



November 15, 2010

Mr. Mitch Glaser
Los Angeles County
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90013

Re: Project No. E2007-01226-(5)
Plan Amendment Case No. 200900006-(5)
Zone Change Case No. 200900009-(5)
Environmental Assessment Case No. 200900080-(5)
State Clearinghouse No. 2008071119

Dear Mr. Glaser:

Please find enclosed a copy of the comments from the school districts of the Santa Clarita Valley regarding the One Valley One Vision Planning (OVOV) document and the Draft Environmental Report (DEIR). These have been submitted to the City of Santa Clarita Planning Department

1

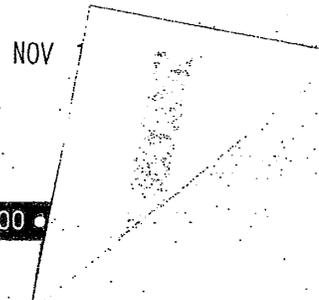
Please consider these written comments in response to the Los Angeles County Department of Regional Planning Notice of Public Hearing.

Sincerely,

Marc Winger, Ed.D.
Superintendent

Enclosure

c: Area Superintendents



**Castaic Union School District
Newhall School District
Saugus Union School District
Sulphur Springs Union School District
William S. Hart Union High School District**

November 3, 2010

RECEIVED
PLANNING DIVISION

NOV 08 2010

CITY OF SANTA CLARITA

Mr. Jason Smisko
Senior Planner
City of Santa Clarita
23920 Valencia Boulevard, Suite 302
Santa Clarita, CA 91355

**Re: Draft Program Environmental Impact Report for City of Santa Clarita
OVOV General Plan, State Clearinghouse No.2008071133**

Dear Mr. Smisko:

Thank you for supplying the local school districts with draft copies of the One Valley One Vision (OVOV) General Plan and the associated DEIR. We offer the following observations and comments.

2

The DEIR states:

“Implementation of the proposed General Plan goals, objectives, policies, and Senate Bill 50 would reduce impacts on school districts to less than significant.”
(3.15-2)

3

- 1) Payment of state mandated fees under SB50 will not mitigate the impact of future development because statutory fees alone cannot assure adequate school housing for children. They are the legal structure for mitigation, but they are simply insufficient. Any additional generation of students from new housing will stress the capacity of our school districts. We appreciate the concept that the plan’s “goals, objectives, and policies” will assist us in convincing developers that schools must be considered in the approval process. But without stronger and specified goals, objectives, and policies mitigation is not guaranteed, and therefore the DEIR should not state that these elements result in a reduction of the impact to “less than significant.” [We require mitigation agreements for all developers that insure full mitigation - a greater level of mitigation than statutory fees - and we look to the City and County to assist us in helping all developers understand this.

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2) SB50 and good intentions are not enough. If we truly want to state that the goals, objectives, and policies mitigate to less than significant, we must have *specific* language that states the expectation and process for achieving this. We feel a stronger statement is needed in the EIR that communicates the expectation that developers will satisfy district needs, including the need to mitigate above and beyond statutory fee requirements, during the approval process.

6

The OVOV General Plan states:

“Master-planned communities such as Newhall Ranch, provide for school sites and funding mechanisms in their specific plans.” (L-38)

7

“As infill occurs in other portions of the planning area, however, it will be necessary to explore all options to alleviate over-crowding. Policies have been included in the General Plan to address coordination of land use planning with school facility planning.” (L-38)

- 1) We agree with the statement on master-planned communities and we would like the plan to clearly state that master planned communities can adequately mitigate for schools only through what are “full mitigation” agreements. [We would like to include the concept that full mitigation is possible only if these agreements include
- a. Sufficiently sized, pre-identified, and California Department of Education (CDE) and Department of Toxic Substances Control (DTSC) approvable land for school sites,
 - b. Funding guarantees and mechanisms regardless of the status of state funding,
 - c. Well –defined triggers for commencement of school construction, and
 - d. Definition of the necessary number and size of schools based on agreed upon student generation rates through build out of the project.

8

9

- 2) A basic concept of the OVOV plan is to reduce housing density in the outlying and unincorporated county areas while allowing denser housing in the core of the city. The larger developers’ planned communities usually occur in the outlying areas and the projects can be mitigated for schools with the proper agreements, as noted above. However, it is the density at the core that is most troublesome for existing schools.

10

- 3) Small, incremental development has been approved over the years, resulting in a piecemeal patchwork of small projects that have cumulatively overtaxed school capacity of our districts. This incremental approval in the past has effectively ignored appropriate regional planning of school facilities. We must find a better way and we believe the Plan should contain a strong statement about the necessity of small developers to work with each other and the city to

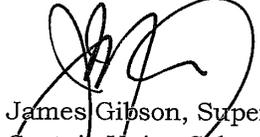
11

- a. Identify modifications to existing school sites to expand capacity. However, even this may be inadequate due to the desire to maintain schools at reasonable and manageable sizes.
- b. Identify adequate nearby land to construct new facilities in the core areas. This is extremely difficult when one small developer cannot be held responsible for a complete school. It is also difficult due to the lack of availability of adequate school acreage in the city's core. However, this discussion must be part of the incremental project approval process.

12

13

Yours truly,



James Gibson, Superintendent
Castaic Union School District



Judy Fish, Ph.D, Superintendent
Saugus Union School District



Robert Challinor, Superintendent
William S. Hart Union High School District



Marc Winger, Ed.D, Superintendent
Newhall School District



Robert Nolet, Ed.D, Superintendent
Sulphur Springs Union School District

Letter No. C1

Letter from Newhall School District, November 15, 2010

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

This comment is an introduction to comments that follow. No further response is required.

Response 3

The comment restates information contained in the Draft EIR for the City of Santa Clarita's (City) General Plan and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The comment states that payment of state mandated fees do not mitigate the impact of future development because the fees alone cannot assure adequate housing for children. The comment further notes that additional students will stress the capacity of the Santa Clarita Valley School Districts (School Districts). The comment concludes that mitigation is not guaranteed without stronger goals, objectives and policies in the City's proposed General Plan and Los Angeles County's (County) proposed Area Plan, and therefore the Draft EIR for the City's General Plan and the Revised Draft EIR for Los Angeles County's (County) Area Plan should not conclude that impacts would be less than significant.

The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required. That being said, County staff has added the following policies to the proposed Area Plan's Land Use Element:

Policy LU 8.1.12: The City, County and the school districts shall cooperate to identify appropriate land to construct new school facilities throughout the planning area. Annual information and update meetings between the planning agencies and the districts are encouraged.

Policy LU 8.1.13: In meeting state law for mitigation, there may be times when additional resources are required in order for the district to fully provide necessary services. Accordingly, Developers are encouraged to reach full mitigation agreements

with the appropriate school districts impacted by their proposed project. Mitigation may include but might not be limited to modifications to existing school sites.

Policy LU 8.1.14: Developers of infill projects shall be aware of the potential cumulative effect that these smaller projects have on schools. Pre and Post construction, infill projects shall be monitored to evaluate student generation rates.

Policy LU 8.1.15: Proposed school sites shall be sufficiently sized, pre-identified and on California Department of Education and Department of Toxic Substances Control approvable land. Further site design considerations shall include appropriate pedestrian and bicycle access.

Response 5

The comment indicates that the School Districts require school mitigation agreements that ensure full mitigation, rather than relying upon statutory fees, and requested assistance from both the County and City in this endeavor.

The comment provides factual background information only and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 6

The comment indicates that the requirements of SB 50 do not provide adequate mitigation for the needs of the School Districts.

The comment only expresses the opinion of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, the comment does not raise an environmental issue, so no further response is required. That being said, the commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

Response 7

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 8

The comment states that master planned communities can adequately mitigate for schools only through “full mitigation” agreements.

The comment only expresses the opinions of the commenter. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required. That being said, the commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

Response 9

The comment suggests policies for the proposed Area Plan in order to provide full mitigation for the School Districts. Please see **Response 4**, above.

Response 10

The comment states that a basic concept of the “One Valley One Vision” (OVOV) joint planning effort is to place higher densities in the core of the City of Santa Clarita instead of outlying unincorporated areas of the Santa Clarita Valley. The comment notes that most large developments occur in the outlying areas and that higher density at the core is the most troublesome for existing schools.

The comment provides factual background information only and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required. That being said, the commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

Response 11

The comment notes that small incremental development approved over the years have cumulatively impacted the School Districts. The comment suggests that small developers need to work with the School Districts. The commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

Response 12

The comment suggests that modifications to existing school sites to expand capacity be identified. The comment states that this may be inadequate given the desire to maintain schools at reasonable and manageable sizes. The commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

Response 13

The commenter suggests that adequate nearby land to construct new facilities in the core areas be identified, however difficult this may be. The commenter is referred to the proposed Area Plan policies listed in **Response 4**, above.

1/3



County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



Leroy D. Baca, Sheriff

December 14, 2010

Mr. Mitch Glaser
Los Angeles County
Department of Regional Planning
Countywide Studies Section
320 West Temple Street
Los Angeles, California 90012



Dear Mr. Glaser:

**REVIEW COMMENTS
ON THE RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE SANTA CLARITA VALLEY AREA PLAN UPDATE
ONE VALLEY ONE VISION PROJECT
(COUNTY PROJECT NO. R-2007-01226-(5); LASD-FPB TRACKING NO. 10-085)**

This letter is transmitted in response to your request for comments on the Recirculated Draft Environmental Impact Report (RDEIR), dated November 23, 2010, for the One Valley One Vision Project (Project) located in the Santa Clarita Valley Plan Area. The RDEIR, and Notices of Completion/Availability for the RDEIR, were received by the Los Angeles County Sheriff's Department (LASD) on November 8, 2010.

1

RDEIR review comments from LASD are provided by Captain Paul Becker of LASD's Santa Clarita Valley Station (see attached correspondence, dated November 16, 2010).

In summary, LASD generally concurs with the LASD-related law enforcement analysis contained therein. LASD has no additional comments at this time. LASD, however, reserves the right to address these and other matters in subsequent reviews of the proposed Project.

2

Thank you for including LASD in the environmental review process for the proposed Project.

Should you have any questions of LASD on this matter, please contact Mr. Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Tracking No. 10-085. Mr. Miyoshi may also be contacted via e-mail, at lhmiyosh@lasd.org.

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Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

10-08

DATE: November 23, 2010

TO: All Interested County Departments

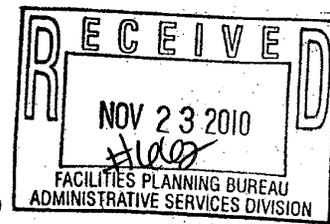
FROM: Mitch Glaser
DEPARTMENT OF REGIONAL PLANNING
Countywide Studies Section *MJG*

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT
ONE VALLEY ONE VISION
PROJECT NO. R2007-01226-(5)
PLAN AMENDMENT CASE NO. 200900006-(5)
ZONE CHANGE CASE NO. 200900009-(5)
ENVIRONMENTAL ASSESSMENT CASE NO. 200900080-(5)
STATE CLEARINGHOUSE NO. 2008071119

In September 2009, the Department of Regional Planning released a Draft Environmental Impact Report (DEIR) for the above project. Due to the comments received on the DEIR, a reexamination of the DEIR data was required. As a result of this examination, the Department of Regional Planning has determined that the entire DEIR will be recirculated for review and comment as a Recirculated Draft Environmental Impact Report (RDEIR). The Department of Regional Planning is requiring reviewers to submit new comments on the RDEIR and will not respond to comments received during the first circulation period, even if those comments pertain to a portion of the DEIR that has not been substantively changed. Attached is the RDEIR for your review.

If you have any questions, please contact Mitch Glaser of the Countywide Studies Section at (213) 974-6476 or via email at mglaser@planning.lacounty.gov, Monday through Thursday from 7:00 a.m. to 6:00 p.m. Our offices are closed on Fridays.

Attachment(s)



only file cc: GARY, DON has only CD

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • Fax: 213-626-0434 • TDD: 213-617-2292

3/3



Leroy D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169
(661) 255-1121



November 16, 2010

Mr. Gary T.K. Tse, Director
Facilities Planning Bureau
1000 South Fremont Avenue
Building A-9 East 5th Floor North
Alhambra, California 91803

Dear Mr. Tse:

DRAFT ENVIRONMENTAL IMPACT REPORT
ONE VALLEY ONE VISION

We have had an opportunity to review the Draft Environmental Impact Report for the One Valley One Vision and have no further comment to what is already in the report for law enforcement services.

Should you have further questions, please feel free to call me at (661) 255-1121 extension 5101, or Deputy Patrick Rissler at extension 5159.

Sincerely,

LEROY D. BACA, SHERIFF

Paul Becker, Captain
Santa Clarita Valley Station

A Tradition of Service Since 1850

Letter No. C2

Letter from County of Los Angeles Sheriff Department, December 14, 2010

Response 1

The County of Los Angeles (County) Sheriff's Department Headquarters noted that they received the notice of completion (NOC) and notice of availability (NOA) for the Revised Draft EIR. This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment stated that the County Sheriff's Department concurred with the findings of the Revised Draft EIR concerning Sheriff services but reserved the right for future comment. The County acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

Response 3

The comment is noted. No further response is required given that the comment does not address or question the content of the Revised Draft EIR.

1/2



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

STEPHEN R. MAGUIN
Chief Engineer and General Manager

January 20, 2011

File No: SCV-00.04-00

Mr. Mitch Glaser
Countywide Studies Section
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

JAN 24 2011

Dear Mr. Glaser:

One Valley One Vision, Project No. R2007-01226-(5)

The Santa Clarita Valley Sanitation District (District) received a Draft Environmental Impact Report (DEIR) for the subject project on November 22, 2010. We offer the following comments regarding sewerage service:

1

1. Tables 3.4-45 and 3.4-46 of the OVOV DEIR: These tables contain estimates of existing and proposed (i.e., proposed General Plan and Area Plan) annual greenhouse gas (GHG) emissions, respectively, from various sources including wastewater treatment. The wastewater GHG emissions calculations in the DEIR (Appendix 3.4) are derived from electrical use and process emissions. The process emissions value of 6,561.63 MT CO2 e/yr (from implementation of both plans) was based on the amount of methane generated utilizing a methodology per the U.S. Environmental Protection Agency (EPA), AP-42 Compilation of Air Pollutant Emission Factors, 1998.

2

During the wastewater treatment process, methane is produced in sealed tanks from anaerobic digestion of degradable organic material removed from the wastewater. The methodology in AP-42 assumes that all the methane generated by the treatment process is emitted to the atmosphere. This assumption is not correct. Organic material removed at both of the District's treatment plants is managed at the District's Valencia Water Reclamation Plant (VWRP). Methane from the anaerobic digesters at VWRP is collected and combusted in a flare or boiler. Only a very small fraction of methane escapes combustion. The U.S. EPA publication Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2008 (released in April 15, 2010) includes a destruction efficiency factor assuming that one percent of methane is uncombusted. However, based on emissions tests at the VWRP, the uncombusted amount of methane is significantly less than one percent. Combusted methane forms CO2, which is a carbon-neutral biogenic emission in this case because the CO2 formed is part of the natural carbon cycle (waste decomposes to CO2, which is taken up by plants, which are consumed by humans and animals and then excreted as waste). Therefore, the process emissions value in the DEIR overestimates actual GHG emissions from the District's treatment of wastewater by two orders of magnitude. The District requests

3

Doc #: 1796154.1



2/2

Mr. Mitch Glaser

-2-

January 20, 2011

that these GHG emissions calculations be revised to account for the capture and subsequent destruction of methane that occurs at VWRP.

3

- 2. The District is not responsible for the water treatment needs of the Santa Clarita Valley. Please revise as follows: (1) *Page 3.17-1, second paragraph*, "...construction of new ~~water~~ or wastewater treatment facilities or expansion of existing facilities..." (2) *Page 3.17-16, second paragraph*, "...construction of new ~~water~~ or wastewater treatment facilities or expansion of existing facilities..." (3) *Page 4.0-30, first paragraph*, "...construction of new ~~water~~ or wastewater treatment facilities or expansion of existing facilities..."

4

- 3. *Page 3.17-4, first paragraph, last sentence*: "The SCVJSS currently processes an average flow of ~~20.8~~ 20.3 mgd."

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- 4. *Page 3.17-13, third paragraph, last sentence*: "The SWRP and the VWRP have current design capacities of 6.5 and 21.6 mgd, respectively, for a total design capacity of ~~34.1~~ 28.1 mgd. As described above in (Planned Improvements) the design capacity of both plants would increase to a capacity of ~~34.2~~ 34.1 mgd..."

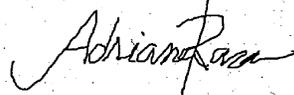
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If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

7

Very truly yours,

Stephen R. Maguin



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

c: T. Nikonova
B. Langpap

Doc #: 1796154.1

Letter No. C3 **Letter from County Sanitation Districts of Los Angeles County,
January 20, 2011**

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment from the Santa Clarita Valley Sanitation District (District) states that the estimated greenhouse gas (GHG) emissions from wastewater treatment are overstated by two orders of magnitude. According to the District, the methane generated from the anaerobic digesters at the Valencia Water Reclamation Plant (VWRP) is collected and combusted in a flare or boiler. The GHG emission calculations for wastewater treatment used methodologies and factors from the U.S. Environmental Protection Agency's *AP-42 Compilation of Air Pollutant Emissions Factors* (AP-42), 1998. The AP-42 methodology assumes that none of the methane from the wastewater treatment process is recovered for energy or flared. However, according to the District's comment, "based on emissions tests at the VWRP, the uncombusted amount of methane is significantly less than one percent." The District requests that the GHG emissions calculations be revised to account for the capture and subsequent destruction of methane that occurs at the VWRP.

Pursuant to the District's comment, if a conservative recovery value of 99 percent (1 percent emitted to the atmosphere) were assumed, the GHG emissions from the wastewater treatment process would be reduced to approximately 38 metric tons of carbon dioxide equivalents (MTCO_{2e}) per year under existing conditions and 66 MTCO_{2e} per year at full buildout of the City of Santa Clarita's (City) proposed General Plan and Los Angeles County's (County) proposed Area Plan, both of which were developed as part of the "One Valley One Vision" (OVOV) joint planning effort. The emissions at full buildout of the City's existing General Plan and the County's existing Area Plan would be approximately 67 MTCO_{2e} per year.

When the aforementioned GHG emissions are combined with the electricity-related wastewater treatment GHG emissions, the total wastewater GHG emissions would be reduced to approximately 15,041 MTCO_{2e} per year under existing conditions and 20,631 MTCO_{2e} per year at full buildout of the City's proposed General Plan and the County's proposed Area Plan. The emissions at full buildout of the City's existing General Plan and the County's existing Area Plan would be approximately 20,632 MTCO_{2e}

per year. The revised GHG emissions from wastewater treatment, as described above, have been included in 3.4, Global Climate Change, in **Section 4.0, Revised Draft EIR Pages**.

Response 4

The requested correction to Section 3.17, Utilities and Infrastructure, pages 3.17-1 and 3.17-15 of the Revised Draft EIR has been made. The requested correction to Section 4.0, Cumulative Scenario, page 4.0-30 of the Revised Draft EIR, has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 5

The requested correction to Section 3.17, Utilities and Infrastructure, page 3.17-4 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 6

The requested correction to Section 3.17, Utilities and Infrastructure, page 3.17-13 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 7

The comment is noted. No further response is required given that the comment does not address or question the content of the Revised Draft EIR.



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-mailed: January 21, 2011
ovov@planning.lacounty.gov

January 21, 2011

Mr. Mitch Glaser
Department of Regional Planning
County of Los Angeles
Los Angeles, CA 90012

**Review of the Re-circulated Draft Environmental Impact Report (Draft EIR)
for the Santa Clarita Valley Area Plan Update**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (final EIR) as appropriate.

1

Based on a review of the draft EIR the AQMD staff is concerned about the project's operational air quality impacts. Specifically, the lead agency has determined that the project's operational phase will exceed the AQMD's CEQA significance thresholds resulting in significant regional and cumulative air quality impacts. The project's operational air quality impacts are primarily from mobile source emissions related to the significant increase of vehicle trips (>1.8 million) associated with the proposed project. AQMD staff appreciates that this plan update, in conjunction with the Santa Clarita City General Plan update, encourages more dense development in already developed areas in Santa Clarita in order to reduce transportation and related air quality impacts. However, the lead agency has not stipulated specific measures or targets to reduce the large increase in mobile source emissions allowed under the proposed project. For example, the Southern California Association of Governments (SCAG) has adopted regional greenhouse gas (GHG) emission reduction targets under SB 375 of 8% by 2020 and 13% 2035. A reduction in GHGs will very likely provide co-benefits by reducing criteria pollutant emissions. Therefore, the AQMD staff recommends that the lead agency include quantitative targets and/or performance standards for the development of this plan in order to minimize the project's significant air quality impacts. Potential quantifiable mitigation measures are included in the greenhouse gas quantification report¹ published by the California Air Pollution Control Officer's Association in the final EIR.

2

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¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Further, the AQMD staff is concerned about the potential health risk impacts to future sensitive receptors (i.e., schools, school yards, parks, playgrounds, day care centers, nursing homes, hospitals, and residential communities) from potential sources of toxic emissions within the project boundaries. For example, Figure 3.1-2 and 3.1-3 in the draft EIR indicates that residential uses will be located adjacent to light industrial uses. Therefore, the AQMD staff recommends that the lead agency include mitigation in the final EIR that is consistent with the advisory recommendations listed in Table 1-1 of the Air Quality and Land Use Handbook² developed by the California Air Resources Board. Further, the AQMD staff requests that the lead agency include mitigation in the final EIR that requires any future project with sensitive land uses located in close proximity to an industrial use (i.e., source of toxic pollutants) to conduct a health risk assessment.

4

Pursuant to Public Resources Code Section 21092.5, please 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 regarding air quality 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.

5

Sincerely,



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

Attachment

IM:DG

LAC101123-05
 Control Number

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Letter No. C4

Letter from South Coast Air Quality Management District, January 21, 2011

Response 1

The comment is an introductory statement that refers to comments presented in the letter from the South Coast Air Quality Management District (SCAQMD). The comments contained therein are addressed below in **Responses 2** through 5. No further response to this comment is required.

Response 2

The comment states that the lead agency has not stipulated specific measures or targets to reduce the increase in mobile source emissions that would occur from development under the City of Santa Clarita's (City) proposed General Plan and Los Angeles County's (County) proposed Area Plan. The comment notes that the project's operational emissions are primarily from mobile sources related to the increase in vehicle trips compared to existing conditions.

The proposed Area Plan contains goals, policies, and objectives that contain specific measures or targets that the County will adopt if it adopts this Area Plan that will reduce vehicle miles traveled associated with development that would occur under the proposed Area Plan. In particular, Section 3.3, Air Quality, of the Revised Draft EIR lists Goal CO 8, Objective CO 8.1 which specifically requires the lead agency to comply with state law, including AB 32, SB 375, and implementing regulations to reach targeted reductions of GHG emissions. While Objective CO 8.1 specifies meeting targeted GHG emissions reductions, the SCAQMD states that a "reduction in GHGs will very likely provide co-benefits by reducing criteria pollutant emissions." The County agrees with the SCAQMD's statement herein since a large portion of the GHG emissions are due to fossil fuel combustion in motor vehicles. The policies under Objective 8.1 would require the lead agency to reduce motor vehicle GHG emissions using a variety of strategies, such as a Climate Action Plan, the County's General Plan Update, which sets policy for all of the County's unincorporated areas, including those within the Santa Clarita Valley, and participation in the Sustainable Communities Strategy (SCS) Plan being developed by the Southern California Association of Governments (SCAG), which would also reduce associated criteria pollutant emissions. The specific measures and targets that the County would adopt if it adopts this Area Plan to reduce mobile source emissions, are contained in the following policies:

Policy C 1.2.1: Develop coordinated plans for land use, circulation, and transit to promote transit-oriented development that concentrates higher density housing, employment, and commercial areas in proximity to transit corridors.

Policy C 1.2.2: Create walkable communities, with paseos and walkways connecting residential neighborhoods to multi-modal transportation services such as bus stops and rail stations.

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

- Policy C 1.2.4:** Consider location, availability, and accessibility of transit in evaluating new development plans.
- Policy C 1.2.6:** Provide flexible standards for parking and roadway design in transit-oriented development areas to promote transit use, where appropriate.
- Policy C 1.2.7:** In pedestrian-oriented areas, provide a highly connected circulation grid with relatively small blocks to encourage walking.
- Policy C 1.2.9:** Emphasize providing right-of-way for non-vehicular transportation modes so that walking and bicycling are the easiest, most convenient modes of transportation available for short trips.
- Policy C 1.2.10:** Protect communities by discouraging the construction of facilities that sever residential neighborhoods.
- Policy C 1.2.11:** Reduce vehicle miles traveled (VMT) through the use of smart growth concepts.
- Policy C 1.2.12:** Balance the anticipated volume of people and goods movement with the need to maintain a walkable and bicycle friendly environment.
- Policy C 3.1.1:** In evaluating new development projects, require trip reduction measures as feasible to relieve congestion and reduce air pollution from vehicle emissions.
- Policy C 3.1.2:** Promote home-based businesses and live-work units as a means of reducing home-to-work trips.
- Policy C 3.1.3:** Promote the use of flexible work schedules and telecommuting to reduce home to work trips.
- Policy C 3.1.4:** Promote the use of employee incentives to encourage alternative travel modes to work.
- Policy C 3.1.5:** Promote the use of van pools, car pools, and shuttles to encourage trip reduction.
- Policy C 3.1.6:** Promote the provision of showers and lockers within businesses and employment centers, in order to encourage opportunities for employees to bicycle to work.

Policy CO 8.1.1: Create and adopt a Climate Action Plan within 18 months of the adoption date of the County's General Plan Update that meets State requirements and includes the following components:

- a. Plans and programs to reduce GHG emissions to State-mandated targets, including enforceable reduction measures;
- b. Mechanisms to ensure regular review of progress towards the emission reduction targets established by the Climate Action Plan;
- c. Procedures for reporting on progress to officials and the public;
- d. Procedures for revising the plan as needed to meet GHG emissions reduction targets; and
- e. Allocation of funding and staffing for Plan implementation.

After adoption of the Climate Action Plan, amend this Area Plan if necessary to ensure consistency with the adopted Climate Action Plan.

Policy CO 8.1.2: Participate in the preparation of a regional Sustainable Communities Strategy (SCS) Plan to meet regional targets for greenhouse gas emission reductions, as required by SB 375.

Policy CO 8.1.3: Implement the ordinances developed through the County's Green Building Program.

Policy CO 8.1.4: Provide information and education to the public about energy conservation and local strategies to address climate change.

Policy CO 8.1.5: Coordinate various activities within the community and appropriate agencies related to GHG emissions reduction activities.

As noted in the comment, SCAG has adopted regional GHG emissions reductions targets under SB 375. SB 375 requires SCAG, as the Metropolitan Planning Organization for the region, to develop an SCS Plan that will achieve GHG reductions of 8 percent, compared to the 2005 baseline year, by 2020 and 13 percent, compared to the 2005 baseline year, by 2035 through land use and transportation, policies. The SB 375 reductions are exclusive of reductions from the low carbon fuel standard and the vehicle tailpipe emissions standard. As a result, the primary method for achieving the target would be from a reduction in vehicle miles traveled. As shown above, the lead agency will adopt policies, if the County adopts this Area Plan that require participation with SCAG's mandated SCS Plan to meet its obligations under SB 375.

Furthermore, if the County adopts the proposed Area Plan, the County will adopt Policy CO 8.1.1, which requires the development of a Countywide Climate Action Plan that would implement plans and programs to reduce GHG emissions to state-mandated targets and would include enforceable reduction measures. The Climate Action Plan would also include mechanisms to ensure regular review of progress towards the emission reduction targets, procedures for reporting on progress to officials and the public, procedures for revising the plan as needed to meet GHG emissions reduction targets, and procedures for allocating funding and staffing for Plan implementation.

Response 3

The comment requests that the County include quantitative targets and/or performance standards to minimize the significance of the air quality impacts. As stated in **Response 2**, the County has incorporated goals, objectives, and policies into the proposed Area Plan that include quantitative targets that would reduce GHG and criteria pollutant emissions. The comment also states that potential quantifiable mitigation measures are included in the California Air Pollution Control Officer's Association's (CAPCOA) publication, "Quantifying Greenhouse Gas Mitigation Measures," which was published in August of 2010. The County's Revised Draft EIR was released in November 2010, soon after the CAPCOA publication became available. It is not possible to accurately estimate the amount of GHG reductions from the list of GHG reductions measures in the CAPCOA publication because they are geared toward project-level analyses where specific detailed project-level information is known. The Revised Draft EIR is a programmatic-level analysis of the County's proposed Area Plan and the City of Santa Clarita's (City's) proposed General Plan (both of which were developed through the joint "One Valley One Vision" (OVOV) planning effort), which do not propose specific developments within the City or County unincorporated areas within the Santa Clarita Valley. However, the CAPCOA publication does list potential ranges of GHG reductions that could be expected from the implementation of the various project-level measures. The potential ranges for transportation-related measures are shown below in **Table 2, CAPCOA Measures for Reducing Vehicle Miles Traveled**. The table also lists the related policies in the proposed Area Plan that would generally fall into each of the strategies. Policies may be related to one or more of the CAPCOA measures; therefore, the estimated range of reduction in VMT due to the policies may overlap to some extent. The County would adopt these policies only if the County adopts the proposed Area Plan.

Table 2
CAPCOA Measures for Reducing Vehicle Miles Traveled

CAPCOA Measure Number	Strategy	Reduction in Vehicle Miles Traveled	Related OVOV Area Plan Policies
LUT-1	Increase Density	0.8 – 30.0%	LU 1.1.5; LU 5.2.1; LU 5.2.4; C 1.2.5; C 5.3.2
LUT-2	Increase Location Efficiency	10 – 65%	LU 1.1.5; LU 2.1.2; LU 2.3.4; LU 2.3.6; LU 3.1.3; LU 4.2.3; LU 5.2.1; LU 5.2.2; LU 5.2.3; LU 5.2.4; C 1.2.5
LUT-3	Increase Diversity of Urban and Suburban Developments (Mixed Use)	9 -30%	LU 2.1.2; LU 2.3.2; LU 2.3.4; LU 2.3.5; LU 2.3.6; LU 3.1.3; LU 4.2.3; LU 5.2.1; LU 5.2.2; LU 5.2.3; LU 5.2.4; LU 5.2.5; C 1.2.5
LUT-4	Increase Destination Accessibility	6.7 – 20%	LU 2.1.2; LU 2.3.2; LU 2.3.4; LU 3.1.3; LU 3.1.4; LU 4.2.3; LU 5.2.1; LU 5.2.2; LU 5.2.3; LU 5.2.5; C 1.2.1; C 1.2.4; C 1.2.5; C 1.2.11; C 5.3.2;
LUT-5	Increase Transit Accessibility	0.5 – 24.6%	LU 3.2.2; LU 4.2.3; LU 5.1.1; LU 5.1.3; LU 5.2.1; 5.2.2; LU 5.2.4; C 1.1.1; C 1.1.2; C 1.1.3; C 1.1.6; C 1.1.12; C 1.1.13; C 1.2.2; C 1.2.3; C 1.2.4; C 1.2.5; C 1.2.6; C 1.2.7; C 1.2.8; C 1.2.9; C 1.3.1; C 1.3.3; C 2.2.6; C 4.1.1; C 4.1.2; C 4.1.3; C 4.1.4; C 4.1.5; C 4.1.6; C 4.1.6; C4.1.7; C 4.2.1; C 4.2.2; C 5.1.1; C 5.1.2; C 5.1.4; C 5.1.5; C 5.2.1; C 5.2.4; C 5.2.5; C 5.3.1; C 5.3.2
LUT-6	Integrate Affordable and Below Market Rate Housing	0.04 – 1.20%	LU 3.1.4; LU 3.1.7; LU 4.2.2; LU 4.2.3
LUT-9	Improve Design of Development	3.0 – 21.3%	LU 1.2.13; LU 2.1.2; LU 2.3.2; LU 2.3.5; LU 3.2.1; LU 3.2.2; LU 5.1.1; LU 5.1.2; C 1.1.1; C 1.1.6; C 1.1.13; C 1.2.2; C 1.2.3; C 1.2.4; C 1.2.5; C 1.2.7; C 1.2.8; C 1.3.1; C 1.3.3; C 2.2.6; C 2.2.7; C 3.3.6; C 6.1.5; C 7.1.1; C 7.1.2; C 7.1.3; C 7.1.4; C 7.1.5; C 7.1.6; C 7.1.7; C 7.1.8; C 7.1.9; C 7.1.10; CO 1.5.7
SDT-1	Neighborhood/Site Enhancements	0 – 2%	LU 1.2.13; LU 2.1.2; LU 2.3.2; LU 2.3.5; LU 3.2.1; LU 3.2.2; LU 5.1.1; LU 5.1.2; C 1.1.1; C 1.1.6; C 1.1.13; C 1.2.2; C 1.2.3; C 1.2.4; C 1.2.5; C 1.2.7; C 1.2.8; C 1.3.1; C 1.3.3; C 2.2.6; C 2.2.7; C 3.3.6; C 6.1.5; C 7.1.1; C 7.1.2; C 7.1.3; C 7.1.4; C 7.1.5; C 7.1.6; C 7.1.7; C 7.1.8; C 7.1.9; C 7.1.10; CO 1.5.7
SDT-2	Provide Traffic Calming Measures	0.25 – 1.00%	LU 2.3.5; C 2.2.6; C 2.2.7; C 7.1.8; C 7.1.9
SDT-3	Implement a Neighborhood Electric Vehicle (NEV) Network	0.5 – 12.7%	C 1.1.2; C 1.1.3; C 1.1.10; C 1.3.2; C 2.2.6; C 2.2.7; C 3.2.3; C 3.2.4
PDT-1	Limit Parking Supply	5 – 12.5%	C 1.2.6; C 2.2.6; C 3.3.2; C 3.3.3; C 3.3.4
PDT-2	Unbundle Parking Costs from Property Cost	2.6 – 13%	No specific policies.

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

CAPCOA Measure Number	Strategy	Reduction in Vehicle Miles Traveled	Related OVOV Area Plan Policies
PDT-3	Implement Market Price Public Parking (On-Street)	2.8 – 5.5%	C 1.2.6; C 2.2.6; C 3.3.2; C 3.3.3; C 3.3.4; C 3.3.7
TRT-1	Implement Commute Trip Reduction Program – Voluntary	1.0 – 6.2%	LU 4.4.3; LU 4.5.4; C 1.1.3; C 1.2.1; C 3.1.4; C 3.1.6; C 4.1.3; C 6.1.5; C 6.2.1; C 6.2.2; C 6.2.3; CO 8.2.13
TRT-2	Implement Commute Trip Reduction Program – Required Implementation/Monitoring	4.2 – 21.0%	C 1.2.1; C 4.1.3; C 6.1.5; C 6.2.1; C 6.2.2; C 6.2.3
TRT-3	Provide Ride-Sharing Programs	1 – 15%	C 1.1.3; C 1.1.11; C 3.1.5; C 3.3.4; C 4.1.1; C 4.1.3; C 5.2.5; C 6.2.2
TRT-4	Implement Subsidized or Discounted Transit Program	0.3 – 20.0%	C 3.1.4; C 3.1.7
TRT-6	Encourage Telecommuting and Alternative Work Schedules	0.07 – 5.50%	LU 4.5.3; C 3.1.3
TRT-7	Implement Commute Trip Reduction Marketing	0.8 – 4.0%	C 7.1.2; CO 8.1.4; CO 8.1.5
TRT-9	Implement Car-Sharing Program	0.4 – 0.7%	C 1.1.3; C 1.1.11; C 3.1.5; C 3.3.4; C 4.1.1; C 4.1.3; C 5.2.5; C 6.2.2
TRT-10	Implement a School Pool Program	7.2 – 15.8%	C 1.1.3; C 1.1.11; C 3.1.5; C 3.3.4; C 4.1.1; C 4.1.3; C 5.2.5; C 6.2.2
TRT-11	Provide Employer-Sponsored Vanpool/Shuttle	0.3 – 13.4%	C 1.1.3; C 1.1.11; C 3.1.5; C 3.3.4; C 4.1.1; C 4.1.3; C 5.2.5; C 6.2.2
TRT-13	Implement School Bus Program	38 – 63%	School bus program already exists.
TRT-14	Price Workplace Parking	0.1 – 19.7%	No specific policies.
TRT-15	Implement Employee Parking “Cash-Out”	0.6 – 7.7%	No specific policies.
TST-1	Provide a Bus Rapid Transit System	0.02 – 3.2%	Bus rapid transit system already exists.
TST-3	Expand Transit Network	0.1 – 8.2%	C 1.1.12; C 4.1.1; C 4.1.3; C 4.1.7; C 4.2.1; C 4.2.2; C 4.2.3; C 5.3.3; C 5.4.3; C 5.4.3; C 7.1.10
TST-4	Increase Transit Service Frequency/Speed	0.02 – 2.5%	C 1.1.12; C 4.1.1; C 4.1.3; C 4.1.7; C 4.2.1; C 4.2.2; C 4.2.3; C 5.3.3; C 5.4.3; C 5.4.3; C 7.1.10
RPT-1	Implement Area or Cordon Pricing	7.9 – 22.0%	C 3.3.7

Source: California Air Pollution Control Officer’s Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).

Response 4

The comment recommends that the lead agency include mitigation in the Revised Final EIR that is consistent with the advisory recommendations in the California Air Resources Board’s (CARB) publication, *Air Quality and Land Use Handbook*, 2005. The comment states that these measures would reduce potential health risk impacts to future sensitive receptors that may locate near light industrial land uses as allowed under the City’s proposed General Plan and the County’s proposed Area Plan (both of which were developed through the joint OVOV planning effort). Based on the recommendations from the

SCAQMD's comment, the following additional mitigation measures have been included in 3.3, Air Quality revisions, in **Section 4.0, Revised Draft EIR Pages**.

- 3.3-10** Prior to implementing project approval, tract maps and other sensitive uses located within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week) shall be required to conduct a health risk assessment.
- 3.3-11** Prior to implementing project approval, tract maps and other sensitive uses located within 1,000 feet of a chrome plater shall be required to conduct a health risk assessment.
- 3.3-12** Prior to implementing project approval, tract maps and other sensitive uses located within 300 feet of any dry cleaning operation shall be required to conduct a health risk assessment.
- 3.3-13** Prior to implementing project approval, tract maps and other sensitive uses located within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater) shall be required to conduct a health risk assessment.
- 3.3-14** Prior to implementing project approval, tract maps and other sensitive uses located immediately downwind of petroleum refineries shall be required to conduct a health risk assessment.

Response 5

The comment requests that all written responses should be provided to SCAQMD pursuant to Public Resources Code Section 21092.5. Furthermore, the comment states that SCAQMD staff is available to work with the County to address these comments and other questions that may arise. The comment will be forwarded to the decision-makers for their review and consideration prior to any approval action on the proposed Area Plan. **Responses to Comments** will be provided to all public agencies 10 days prior to action taken by the decision-makers. Since this comment is not directed at the environmental analysis or conclusions contained in the Revised Draft EIR, no further response is required.

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division

Kimberly L. Prillhart
Director

January 24, 2011

County of Los Angeles
Department of Regional Planning
Attn.: Mr. Mitch Glaser
320 W. Temple Street
Los Angeles, CA 90012

E-mail: ovov@planning.lacounty.gov

Subject: Comments on Revised DEIR; Santa Clarita Valley Area Plan Update

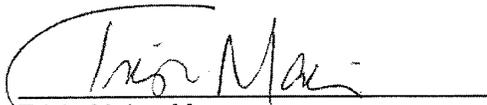
Dear Mr. Glaser:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,



Tricia Maier, Manager
Program Administration Section

Attachment

County RMA Reference Number 09-045-1

800 South Victoria Avenue, L#1740, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509



Printed on Recycled Paper



1



**PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division**

MEMORANDUM

DATE: January 3, 2011
TO: RMA – Planning Division
Attention: Laura Hocking
FROM: Behnam Emami, Engineering Manager II
SUBJECT: REVIEW OF DOCUMENT 09-045-1 Notice of Completion, Availability, and Recirculated Draft Environmental Impact Report (RDEIR) for the **Santa Clarita Valley Area Plan Update One Valley One Vision (OVOV)**
All unincorporated areas within the Santa Clarita Valley planning area, including communities of Agua Dulce, Bouquet Canyon, Castaic, Fair Oaks Ranch, Hasley Canyon, San Francisquito Canyon, Val Verde, Sunset Pointe, Southern Oaks, Stevenson Ranch, and Westridge.
Lead Agency: **Los Angeles County Department of Regional Planning**

Pursuant to your request, the Public Works Agency -- Transportation Department has reviewed the subject Notice of Completion, Availability, and Recirculated Draft EIR for the Santa Clarita Valley Area Plan Update One Valley One Vision. The project is a comprehensive update of the Santa Clarita Valley Area Plan, a component of "One Valley One Vision," a joint planning effort with the City of Santa Clarita. The project location includes all unincorporated area within the Santa Clarita Valley planning area which includes the communities of Agua Dulce, Bouquet Canyon, Castaic, Fair Oaks Ranch, Hasley Canyon, San Francisquito Canyon, Val Verde, Sunset Pointe, Southern Oaks, Stevenson Ranch, and Westridge.

2

We offer the same comment as in our Memorandum dated September 21, 2009:

When future developments are proposed, the projects may have site specific and/or cumulative impact on County roadways. The subsequent environmental document for these projects should include any site-specific or cumulative impact to the County local roads and the Regional Road Network.

3

Our review is limited to the impacts this project may have on the County's Regional Road Network.

4

Please contact me at 654-2087 if you have questions.

F:\transport\LanDev\Non_County\09-045-1.doc



Ventura County
Watershed Protection District
Planning and Regulatory Division
Permit Section

MEMORANDUM

DATE: January 24, 2011
TO: Laura Hocking, RMA/Planning Technician
FROM: Tom Wolfington, P.E. – Permit Section
(805) 654-2061
SUBJECT: RMA 09-045-1, Notice of Completion, Availability and Recirculation of Draft Environmental Impact Report and Notice of Public Hearing, Santa Clarita Valley Area Plan Update, SCN 2008071119

Pursuant to your request, this office has reviewed the subject Recirculated Draft Environmental Impact Report.

5

The District commented on the Draft Environmental Impact Report for the subject project on October 29, 2009. A review of the Recirculated Draft Environmental Impact Report does not reveal where the District's prior comments were addressed. A copy of the October 29, 2009 memo is attached for reconsideration. Specifically the following concluding paragraph transcribed from the October 29, 2009 memo should be addressed in the Environmental Impact Report:

6

"The District reiterates its previous comments that the EIR must clearly state how the proposed mitigation measures would eliminate increases in runoff at the county line. Proposals to convey the capital flood event are not mitigation measures that eliminate increases; rather this is a method to pass the increases downstream. The District expects some discussion on regional solutions such as detention/retention basins including approximate locations, mitigation measures for project-specific detention/ retention that reduces the development runoff to pre-project conditions, or other similar scenarios to address the District's concerns."

END OF TEXT

4/4



VENTURA COUNTY

PUBLIC WORKS AGENCY
JEFF PRATT, P.E.
Agency Director

WATERSHED PROTECTION DISTRICT

Norma Camacho
District Director

Gerhardt Hubner
Water & Environmental
Resources

Peter Sheydayi
Design/Construction

Sergio Vargas
Planning/Regulatory

Karl Novak, P.E.
Operations/Maintenance

January 24, 2011

Mr. Mitch Glaser
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

SUBJECT: Santa Clarita Valley Area Plan Update One Valley One Vision – Recirculation of Draft Environmental Impact Report. (RDEIR)

Dear Mr. Glaser,

The Watershed Protection District – Groundwater Section has reviewed the above subject document and is providing the following comments:

The subject document Conservation and Open Space Element Section VI. Water Resources; did not provide an evaluation on the potential impacts to Ventura County surface water and groundwater quantity and quality. How will surface water and groundwater quantity and quality entering Ventura County from the area covered by the subject document change over time? The time interval evaluated should include now, through build out of the area plan. Elements included in the time interval should include changes in surface water and groundwater quantity and quality.

7

Sincerely,

Rick Viergutz, C.E.G.
Manager, Groundwater Section
Water & Environmental Resources Division
Ventura County Watershed Protection District

800 South Victoria Avenue • Ventura, California 93009-1610
(805) 654-2001 • Fax (805) 654-3350 • <http://www.vcwatershed.org>

Letter No. C5 **Letter from County of Ventura, Resource Management Agency, January 24, 2011**

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The comment restates information contained in the Revised Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 3

The comment states that future development may require site-specific environmental documentation. Subsequently, these documents should include site-specific or cumulative impacts to the Ventura County local roads and Regional Road Network.

The Revised Draft EIR is a programmatic EIR for a proposed Area Plan. When applications for future development projects requiring discretionary approval are submitted to Los Angeles County for review, such applications may be reviewed for site-specific and cumulative traffic impacts on Ventura County roads at that time, in accordance with CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan. However, because the comment does not raise an environmental issue, no further response is required.

Response 4

The County acknowledges the input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

Response 5

This comment is an introduction to comments that follow. No further response is required.

Response 6

The County acknowledges the input and comment.

The analysis with the Revised Draft EIR was conducted at a programmatic level and consequently does not provide project-specific detention/retention basin locations. Subsequent environmental documentation may be required when applications for future development projects requiring discretionary approval are submitted to Los Angeles County for review. Additionally, subsequent projects may or may not have site specific and/or cumulative impacts to runoff and water quality. Please

see Section 3.9 Geology, Soils, Seismicity, of the Revised Draft EIR for mitigation measures which require drainage design measures to be incorporated into the final design of individual projects including, but not limited to, the conveyance of runoff through swales and drains before entering natural drainage courses (MM 3.9-10). That being said, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Area Plan.

Response 7

The comment refers to the proposed Area Plan's Conservation and Open Space Element, Section VI, Water Resources, and expresses concern about the lack of evaluation of potential surface water and groundwater quantity and quality impacts, including impacts to Ventura County, in that Section.

Please see Section 4.0, Cumulative Scenario, of the Revised Draft EIR for cumulative discussions on hydrology and water quality impacts and water service impacts. The analysis of the Revised Draft EIR was conducted at a programmatic level. The proposed Area Plan, as it may be amended from time to time, is intended to serve as a long-term blueprint for development over the next approximately 20-year planning period, except where specific policies address other target dates as set forth in the proposed Area Plan (see discussion in Section 2.0, Project Description, of the Revised Draft EIR). The County does not know how future development will or will not impact water and groundwater quality over time, as this analysis is dependent upon the project-specific design of future development projects. As project-specific environmental documents are prepared for such projects that require discretionary approval, potential impacts to water and groundwater quality, including impacts to Ventura County, would be reviewed at that time.



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

Russ Guiney, Director

February 15, 2011

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

TO: Mitch Glaser
Department of Regional Planning

FROM: Joan Rupert *JRupert*
Environmental and Regulatory Permitting Section

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT
ONE VALLEY ONE VISION
PROJECT NO. R2007-01226-(5)
ZONE CHANGE CASE NO. 200900009-(5)
ENVIRONMENTAL ASSESSMENT CASE NO. 200900080-(5)
STATE CLEARINGHOUSE NO. 2008071119**

The above project has been reviewed for potential impact on the facilities of this Department for which we offer the following comment:

1

Page 3.16-4: Table 3.16-1- Existing Parklands in the County's Planning Area
Please update the heading "State Owned Parkland" to "State Owned/ County Operated Parklands."

2

Page 3.16-7: Vasquez Rocks
Please correct Vasquez Rocks County Park to Vasquez Rocks Natural Area.

3

NOTE: The comments below pertain to trails.

Page 3.16-11 to 3.16-13: Federal Land
Angeles National Forest and Los Padres National Forest lands exist within and adjacent to the OVOV Planning Area. Some of the facilities in the national forests include multi-use (equestrian, mountain biking, and hiking) hiking trails and campgrounds.

4

Angeles National Forest
The Angeles National Forest covers 693,000 acres of land area in the San Gabriel Mountains, which constitutes approximately one-quarter of the land located within Los Angeles County. The United States Forest Service administers the National Forest, which is an agency of the United States Department of Agriculture. The Angeles National Forest is supervised in districts, one of which is the Santa Clara/Mojave Rivers Ranger District within the OVOV boundary. The Angeles National Forest offers a wide range of camping (with fees) and picnicking facilities. The Angeles National Forest also

5

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5198

provides non-fee Off-Highway Vehicle (OHV) areas such as, Rowher Flats, Drinkwater, Drinkwater Staging Area, Indian Canyon Staging Area (Staging area for both motorized and non-motorized trail users), and a multitude of OHV designated roads connecting Rowher Flats to Drinkwater with continued connectivity further north, all of which are located within the OVOV Planning Area. In addition, there are hundreds of miles of non-motorized, multi-use (equestrian, hiking, and mountain biking) trails in the forest, some of which are located within the OVOV Planning Area. (See discussion on trails below p.3.16-14 to p.3.16-16). There are four reservoirs in the Angeles National Forest including the State owned, County operated Castaic Lake State Recreation Area (includes upper and lower lakes), and the State owned and operated Pyramid Lakes (~~5 miles northeast and 18 miles north of the site respectively~~) each providing water skiing, fishing, sail boarding, jet skiing, and swimming activities. The operators of the water reservoirs charge entrance fees, as well as provide boat launching, boat rental, and overnight camping fee. In addition, to the identified recreational opportunities, the Angeles National Forest provides a home for an array of wildlife. There are five ~~our~~ trails that exist within both the OVOV Planning Area and the Angeles National Forest:

5

- Pacific Crest Trail (Federal)
- Fish Canyon Trail (Federal)
- Bear Canyon Trail (Federal)
- Gillette Mine Trail (County of Los Angeles Trail)
- Los Pinetos Trail (Federal/State/County of Los Angeles)

Page 3.16-12: Trails

Please modify the last sentence of the first paragraph as follows.

The Rim of the Valley Trail encompasses the Santa Clara River Valley, the Angeles National Forest, the unincorporated areas of Los Angeles County, in addition to San Fernando, La Crescenta, and Simi Valley.

6

Page 3.16-13: Trails- continued

Please modify the first sentence of the last paragraphs follows:

Additionally, many ~~the~~ trails in the OVOV Planning Area are part of a larger National Scenic trail system, such as the Pacific Crest trail (PCT), which spans 2,650 miles from Mexico to Canada.

7

State, Federal, and County Trails

Two of the larger trails alignments in the system are described below, followed by a listing of other State, Federal, or County trails alignments both existing and proposed within the OVOV Planning Area.

8

Page 3.16-13 to Pg. 3.16-14: Santa Clara River Trail

The Santa Clara River has been primarily preserved as a Significant Ecological Area (SEA) and as open space to provide flood protection. The State of California recently adopted the Santa Clara River as a State Recreation Trail Corridor. Its preservation has allowed for the development of a 30-mile-long multi-use (equestrian, mountain biking, and hiking) trail following the river's banks from ~~Valencia~~ to Canyon Country to the Ventura/Los Angeles County border, which is the backbone to the Valley's larger County regional trail system. The unincorporated portion of the County of Los Angeles (County) proposed Santa Clara River Trail alignment within the OVOV Planning Area from I-5 to the Ventura/Los Angeles County border has been adopted by the County of Los Angeles Board of Supervisors. The trail adoption permits the County to require trail easements and construction of trail tread when property owners request a discretionary action, such as a conditional use permit (CUP) or the division of land (parcel or tract map) with use of the map act.

Other State, Federal, County, or City Trails within OVOV Planning Area

*Note: Trail mileage are estimates with (P) =Proposed trail, (E)=Existing trail, and trail jurisdiction as either State, Federal, County, or City.

- William S. Hart Park Trail 2.5 miles (E- County)
- Gavin Canyon Trail 8.0 miles (P-County)
- Pico Canyon Trail 9.0 miles (P & E -County/City)
- Sand Canyon Trail 4.0 miles (P & E -County)
- Castaic Creek Trail 5.0 miles (P-State/County)
- Castaic Lake Trail 2.0 miles (P & E-State/County)
- Bouquet Canyon Trail 7.0 miles (P-County)
- Placerita Creek Trail 3.0 miles (E-State/County)
- Acton Community Trail 22.0 miles (P-County)
- Northside Connector Trail 6.5 miles (P-County)
- Vasquez Loop Trail 17.3 miles (P-County)
- Hasley Canyon Trail 3.4 miles (P & E -County)
- Mint Canyon Trail 3.7 miles (P & E-County)
- Los Pinetos Trail 3.3 miles (E-State/Federal/County)
- Placerita Canyon Connector Trail 2.8 miles (P-County)
- South Fork Trail – Class I 4.0 miles (E-City)

Page 3.16-15: Los Pinetos Trail (Federal, State, and County)

This is an ~~equestrian~~ multi-use trail with camping facilities available by reservation. The 3.3 mile trail begins at the intersection of the Los Pinetos Trail and Placerita Creek Trail near the camping area at the eastern edge of the Placerita Canyon Natural Area. The trail links to the proposed Rim of the Valley State Trail from the proposed Placerita

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Connector Trail. The southern segment of the trail is within the jurisdiction of the Angeles National Forest Service (All non-motorized trails within the Forest are multi-use (equestrian, mountain-biking, and hiking regardless of width).

10

Placerita Creek Trail (State, County)

The trail is dual-use (equestrian and hiking) and connects to the Los Pinetos Trail at the eastern edge of Placerita Canyon Natural Area and meanders along Placerita Creek eventually connecting to the western edge of the Natural Area. The amenities within the Natural Area include paved/unpaved parking, potable water, toilets, picnic areas, historic structure, shorter internal loop trails, a short interpretive trail, and County operated Nature Center.

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Thank you for including this Department in the environmental review process. If you have any questions pertaining to trails, please contact Mr. Robert Ertleman at (213) 351- 5134 or rettleman@parks.lacounty.gov. For any other questions or inquiries, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

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c: Parks and Recreation (N. E. Garcia, L. Hensley, F. Moreno, R. Ertleman, J. Yom)



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

Russ Guiney, Director

January 24, 2011

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

TO: Mitch Glaser
Department of Regional Planning

FROM: Joan Rupert *JRupert*
Environmental and Regulatory Permitting Section

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT
ONE VALLEY ONE VISION
PROJECT NO. R2007-01226-(5)
ZONE CHANGE CASE NO. 200900009-(5)
ENVIRONMENTAL ASSESSMENT CASE NO. 200900080-(5)
STATE CLEARINGHOUSE NO. 2008071119**

The above project has been reviewed for potential impact on the facilities of this Department for which we offer the following comment:

Page 3.16-4: Table 3.16-1- Existing Parklands in the County's Planning Area
Please update the heading "State Owned Parkland" to "State Owned/ County Operated Parklands."

Page 3.16-7: Vasquez Rocks
Please correct Vasquez Rocks County Park to Vasquez Rocks Natural Area.

NOTE: The comments below pertain to trails.

Page 3.16-11 to 3.16-13: Federal Land
Angeles National Forest and Los Padres National Forest lands exist within and adjacent to the OVOV Planning Area. Some of the facilities in the national forests include multi-use (equestrian, mountain biking, and hiking) hiking trails and campgrounds.

Angeles National Forest

The Angeles National Forest covers 693,000 acres of land area in the San Gabriel Mountains, which constitutes approximately one-quarter of the land located within Los Angeles County. The United States Forest Service administers the National Forest, which is an agency of the United States Department of Agriculture. The Angeles National Forest is supervised in districts, one of which is the Santa Clara/Mojave Rivers Ranger District within the OVOV boundary. The Angeles National Forest offers a wide range of camping (with fees) and picnicking facilities. The Angeles National Forest also

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Mr. Mitch Glaser
 January 24, 2011
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provides non-fee Off-Highway Vehicle (OHV) areas such as, Rowher Flats, Drinkwater, Drinkwater Staging Area, Indian Canyon Staging Area (Staging area for both motorized and non-motorized trail users), and a multitude of OHV designated roads connecting Rowher Flats to Drinkwater with continued connectivity further north, all of which are located within the OVOV Planning Area. In addition, there are hundreds of miles of non-motorized, multi-use (equestrian, hiking, and mountain biking) trails in the forest, some of which are located within the OVOV Planning Area. (See discussion on trails below p.3.16-14 to p.3.16-16). There are four reservoirs in the Angeles National Forest including the State owned, County operated Castaic Lake State Recreation Area (includes upper and lower lakes), and the State owned and operated Pyramid Lakes (5 miles northeast and 18 miles north of the site respectively) each providing water skiing, fishing, sail boarding, jet skiing, and swimming activities. The operators of the water reservoirs charge entrance fees, as well as provide boat launching, boat rental, and overnight camping fee. In addition, to the identified recreational opportunities, the Angeles National Forest provides a home for an array of wildlife. There are five ~~our~~ trails that exist within both the OVOV Planning Area and the Angeles National Forest:

- Pacific Crest Trail (Federal)
- Fish Canyon Trail (Federal)
- Bear Canyon Trail (Federal)
- Gillette Mine Trail (County of Los Angeles Trail)
- Los Pinetos Trail (Federal/State/County of Los Angeles)

Page 3.16-12: Trails

Please modify the last sentence of the first paragraph as follows.

The Rim of the Valley Trail encompasses the Santa Clara River Valley, the Angeles National Forest, the unincorporated areas of Los Angeles County, in addition to San Fernando, La Crescenta, and Simi Valley.

Page 3.16-13: Trails- continued

Please modify the first sentence of the last paragraphs follows:

Additionally, many ~~the~~ trails in the OVOV Planning Area are part of a larger National Scenic trail system, such as the Pacific Crest trail (PCT), which spans 2,650 miles from Mexico to Canada.

State, Federal, and County Trails

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Connector Trail. The southern segment of the trail is within the jurisdiction of the Angeles National Forest Service (All non-motorized trails within the Forest are multi-use (equestrian, mountain-biking, and hiking regardless of width).

Placerita Creek Trail (State, County)

The trail is dual-use (equestrian and hiking) and connects to the Los Pinetos Trail at the eastern edge of Placerita Canyon Natural Area and meanders along Placerita Creek eventually connecting to the western edge of the Natural Area. The amenities within the Natural Area include paved/unpaved parking, potable water, toilets, picnic areas, historic structure, shorter internal loop trails, a short interpretive trail, and County operated Nature Center.

Thank you for including this Department in the environmental review process. If you have any questions pertaining to trails, please contact Mr. Robert Ettleman at (213) 351- 5134 or rettleman@parks.lacounty.gov. For any other questions or inquiries, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

c: Parks and Recreation (N. E. Garcia, L. Hensley, F. Moreno, R. Ettleman, J. Yom)

Letter No. C6 **Letter from County of Los Angeles Department of Parks and Recreation,
January 24, 2011/February 15, 2011**

Response 1

This comment is an introduction to comments that follow. No further response is required.

Response 2

The requested correction concerning the heading of Existing Parklands to Section 3.16, Parks and Recreation, page 3.16-4 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 3

The requested correction to Section 3.16, Parks and Recreation, page 3.16-7 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 4

The requested correction concerning multi-use trails to Section 3.16, Parks and Recreation, page 3.16-11 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 5

The requested correction concerning the Angeles National Forest in Section 3.16, Parks and Recreation, pages 3.16-11 and 3.16-12 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 6

The requested correction concerning trails to Section 3.16, Parks and Recreation, page 3.16-13 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 7

The requested correction to Section 3.16, Parks and Recreation, page 3.16-13 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 8

The requested correction to Section 3.16, Parks and Recreation, page 3.16-13 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 9

The requested correction to the Santa Clara River Trail discussion in Section 3.16, Parks and Recreation, pages 3.16-14 and -15 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 10

The requested correction to the Los Pinetos Trail discussion in Section 3.16, Parks and Recreation, page 3.16-15 and 3.16-16 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 11

The requested correction to the Placerita Creek Trail discussion in Section 3.16, Parks and Recreation, page 3.16-16 of the Revised Draft EIR has been made. Please see the portion of the Revised Final EIR entitled, "Revised Draft EIR Pages," for the actual text revision.

Response 12

The comment is noted. No further response is required given that the comment does not address or question the content of the Revised Draft EIR.