March 9, 2011

Via Email (rruz@planning.lacounty.gov) and U.S. Mail

Regional Planning Commission
County of Los Angeles
320 W. Temple Street, Room 1350
Los Angeles, CA 90012

Re: Proposed Changes to Designation of Sloan Canyon Road in One Valley One Vision Plan

Honorable Commissioners:

This firm represents Citizens for Castaic, a community organization consisting of nearly 100 community members residing throughout the Castaic area dedicated to the sensible development for the community of Castaic and protection of its rural lifestyle. Citizens for Castaic strongly opposes the proposed removal of Limited Secondary Highway designation of Sloan Canyon Road between Hillcrest Parkway and Quail Valley Road included in the proposed revisions to the One Valley One Vision Plan (OVOV). We believe the removal of the designation would lead to increased greenhouse gas emission and would encourage urban sprawl, in direct contravention of the objectives of the OVOV.

I. Sloan Canyon Road Would Provide Needed North-South Connection.

Sloan Canyon Road, including the area between Hillcrest Parkway and Quail Valley Road, has been designated as a Limited Secondary Highway since the 1960s. The community has relied on this designation for years and property owners along Sloan Canyon Road have contributed funds to the Bridge and Thoroughfare District based on the designation. Property owners along the length of Sloan Canyon Road have already provide all of the required easements to the County to allow Sloan Canyon Road to be developed to Limited Secondary Highway standards. The eventual development of Sloan Canyon Road to Limited Secondary Highway standards, through the use of Bridge and Thoroughfare District funds, would provide the additional north-south connection needed by the community in this high fire area that is prone to flooding. In addition to times of fire evacuation, this additional connection is also required for days when the I-5 is shut
There are no alternative circulation routes currently designated as Limited Secondary Highway. The only other north-south road in the area is Romero Canyon Road, located on the outskirts of Castaic development, and it is a private street in several areas where easements have not been provided to the County. The improvement of Romero Canyon Road for use as a north-south connector could push development to the outskirts of Castaic, leading to urban sprawl. Sloan Canyon Road is highly preferable as a north-south connection not only because easements for its entire length already have been provided, but also because it is centrally located. Sloan Canyon Road would provide a direct connection between the highest concentration of residential development in Castaic, which is located along Hillcrest Parkway-a designated Secondary Highway, and Castaic’s commercial center. Use of Sloan Canyon Road as the north-south connector for the area would allow for shortened commute times for and vehicle miles traveled by residents, in particular in accessing the Castaic Area High School, proposed for development in Romero Canyon. Shorter commute times and fewer vehicle miles travel can help reduce greenhouse gas emissions.


The Interagency Engineering Commission (IEC) recommended the retention of Sloan Canyon Road’s Limited Secondary Highway designation between Quail Valley Road and Mandolin Canyon Road, with a realignment of the northerly section of this road to provide direct access to the residential development that will be constructed pursuant to Tract 46443. This realignment would require the County to obtain the dedication of additional right-of-way. The IEC also recommended the removal of the designation between Mandolin Canyon Road and Hillcrest Parkway. This would result in the removal of the designation from the middle of Sloan Canyon Road, while the Limited Secondary Highway designation would remain south of Hillcrest Parkway and north of Mandolin Canyon. The IEC’s proposal to remove the designation between Mandolin Canyon Road and Hillcrest Parkway was based on claims of low traffic counts and an even split in community support and opposition to the removal. Citizens for Castaic disputes both of these reasons.

First, we provided comments on the OVOV RDEIR from traffic expert Tom Brohard setting out the RDEIR’s failure to accurately analyze predicted future low traffic levels on Sloan Canyon Road and the need for this additional north-south connection. (Attachment 1, January 21, 2011 Citizens for Castaic letter to Mitch Glasser regarding the proposed removal of Limited Secondary Highway designation from Sloan Canyon Road, including comments from traffic expert Tom Brohard.) Mr. Brohard found that the
RDEIR failed to analyze the potential traffic impacts associated with the Castaic Area High School, proposed for development in Romero Canyon and requiring site access from Sloan Canyon Road. Other projects, such as Tentative Tract Map 52729, are planned for construction along Sloan Canyon Road between Mandolin Canyon Road and Hillcrest Parkway, were not considered in the RDEIR’s analysis of the traffic levels on Sloan Canyon Road.

Secondly, community opinion regarding the removal of the limited secondary highway designation between Mandolin Canyon Road and Hillcrest Parkway is not evenly split between supporters and opponents—opponents of the removal of the designation greatly outweigh supports. As shown in the attached map, more than 80 percent of Castaic community members that submitted comments opposed the proposed removal of Sloan Canyon Road’s Limited Secondary Highway designation. (Attachment 2, map showing opposition and support for the removal of the designation.) Moreover, while there was strong community support for retaining the Limited Secondary Highway designation along the northerly portion of Sloan Canyon Road, there were no community member comments in favor of the realignment of Sloan Canyon Road to provide publically funded access to Tract 46443.

III. The Recommendation of Castaic Area Town Council Was Not Based on Substantial Community Support.

The IEC also gave great weight to the Castaic Area Town Council’s (CATC) endorsement of the removal of the Limited Secondary Highway designation on the southern portion of Sloan Canyon Road, between Mandolin Canyon and Hillcrest Parkway. Since 80 percent of those submitting comments oppose the removal of the Limited Secondary Highway Designation, the CATC’s request clearly was not based on substantial community support. The Castaic Area Community Standards District defines substantial community support as the support of at least two-thirds of all residents, property owners, and business within 1,000 feet of the project boundary and that the CATC’s position counts as only one vote towards reaching the two-thirds requirement. (Los Angeles County Code section 22.44.137 (I)(3).) Based on the CSD’s definition, there is not substantial community support for the removal of the Limited Secondary Highway designation.


Instead of providing the public benefit of a centrally located north-south connector for the community that could limit urban sprawl and reduce greenhouse gas emissions, Citizens for Castaic believes the IEC’s recommendations would only provide private
benefits to the owners of Tract 46443 and the developer of the proposed Romero Canyon site for the Castaic Area High School. The proposed realignment of Sloan Canyon Road would allow the use of Bridge and Thoroughfare Funds to provide access to Tract 46443, providing a huge benefit to the owners of Tract 46443. Tract 46443 was conditioned upon the owners of the site funding the construction of access to the existing alignment of Sloan Canyon Road, and they have provided a bond for that access construction. By retaining the Limited Secondary Highway designation on a realigned Sloan Canyon Road, the County would be allowing the use of public funds for road construction the owner of Tract 46443 would otherwise be required to privately fund.

The removal of Sloan Canyon Road’s Limited Secondary Highway designation between Mandolin Canyon Road and Hillcrest Parkway would also provide a private benefit to the developer of the proposed Romero Canyon high school site. Tentative Tract Map (TTM) 47807 was previously approved for this school site. The conditions of approval for TTM 47807 require the developer to provide primary access to the site via Sloan Canyon Road from the south as traffic mitigation. (See Attachment 1, p. 2-3 regarding access requirements for the proposed high school site.) The developer of the proposed Romero Canyon high school site has proposed to not provide access to the high school site via Sloan Canyon Road from the south. Removing the Limited Secondary Highway designation from Sloan Canyon Road south of Mandolin Road, could be used by the developer as a reason why the previous traffic mitigation conditions should not be imposed on the high school.

Citizens for Castaic is also concerned the CATC’s request for the removal of Sloan Canyon Road’s Limited Secondary Highway designation between Mandolin Canyon Road and Hillcrest Parkway, as well as the continued designation north of Mandolin Canyon was submitted as a private benefit to these developers instead of as a representation of community support. The CATC submitted letters in support of the Romero Canyon site as a preferred site for the Castaic Area High School on May 21, 2010, the same day it submitted its letter regarding the partial removal of the Limited Secondary Highway designation of Sloan Canyon Road, giving a strong implication the two letters pertaining to the same area are related. (Attachment 3, May 21, 2010 letter from CATC to Hart School District supporting Romero Canyon high school site and email from CATC member objecting to the support.) For this reason, and those discussed above, the County should not rely on the CATC’s request as evidence of community support for the realignment and designation removal.

V. Conclusion

Citizens for Castaic urges you to maintain the Limited Secondary Highway designation for all of Sloan Canyon Road and to keep the existing alignment of Sloan
Canyon Road. This will provide the community with the necessary north-south connection, in the most beneficial location, providing reductions in greenhouse gas emissions and limiting urban sprawl. This is the result requested by the majority of the community. Thank you for your time and consideration in this matter.

Sincerely,

Amy Minteer

cc: Citizens for Castaic
    William S. Hart Union High School District
    Daryl L. Osby, Los Angeles County Fire Chief
    Los Angeles County Department of Public Works
    Susie Tae, Los Angeles Regional Planning
    Michael D. Antonovich, Los Angeles County Supervisor
    Edel Vizcarra, Planning Deputy to Supervisor Antonovich
    Rosalind Wayman, Senior Deputy to Supervisor Antonovich
    Ron Vaughn, Senior Architect, California Division of State Architect
    California Department of Education, School Facilities Planning Division
    Valerie Castro, Project Manager, California Office of Public School Construction
    Dwayne Mears, The Planning Center
January 21, 2011

Via Email (ovov@planning.lacounty.gov) and U.S. Mail

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

Re: Comments on RDEIR Proposed Changes to Designation of Sloan Canyon Road in One Valley One Vision Plan

Dear Mr. Glaser:

On behalf of Citizens for Castaic, we provide the following comments on the Revised Draft Environmental Impact Report (RDEIR) prepared to analyze proposed changes to the Santa Clarita Valley One Valley One Vision Plan (OVOV). Specifically, we direct our comments to the proposal to remove the Limited Secondary Highway designation of Sloan Canyon Road from Hillcrest Parkway to Quail Valley Road in Castaic. As stated in our letter dated November 23, 2010, Citizens for Castaic strongly opposes this proposal. (Please include our November 23, 2010 letter of opposition as a comment letter on the RDEIR. A copy of this letter is included as Attachment 1.)

Citizens for Castaic hereby submits the attached comments on the RDEIR’s traffic analysis prepared by traffic expert Tom Brohard and Associates. (Attachment 2, comments by Tom Brohard and Associate; Attachment 3, curriculum vitae for Tom Brohard.) Tom Brohard and Associates have identified numerous potentially significant adverse traffic impacts associated with the removal of the Limited Secondary Highway designation on Sloan Canyon Road. Flaws in the RDEIR’s proposal to remove the designation from Sloan Canyon Road include: conflict of the removal with other goals and objectives of the OVOV; lack of adequate emergency/secondary access; lack of adequate traffic analysis to support the removal; and failure to include the traffic that would be generated by the proposed Castaic Area High School.
A. Greenhouse Gas and Air Quality Impacts from Traffic Gridlock Should Be Analyzed.

Tom Brohard and Associates notes that leaving the Limited Secondary Highway designation of Sloan Canyon Road could reduce the significant traffic gridlock that would otherwise occur at the I-5 interchanges with Sloan Canyon Road and Parker Road along The Old Road. Failing to provide this additional north-south connector for Castaic by removing the designation of Sloan Canyon Road would increase predicted traffic backups. Further, these traffic backups would result in increased greenhouse gases emissions and other vehicular emissions such as carbon monoxide and particulate matter. The RDEIR must analyze the potential increase in greenhouse gas emission as required by CEQA Guidelines section 15064.4, as well as air quality impacts that would result from the removal of an additional north-south connector for Castaic. CEQA requires the County to consider all feasible measures to reduce greenhouse gas emissions. Thus, the County should consider leaving the designation of Sloan Canyon Road in place as a means to reduce greenhouse gas emissions that would otherwise result from increased traffic gridlock.

B. The Community Standards District Would Significantly Limit the Width of Sloan Canyon Road if the Designation is Removed.

If the Limited Secondary Highway designation is removed from Sloan Canyon Road, it would be deemed a local street. The Castaic Area Community Standards District limits the width of local streets to a maximum of 28 feet. (Los Angeles County Code section 22.44.137(D)(2)(a).) This is less than half the width that would be allowed for Sloan Canyon Road if the designation were to remain in place. The RDEIR fails to acknowledge this limitation that would be placed on the width of Sloan Canyon Road, and thus fails to adequately analyze the potential land use and traffic impacts associated with the proposed removal of the Limited Secondary Highway designation of Sloan Canyon Road.

C. The RDEIR Fails to Analyze Impacts to Existing Land Use Approvals.

The approval of Tentative Tract Map 47807 requires the owners of this 77 home tract map located in the Romero Canyon area of Castaic to provide access to the site via Sloan Canyon Road from both north and south in the area between Hillcrest Parkway and Quail Valley Road. Specifically, the County has required that the developers provide access to the site “on Romero Canyon Road via Parker Road [which connects to Sloan Canyon Road] north of the project and on Romero Canyon Road via Sloan Canyon Road and Madloy Street [now known as Hillcrest Parkway] south of the project.” (Attachment 4, November 19, 1991 Los Angeles County Department of Regional Planning Project
Changes/Conditions Due To Environmental Evaluation for Tract No. 47807. If the Limited Secondary Highway designation is removed from Sloan Canyon Road, the developers may no longer be able to comply with the conditions of approval for Tentative Tract Map 47807. This would result in their inability to move forward with the project because they could not be in substantial compliance with the conditions of approval. The RDEIR fails to analyze this land use conflict.

Further, the County specified that access to this site should be provided by Sloan Canyon Road as a means of mitigating potentially significant traffic impacts associated with Tract Map 47807. If Tract Map 47807, or any other project located at the same site such as the proposed Castaic Area High School project, were no longer able to comply with this mitigation measure to use Sloan Canyon Road from the south as a primary access route and Sloan Canyon Road from the north as a secondary access route, significant adverse traffic impacts would result. The RDEIR fails to analyze whether the Sloan Canyon Road could still be used to access Tract Map 47807 or the Castaic Area High School if the Limited Secondary Highway designation were removed.

Conclusion

In conclusion, Citizens for Castaic reiterates it request that the County maintain the Limited Secondary Highway designation for Sloan Canyon Road. Sloan Canyon Road has been designated as a Limited Secondary Highway for 50 years without any negative impacts on the community, whereas removing this designation could result in adverse impacts to Castaic citizens. Further, the majority of the property owners along Sloan Canyon Road have paid fees into the County’s Bridge and Thoroughfare District. If the designation is removed, the fees already paid will no longer be able to be used to fund road construction and rehabilitation projects along Sloan Canyon Road. For all of these reasons, including those indentified in the traffic analysis prepared by Tom Brohard and Associates, we request that you revise the proposed OVOV to include the continued Limited Secondary Highway designation for Sloan Canyon Road.

Thank you for your time and consideration in this matter.

Sincerely,

Amy Minteer
Attachments:

1. Citizens for Castaic November 23, 2010 Comment Letter
2. Analysis of Traffic Impacts by Tom Brohard and Associate
3. Curriculum Vitae for Tom Brohard
4. Conditions of Approval for TTM 47807

cc: Citizens for Castaic
    William S. Hart Union High School District Governing Board
    Los Angeles County Department of Public Works
    Michael D. Antonovich, Los Angeles County Supervisor
    Edel Vizcarra, Planning Deputy to Supervisor Antonovich
    Rosalind Wayman, Senior Deputy to Supervisor Antonovich
    Los Angeles County Planning Commission
    Ron Vaughn, Senior Architect, California Division of State Architect
    California Department of Education, School Facilities Planning Division
November 23, 2010

Via Email and U.S. Mail

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

Re: Proposed Changes to Designation of Sloan Canyon Road in One Valley One Vision Plan

Dear Mr. Glaser:

This firm represents Citizens for Castaic, a community group dedicated to the sensible development for the community of Castaic and protection of its equestrian lifestyle. Citizens for Castaic strongly opposes the proposed removal of Limited Secondary Highway designation of Sloan Canyon Road north of Hillcrest Parkway.

The area around Sloan Canyon Road is prone to wildfires and flooding, necessitating adequate emergency access. The continued designation of Sloan Canyon Road as a Limited Secondary Highway will help provide the required emergency access. The removal of the Limited Secondary Highway designation for Sloan Canyon would also remove Sloan Canyon Road from the Highway Plan and Bridge and Thoroughfare District, limiting the funds that could be used to improve emergency access along this road.

The retention of the Limited Secondary Highway designation is particularly important in light of a recent proposal to construct a new high school at a location to which Sloan Canyon Road could provide access. Sloan Canyon Road should remain designated as a Limited Secondary Highway to ensure there could be a safe route to the proposed school and adequate funding to provide that route in a timely manner.
Please feel free to contact me if you have any questions. Thank you for your time and consideration in this matter.

Sincerely,

Amy Minteer

cc: Citizens for Castaic
    Michael D. Antonovich, Los Angeles County Supervisor
    Pat Modugno, Planning Commissioner
    Paul Novak, Planning Deputy to Supervisor Antonovich
    Rosalind Wayman, Senior Deputy to Supervisor Antonovich
    Castaic Area Town Council
    William S. Hart UHSD Governing Board
January 19, 2011

Amy Minteer  
Chatten-Brown & Carstens  
2601 Ocean Park Blvd. Suite 205  
Santa Monica, CA 90405


Dear Ms. Minteer:

Tom Brohard, P.E., has reviewed Section 3.2 Transportation and Circulation of the November 2010 Revised Draft Program Environmental Impact Report (Draft EIR) prepared by Impact Sciences, Inc. for the Santa Clarita Valley Area Plan One Valley One Vision in the County of Los Angeles. Other documents including the Circulation Element of the November 2010 Revised Draft Santa Clarita Valley Area Plan One Valley One Vision (OVOV Area Plan) and various traffic studies prepared by Austin-Foust Associates including the June 2010 One Valley One Vision Valley-Wide Traffic Study (OVOV Traffic Study) in Appendix 3.2 to the Draft EIR and the June 1, 2010 Draft Castaic High School Romero Canyon Site Analysis (High School Traffic Study), as well as various other documents available on the County of Los Angeles and the Wm. S. Hart Union High School District websites, have also been reviewed.

This review focuses on the proposed removal of the limited secondary highway classification of Sloan Canyon Road in the Castaic area. The proposed deletion of certain portions of Sloan Canyon Road is directly contrary to several goals and objectives of the OVOV Area Plan, namely to provide a unified network of roadways which provides safe and efficient movement of people and goods. The proposed deletion will hinder, not enhance, the connectivity of the area’s roadway network that has long been envisioned for Castaic. The proposed deletion will not ensure that new development is provided with adequate emergency/secondary access for evacuation and emergency response and does not meet the OVOV Area Plan requirement to provide two access points for every subdivision. Moreover as discussed throughout this letter, the Draft EIR fails to provide a proper traffic analysis for deletion of Sloan Canyon Road from Mandolin Canyon Road to Hillcrest Parkway.

In addition to the contradictions with the goals and objectives of the OVOV Area Plan and the failure to analyze the proposed deletion, 7,400 daily trips forecast for Castaic High School have been omitted from the analysis of roadways in the OVOV Draft EIR. This serious flaw understates the number of trips that will use area roadways including Sloan Canyon Road in the future. It is premature for the County of Los Angeles to remove the limited secondary highway designation
Ms. Amy Minteer  
OVOV Draft Program EIR - Sloan Canyon Road Deletion – Traffic Issues  
January 19, 2011

from portions of Sloan Canyon Road until the traffic impacts and roadway needs are evaluated in the Draft Environmental Impact Report now being prepared by The Planning Center for the Wm. S. Hart Union High School District. The Castaic High School Project clearly will have impacts on traffic and circulation including cumulative impacts that are greater than projected by the OVOV Traffic Study and Draft EIR. These impacts must be fully and properly assessed in a revised Draft EIR for the OVOV Area Plan.

**Education and Experience**

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 40 years of professional engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the Cities of Big Bear Lake, Mission Viejo, and San Fernando. I have extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects. Several recent assignments are highlighted in the enclosed resume.

**Sloan Canyon Road Deletion**

As shown on Page 81 of the OVOV Area Plan, Sloan Canyon Road from Hillcrest Parkway to Quail Valley Road is recommended to be removed from the Highway Plan as a Limited Secondary Highway. If approved, there would be no north/south Highway Plan roadway west of I-5 that connects development between Quail Valley Road and Hillcrest Parkway other than The Old Road.

At their December 6, 2010 meeting, the County’s Interdepartmental Engineering Committee (IEC) discussed the OVOV Area Plan recommendation to delete portions of Sloan Canyon Road. The IEC recommended a modification to the OVOV Area Plan that would retain the Limited Secondary Highway designation for the east/west portions of Sloan Canyon Road and Mandolin Canyon Road but would remove the north/south portion of Sloan Canyon Road from Mandolin Canyon Road to Hillcrest Parkway. If the recommended IEC modification to the Highway Plan is approved, there still would be no north/south Highway Plan roadway west of I-5 connecting development other than The Old Road.

**Traffic Issues**

Based on the information provided in the various documents that I have reviewed and what I have learned in discussions with you and your clients, Citizens for Castaic, my review indicates the following traffic issues and areas of concern:
1) Sloan Canyon Road Deletion Contradicts OVOV Area Plan – In identifying circulation needs for the Santa Clarita Valley, Item #2 on Page 111 of the OVOV Area Plan states a high priority to “Increase connectivity between neighborhoods and districts.” To address this need, Objectives and Policies are identified for the Street and Highway System including:

“Goal C-2: Street and Highway System – A unified and well-maintained network of streets and highways which provides safe and efficient movement of people and goods between neighborhoods, districts, and regional centers, while maintain community character.

Objective C-2.1 – Implement the Circulation Plan (as shown on Exhibit C-2) for streets and highways to meet existing and future travel demands for mobility, access, connectivity, and capacity.

Policy C-2.1.2 – Enhance connectivity of the roadway network to the extent feasible given the constraints of topography, existing development patterns, and environmental resources, by constructing grade separations and bridges; connecting discontinuous streets; extending secondary access into areas where needed; prohibiting gates on public streets; and other improvements as deemed appropriate based on traffic analysis.

Objective C-2.5 – Consider the needs for emergency access in transportation planning.

Policy C-2.5.2 – Ensure that new development is provided with adequate emergency and/or secondary access for purposes of evacuation and emergency response; require two points of ingress and egress for every subdivision or phase thereof, except as otherwise approved for small subdivisions where physical constraints preclude a second access point.”

The proposed deletion of the north/south portion of Sloan Canyon Road between Mandolin Canyon Road and Hillcrest Parkway contradicts Goal C-2 of the OVOV Area Plan to provide a unified network of roadways for the safe and efficient movement of people and goods. The proposed deletion will hinder, not enhance, the connectivity of the area’s roadway network that has long been envisioned for Castaic, contradicting Objective C-2.1 and Policy C-2.1.2. In contrast to Objective C-2.5 and Policy C-2.5.2, the proposed deletion will not ensure that new development is provided with adequate emergency and/or secondary access for purposes of evacuation and emergency response. The proposed deletion also does not meet the OVOV Area Plan requirement to provide two points of ingress and egress for every subdivision.

As shown on the current Highway Plan and as envisioned for many years, Sloan Canyon Road provides both east/west and north/south connectivity in
the area west of I-5. With very rugged topography to the northwest, future
development opportunities in those areas are extremely limited. To serve the
planned development and connect the Highway Plan roadways together at
their westerly ends, the north/south portion of Sloan Canyon Road should
remain as the Limited Secondary Highway and connect the east/west part of
this roadway with Hillcrest Parkway. Under the OVOV Area Plan land uses,
both Mandolin Canyon Road and Romero Canyon Road to the northwest
should continue to be classified as local residential streets.

2) Traffic Volume Forecasts Not Provided for Sloan Canyon Road Deletion –
Page 3.2-32 of the Draft EIR states “Future daily traffic volumes on study
arterial roadways were estimated for both current County Area Plan and City
General Plan land uses and the proposed OVOV land uses, with
incorporation of the proposed Highway Plan, which is illustrated in Figure 3.2-5,
OVOV Highway Plan. The proposed Highway Plan includes improvements
such as roadway designation changes, widenings, and traffic signal
modifications, to roadways located throughout the OVOV Planning Area.”
Sloan Canyon Road from west of Quail Valley Road to Hillcrest Parkway is
not shown on the proposed Highway Plan in Figure 3.2-5, reflecting the
proposed deletion of this part of Sloan Canyon Road from the Highway Plan.

Page 3.2-34 of the Draft EIR states “Long-range ADT volumes for study
arterial roadways under current County Area Plan and City General Plan
buildout are shown in Figure 3.2-6, Average Daily Traffic Volumes – Buildout
of County Area Plan and Current City General Plan.” This figure as well as
Table 3.2-9 on Page 3.2-44 show 2,000 vehicles per day on Sloan Canyon
Road just west of Quail Valley Road and 4,000 vehicles per day on Sloan
Canyon Road south of Hillcrest Parkway. Figure 3.2-7, Average Daily Traffic
Volumes – Buildout of County Area Plan and Proposed City General Plan and
Table 3.2-9 indicate 2,000 vehicles per day on Sloan Canyon Road just west
of Quail Valley Road and 3,000 vehicles per day on Sloan Canyon Road
south of Hillcrest Parkway. These future traffic forecasts for Sloan Canyon
Road are significantly lower than they would be with the connection retained.

While the Draft EIR recommends deletion of Sloan Canyon Road from west of
Quail Valley Road to Hillcrest Parkway, forecasts have not been provided to
compare traffic volumes under the existing Highway Plan including the Sloan
Canyon Road connection against the proposed Highway Plan without this
portion of Sloan Canyon Road. Appendix 3.2 of the Draft EIR, the OVOV
Traffic Study on which the Draft EIR is based, also does not provide daily
traffic forecasts with and without Sloan Canyon Road from Quail Valley Road
to Hillcrest Parkway. Instead, Page 3-12 of the OVOV Traffic Study merely
lists the roadway segments recommended to be removed from the Highway
Plan “as a result of the traffic analysis.” The Draft EIR and the OVOV Traffic
Study do not provide any traffic analysis for the proposed deletion of the
north-south portion of Sloan Canyon Road or for the IEC recommendation to add Mandolin Canyon Road to the west as a Limited Secondary Highway.

3) Sloan Canyon Road Provides Alternate North-South Connection – Appendix C to the OVOV Traffic Study provides future land uses and their associated trips for 455 traffic analysis zones in the entire OVOV Planning Area. Zones west of I-5 that could use a north-south Highway Plan connection between Mandolin Canyon Road and Hillcrest Parkway include Traffic Analysis Zones 1, 2, 13, 14, 15, 16, 17, 18, and 19. From the OVOV Buildout Land Use and Trip Generation by TAZ Table in Appendix C, the OVOV land uses in these nine traffic analysis zones are forecast to generate 60,524 daily trips.

Without the north-south portion of Sloan Canyon Road, trips oriented north-south in the nine zones will be required to use The Old Road or I-5. Without widening of I-5, Table 3.2-13 on Page 3.2-60 of the Draft EIR indicates I-5 Northbound will operate at Level of Service F and I-5 Southbound will operate at Level of Service E in the PM peak hour with buildout of the OVOV Area Plan. Sloan Canyon Road provides an alternate route for localized north-south circulation to the west of I-5, and could potentially reduce the significant traffic impacts that are otherwise forecast to occur.

Without a connection to the north, a significant portion of the over 2,800 daily trips to and from the middle school on Hillcrest Parkway in Zone 19 must travel east to The Old Road before going north or west to and from their homes. When I-5 is closed up to 10 times a year north of Sloan Canyon Road with snow and/or ice or during brush fires, all I-5 traffic is turned around and rerouted from the northbound to the southbound freeway lanes, resulting in gridlocked conditions at the I-5 Interchanges with Sloan Canyon Road and Parker Road and along The Old Road. Deletion of Sloan Canyon Road takes away the only alternative route that would otherwise be available for north-south circulation to the west of I-5 during these times.

4) Sloan Canyon Road Is Required to Meet North-South Travel Demand – Sloan Canyon Road has been planned as a limited secondary highway on the County’s Highway Plan for many years. As part of the planning process, it is my understanding that all necessary easements and dedications already exist for the extension of Sloan Canyon Road as a Limited Secondary Highway between Mandolin Canyon Road and Hillcrest Parkway. Further, it is my understanding that Bridge and Thoroughfare Fees have been collected for its construction. The only other alternative north-south route, Romero Canyon Road, has not been planned as part of the County’s Highway Plan. Additional right-of-way would be necessary to provide the width and convert Romero Canyon Road to a Limited Secondary Highway. Furthermore, Romero Canyon Road is a local residential street designed for full access to about 150
adjacent single family homes whereas there are about six residential properties along Sloan Canyon Road.

With Sloan Canyon Road between Mandolin Canyon Road and Hillcrest Parkway currently designated as a two-lane Limited Secondary Highway, this planned facility can accommodate up to 18,000 vehicles per day. With deletion of this portion of Sloan Canyon Road, the ability to serve north-south travel demand would be limited to 2,500 vehicles per day for a local residential street. With buildout of the OVOV development in the area generating over 60,000 daily trips as indicated above, the demand for north-south trips in the area of Sloan Canyon Road would exceed the 2,500 vehicles per day threshold capacity for a local residential street.

5) **Proposed High School Will Further Increase North-South Traffic Volumes** – According to Table 1-1 on Page 1-4 of the High School Traffic Study, a total of 2,600 students are expected to attend Castaic High School at buildout and this enrollment would be expected to generate 7,400 daily trips to and from the site. From the Wm. S. Hart Union High School District website, the new high school attendance area will extend north and west to the Los Angeles County boundaries as well as east of I-5 and south of SR-126.

According to Figure 1-3 of the High School Traffic Study, nearly 75 percent of the trips to and from the proposed high school will begin or end in the area to the southeast of the high school site. A significant number of these trips, on the order of 3,000 vehicles per day, would be likely to use the planned extension of Sloan Canyon Road. These additional trips have not been considered or included within the OVOV traffic forecasts for Sloan Canyon Road. High school trips alone would exceed the threshold capacity of 2,500 vehicles per day for a local residential street.

6) **Romero Canyon High School Site Requires Two Access Points** – The November 19, 1991 Los Angeles County Department of Regional Planning Project Changes/Conditions Due To Environmental Evaluation for Tract No. 47807 required access to and from the south and north/east for the 77 single family homes. Specifically, the County has required access to the site to be provided “on Romero Canyon Road via Parker Road north of the project and on Romero Canyon Road via Sloan Canyon Road and Madloy Street [now known as Hillcrest Parkway] south of the project.” If the Wm. S. Hart Union High School District purchases this property for development of Castaic High School, the prior conditions of approval for two points of access for Tract No. 47807 would still apply to the high school. Further, the high school would generate ten times more daily traffic than the 77 single family homes (7,400 vehicles per day with the high school compared to about 740 vehicles per day for 77 homes), creating an even greater need for two accesses to the north/east and south of the site.
If access only to the north/east is provided for the proposed high school, the High School Traffic Study indicates a significant traffic impact would occur at The Old Road and Parker Road. This significant impact could not be mitigated even with widening Parker Road west of The Old Road as the intersection would still operate at Level of Service "E" in the AM peak hour. In addition, Sloan Canyon Road west of Quail Valley Road would require four traffic lanes (Secondary Highway) rather than two traffic lanes (Limited Secondary Highway) that have been recommended as part of the OVOV Area Plan.

As with the OVOV Traffic Study, the High School Traffic Study has not fully evaluated a second access to and from the south for the high school site. In my professional opinion, Sloan Canyon Road as originally planned and included in the current Highway Plan would disperse high school traffic. With the connection of Sloan Canyon Road between Mandolin Canyon Road and Hillcrest Parkway, significant and unmitigated traffic impacts at The Old Road and Parker Road may not occur and the widening of Sloan Canyon Road to four lanes west of Quail Valley Road will probably not be needed. Both the OVOV Traffic Study as well as the High School Traffic Study must conduct further traffic analysis of the southerly second access for circulation and emergency access for the high school site based on buildout conditions.

7) Deletion of Sloan Canyon Road Is Premature – The County’s Highway Plan is amended from time to time based on land use changes. While the OVOV Area Plan is based on updated and revised land uses, trips to and from Castaic High School are not included within the OVOV Traffic Study. If the Wm. S. Hart Union High School District proceeds with a high school at the location of Tract No. 47807 or at any of the other high school sites previously considered, the north/south part of Sloan Canyon Road provides necessary access to the high school as well as an important connection for area circulation. Clearly, it is premature for Los Angeles County to delete Sloan Canyon Road from Mandolin Canyon Road to Hillcrest Parkway at this time, only to add this critical facility back into the Highway Plan within the next year in response to traffic needs associated with the new high school.

In sum, the proposed deletion of Sloan Canyon Road from Mandolin Canyon Road to Hillcrest Parkway is directly contrary to several goals and objectives of the OVOV Area Plan, namely to provide a unified network of roadways which provides safe and efficient movement of people and goods. The proposed deletion will hinder, not enhance, the connectivity of the area’s roadway network that has long been envisioned for Castaic. The proposed deletion does not provide adequate emergency/secondary access for purposes of evacuation and emergency response and does not meet the OVOV Area Plan requirement to provide two access points for every subdivision.
Ms. Amy Minteer  
OVOV Draft Program EIR - Sloan Canyon Road Deletion – Traffic Issues  
January 19, 2011  

The Draft EIR fails to provide a proper traffic analysis for deletion of Sloan Canyon Road from Mandolin Canyon Road to Hillcrest Parkway. The concerns raised throughout this letter regarding this issue must be fully assessed using reasonable assumptions in a revised environmental impact report. If you have questions regarding these comments, please call me at your convenience.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard, PE  
Principal  

Enclosure
Tom Brohard, PE

Licenses:
- 1975 / Professional Engineer / California – Civil, No. 24577
- 1977 / Professional Engineer / California – Traffic, No. 724
- 2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education:
- 1969 / BSE / Civil Engineering / Duke University

Experience:
- 40 Years

Memberships:
- 1977 / Institute of Transportation Engineers – Fellow, Life
- 1978 / Orange County Traffic Engineers Council - Chair 1982-1983
- 1981 / American Public Works Association - Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. Since May 2005, he has served as Consulting City Traffic Engineer three days a week to the City of Indio. He also currently provides “on call” Traffic and Transportation Engineer services to the Cities of Big Bear Lake and San Fernando. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower ..................................................... 1997 - 1998
- Bell Gardens ................................................ 1982 - 1995
- Huntington Beach ...................................... 1998 - 2004
- Lawndale ...................................................... 1973 - 1978
- Los Alamitos .............................................. 1981 - 1982
- Oceanside .................................................... 1981 - 1982
- Paramount .................................................... 1982 - 1988
- Rancho Palos Verdes .................................... 1973 - 1978
- San Marcos .................................................. 1981
- Santa Ana ....................................................... 1978 - 1981
- Westlake Village ......................................... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over $5 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.
In his service to the City of Indio since May 2005, Tom has accomplished the following:

- Oversaw preparation and adoption of the Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain constraints.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installation in Caltrans District 8 in Riverside County; oversaw preparation of plans and provided assistance during construction of a $1.5 million project to install traffic signals and widen three of four ramps at the I-10/Jackson Street Interchange under a Caltrans encroachment permit issued under the Streamlined Permit Process.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Monroe Street over I-10 as well as striping plans to install left turn lanes on Monroe Street at the I-10 Interchange under a Caltrans encroachment permit.

- Oversaw preparation of traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvement of the I-10/Monroe Street and the I-10/Golf Center Parkway Interchanges.

- Oversaw preparation of plans, specifications, and contract documents and provided assistance during construction of 22 new traffic signal installations.

- Oversaw preparation of plans and provided assistance during construction for the conversion of two traffic signals from fully protected left turn phasing to protected-permissive left turn phasing with flashing yellow arrows.

- Reviewed and approved over 450 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.

- Oversaw preparation of a City wide traffic safety study of conditions at all schools.

- Prepared over 350 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.

- Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 125 street segments.

- Reviewed and approved traffic impact studies prepared for more than 16 major development projects.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.
November 19, 1991

Sikand Engineering Association
15230 Burbank Blvd.
Van Nuys, CA 91411
Attn: Matt Beneviste

PROJECT CHANGES/CONDITIONS
DUE TO ENVIRONMENTAL EVALUATION

Project 89213/TR 47807

The Department of Regional Planning staff has determined that the following conditions or changes in the project are necessary in order to assure that there will be no substantial evidence that the proposed project may have a significant effect on the environment:

Prior to alteration of any streambeds, and as a means of mitigating potential environmental impacts, the applicant shall enter into an agreement with the California State Department of Fish and Game, pursuant to Sections 1601 through 1603 of the State Fish and Game Code.

As a means of mitigating potential environmental impacts, the applicant shall agree to suspend construction in the vicinity of a cultural resource encountered during subsurface development of the site, and leave the resource in place until a qualified archaeologist can examine them and determine appropriate mitigation measures. The applicant shall agree to comply with mitigation measures recommended by the archaeologist and approved by the Department of Regional Planning.

Before any discharge of dredged or fill material into waters of the United States or if the project may effect an endangered species, the applicant may be required to apply for a Department of Army Permit pursuant to Section 404 of the Clean Water Act, and Section 103 of the Marine Protection, Research and Sanctuaries Act to the United States Army Corps. of Engineers Los Angeles District Branch.

The applicant shall comply with all requirements of the County Code and the Subdivision Committee which mitigate potential impacts due to hydrological characteristics of the project site as identified in the Initial Study. This shall be ensured and monitored through the filing of the appropriate development permits with the Department of Public Works.
The applicant shall comply with all requirements of the County Code and the Subdivision Committee which mitigate potential impacts due to geotechnical characteristics of the project site as identified in the Initial Study. This shall be ensured and monitored through the filing of the appropriate development permits with the Department of Public Works.

Per the County Fire Department letter of July 12, 1990 regarding the Oak Tree Permit, the following is required:

1. All oak trees to be retained must be fenced at dripline plus five (5) feet prior to and during construction with chain link fencing of not less than four (4) feet in height. Fencing must be approved by a County Forester before grading is to begin.

2. All trenching within the dripline or ten (10) feet of the trunk, whichever is greater, of any oak tree to be retained shall be accomplished with the use of hand tools or small hand powered equipment.

3. All roots to be cut shall be properly pruned and sealed under the supervision of a tree expert acceptable to the Director of Regional Planning.

4. No planting or irrigation system shall be installed within the dripline of any established oak tree that will be retained.

5. The parking, storage or use of equipment shall be limited to that area outside the dripline of each oak tree. No temporary structure shall be placed within the dripline of any oak tree.

6. All replacement trees shall be planted on fill or native undisturbed soil. Planting of heavily compacted fill shall be accompanied by augering a minimum of five (5) feet into the fill and extracting the soil. The soil will be amended with enriched soil conditioners and used to plant the replacement trees.

7. All oak trees to be removed shall be replaced at the ration of two (2) 15-gallon or larger, specimen in size, one inch or more in diameter one (1) foot above the base, with trees of the oak genus for each tree removed.

8. Replacement trees shall be properly maintained for a period of two (2) years and replaced by the permittee if mortality occurs within that period. These trees should receive regular watering throughout the replacement period. This can be accomplished by manual means or by the installation of an appropriate (drip or low-flow) irrigation system. All watering should be done so as to wet the entire root zone.
To mitigate traffic impacts, the applicant shall follow the February 12, 1990 recommendations of Public Works Namely:

Access to the project would be on Romero Canyon Road via Parker Road north of the project and on Romero Canyon Road via Sloan Canyon Road and Madloy Street south of the project. Each of these routes would require construction of off-site roadways. The majority of the project's trips would be oriented to the I-5 Freeway interchanges at Lake Hughes Road and Parker Road. In the event that the Romero Canyon Road/Parker Road connection is not constructed, the study also analyzes single access alternative to the south of the project utilizing the Sloan Canyon Road and Madloy Street route.

We agree with the report that additional roadway improvements will not be required if both the north and south access routes are opened with this project. However, if the project is constructed with only the single southerly access, the traffic study is based on the following roadway improvements being in place with this project and other related projects.

At the Backer Road/I-5 southbound ramps, provide an eastbound right-turn lane, and a second westbound through lane.

At the Old Road/Backer Road intersection, provide a northbound left turn lane and a second through lane, provide southbound dual left-turn lanes, and provide a westbound left-turn lane and a second through lane.

We agree with the single access study that with these additional roadway improvements, the circulation system would adequately handle the traffic generated by this project and other nearby related projects. We, therefore, recommend that this project be approved provided that no building permits be issued until these improvements are constructed.

We also recommend the following mitigation measures be made a condition of approval of this project for both access alternatives.

Enter into a secured agreement with this department to pay for pro rata shares of the cost to install traffic signals when needed at the following intersections. The developer should determine his proportionate share and submit this information to this Department for review and approval. Traffic signals should only be installed when the actual volumes warrant the signals.
Lake Hughes Road/southbound I-5 Freeway ramps (relocated)
Lake Hughes Road/The Old Road
Lake Hughes Road/northbound I-5 Freeway ramps
Parker Road/Camino Del Valle (Sloan Canyon Road)
Parker Road/The Old Road
Parker Road/southbound I-5 Freeway ramps
Parker Road/northbound I-5 Freeway ramps
Backer Road/The Old Road
Backer Road/southbound I-5 Freeway ramps (relocated)
Backer Road/northbound I-5 Freeway ramps
Sloan Canyon Road/Madloy Street

Include this project in the Castaic Benefit District. Should any of the above measures be identified as District improvements, they may be eligible for a credit against the project's obligations subject to the approval of the Director of Public Works.

To mitigate potential runoff to downstream portions of Castaic Creek and the Santa Clara River, runoff from the site shall be controlled by catchment basins and that standard runoff measures shall be incorporated into grading plans.

As the applicant, I agree to incorporate these changes/conditions into my project, and understand that the public hearing and consideration by the Regional Planning Commission will be on the project as changed/conditioned.

[Signature]  /project representative  12/4/91
Applicant  

Date

No response received within 15 days. Environmental Determination requires that these changes/conditions be included in project.

-------------------------------
Staff  

Date
Parcels identified from Letters submitted to LA County regarding the removal of the Limited Secondary Access north of Hillcrest.

**Data thus far gathered**

**Number of Parcels**
- 53 parcels 80.3%
- 13 parcels 19.7%
- 66 parcels 100%

**Acreage**
- 773 acres 89.6%
- 90 acres 10.4%
- 863 acres 100%

See next page for Live Oak area
Letters submitted to LA County from Live Oak

- [Image of a map with streets and roads, indicating areas that oppose or support the removal.]

Legend:
- Red: Opposes the removal
- Blue: Supports the removal
Letters submitted to LA County from Castaic

- Supports the removal
- Opposes the removal
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<td>89.6%</td>
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May 21, 2010

Jaime Castellanos  
Superintendent William S Hart Union School District  
21515 Centre Pointe Parkway  
Santa Clarita, California 91350  

Re: Future Castaic High School

Mr. Castellanos,

Based on the information received to date, the Castaic Area Town Council would like to endorse the Romero property owned by Larry Rasmussen as the future Castaic High School site.

The Romero property offers the most expeditious solution to a long awaited High School to serve the Castaic community and needed to relieve the chronic overcrowding at other nearby High Schools.

Furthermore, while the Romero property is one of only two properties currently under consideration by the district, the CATC reserves the right to assess the viability of any additional sites the Hart District may consider, such as, but not limited to, the Los Valles property and Mr. Lombardi’s Romero Canyon property.

Thank you,

Robert Kelly  
President Castaic Area Town council  
RobertKelly@Castaicareatowncouncil.org

Cc: Mr. Robert N. Jensen Jr.  
Mrs. Gloria E. Mercado-Fortine  
Mr. Joe Messina  
Mr. Paul Strickland  
Mr. Steven M. Sturgeon  
Rosalind Wayman  
CATC
From: "Jeff Preach" <jeff.preach@earthlink.net>
To: "Robert N. Jensen Jr" <bob@kkajcpa.com>, "Joe Messina" <jmessina@hartdis...>
Date: 5/28/2010 3:20 PM
Subject: Castaic Area Town Council (CATC) / Castaic High School Site Selection - Endorsement Vote

May 28, 2010

To the Wm. S. Hart School District Governing Board:

Re: Castaic Area Town Council (CATC) / Castaic High School Site Selection - Endorsement Vote

I am a current elected member of the Castaic Area Town Council and have previously served the Castaic Community as a three term member of the Land Use Committee. Greater than seven years ago the Hart School Board bought the Hasley/Sloan site to build the Castaic Community a high school. The CATC and a small group of people successfully stopped our community from getting a high school at that time. The fact is, our children would now be attending their own high school today if it weren't for a small selfish group.

Since that time, the CATC has not had a more critical or important decision to make that affects our entire community. The CATC members are elected and given the responsibility to make informed decisions and endorsements based on valid, factual information - and to communicate this information to the Community and to the 5th District County Supervisor Michael Antonovich. The CATC members are not elected to make premature, uninformed decisions, and to be influenced or pressured by donations and unprecedented lobbying. I would never criticize legitimate fundraising, however just a few a weeks before the CATC took their vote, Rene Sabol, a voting member, received a $10,000.00 donation from Larry Rasmussen for her "Castaic Days" fundraiser. Could this have an influence on a Castaic High School site selection endorsement vote? If the CATC truly wanted to pass judgment and offer a site endorsement, why were there no planned Town Hall meetings on this school site issues or an effort to understand the true desires of our whole community with validated site information for both sites.

The Hart School District is spending nearly $500,000.00 of our tax payer money on civil engineers, soil and geology, hydrology, and independent consultants in order to make an informed decision regarding the best school site! What gives the CATC the right to ignore this costly process and jump the gun, which results in making an incredibly uninformed decision?

The State of California's budget is in crisis. It is possible we may not receive matching funds which makes it all the more critical to focus on the cost of the high school site before making a final decision on which site is best. This is what the Hart School Board is currently doing. It is very possible that the Romero Canyon / Rasmussen site could cost as much as 50 million dollars, whereas the Sloan site could be under 20 million.

Again, how could the CATC take a resolution vote just 30-45 days prior to receiving the results and conclusions from these outside consultants. This makes the endorsement resolution and decision making process on the part of the CATC questionable and a total farce!
In conclusion, a few members of the CATC orchestrated a vote on the school site endorsement knowing that I would be out of town and not available to vote on this resolution. The vote was 5 in favor - 4 in opposition of the resolution. With my opposition vote - this would not have passed. It is my hope that the Wm. S. Hart Governing School Board will consider this letter as my "fifth vote" on my behalf, and not to endorse the Romero Site because the consultant’s facts and information is not yet in.

Sincerely,

Jeff Preach

Castaic Area Town Council Member

cc: CATC The Signal Newspaper, County Supervisor Michael Antonovich, Rosalind Wayman, All CATC members,