasing schedule)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACFD— for support/referral
<p>MM F-10: Prior to, but within one year of, the commencement of Project construction, protocol surveys for the coastal California gnatcatcher (<i>Polioptila californica californica</i>) shall be conducted within the areas proposed for construction and designated as Critical Habitat by biologist(s) holding federal permits to conduct gnatcatcher surveys in accordance with the U.S. Fish and Wildlife Service’s Coastal California Gnatcatcher Presence/Absence Survey Guidelines. The results of the surveys shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review. (Refer to MM F-2 regarding pre-construction nesting bird surveys, agency consultation, and necessary take permits should any state or federally listed bird species, including coastal California gnatcatcher, be detected.)</p>	<p>A. Submit biologist qualifications for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP
	<p>B. Conduct protocol surveys for coastal California gnatcatcher</p>	<p>Prior to, but within one year of, the commencement of Project construction</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>C. Submit survey results for review</p>	<p>Prior to commencement of construction activities</p>	<p>Applicant/Qualified Biologist</p>	<ul style="list-style-type: none"> • LACDRP
<p>MM F-11: Prior to the issuance of a grading permit, the Applicant shall record a use restriction which shall run with the land in perpetuity over 3.18 acres of other coastal sage scrub that is suitable for coastal California gnatcatcher within the Ranch south of Placerita Canyon Road located within designated critical habitat for the</p>	<p>A. Submit use restriction language over area located within designated critical habitat for coastal California gnatcatcher for review and approval</p>	<p>Prior to recordation of use restriction language</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
coastal California gnatcatcher for purposes of preservation/conservation. The precise location of the use restriction area shall be determined in consultation with the California Department of Fish and Wildlife. The use restriction shall recognize the ability of those holding oil and other subsurface rights in the property to continue existing subsurface oil extraction operations under the use restriction area. The use restriction language shall be submitted to the California Department of Fish and Wildlife and the County of Los Angeles Department of Regional Planning for review and approval prior to recordation with the Los Angeles County Registrar-Recorder/County Clerk.	B. Record use restriction language over area located within designated critical habitat for coastal California gnatcatcher	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP
G. CULTURAL AND PALEONTOLOGICAL RESOURCES				
MM G-1: A qualified archaeologist shall monitor all stripping and other earthmoving activities within native soils along the Placerita Creek floodplain within the Development Area. If an archaeological site is discovered during monitoring, construction activity in that part of the Development Area shall cease until the site can be studied by a qualified archaeologist.	A. Archaeological monitoring	During stripping and earthmoving activities in native soils	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
	B. Maintain log demonstrating compliance	During stripping and earthmoving activities in native soils	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
	C. Site inspection as needed	During stripping and earthmoving activities in native soils	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
MM G-2: A qualified archaeologist shall monitor the grading and excavations for light poles and electrical conduits at the two Conditional Parking Areas, if developed.	A. Archaeological monitoring	During grading and excavation	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	B. Maintain log demonstrating compliance	During grading and excavation	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
<p>MM G-3: A qualified archaeologist shall monitor the grading and septic tank excavation at the selected of the two Potential Mobile Home Relocation Areas.</p>	A. Archaeological monitoring	During grading and excavation	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
	B. Maintain log demonstrating compliance	During grading and excavation	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
<p>MM G-4: In the event archaeological resources are encountered during Project construction, all ground-disturbing activities within the vicinity of the find shall cease and a qualified archaeologist shall be notified of the find. The archaeologist shall record all recovered archaeological resources on the appropriate California Department of Parks and Recreation Site Forms to be filed with the California Historical Resources Information System–South Central Coastal Information Center, evaluate the significance of the find, and if significant, determine and implement the appropriate mitigation in accordance with the U.S. Secretary of the Interior and California Office of Historic Preservation guidelines, including but not limited to a Phase III data recovery and associated documentation. The archaeologist shall prepare a final report about the find to be filed with the Applicant, the County of Los Angeles Department of Regional Planning, and the California Historical Resources Information System–South Central Coastal</p>	A. Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
	B. Site inspection as needed	During construction	Applicant/ Construction Manager/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP
	C. Submit California Department of Parks and Recreation Site Forms, and Phase III data recovery and associated documentation, as applicable	During construction	Applicant/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP • California Office of Historic Preservation
	D. Submit final report, as applicable	Prior to issuance of certificate of occupancy	Applicant/Qualified Archaeologist	<ul style="list-style-type: none"> • LACDRP • California Office of Historic Preservation • CHRIS-SCCIC

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>Information Center, as required by the California Office of Historic Preservation. The report shall include documentation of the resources recovered, a full evaluation of the eligibility with respect to the California Register of Historical Resources, and treatment of the resources recovered. In the event of a find, archaeological and Native American monitoring shall be provided thereafter for any ground-disturbing activities within the boundary of the archaeological site.</p>	<p>E. Archaeological and Native American monitoring, as applicable</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Archaeologist</p>	<ul style="list-style-type: none"> • LACDRP • NAHC
<p>MM G-5: In the event human remains are encountered during construction activities, all ground-disturbing activities within the area of the human remains shall cease and the County coroner shall be notified. In the event the remains are determined to be of Native American descent, the coroner shall notify the California Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person(s) thought to be the Most Likely Descendant of the deceased Native American, who shall have 48 hours from notification by the Native American Heritage Commission to inspect the site of the discovery of Native American remains and to recommend to the Applicant or landowner means for the treatment and disposition of the human remains and any associated grave goods. The Applicant or landowner shall reinter the remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance. In the event Native American remains are found, Native American monitoring shall be provided thereafter for any ground-disturbing activities in the area of the remains.</p>	<p>A. Maintain documentation demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Archaeologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>B. Native American monitoring, as applicable</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Archaeologist</p>	<ul style="list-style-type: none"> • LACDRP • NAHC
	<p>C. Site inspection as needed</p>	<p>During construction</p>	<p>Applicant/ Construction Manager/Qualified Archaeologist</p>	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM G-6: A qualified paleontologist shall be retained by the Applicant prior to the implementation of the Project to develop and execute a paleontological monitoring plan for the grading activities planned for the undisturbed northern portion of the Development Area, the Water Tank Area, the Trail Area, and those portions of the Potential Mobile Home Relocation Areas and the Off-Site Infrastructure Improvement Areas within the Saugus Formation. The qualified paleontologist shall meet the qualifications established by the Society of Vertebrate Paleontologists.</p>	<p>A. Submit paleontological monitoring plan</p>	<p>Prior to grading or excavation activities in the referenced areas</p>	<p>Applicant/Qualified Paleontologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>B. Paleontological monitoring</p>	<p>During grading and excavation in the referenced areas</p>	<p>Applicant/Construction Manager/Qualified Paleontologist</p>	<ul style="list-style-type: none"> • LACDRP
	<p>C. Maintain log demonstrating compliance</p>	<p>During grading and excavation in the referenced areas</p>	<p>Applicant/Construction Manager/Qualified Paleontologist</p>	<ul style="list-style-type: none"> • LACDRP
<p>MM G-7: The paleontologist shall attend a pre-grade meeting in order to become familiar with the proposed depths and patterns of grading for grading activities planned for the undisturbed northern portion of the Development Area, the Water Tank Area, the Trail Area, and those portions of the Potential Mobile Home Relocation Areas and the Off-Site Infrastructure Improvement Areas within the Saugus Formation to provide a basis to the development of a monitoring program.</p>	<p>Maintain documentation demonstrating compliance</p>	<p>Prior to grading or excavation activities in the referenced areas</p>	<p>Applicant/Construction Manager/Qualified Paleontologist</p>	<ul style="list-style-type: none"> • LACDRP
<p>MM G-8: The paleontologist shall establish a curation agreement with an accredited facility prior to the initiation of ground-disturbing activities.</p>	<p>Submit curation agreement</p>	<p>Prior to any ground-disturbing activities</p>	<p>Applicant/Qualified Paleontologist</p>	<ul style="list-style-type: none"> • LACDRP
<p>MM G-9: A paleontological monitor, supervised by the paleontologist, shall monitor all ground-disturbing activities associated with grading activities in the undisturbed northern portion of the Development Area, the Water Tank Area, the Trail Area, and those portions of the Potential</p>	<p>A. Paleontological monitoring</p>	<p>During all ground disturbing activities in the referenced areas</p>	<p>Applicant/Construction Manager/Qualified Paleontologist/Paleontological Monitor</p>	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Mobile Home Relocation Areas and the Off-Site Infrastructure Improvement Areas within the Saugus Formation. If fossils are found during ground-disturbing activities, the paleontological monitor shall be authorized to halt the ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment in accordance with Society of Vertebrate Paleontology guidelines for identification, evaluation, disclosure, avoidance or recovery, and curation, as appropriate.	B. Maintain log demonstrating compliance	During all ground disturbing activities in the referenced areas	Applicant/ Construction Manager/Qualified Paleontologist/ Paleontological Monitor	• LACDRP
	C. Site inspection as needed	During all ground disturbing activities in the referenced areas	Applicant/ Construction Manager/Qualified Paleontologist/ Paleontological Monitor	• LACDRP
MM G-10: The paleontological monitor and/or the paleontologist shall collect all significant fossils encountered. All significant fossils shall be stabilized and prepared to a point of identification and permanent preservation.	Maintain log demonstrating compliance	During grading and excavation	Applicant/ Construction Manager/Qualified Paleontologist/ Paleontological Monitor	• LACDRP
MM G-11: Some fossils from the Saugus Formation are very small specimens that can typically be missed in monitoring for large construction projects. Therefore, the paleontological monitor shall collect sediment samples and process them to determine the potential for small fossils in these deposits obtained during grading activities in the undisturbed northern portion of the Development Area, the Water Tank Area, the Trail Area, and those portions of the Potential Mobile Home Relocation Areas and the Off-Site Infrastructure Improvement Areas within the Saugus Formation.	Maintain log demonstrating compliance	During grading and excavation in the referenced areas	Applicant/ Construction Manager/Qualified Paleontologist/ Paleontological Monitor	• LACDRP
MM G-12: The paleontologist shall prepare a final report on the monitoring. If fossils are identified, the report shall contain an appropriate description of the fossils, treatment, and curation.	Submit final report regarding paleontological monitoring	Following completion of grading and excavation	Applicant/Qualified Paleontologist/ Paleontological Monitor	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
A copy of the report shall be filed with the Applicant, County of Los Angeles Department of Regional Planning, and the Natural History Museum of Los Angeles, and shall accompany any curated fossils.				
I. VISUAL QUALITIES				
PDF I-1: Project buildings shall have a maximum building height of 60 feet.	Submit building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral
PDF I-2: A vegetation barrier heavily planted with trees and shrubs shall be introduced along portions of Placerita Canyon Road and State Route 14 adjacent to the Development Area, as well as the northern portion of the site to screen the electrical substation from State Route 14.	A. Submit landscape plan for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP/LACDPW/LACFD—Approval of landscape plan, mutual support/referral
	B. Implement approved landscape plan	Upon completion of each major phase of Project development (see CUP revised Exhibit A phasing schedule)	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACFD—for support/referral
PDF I-3: The proposed water tank shall be painted a neutral color that is predominant in the surrounding area so as to blend with the surrounding landscape. The water tank color shall be submitted to the County of Los Angeles	A. Submit water tank color for review and approval	Prior to issuance of applicable building permit	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Department of Regional Planning for approval prior to issuance of a building permit. In addition, the area disturbed during construction immediately surrounding the water tank's ring road and fencing shall be revegetated with native plants, upon completion of tank construction. A landscape plan shall be submitted for approval of plant selection(s) from the County of Los Angeles Department of Regional Planning, Los Angeles County Fire Department, Newhall County Water District, and California Department of Fish and Wildlife.	B. Submit landscape plan for review and approval	Prior to issuance of applicable building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP/LACDPW/LACFD—Approval of landscape plan, mutual support/referral • LACDRP/LACFD/NCWD/CDFW—Approval of plant selections
	C. Revegetate specified area in accordance with approved landscape plan	Upon completion of water tank construction	Applicant	<ul style="list-style-type: none"> • LACDRP
MM I-1: Prior to issuance of a building permit, the Applicant shall submit the Project's final design drawings, including a lighting plan to the County of Los Angeles Department of Regional Planning for review and approval, consistent with the County's established codes and procedures.	Submit final design drawings and lighting plan for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP
MM I-2: The Applicant shall submit detailed lighting plans including fixture types and locations to the County of Los Angeles Department of Regional Planning and County of Los Angeles Department of Public Works for review and approval consistent with the County's established codes and procedures prior to issuance of a building permit.	Submit detailed lighting plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW
MM I-3: To ensure minimal light trespass on sensitive habitat within Placerita Creek, bridges shall be lit by low focused light located on the side walls or railings and aimed at the road. The lighting along the creek-side of Project buildings shall be located primarily on outdoor decks/balconies and consist of surface-mounted	A. Submit detailed lighting plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW
	B. Submit building plans incorporating approved detailed lighting plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
fixtures facing down with full light cutoff to confine light to the decks/balconies and prevent spillover of light onto habitat areas. Lighting in these areas shall be consistent with the approved lighting plan.				
J. TRAFFIC, ACCESS, AND PARKING				
<p>PDF J-1: The Project Applicant shall prepare and implement a Transportation Demand Management program to encourage the use of alternative modes of transportation and reduce vehicular traffic on the street and freeway system during the most congested time periods of the day. The Transportation Demand Management program shall be submitted to County of Los Angeles Department of Regional Planning and County of Los Angeles Department of Public Works for review and approval and shall include implementation of several Transportation Demand Management strategies, which shall include, but shall not be limited to the following:</p> <ul style="list-style-type: none"> • The provision of information on transportation alternatives including establishment of a Transportation Information Center (transit schedules, maps, bulletin board/kiosk and/or intranet, etc.); • A rideshare/vanpool/carpool matching program for Disney and ABC employees; • Preferred parking for low-emitting (Zero Emission) and fuel-efficient vehicles; • Preferred parking for carpool/vanpool vehicles; • Video conferencing facilities within the Project; • On-site secure, bicycle storage areas; 	Submit TDM program for review and approval	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<ul style="list-style-type: none"> Alternative work schedules; An Emergency Ride Home Program, which may include taxi vouchers and/or the availability of on-site vehicle(s) for Disney and ABC employees who are registered transit users; Discounted Disney/ABC employee transit passes; Designation of a Transportation Demand Management program coordinator to oversee program implementation; and Financial mechanisms and/or programs to provide for the implementation of the Transportation Demand Management program. 				
<p>MM J-1: Prior to any construction activities and/or issuance of required encroachment permits from Los Angeles County, the City of Santa Clarita and Caltrans, detailed Construction Traffic Management Plans shall be submitted to the relevant agency or agencies for review and approval, consistent with each agency's established codes and procedures. The Construction Traffic Management Plans shall include the following, as required by the applicable public agency or agencies:</p> <ul style="list-style-type: none"> Provisions to configure construction parking to minimize traffic interference; Provisions for traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person); Provision of adequate emergency access to all residences and businesses adjacent to the roadways impacted by the utility construction 	<p>A. Submit Construction Traffic Management Plans to relevant agencies for review and approval</p>	<p>Prior to issuance of grading permit(s) and/or encroachment permits, as applicable</p>	<p>Applicant</p>	<ul style="list-style-type: none"> LACDPW SCPWD Caltrans—as applicable
	<p>B. Submit detailed CTMP to agencies having jurisdiction</p>	<p>At least 14 days prior to construction activities that may affect emergency response</p>	<p>Applicant</p>	<ul style="list-style-type: none"> LACDPW LACFD LACSD SCPWD Caltrans CHP—as applicable
	<p>C. Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> LACDPW SCPWD Caltrans

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>activities during all phases of construction activities;</p> <ul style="list-style-type: none"> • Scheduling construction activities to reduce the effect on traffic flow on arterial streets; • With the exception of travel on Placerita Canyon Road, rerouting construction trucks along parallel routes with less congestion, to reduce travel on congested streets; • Provision of dedicated turn lanes for movement of construction trucks and equipment on- and off-site in accordance with the Construction Traffic Management Plans approved by the County of Los Angeles Department of Public Works and/or other public agency; • With the exception of off-site infrastructure improvements, prohibition against parking of construction-related vehicles on streets in predominantly residentially zoned areas; • Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers on streets impacted by Project construction; • Requirement that contractors participate in a common carpool registry during all periods of contract performance, with the registry monitored and maintained by the general contractor; • Scheduling of the majority of construction-related deliveries, other than concrete and earthwork-related deliveries, during off-peak travel periods; 				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<ul style="list-style-type: none"> The Applicant shall submit the detailed Construction Traffic Management Plans to the public agency or agencies having jurisdiction, including the County of Los Angeles Department of Public Works, Caltrans, and the City of Santa Clarita, including the Sheriff and Fire Departments of the County of Los Angeles, the Police and Fire Departments of the City of Santa Clarita, and/or the California Highway Patrol, at least 14 days in advance of any construction activities that may affect emergency response in the areas over which the public agency has or public agencies have jurisdiction. All measures identified in the detailed Construction Traffic Management Plans, as approved by the public agency or agencies, shall be implemented during construction to ensure that adequate and safe access remains available on-site and within the Off-Site Infrastructure Improvement Areas. 				
<p>MM J-2: The Applicant shall obtain the required permits for truck haul routes from the County of Los Angeles Department of Public Works and/or any other public agency, as applicable, prior to the issuance of a grading permit for the Project.</p>	A. Request approval of haul route	Prior to issuance of haul route permit	Applicant	<ul style="list-style-type: none"> LACDPW Other agency—as applicable
	B. Obtain haul route permit	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> LACDPW Other agency—as applicable
<p>MM J-3: The Applicant shall obtain a Caltrans transportation permit prior to the use of oversized transport vehicles on Caltrans facilities.</p>	Obtain transportation permit(s)	Prior to use of oversized transport vehicles	Applicant	<ul style="list-style-type: none"> Caltrans

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM J-4: Prior to issuance of a grading permit, Applicant shall document and submit all required information and/or material pertaining to the pavement of County roadways along the Project haul route, including the formula for calculating the Project's fair share of any repair and/or reconstruction of County roadways along the Project haul route, to the satisfaction of the County of Los Angeles Department of Public Works.</p>	<p>A. Submit pre-construction pavement condition and documentation, along with the Project's fair share formula for review and approval</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>A bond (amount to be reasonably determined by the County of Los Angeles Department of Public Works once a specific haul route is designated) shall be put in place to cover any structural impacts to the roadways along the haul route attributable to the Project's truck trips during hauling.</p>	<p>B. Submit Bond Amount for review and approval and post bond</p>	<p>Prior to issuance of haul permit</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>The Applicant shall reimburse the County of Los Angeles for the cost of any repairs and/or reconstruction of County roadways along the Project haul route attributable to the Project as agreed to by the County of Los Angeles Department of Public Works. The timing of any necessary repairs and/or reconstruction of County Roadways by the Applicant shall be determined by the County of Los Angeles Department of Public Works.</p>	<p>C. Submit post construction pavement condition and documentation supporting fair share cost to be reimbursed for review and approval</p>	<p>Prior to issuance of certificate of occupancy</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
<p>MM J-5: Sierra Highway/SR-14 Southbound Ramps: Prior to issuance of the first certificate of occupancy, the Project Applicant shall install a traffic signal at this intersection with protected left-turn phasing for southbound Sierra Highway. Northbound Sierra Highway shall be widened to provide a separate right-turn only lane onto the SR-14 southbound on-ramp. These</p>	<p>A. Submit detailed striping/signing and traffic signal plans for review and approval</p>	<p>Prior to street improvements implementation</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
	<p>B. Install striping/signing and traffic signal in accordance with approved plans</p>	<p>Prior to issuance of first certificate of occupancy</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>improvements shall be the sole responsibility of the Project. Detailed striping/signing and traffic signal plans shall be submitted to the County of Los Angeles Department of Public Works and Caltrans for review and approval prior to implementation.</p>				
<p>MM J-6: Sierra Highway/Placerita Canyon Road: Prior to issuance of the first certificate of occupancy, the Project Applicant shall widen the Placerita Canyon Road westbound approach to provide a free-flow right-turn lane onto northbound Sierra Highway, facilitating traffic flow to the SR-14 southbound on-ramp. These improvements shall be the sole responsibility of the Project. A detailed striping/signing plan shall be submitted to the County of Los Angeles Department of Public Works and Caltrans for review and approval prior to implementation.</p>	<p>A. Submit detailed striping/signing plan for review and approval</p>	<p>Prior to street improvements implementation</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
	<p>B. Install striping/signing in accordance with approved plans</p>	<p>Prior to issuance of first certificate of occupancy</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
<p>MM J-7: Current Ranch main entrance/Placerita Canyon Road (Easterly Driveway): Prior to issuance of the first certificate of occupancy, the Project Applicant shall install a traffic signal at this intersection. The eastbound approach of Placerita Canyon Road at the intersection shall be striped to provide for a left-turn only lane to improve access to the Ranch. This intersection's southbound approach exiting the Development Area shall be striped to provide one left-turn lane and one right-turn lane. These improvements shall be the sole responsibility of the Project. Detailed striping/signing and traffic signal plans shall be submitted to the County of Los Angeles Department of Public Works for review and approval prior to implementation.</p>	<p>A. Submit detailed striping/signing and traffic signal plans for review and approval</p>	<p>Prior to implementation of street improvements</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW
	<p>B. Install striping/signing and traffic signal in accordance with approved plans</p>	<p>Prior to issuance of first certificate of occupancy</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM J-8: <u>Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Ramps:</u> The Project shall provide a direct entrance, if approved by Caltrans, to the Development Area from the SR-14 northbound off-ramp to allow immediate access to the Project. This intersection shall be signalized and the off-ramp widened to provide three lanes (one left-turn lane, one optional through and left-turn lane, and one right-turn lane). The eastbound lanes on Placerita Canyon Road shall also be restriped to provide one through lane and one dedicated right-turn lane for the SR-14 northbound on-ramp. Eastbound to northbound left-turns shall be prohibited, and southbound movement out of the Development Area shall be limited to right-turns only. These improvements shall be the sole responsibility of the Project.</p>	<p>A. Submit appropriate improvement plans (to the appropriate jurisdictional agency/ Departments) for review and approval</p>	<p>Prior to street improvements implementation</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
	<p>B. Construct improvements in accordance with approved improvement plans</p>	<p>Prior to issuance of first certificate of occupancy</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
<p>MM J-9: <u>Sierra Highway/SR-14 Southbound Ramps:</u> Prior to recordation of the final map, the Project Applicant shall pay its pro rata share (20.9 percent) of the cost for the widening of southbound Sierra Highway to provide a second left-turn only lane onto the SR-14 southbound on-ramp.</p>	<p>Provide proof of payment of pro rata share of cost</p>	<p>Prior to recordation of final map</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans
<p>MM J-10: <u>Sierra Highway/Placerita Canyon Road:</u> Prior to recordation of the final map, the Project Applicant shall pay its pro rata share (16.2 percent) of the cost for the widening of the Sierra Highway northbound approach to provide a separate right-turn only lane onto eastbound Placerita Canyon Road, as well as the widening of the Sierra Highway southbound approach to provide a separate right-turn only lane onto westbound Placerita Canyon Road.</p>	<p>Provide proof of payment of pro rata share of cost</p>	<p>Prior to recordation of final map</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • Caltrans

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
MM J-11: The Project shall pay its share of the applicable Eastside Bridge and Major Thoroughfare District fees in effect at the time of final map recordation.	Payment of applicable Eastside Bridge and Major Thoroughfare District fees	Prior to recordation of final map	Applicant	<ul style="list-style-type: none"> • LACDPW
MM J-12: The Applicant shall comply with all applicable Caltrans rules and regulations and obtain all necessary approvals from Caltrans, potentially including but not limited to: synchronization of the street signals at Placerita Canyon Road (new Ranch main entrance)/SR-14 Northbound Off-Ramp and Sierra Highway/Placerita Canyon Road; and implementation of an approved soil sampling workplan.	Approval of soil sampling workplan and other action(s) as required by Caltrans	During and/or upon completion of construction, as required by Caltrans	Applicant/ Construction Manager	<ul style="list-style-type: none"> • Caltrans
K.1 PUBLIC SERVICES—LAW ENFORCEMENT				
PDF K.1-1: During construction, fencing shall be placed around the Development Area to prevent public entry and theft, and periodic and random private security patrols shall be conducted on the Development Area and the Ranch.	A. Maintain documentation demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACSD
	B. Site inspection as needed	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACSD
PDF K.1-2: The Applicant shall notify the County of Los Angeles Sheriff’s Department and California Highway Patrol a minimum of five business days prior to any Project-related lane closures or other road construction and ensure that emergency access remains clear and unobstructed.	A. Provide notification	Minimum of five business days prior to any lane closures	Applicant	<ul style="list-style-type: none"> • LACSD • CHP
	B. Maintain documentation demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP
PDF K.1-3: The Project’s design shall incorporate state-of-the-art security features to provide for the safety of on-site employees and visitors including the provision of 24-hours per day, 7 days per week on-site private security guards with a guard kiosk positioned at the main vehicular entrance, closed circuit television	A. Maintain documentation demonstrating compliance	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
	B. Site inspection as needed	Prior to issuance of certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP • LACSD—for support/ referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
cameras to monitor the Development Area and the Ranch, fencing around portions of the Development Area bordering SR-14 and Placerita Canyon Road, and alarm systems for all Project buildings with motion sensors and video surveillance.				
PDF K.1-4: Upon Project completion and prior to issuance of the first certificate of occupancy, the Applicant shall provide the County of Los Angeles Sheriff's Department Santa Clarita Valley Station Commander with a diagram of each portion of the Development Area, including access routes.	Submit diagram of Development Area with access routes	Prior to issuance of first certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACSD
PDF K.1-5: The Project's design shall incorporate a Knox Box entry system and lighted building address numbers to facilitate emergency response.	Site visit verification	Prior to issuance of first certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDRP
K.2 PUBLIC SERVICES—FIRE PROTECTION				
PDF K.2-1: The Applicant shall notify the County of Los Angeles Fire Department a minimum of five business days prior to any Project-related lane closures or other road construction and ensure that emergency access remains clear and unobstructed.	A. Provide notification	Minimum of five business days prior to lane closures	Applicant	<ul style="list-style-type: none"> • LACFD
	B. Maintain documentation demonstrating compliance	During construction	Applicant	<ul style="list-style-type: none"> • LACDRP
PDF K.2-2: In accordance with County of Los Angeles Fire Department requirements, all required fire hydrants shall be installed, tested, and accepted prior to combustible building construction, and vehicular access to such hydrants shall be maintained during construction.	Submit required plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>PDF K.2-3: The Applicant shall submit a fire exhibit that depicts detailed design requirements to the County of Los Angeles Fire Department for review and approval prior to the recordation of the final map or issuance of a building permit.</p>	<p>Submit fire exhibit for review and approval</p>	<p>Prior to the recordation of final map or issuance of building permit(s), whichever occurs first</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
<p>PDF K.2-4: Following construction and prior to the issuance of the first certificate of occupancy, the Applicant shall submit an emergency response plan for approval by the County of Los Angeles Fire Department. The emergency response plan shall include, but not be limited to, the following: mapping of site access and emergency exits, evacuation routes for vehicles and pedestrians, and locations of the nearest hospitals and fire stations.</p>	<p>Submit emergency response plan for review and approval</p>	<p>Prior to issuance of first certificate of occupancy</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
<p>PDF K.2-5: The Applicant shall submit a final fuel modification plan, consistent with the approved Preliminary Fuel Modification Plan contained in Appendix F.8 of the Draft EIR, to be reviewed and approved by the County of Los Angeles Fire Department in accordance with its Fuel Modification Plan Guidelines prior to the issuance of building permits.</p>	<p>Submit final fuel modification plan for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
<p>PDF K.2-6: All Project construction managers and supervisory personnel shall be trained in emergency response and fire safety operations and a log documenting such training shall be made available for inspection within five business days upon request by the County of Los Angeles Fire Department and County of Los Angeles Department of Regional Planning.</p>	<p>Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACDRP • LACFD—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>PDF K.2-7: Fire suppression equipment specific to Project construction activities shall be maintained on the construction site in accordance with Occupational Safety and Health Administration and County of Los Angeles Fire Code requirements.</p>	<p>Maintain log demonstrating compliance</p>	<p>During construction</p>	<p>Applicant/ Construction Manager</p>	<ul style="list-style-type: none"> • LACFD • OSHA
<p>PDF K.2-8: The Project shall incorporate building design features that comply with applicable Los Angeles County Code fire safety requirements. Fire safety design features shall include, but shall not be limited to, the following: use of fire-resistant building materials where appropriate, smoke detection and fire alarm systems throughout most buildings, automatic sprinkler systems where necessary, portable fire extinguishers, and emergency exit signage in all buildings.</p>	<p>Submit required plans for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
<p>PDF K.2-9: The Project shall provide approved street signs, building access numbers, and all-weather emergency access to and within the Development Area. Secondary emergency access shall be provided via a gated driveway on Placerita Canyon Road, between the new main entrance and the current Ranch main entrance. With the exception of the access drive to the proposed electrical substation and the proposed water tank, none of the Project’s driveways shall be of a single access design.</p>	<p>A. Submit required plans for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
	<p>B. Site inspection as needed</p>	<p>Prior to issuance of certificate of occupancy</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACFD
<p>L.1 UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY</p>				
<p>PDF L.1-1: The Project shall include the construction of a 2,000,000 gallon water tank and associated water line to be located on the Ranch south of Placerita Canyon Road (i.e., within the Water Tank Area).</p>	<p>Submit building plans for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • NCWD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
PDF L.1-2: The Project shall incorporate water conservation features pursuant to Title 20 Section 1605 of the California Code, which shall reduce the Project's water demand by at least 20 percent.	Submittal of documentation demonstrating compliance	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
PDF L.1-3: The Project shall incorporate water conservation features that shall reduce the Project's landscaping water demand by at least 50 percent from business as usual (i.e., without water conservation measures in place).	A. Submit landscape plan for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP/LACDPW/LACFD—Approval of landscape plan, mutual support/referral
	B. Implement approved landscape plan	During operation	Applicant	<ul style="list-style-type: none"> • LACDRP • LACDPW/LACFD—for support/referral
L.2 UTILITIES AND SERVICE SYSTEMS—WASTEWATER/SEWAGE DISPOSAL				
PDF L.2-1: In compliance with the requirements of the County Sanitation Districts of Los Angeles County, kitchen drains shall be provided with oil separators to treat wastewater prior to discharge to the on-site sewer system.	Submit building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • CSDLAC—for support/referral
PDF L.2-2: The sewer line proposed as part of the Project within the City of Santa Clarita shall be encased where it crosses the City of Los Angeles Department of Water and Power aqueduct (constructed above ground) and Placerita Creek (two crossings below ground).	Submit sewer plans to the appropriate jurisdictions for review and approval	Prior to issuance of appropriate City permit(s)	Applicant	<ul style="list-style-type: none"> • SCPWD
L.3 UTILITIES AND SERVICE SYSTEMS—SOLID WASTE				
PDF L.3-1: The Project shall establish a Solid Waste Diversion Program of 50 percent for Project operations.	Submit Solid Waste Diversion Program for Project operations	Prior to issuance of first certificate of occupancy	Applicant	<ul style="list-style-type: none"> • LACDPW
PDF L.3-2: The Project shall establish a Solid Waste Diversion Program of 75 percent for Project construction.	A. Submittal of Solid Waste Diversion Program for Project construction	Prior to issuance of grading permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
	B. Maintain log demonstrating compliance	During construction	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACDRP • LACDPW—for support/referral
PDF L.3-3: The Applicant shall ensure that the construction contractor shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as required per the Los Angeles County Code.	Submit a Recycling and Reuse Plan incorporating recycling requirement for review and approval	Prior to issuance of demolition permit and grading permit	Applicant	<ul style="list-style-type: none"> • LACDPW
PDF L.3-4: The Applicant shall provide readily accessible areas around the Project site for the deposit, storage, and collection of non-hazardous materials for recycling.	Submit revised Exhibit A depicting requirements for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDRP
L.4 UTILITIES AND SERVICE SYSTEMS—ENERGY				
PDF L.4-1: The Project shall incorporate energy conservation features to reduce energy usage by at least 15 percent below the equivalent of Title 24 (2008) standards.	Submit appropriate building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW
PDF L.4-2: As part of the Project, the proposed soundstages, production offices, and the administration building shall comply with the County's Green Building ordinance and achieve Leadership in Energy and Environmental Design (LEED™) Silver Certification or equivalent. The commissary shall comply with the County's Green Building ordinance and achieve LEED™ Certification or equivalent. The writers/producers bungalows shall comply with the County's Green Building ordinance. While the mills and the warehouse are exempt from County Code Sections 22.52.2130.C.1 and 22.52.2130.D regarding energy conservation and third party rating systems, they shall comply with the other applicable sections of the County's Green	Submit appropriate building plans for review and approval	Prior to issuance of building permit(s)	Applicant	<ul style="list-style-type: none"> • LACDPW • LACDRP—for support/referral

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Building ordinance and achieve equivalency of LEED™ Certification. The substation and central utility plant would be exempt from the County's Green Building ordinance.				
M. ENVIRONMENTAL SAFETY/FIRE HAZARDS				
PDF M-1: All hazardous materials within the Project site shall be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements.	Maintain log demonstrating compliance	During construction and operation	Applicant/ Construction Manager	<ul style="list-style-type: none"> • LACFD
MM M-1: If previously unidentified soil contamination is observed by sight or smell or indicated by testing by a qualified professional using a portable volatile organic compound analyzer during excavation and grading activities, excavation and grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented, as contained in the South Coast Air Quality Management District's Rule 1166, to make the area suitable for grading activities to resume. In the event contamination is found, the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable. The contaminated soil shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in accordance with all applicable federal, State, and local laws and regulations.	A. Submit documentation summarizing the results of any soil testing and verify whether applicable regulatory contaminant thresholds are met	During grading and excavation	Applicant/ Construction Manager/Qualified Professional	<ul style="list-style-type: none"> • LACDRP • LACFD • SCAQMD • DTSC—as applicable
	B. Evaluation, management, and disposal, as applicable	Before grading and excavation can resume in the contaminated areas	Applicant/ Construction Manager/Qualified Professional	<ul style="list-style-type: none"> • LACFD • LACDPW—for support/referral • SCAQMD • DTSC—as applicable

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>MM M-2: During grading for construction of the proposed water tank and associated water line in the southwest corner of the Ranch and construction in the westernmost portion of the Development Area containing abandoned oil wells, a qualified professional shall observe by sight or smell and test using a portable volatile organic compound analyzer the surrounding soil for the presence of potential contaminants. In the event contamination is found, grading and excavation in the area shall be temporarily halted and the Applicant shall notify the Los Angeles County Fire Department, the South Coast Air Quality Management District, and/or the California Department of Toxic Substances Control, as applicable. Any soil found to be contaminated shall be excavated/disposed of, treated in-situ (in-place), or otherwise managed and disposed of in full compliance with all applicable federal, State, and local laws and regulations, including the South Coast Air Quality Management District’s Rule 1166 before grading and excavation can resume in the contaminated area.</p>	<p>A. Submit documentation summarizing the results of soil testing and verify whether applicable regulatory contaminant thresholds are met</p>	<p>During grading and excavation in the referenced areas</p>	<p>Applicant/ Construction Manager/Qualified Professional</p>	<ul style="list-style-type: none"> • LACDRP • LACFD • SCAQMD • DTSC—as applicable
	<p>B. Evaluation, management, and disposal, as applicable</p>	<p>Before grading and excavation can resume in the contaminated areas</p>	<p>Applicant/ Construction Manager/Qualified Professional</p>	<ul style="list-style-type: none"> • LACFD • LACDPW—for support/referral • SCAQMD • DTSC—as applicable
<p>MM M-3: Prior to the issuance of any grading permit, a qualified professional shall conduct soil testing for pesticides, petroleum hydrocarbons, and vapors in the following areas where agricultural operations and oil production activities have occurred but testing has not been previously conducted: the portion of the Development Area located east of the southern fill pad, the Water Tank Area, and the Conditional Parking Areas, if developed. In the event contamination is found, the Applicant shall notify</p>	<p>A. Conduct soil testing</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Professional</p>	<ul style="list-style-type: none"> • LACFD • LACDPW • DTSC—as applicable
	<p>B. Submit documentation summarizing the results of soil testing and verify whether applicable regulatory contaminant thresholds are met</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant/Qualified Professional</p>	<ul style="list-style-type: none"> • LACFD • LACDPW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
the Los Angeles County Fire Department and/or the California Department of Toxic Substances Control, as applicable. Any soil found to be contaminated shall be evaluated, managed, treated or disposed in full compliance with all applicable federal, State, and local laws and regulations prior to construction in the affected area.	C. Evaluation, management, and disposal, as applicable	Prior to issuance of grading permit(s)	Applicant/Qualified Professional	<ul style="list-style-type: none"> • LACFD • LACDPW • DTSC—as applicable
MM M-4: Prior to the issuance of any demolition permit for an existing building within the Project site with asbestos-containing materials, the Applicant shall provide a copy of the qualifications/license of the asbestos abatement contractor that will perform the abatement or removal of asbestos to the County of Los Angeles Department of Public Works Building and Safety Division and the County of Los Angeles Fire Department Health Hazardous Materials Division. If required, the Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to the County of Los Angeles Department of Public Works and the County of Los Angeles Fire Department for review and approval to ensure compliance with all applicable federal, State, and local laws and regulations.	A. Submit documentation summarizing the results of asbestos testing	Prior to issuance of demolition permit	Applicant/Qualified Professional	<ul style="list-style-type: none"> • LACDPW • LACFD
	B. Submit a copy of qualifications/license of the asbestos abatement contractor, if applicable	Prior to issuance of demolition permit	Applicant	<ul style="list-style-type: none"> • LACDPW • LACFD
	C. Submit Hazardous Building Materials Demolition Assessment and Management Plan for review and approval, if required	Prior to issuance of demolition permit	Applicant/Qualified Professional	<ul style="list-style-type: none"> • LACFD • LACDPW
MM M-5: Prior to the issuance of any demolition permit for any existing building within the Project site containing lead-based paint, the Applicant shall provide a copy of the qualifications/license of the lead-based paint abatement contractor that will perform the abatement or removal of lead-based paint to the County of Los Angeles Department of Public Works Building and Safety Division and the County of Los Angeles Fire	A. Submit documentation summarizing the results of lead-based paint testing	Prior to issuance of demolition permit	Applicant/Qualified Professional	<ul style="list-style-type: none"> • LACDPW • LACFD
	B. Submit a copy of qualifications/License of the lead-based paint abatement contractor, if applicable	Prior to issuance of demolition permit	Applicant	<ul style="list-style-type: none"> • LACDPW • LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<p>Department Health Hazardous Materials Division. If required, the Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to the County of Los Angeles Department of Public Works and the County of Los Angeles Fire Department for review and approval to ensure compliance with all applicable federal, State, and local laws and regulations.</p>	<p>C. Submit Hazardous Building Materials Demolition Assessment and Management Plan for review and approval, if required</p>	<p>Prior to issuance of demolition permit</p>	<p>Applicant/Qualified Professional</p>	<ul style="list-style-type: none"> • LACFD • LACDPW
<p>MM M-6: In accordance with Section 110.4 of the County of Los Angeles Building Code, the Project development plans shall comply with the required setbacks from oil and gas wells, as determined by the California Department of Conservation Division of Oil, Gas and Geothermal Resources and the County of Los Angeles Department of Public Works. As part of these requirements, buildings or structures to be located between 25 to 200 feet of active, abandoned or idle oil or gas wells shall be designed according to recommendations prepared by a licensed Civil Engineer and approved by the County Building Official.</p>	<p>Submit building plans for review and approval</p>	<p>Prior to issuance of building permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • DOGGR—for support/referral
<p>MM M-7: Prior to issuance of a grading permit, the Applicant shall submit documentation to the County of Los Angeles Department of Public Works to verify that all oil wells within 200 feet of Project buildings or structures have been properly abandoned according to required standards. If the wells were not abandoned properly, as determined by the California Department of Conservation Division of Oil, Gas and Geothermal Resources, the wells shall be re-abandoned in accordance with the requirements of the California Department of Conservation Division of Oil, Gas and Geothermal Resources.</p>	<p>A. Submit documentation verifying proper abandonment of oil wells</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • DOGGR
	<p>B. Re-abandon oil wells, if required</p>	<p>Prior to issuance of grading permit(s)</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDPW • DOGGR

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
MITIGATION COMPLIANCE				
<p>The Applicant shall be responsible for complying with all Project PDFs and MMs throughout the lifetime of the Project. As a means of ensuring compliance with the above mitigation measures and California Public Resources Code Section 21081.6, the Applicant is responsible for submitting an annual mitigation compliance report to the County of Los Angeles Department of Regional Planning for review. The annual mitigation compliance report shall include, but not be limited to, a list of all approvals and/or permits obtained from the County for the Project. Such list shall include any approvals and/or permits obtained during the current compliance period as well as all approvals and/or permits obtained during the previous compliance periods.</p>	<p>A. Submit annual mitigation compliance report</p>	<p>Annually until all mitigation measures have been implemented and completed</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP
<p>In connection with the application for any approvals and/or permits that the Applicant requests from the County, the Applicant shall provide a copy of all PDFs and/or MMs applicable to the subject matter of the application to the County staff who is reviewing such application at the time the request is made. The Applicant shall also provide all applicable agency clearances, LACDRP clearances, and/or other County department clearances associated with such PDFs and/or MMs.</p>	<p>B. Provide a copy of applicable PDFs and/or MMs and applicable clearances</p>	<p>At the time of request of any future approvals and/or permits</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP • Other County Departments—as applicable
<p>The Applicant shall replenish the mitigation monitoring account, as necessary, until such time as all mitigation measures have been implemented and completed.</p>	<p>C. Replenish mitigation monitoring account as necessary</p>	<p>During mitigation monitoring</p>	<p>Applicant</p>	<ul style="list-style-type: none"> • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
<u>List of Acronyms:</u>				
Caltrans	California Department of Transportation			
CDFW	California Department of Fish and Wildlife			
CHP	California Highway Patrol			
CHRIS-SCCIC	California Historical Resources Information System-South Central Coastal Information Center			
CSDLAC	County Sanitation Districts of Los Angeles County			
CTMP	Construction Traffic Management Plans			
DOGGR	California Department of Conservation Division of Oil, Gas and Geothermal Resources			
DTSC	California Department of Toxic Substances Control			
HMMP	Habitat Mitigation and Monitoring Program			
LACDPH	Los Angeles County Department of Public Health			
LACDPW	Los Angeles County Department of Public Works			
LACDRP	Los Angeles County Department of Regional Planning			
LACFD	Los Angeles County Fire Department			
LACSD	Los Angeles County Sheriff's Department			
LARWQCB	Los Angeles Regional Water Quality Control Board			
LID	Low Impact Development			
LSWPPP	Local Stormwater Pollution Prevention Plan			
MM	Mitigation Measure			
NAHC	Native American Heritage Commission			
NCWD	Newhall County Water District			
NOI	Notice of Intent			
OSHA	Occupational Safety and Health Administration			
OTWMMP	Oak Tree and Woodland Mitigation and Monitoring Program			
OWTS	Onsite Wastewater Treatment System			
PDF	Project Design Feature			
SCAQMD	South Coast Air Quality Management District			
SCCDD	City of Santa Clarita Community Development Department			
SCPWD	City of Santa Clarita Public Works Department			
SUSMP	Standard Urban Stormwater Mitigation Plan			

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
SWPPP	Stormwater Pollution Prevention Plan			
TDM	Transportation Demand Management			
USACOE	United States Army Corps of Engineers			
USFWS	United States Fish and Wildlife Service			
WWECP	Wet Weather Erosion Control Plan			

Final EIR Appendices



Appendix E.3

Pyrotechnics Worksheets



Disney/ABC Studios at The Ranch
Proposed Soundstage Pyrotechnic Effects Air Pollutant Emissions

	Calculated Emissions (lbs/day)					
	VOC	CO	NOX	SOX	PM10	PM2.5
Black Powder	0.000	0.011	0.002	0.000	0.086	0.086
Propane	0.005	0.0375	0.065	0.0005	0.0035	0.0035
Total	0.005	0.048	0.067	0.001	0.090	0.090

Black Powder Emissions

	oz burned/day	lbs/oz of Black Powder						Calculated Emissions (lbs/day)					
		VOC	CO	NOX	SOX	PM10	PM2.5	VOC	CO	NOX	SOX	PM10	PM2.5
Black Powder	2	0.00000	0.00531	0.00096	0.00000	0.04313	0.04313	0.000	0.011	0.002	0.000	0.086	0.086

Black Powder Emission Factors:

VOC -	0
CO -	170 lb/ton
NOX -	31 lb/ton
SOX -	0
PM -	0.69 lb/lb

Black Powder Emission Factors Sources:

VOC -	The <i>Compilation of Air Pollutant Emission Factors, US EPA (AP-42)</i> document does not report any VOC emissions from the detonation of black powder.. No emission factors for VOCs were identified in the on-line search of scientific abstracts. ¹
CO -	AP-42 Table 13.3-1 During the combustion of black powder, gaseous emissions (about 31% by weight) including approximately 30% CO ₂ , 4-5% CO, and 40% N ₂ and small amount of H ₂ O and H ₂ S. ¹ The percentage of N occurring as N ₂ is 92.22 percent. ²
NOX -	Using this information, the NOx emission factor was calculated based on the CO emission factor provided in AP-42. $EF_{NOx} = EF_{CO} \times 10 / 0.9822 \times 0.0178$
SOX -	The <i>Compilation of Air Pollutant Emission Factors, US EPA (AP-42)</i> document does not report any SOx emissions from the detonation of black powder
PM -	During the combustion of black powder, gaseous emissions (about 31% by weight) including approximately 30% CO ₂ , 4-5% CO, and 40% N ₂ and small amount of H ₂ O and H ₂ S. ¹ Given that 31% by weight is converted into gaseous emissions, it was conservatively assumed that the all of the remaining 69% would constitute particulate emissions.

Sources:

- 1 - http://www.epd.gov.hk/eia/register/report/eiareport/eia_0412000/Doc/theme_park-section3.htm
- 2 - <http://www.aepi.army.mil/publications/environmentalhealth/docs/emissions-rel-munitions-firing.pdf>
- 3 - <http://www.epa.gov/ttn/chief/ap42/ch13/final/c13s03.pdf>

Propane Emissions

	Gal burned per day	lbs/Gal of Propane						Calculated Emissions (lbs/day)					
		VOC	CO	NOX	SOX	PM10	PM2.5	VOC	CO	NOX	SOX	PM10	PM2.5
Propane	5	0.00100	0.00750	0.01300	0.00010	0.00070	0.00070	0.005	0.038	0.065	0.001	0.004	0.004

Propane Emission Factors:

VOC -	1 lb/10 ³ gal
CO -	7.5 lb/10 ³ gal
NOX -	13 lb/10 ³ gal
SOX -	0.1 lb/10 ³ gal
PM -	0.7 lb/10 ³ gal

Sources:

- 1 - <http://www.epa.gov/ttn/chief/ap42/ch13/final/c13s03.pdf>

The *Compilation of Air Pollutant Emission Factors, US EPA (AP-42)* document does not report any emissions from the detonation/uncontrolled burning of propane. Due to this lack of specific data, emission factors from Propane fueled boilers were used due to the similar "open-burning" nature of the equipment. It should be noted, however, that these boiler emission factors likely overstate emission estimates due to the shorter residence time of the propane through the chemical reaction. That is, propane burns cleaner (less NOx) when it burns faster.

Appendix N

Economic & Fiscal Impact Analysis





Project Report

**Economic & Fiscal Impact Analysis
Disney | ABC Studios at the Ranch**

Prepared for

**Disney Worldwide Services, Inc.
Burbank, California**

Submitted by

**Economics Research Associates, an AECOM
company (ERA)**

September 15, 2009 (Revised and Abridged)

ERA Project No. 18179

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General & Limiting Conditions

Every reasonable effort has been made to ensure that the data contained in this report are accurate as of the date of this study; however, factors exist that are outside the control of Economics Research Associates, an AECOM company (ERA) and that may affect the estimates and/or projections noted herein. This study is based on estimates, assumptions and other information developed by Economics Research Associates from its independent research effort, general knowledge of the industry, and information provided by and consultations with the client and the client's representatives. No responsibility is assumed for inaccuracies in reporting by the client, the client's agent and representatives, or any other data source used in preparing or presenting this study.

This report is based on information that was current as of February, 2009 and Economics Research Associates has not undertaken any update of its research effort since such date.

Because future events and circumstances, many of which are not known as of the date of this study, may affect the estimates contained therein, no warranty or representation is made by Economics Research Associates that any of the projected values or results contained in this study will actually be achieved.

Possession of this study does not carry with it the right of publication thereof or to use the name of "Economics Research Associates" in any manner without first obtaining the prior written consent of Economics Research Associates. This report is not to be used in conjunction with any public or private offering of securities, debt, equity, or other similar purpose where it may be relied upon to any degree by any person other than the client, nor is any third party entitled to rely upon this report, without first obtaining the prior written consent of Economics Research Associates. This study may not be used for purposes other than that for which it is prepared or for which prior written consent has first been obtained from Economics Research Associates.

This study is qualified in its entirety by, and should be considered in light of, these limitations, conditions and considerations.

I. Introduction

Disney Worldwide Services, Inc. (Disney) has commissioned Economics Research Associates, an AECOM Company (ERA), to perform an economic analysis of a master plan for a predominantly television production studio at Disney's Golden Oak Ranch ("The Ranch"), which is located east and south of the City of Santa Clarita in an unincorporated area of Los Angeles County. The 890-acre Ranch has been used for outdoor filming of motion pictures, television and commercials since the 1950s. The development of indoor studios on the westernmost portion of The Ranch is a natural extension of the outdoor filming.

The Walt Disney Company, together with its subsidiaries and affiliates, is a long-time leader in the motion picture industry, which includes feature films, television, music videos, and commercials. More recently, the motion picture industry has broadened to include video games and short film product made for distribution on the Internet. The proposed studio is intended mostly for television production, however, when not in use by Disney, the soundstages will be available for other types of production.

The Walt Disney Company, together with its subsidiaries and affiliates, is a leading diversified international family entertainment and media enterprise with four business segments: media networks, parks and resorts, studio entertainment and consumer products. The company is one of the largest media and entertainment corporation in the world. As part of the media networks division, ABC Studios and ABC Entertainment, which were consolidated in January 2009 into ABC Entertainment Group, have delivered successful television series, including "Desperate Housewives," "Lost," "Grey's Anatomy," "Ugly Betty," and "Brothers & Sisters".

Purpose of the Assignment

Due to the demand for stage space for its current television shows and the lack of available soundstages in the Los Angeles market, Disney has produced a master plan to build eight (8) to twelve (12), state-of-the-art soundstages, each consisting of 18,000 square feet, at The Ranch facility. The ABC Entertainment Group estimates that it currently occupies an estimated 12 percent of the total available soundstage space in the Los Angeles market for its productions.

The purpose of this assignment is to perform an economic and fiscal impact analysis of the proposed master plan.

Existing Site

Located at 19802 Placerita Canyon Road in an unincorporated area of Los Angeles County just east and south of the City of Santa Clarita, The Ranch is a Disney-owned, 890-acre facility. The site has convenient access from the Antelope Valley Freeway (SR 14).

The initial 390-acre ranch was purchased by Walt Disney Productions in 1959. With subsequent purchases, The Ranch now totals approximately 900 acres. Currently, most of the site is designated "Non-Urban, Rural" in the Los Angeles County General Plan, and the entire ranch is zoned "Agricultural". The proposed production facility would be located on approximately 56 acres of the western portion of the Ranch.

Over the years, The Ranch has been used as a location and for temporary backlot sets for Disney movies such as "The Apple Dumpling Gang," "Treasure of Matecumbe," and "Pete's Dragon." In addition, it has been used for television productions such as "Roots II," "Bonanza," "Little House on the Prairie," and "The Waltons." In conjunction with the proposed master plan, Disney believes the opportunity exists to create synergies between shooting that occurs on the soundstages and location shooting on the existing acreage.

Scenarios for the Proposed Master Plan

The client group is considering two scenarios for development at The Ranch as follows:

1. **Option A:** Eight (8) soundstages of 18,000 square feet each in Phase I, followed by four (4) additional stages of similar square footage in Phase II, representing a total of twelve (12) stages. Under this scenario six (6) television series would be utilizing these stages; and
2. **Option B:** Eight (8) soundstages of 18,000 square feet each in Phase I followed by a three-story media office building of approximately \pm 100,000 square feet in Phase II. Under this scenario, four (4) television series would be utilizing these stages.

Additional production support and ancillary buildings would include mill space, a commissary, warehouse space, and an administrative support building.

The client has provided ERA with preliminary construction cost estimates and operating expenses for both scenarios, as well as the estimated total investment required of it for both Option A and Option B.

Organization of the Report

ERA has prepared a fiscal impact analysis focusing on direct fiscal impacts to the City of Santa Clarita, the County of Los Angeles, and the State of California. In this analysis (Section III), ERA has forecasted the direct fiscal impacts of stable year operations for the two scenarios. In addition, ERA has prepared an economic impact analysis for both the construction period and annual operations of the project (Section III).

II. Executive Summary

Economic and Fiscal Impact

The analysis considers economic and fiscal impacts during the construction phase and annual operations. Construction benefits are commonly referred to as “one-time” impacts because they arise only during the period when real estate improvements are made on the site. Annual benefits arise from facility related expenditures and television production related expenditures that will occur within the regions of interest. ERA has estimated the economic impact based on the level of economic activity occurring on-site. All fiscal impacts are based on construction and operation related expenditures as well as direct and indirect employee spending. A summary table of results for both phases of the analysis is presented below in ES-1 and ES-2.

One-Time Construction Impact

Examining construction related impacts in Los Angeles County; the proposed development is expected to create approximately 1,840 to 1,730 direct jobs¹ with an average wage of \$66,000 during the lifetime of the construction period². In aggregate, this project will create between 3,150 jobs (Option A) and 2,920 jobs (Option B) during construction, and will add between \$522.3 million (Option A) and \$499.9 million (Option B) to the regional economy.

¹ Jobs refer to full-time equivalent annual employment in this report.

² Construction impacts are expressed in “job years.” The total jobs and impacts presented in this report represent the direct, indirect, and induced impacts that occur during the entire construction. For example, if the construction phase lasts a total of two years then the project would create an average 920 and 865 direct jobs annually.

Figure ES-1
One-Time Construction Impact

Option A	Direct	Indirect	Induced	Total
<u>Economic Impact</u>				
Employment	1,844	593	715	3,152
Earnings (\$000,000)	\$122.0	\$39.5	\$40.9	\$202.4
Economic Impact (\$000,000)	\$293.2	\$110.0	\$119.1	\$522.3
<u>Fiscal Impact</u>				
State	\$13,724,000			
County	\$211,000			
City of Santa Clarita	\$35,000			
Total	\$13,971,000			
Option B	Direct	Indirect	Induced	Total
<u>Economic Impact</u>				
Employment	1,729	487	708	2,924
Earnings (\$000,000)	\$116.5	\$37.9	\$39.1	\$193.5
Economic Impact (\$000,000)	\$280.7	\$105.4	\$113.9	\$499.9
<u>Fiscal Impact</u>				
State	\$12,641,000			
County	\$199,000			
City of Santa Clarita	\$33,000			
Total	\$12,875,000			

Note: Totals may not add due to rounding. Economic impacts presented at the County level.

Source: Economics Research Associates

During the construction period payroll taxes, income taxes, and related sales tax capture from employee expenditures will range from \$13.9 to \$12.8 million statewide. ERA estimates \$211,000 to \$199,000 will flow to the County and \$35,000 to \$33,000 will flow into the City of Santa Clarita during construction period. These totals do not include an estimated \$4.7 to \$4.4 million in permit fees paid to City and County agencies.

Annual Operation Impact

Operational impacts, which will occur annually, include facility related costs as well as costs associated with television related production activities occurring on-site. Based on our analysis of Option A, the production of six one-hour television dramas will directly support approximately 1,640³ jobs with associated average annual wage of approximately \$83,000 per job. The number of actual people involved (most working a few days or weeks) in production would be much greater. In total, annual television related production activity is estimated to stimulate \$532.6 million of economic impact in the County. This level of economic activity is estimated to support approximately 2,850 jobs on an annual basis.

Figure ES-2
On-Going Operation Impact

Option A	Direct	Indirect	Induced	Total
<u>Economic Impact</u>				
Employment	1,639	606	610	2,854
Earnings (\$000,000)	\$136.6	\$44.8	\$41.4	\$222.8
Economic Impact (\$000,000)	\$296.8	\$115.2	\$120.6	\$532.6
<u>Fiscal Impact</u>				
State	\$26,042,000			
County	\$1,293,000			
City of Santa Clarita	\$199,000			
Total	\$27,534,000			
Option B	Direct	Indirect	Induced	Total
<u>Economic Impact</u>				
Employment	1,512	515	564	2,591
Earnings (\$000,000)	\$126.6	\$35.8	\$35.4	\$197.8
Economic Impact (\$000,000)	\$246.7	\$93.3	\$103.0	\$443.0
<u>Fiscal Impact</u>				
State	\$18,164,000			
County	\$892,000			
City of Santa Clarita	\$133,000			
Total	\$19,189,000			

Note: Totals may not add due to rounding. Economic impacts presented at the County level.

Source: Economics Research Associates

³ ERA's full-time equivalent job estimate exceeds the total number of on-site jobs (full-time and part-time) estimated by Disney. The total number of jobs estimated by Disney represents the total number of workers on-site at any given time. Due to the unique nature of television production, ERA's full-time equivalent estimate is higher because television production related jobs are often on-site for extended hours and episodes are produced over more than one day

It is estimated that approximately 54 percent of the total indirect and induced economic impact in Option A is expected to occur within the City of Santa Clarita, largely driven by the capture of production related economic activity. There is marginal difference between the economic impact for the County and State regions as it is assumed that the majority of demand for operations can be satisfied within Los Angeles County, especially in industries connected to television and film production.

Annual fiscal benefit resulting from production related spending and direct and indirect employee spending in Option A is estimated to total just over \$26.0 million statewide. ERA estimates \$1.3 million will flow to the County and approximately \$199,000 will flow into the City of Santa Clarita on an annual basis.

Option B, which includes four one-hour shows in production facilities and the 100,000 square feet of office has a smaller, but still significant, economic impact on the region. Based on ERA's estimate, the on-going operations will stimulate \$443.0 million of economic impact in the region. This level of economic activity is estimated to support approximately 2,600 jobs on an annual basis.

Annual fiscal benefit resulting from production related spending and direct and indirect employee spending in Option B is estimated to total \$19.2 million statewide. ERA estimates \$892,000 will flow to the County and approximately \$133,000 will flow into the City of Santa Clarita on an annual basis.

The major driver of both economic and fiscal impacts in Option A and Option B relates to expenditures associated with a one-hour television series drama.

III. Economic & Fiscal Impact Analysis

Introduction

This section summarizes ERA's estimates of the potential economic and fiscal benefits to the City of Santa Clarita⁴ (City), Los Angeles County (County), and the State of California (State) that will result from the proposed development alternatives for The Ranch soundstage facility (Facility). The purpose of this section is to provide Disney an analytical framework for evaluating the expected contribution of the development program to the local, regional, and State economy, which may be shared with local and regional government officials.

The economic impact analysis considers total economic impacts of the project in three distinct phases. First, ERA calculates a construction period impact that represents the sum value of impacts which occur over the entire construction period for the proposed development. Second, we calculate the impact of annual recurring operations of the Facility, which represents the economic effects of on-going business activities of the Facility for its initial year of operations. Finally, we calculate the expected impact of production related spending on the economy, which will also reoccur on an annual basis. The latter two have been combined and reported as the annual operations economic impact, representing the total reoccurring economic effect of the proposed development.

ERA has estimated the development alternative's fiscal benefits at the City, County, and State level from both the Construction period and during on-going production and Facility operations.

Methodology

This section provides an explanation of the economic and fiscal impact modeling methodologies. The estimates of economic and fiscal benefits presented in this report are based on the entire Facility program at build out. The analysis considers impacts during the construction phase and ongoing operations. Construction benefits are commonly referred to as "one-time" benefits because they arise only during the period when real estate improvements are made on the site. On-going benefits arise from operations-related expenditures and production-related expenditures that will occur within the regions of interest.

ERA's assessment of economic and fiscal activity generated by the Facility considers the following inputs summarized in Figure 1.

⁴ As defined by a collection of Zip Codes for the economic impact analysis and municipal boundaries for the fiscal impact analysis.

Figure 1
Economic and Fiscal Activity Inputs

Economic Inputs		Fiscal Inputs	
One-Time Construction Phase	Annual Operations	One-Time Construction Phase	Annual Operations
Construction Expenditures	Operational Expenditures	Sales and Use Tax	Sales and Use Tax
Construction Employment	Operational Employment	Income Tax	Property Tax
Construction Wages	Operational Wages	Payroll Tax	Income Tax
	TV Production Expenditures		Payroll Tax
	TV Production Employment		Utility Usage Tax
	TV Production Wages		
	Media Office Expenditures		
	Media Office Employment		
	Media Office Wages		

Source: Economics Research Associates

A number of important assumptions have been made in this report and form the basis of the model of fiscal and economic activity presented. These assumptions include the following:

- All dollar amounts shown are in 2009 dollars and are based upon estimated construction, operating, and production related expenditures provided by Disney. In the fiscal impact analysis, ERA has provided estimates for retail expenditures for direct and indirect employment.
- The primary region of study for the economic impact assessment is Los Angeles County. Results are presented in terms of the County and compared to the City of Santa Clarita and State of California.
- To the extent possible, ERA has employed separate estimates for economic activities in order to more accurately reflect the fact that differing activities have different magnitudes of impact.
- The analysis measures gross economic and fiscal impacts and does not take into account substitution or re-allocation of existing expenditures.
- Regional Production Coefficients were used to estimate impacts in each region.

Economic Impact Methodology

Key Definitions

The following are definitions for key terminology used in this report.

IMPLAN® model (IMPLAN®): The IMPLAN® model is the software used in this report to estimate the economic impacts of the proposed Facility. The software is based on numerous federal primary data sources including the U.S. Department of Commerce Bureau of Economic Analysis, the U.S. Bureau of Labor Statistics, the U.S. Census Bureau, the U.S. Department of Agriculture, and the U.S. Geological Survey. IMPLAN® was originally developed in 1993 and is used by more than 1,500 active users in federal and state government, private consultancies, and internationally.

Multiplier: In IMPLAN® multipliers describe the response of the economy to a stimulus (a change in demand or production).

Earnings (Wages): Earnings represent total payroll wages and salaries including benefits such as health and life insurance and retirement payments.

Employment (Jobs): Employment in this study has been converted to reflect full-time equivalent annual jobs. In many cases, the actual number of people involved in television production (most working a few days or weeks) is much greater.

Economic Impact: Economic impact is a single number in millions of dollars for each industry. The dollars represent the value of an industry's total production in the economy of study, which is equal to the sum of the direct, indirect, and induced effects.

Direct Impact: Direct impact represents the impacts for the expenditures and/or production values specified as the direct final demand changes. In this report, direct impacts derive from the one-time construction costs and costs associated with annual operations for the alternative development options.

Indirect Impact: Indirect impact represents the impacts caused by the iteration of industries purchasing from other industries resulting from direct final demand changes.

Induced Impact: Induced impact represents the impacts on all local industries caused by the expenditures of new household income generated by the direct and indirect effects or direct final demand changes.

Regional Production Coefficient: Regional production coefficient refers to the proportion of the total supply of goods or service required to meet a particular Industry's intermediate and final demands that are produced within the region of study.

Area of Study

A number of ZIP codes⁵ were chosen to represent the approximate size and boundary of the City of Santa Clarita. An IMPLAN® ZIP code file is a proportional reduction of the larger county data base.⁶ A map of these selected ZIP codes is presented in Exhibit 1.

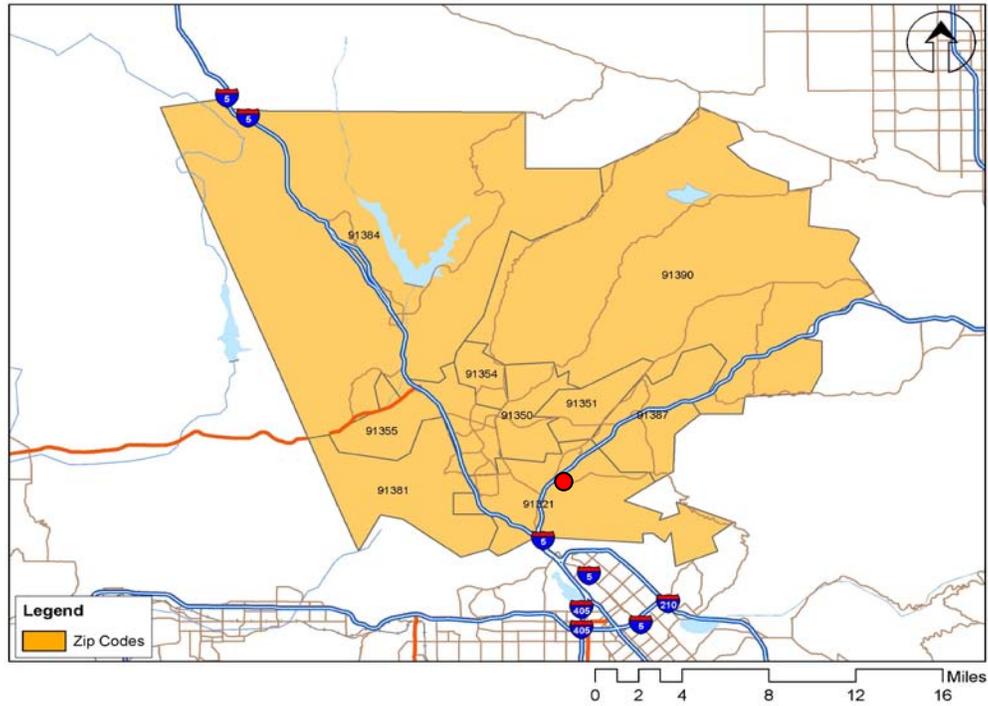
Economic impact is a measure of the spending and employment associated with a business, a sector of the economy, a change in government policy, or a specific project. Economic impact is the cumulative impact that occurs in all sectors of the economy as a result of Facility operations and related production expenditures within the Facility. For this analysis, ERA reports our estimates of the total economic impact, the number of employees and wages to labor that result from the Facility development alternatives. Total economic impacts occur on three levels – direct, indirect, and induced.

It should be recognized that use of the multiplier concept is well accepted in measuring the re-spending impact of an initial expenditure in the economy. While the methodology is sound, the actual multiplier values for specific levels of geography vary in precision due to the extremely complex maze of economic interrelationships that are difficult to fully document. Nevertheless, the relative magnitude of multiplier values is regarded as acceptable and appropriate for approximating economic impact.

⁵ ZIP codes 91355, 91354, 91350, 91351, 91321, 91387, 91384, 91390, and 91381 were used to estimate impact on the City.

⁶ A small study area, such as the ZIP code approximation for the City, will have some leakage. Leakages are any payments made to imports of value-added sectors that do not in turn re-spend the dollars within the City. From the aggregation of ZIP code level data for the City, IMPLAN® software regionalizes the national structural matrices by eliminating industries that do not exist, and adjusts for value added to total industry output ratios.

Exhibit 1
Zip Code Approximation for City of Santa Clarita



Note: red dot = approximate site location

Source: Economics Research Associates

Fiscal Impact Methodology

In this analysis, the term ‘Fiscal Impact’ is defined as the annual fiscal revenue to the City, County, and State during stable year operations of the proposed Facility development.

ERA individually modeled five major fiscal revenue sources to the various jurisdictions resulting from the proposed project: Sales and Use Taxes, Property Taxes, Income Taxes, Payroll Taxes, and Utility Taxes. Taxes were applied to revenue estimates based on Facility operations, production activity, and direct and indirect employee spending.

Economic Impact Analysis

ERA has presented data relevant to the economic impact assessment broken into two general sections for each of the economic activities: model assumptions and total economic impacts. Estimated construction costs, Facility operation costs and production-related expenditures were provided by Disney. All impacts illustrated in this section are presented at the County level. Specific impacts for the City and State level of analysis are presented in Appendix Table A of this report.

Construction

The first and most immediate economic impact of the proposed development is the costs associated with building the new Facility. Disney has provided ERA with estimates for both the soft costs and hard costs associated with the project, all of which have been factored into this economic analysis. While the development may occur over several phases, ERA has estimated the economic impact using the total costs associated with the development over the entire construction period (not annualized). This direct construction spending is expected to create between approximately 1,840 and 1,730 jobs with associated earnings between \$122.0 million and \$116.5 million in Option A and Option B, respectively.

As presented in Figure 2, the total economic impact of construction expenditures is approximately \$522.3 million for development Option A and \$499.9 million for development Option B in the County. The total economic impact includes all spending associated with construction and development of the Facility along with the indirect and induced economic impacts in the County over the construction period. This level of economic impact is estimated to support approximately 3,150 jobs with earnings of \$202.4 million and 2,920 jobs with wages of \$193.5 million for Option A and Option B, respectively.

Figure 2
Economic Impact of Construction Expenditures

Option A	Direct	Indirect	Induced	Total
Employment	1,844	593	715	3,152
Earnings (\$000,000)	\$122.0	\$39.5	\$40.9	\$202.4
Economic Impact (\$000,000)	\$293.2	\$110.0	\$119.1	\$522.3
Option B	Direct	Indirect	Induced	Total
Employment	1,729	487	708	2,924
Earnings (\$000,000)	\$116.5	\$37.9	\$39.1	\$193.5
Economic Impact (\$000,000)	\$280.7	\$105.4	\$113.9	\$499.9

Source: Economics Research Associates

By definition, construction related (hard cost) impacts occur on-site. As a result, the direct impacts will be similar across all regions under study. As the region of analysis grows, however, the indirect

and induced impacts increase based on a higher multiplier effect. The total economic impact in the State is expected to be between \$536.5 million (Option A) and \$513.4 million (Option B).

Annual Operations (Assumptions)

Facility

Distinct from the construction period, the proposed development alternatives will have an impact resulting from ongoing annual recurring operations. ERA has estimated 39 full-time equivalent jobs as a direct result of Facility operations in Option A, and a slightly smaller number of full-time equivalent jobs – 37 – for Option B.

**Figure 3
Annual Operational Expenditures Assumptions**

	Option A	Option B
Operating Expenses (\$000,000)	\$5.0	\$4.9
Employment	39	37

Source: Economics Research Associates

Production

The television production activity occurring within the Facility will have a significant impact in the areas of study. The difference between alternatives is the number of proposed soundstages in the Facility. The general assumptions used as the basis of this analysis are provided below in Figure 4. In total, Disney has estimated that there will be 1,020 people working per show day (not including Facility management), and 920 people working per show day in Option A and Option B, respectively.⁷

**Figure 4
Production Activity Assumptions**

	Option A	Option B
Shows	6	4
Episodes per Season	22	22
<u>Per Show Assumptions</u>		
Employment		
Drama cast/crew/extras	170	170
TV Production Expenditures (millions)	\$2.5	\$2.5

Source: Economics Research Associates

⁷ Total = (cast, crew, extras per show x number of shows).

Media Office

Unique from Option A, Option B includes a 100,000 square foot media/studio office building as part of its development program. Using an assumption of 200 square feet per employee Disney has estimated 475 jobs based on a five percent vacancy rate within the office building. ERA has used the figures provided in Figure 5 as the basis for the economic and fiscal impact estimate.

**Figure 5
Media Office Assumptions**

	Option A	Option B
Square Feet (SF)	NA	100,000
Vacancy	NA	5%
Employees per SF	NA	200
Total Employees	NA	475

Source: Economics Research Associates

Total Economic Impact

As presented in Figure 6, the total economic impact of annual operations in Option A is estimated to be \$532.6 million. This level of economic impact is estimated to support approximately 2,850 jobs with earnings of \$222.8 million. The total impacts include all spending associated with Facility operations and payroll, along with the indirect and induced economic impact, that are captured within the County.

The total economic impact of annual operations in alternative Option B is estimated to be \$443.0 million. This level of economic impact is estimated to support approximately 2,600 jobs with earnings of \$197.8 million. It is estimated that approximately half of the indirect and induced economic impact in Option A and Option B is expected to occur within the City. There is also marginal difference between the County and State regions as it is assumed that the majority of demand for television production can be satisfied within Los Angeles County.

Figure 6
Economic Impact of Annual Operations

Option A	Direct	Indirect	Induced	Total
Employment	1,639	606	610	2,854
Earnings (\$000,000)	\$136.6	\$44.8	\$41.4	\$222.8
Economic Impact (\$000,000)	\$296.8	\$115.2	\$120.6	\$532.6
Option B	Direct	Indirect	Induced	Total
Employment	1,512	515	564	2,591
Earnings (\$000,000)	\$126.6	\$35.8	\$35.4	\$197.8
Economic Impact (\$000,000)	\$246.7	\$93.3	\$103.0	\$443.0

Note: Employment has been converted to annual full-time equivalents by ERA for the purposes of reporting the economic impact and do not equal the number of jobs per show days provided by Disney.

Source: Economics Research Associates

Fiscal Impact Analysis

Fiscal benefits to the City, County, and State arising from the proposed Facility will be derived from five primary taxes – income, payroll, sales and use, utility, and property. A summary of each of these taxes and their rate application is presented below:

- **Income Tax:** The State levies an income tax for all employees based on a variable tax rate by income level. For the purposes of this analysis, ERA has assumed that all employees are filing as either single or married filing separately.
- **Payroll Tax:** There are three different tax rates within the payroll tax. They include Unemployment Insurance Tax (UI), Employment Training Tax (ETT), and State Disability Insurance (SDI). UT and ETT were calculated on a per employee basis by allocating a cost of \$434 for UI and \$7 for ETT for each job created. SDI was calculated using the average wage by economic activity and then taxing \$0.011 per dollar of annual wage.
- **Sales Tax:** Direct expenditures from production activity and facility operations as well as direct and indirect employee spending will be assessed a City sales tax of 1.0%, a County sales tax of 1.0%, and a State sales tax of 7.25% (9.25% total tax rate). Revenue estimates for employee spending were based on the 2007 BLS consumer expenditure survey for Los Angeles, Orange, and San Bernardino Counties. ERA has also estimated the taxable proportion of each spending category in an effort not to overestimate potential sales tax revenues. In this analysis it is assumed that 15 percent of retail purchases will occur within the City, 90 percent of retail purchases will occur in the County, and 95 percent of all retail

purchases will occur in the State. This is a blended rate to account for both business and employee related spending.

- **Utility Tax:** The County levies a utility tax of 4.5% against utility consumption expenditures. Utility expenditures have been provided by Disney for facility operations related to television production activity. ERA has estimated that utility costs associated with the media office building will be \$2.50 per square foot annually.
- **Property Tax:** The State of California applies a 1.0% tax against real and personal property. ERA applied a 1.0% rate against the property's value in our revenue calculations which does not include special district taxes.

Construction

Based on assumptions provided in this Section for development alternatives, ERA estimates that approximately \$13.9 million or \$12.8 million in taxes will result from the one-time construction period. Of those taxes the State, County, and City could receive approximate \$13.7 million, \$211,000, and \$35,000 in total revenues, respectively, under Option A. In Option B, the taxes generated for the State, County, and City are estimated to be \$12.6 million, \$199,000, and \$33,000 in total annual revenues, respectively. These totals do not include an estimated \$4.7 to \$4.4 million in permit fees paid to City and County agencies. There will also be a reoccurring fiscal benefit associated with Property Taxes paid by Disney based on on-site improvements. The total Property Tax estimate is included below in the annual operations impact.

Figure 7
Construction Period Fiscal Impact

	Option A	Option B
Impacts by Tax		
State Income Tax	\$9,173,000	\$8,431,000
Payroll Tax	\$2,940,000	\$2,684,000
Sales Tax	\$1,858,000	\$1,760,000
Impacts by Jurisdiction		
State	\$13,724,000	\$12,641,000
County	\$211,000	\$199,000
City of Santa Clarita	\$35,000	\$33,000
Total	\$13,971,000	\$12,875,000

Note: Totals may not add due to rounding. This table does not include an estimated additional \$4.4 - \$4.7 million in permit fees to the City and County.

Source: Economics Research Associates

Annual Operations

On-going operations at the Facility are expected to create tax benefit for the State, County, and City. As presented in Figure 8, the various level of fiscal impact ranges from \$27.5 million to \$19.2 million. Impacts are presented by tax and jurisdiction. Of those taxes the State, County, and City could receive approximate \$26.0 million, \$1.3 million, and \$199,000 in total revenues, respectively, under Option A. In Option B, the taxes generated for the State, County, and City are estimated to be \$18.2 million, \$892,000, and \$133,000 in total annual revenues, respectively.

Figure 8
Annual Operations Fiscal Impact

	Option A	Option B
<u>Impacts by Tax</u>		
State Income Tax	\$11,524,000	\$7,740,000
Payroll Tax	\$2,956,000	\$1,988,000
Sales Tax	\$10,497,000	\$7,010,000
Property Tax	\$2,453,000	\$2,356,000
Utility Tax	\$103,000	\$97,000
<u>Impacts by Jurisdiction</u>		
State	\$26,042,000	\$18,164,000
County	\$1,293,000	\$892,000
City of Santa Clarita	\$199,000	\$133,000
Total	\$27,534,000	\$19,189,000

Note: Totals may not add due to rounding.

Source: Economics Research Associates

IV. Appendix

Appendix Table A

Economic Impact

Construction (Option A)	Direct	Indirect	Induced	Total
<i>City</i>				
Economic Impact (\$000,000)	\$292.1	\$79.6	\$73.6	\$445.2
Jobs	1,836	477	590	2,903
Wages (\$000,000)	\$121.5	\$31.5	\$29.4	\$182.4
<i>County</i>				
Economic Impact (\$000,000)	\$293.2	\$110.0	\$119.1	\$522.3
Jobs	1,844	593	715	3,152
Wages (\$000,000)	\$122.0	\$39.5	\$40.9	\$202.4
<i>State</i>				
Economic Impact (\$000,000)	\$293.3	\$110.6	\$132.6	\$536.5
Jobs	1,858	597	726	3,181
Wages (\$000,000)	\$122.9	\$40.7	\$45.5	\$209.1
<hr/>				
Annual Operations (Option A)	Direct	Indirect	Induced	Total
<i>City</i>				
Economic Impact (\$000,000)	\$234.7	\$70.3	\$57.9	\$362.9
Jobs	1,220	302	302	1,825
Wages (\$000,000)	\$107.1	\$26.5	\$26.5	\$160.1
<i>County</i>				
Economic Impact (\$000,000)	\$296.8	\$115.2	\$120.6	\$532.6
Jobs	1,639	606	610	2,854
Wages (\$000,000)	\$136.6	\$44.8	\$41.4	\$222.8
<i>State</i>				
Economic Impact (\$000,000)	\$296.8	\$120.3	\$136.0	\$553.1
Jobs	1,739	606	711	3,055
Wages (\$000,000)	\$132.9	\$46.8	\$46.7	\$226.3

Construction (Option B)	Direct	Indirect	Induced	Total
<i>City</i>				
Economic Impact (\$000,000)	\$279.5	\$76.2	\$70.3	\$426.0
Jobs	1,720	473	484	2,677
Wages (\$000,000)	\$116.0	\$30.2	\$28.1	\$174.3
<i>County</i>				
Economic Impact (\$000,000)	\$280.7	\$105.4	\$113.9	\$499.9
Jobs	1,729	487	708	2,924
Wages (\$000,000)	\$116.5	\$37.9	\$39.1	\$193.5
<i>State</i>				
Economic Impact (\$000,000)	\$280.7	\$105.9	\$126.8	\$513.4
Jobs	1,742	591	717	3,050
Wages (\$000,000)	\$117.4	\$39.0	\$43.5	\$199.9
<hr/>				
Annual Operations (Option B)	Direct	Indirect	Induced	Total
<i>City</i>				
Economic Impact (\$000,000)	\$177.0	\$52.1	\$44.5	\$273.6
Jobs	1,021	239	254	1,513
Wages (\$000,000)	\$86.3	\$19.5	\$19.5	\$125.4
<i>County</i>				
Economic Impact (\$000,000)	\$246.7	\$93.3	\$103.0	\$443.0
Jobs	1,512	515	564	2,591
Wages (\$000,000)	\$126.6	\$35.8	\$35.4	\$197.8
<i>State</i>				
Economic Impact (\$000,000)	\$247.6	\$97.3	\$116.4	\$461.3
Jobs	1,612	518	683	2,812
Wages (\$000,000)	\$124.1	\$37.6	\$39.9	\$201.6

Note: totals may not add due to rounding.

Source: Economic s Research Associates

Appendix Table B

Fiscal Impact

Construction (Option A)		Construction (Option B)	
<i>Impacts by Tax</i>		<i>Impacts by Tax</i>	
State Income Tax	\$9,173,000	State Income Tax	\$8,431,000
Payroll Tax	\$2,940,000	Payroll Tax	\$2,684,000
Sales Tax (State)	\$1,612,000	Sales Tax (State)	\$1,528,000
Sales Tax (County)	\$211,000	Sales Tax (County)	\$199,000
Sales Tax (City)	\$35,000	Sales Tax (City)	\$33,000
<i>Impacts by Jurisdiction</i>		<i>Impacts by Jurisdiction</i>	
State	\$13,724,000	State	\$12,641,000
County	\$211,000	County	\$199,000
City	\$35,000	City	\$33,000
Annual Operations (Option A)		Annual Operations (Option B)	
<i>Impacts by Tax</i>		<i>Impacts by Tax</i>	
State Income Tax	\$11,524,000	State Income Tax	\$7,740,000
Payroll Tax	\$2,956,000	Payroll Tax	\$1,988,000
Sales Tax (State)	\$9,108,000	Sales Tax (State)	\$6,082,000
Sales Tax (County)	\$1,190,000	Sales Tax (County)	\$795,000
Sales Tax (City)	\$199,000	Sales Tax (City)	\$133,000
Property Tax	\$2,453,000	Property Tax	\$2,356,000
Utility Tax	\$103,000	Utility Tax	\$97,000
<i>Impacts by Jurisdiction</i>		<i>Impacts by Jurisdiction</i>	
State	\$26,042,000	State	\$18,164,000
County	\$1,293,000	County	\$892,000
City	\$199,000	City	\$133,000

Note: totals may not add due to rounding.

Source: Economics Research Associates