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Agenda Item 9(b)  
SMMC  
5/23/16

January 11, 2016

Tyler Montgomery  
Los Angeles County  
320 West Temple Street  
Los Angeles, California 90012

**Draft Environmental Impact Report Comments**  
**Aidlin Hills Project PN 00-136**  
**SCH No. 2014091027**

Dear Mr. Montgomery:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced Draft Environmental Impact Report (DEIR) that abuts the Conservancy’s Pico Canyon Park, a component of the Santa Clarita Woodlands. The proposed project with 3,200,000 cubic yards of grading, 102 houses, two large water tanks, and an intrusive elevated secondary access road would represent a major intrusion into the Santa Susana Mountains core habitat area.

1

The elimination of 53 acres of core Santa Susana Mountains habitat, permanent annual stripping of 13 acres of habitat for fuel modification, and all of the indirect impacts--such as lighting--of a 102 home subdivision comprises a significant biological impact on the ecological sustainability of the lower Pico Canyon watershed.

2

Much of the 2,300,000 CY of grading--a 1,500-foot-long section of development-- would be starkly visible from Pico Canyon Road. That viewshed would be further marred by a 1,500-foot-long, 200-foot-wide fuel modification zone below that long row of ridgeline houses. The combined development visibility, including lighting, and the fuel modification is a potentially significant visual impact from Pico Canyon Road.

3

As proposed, the project would adversely affect an approximately 4,000-foot-long section of viewshed along a scenic roadway. The location of 102 homes and streets with their night lighting impacts on the edge of the Santa Susana Mountains ecosystem in full view of both Pico Canyon Road and all associated public trails and sidewalks would result in unavoidable significant adverse visual impacts. The proposed landscaping along the front of the development cannot guarantee the blocking of views over the life of the project. The

beautiful rural feel of the site that leads to the entrance of Mentryville Park, would be substantially degraded. The visual character and quality of the site and surroundings would be substantially degraded. That viewshed degradation is avoidable with moderate project modifications.

3  
(cont.)

These significant visual and biological impacts can easily be avoided by reducing the project footprint at higher elevations. It is good that approximately 70 percent of the site would not suffer from direct project impacts. However, the proposed area to be impacted has an average slope area that exceeds 40 percent and approximately 80 percent of the proposed development area has slopes in excess of 25 percent. The project itself does not meet its DEIR objective of placing development in flatter terrain. The mass graded project (3.2 million cubic yards of earth) does not fit the terrain or the natural landscape setting. Each house would require 25,000 cubic yards of grading.

4

The impacts (to the remaining 30 percent of the site) are not miraculously dissolved because the applicant proposes not to develop the undevelopable other 70 percent of the property.

All of the biological mitigation measures offer no permanent or adequately defined mitigation value. The biological mitigation measures only address giving animals in the development footprint some warning before their habitat is destroyed, or they represent deferred mitigation with undefined mitigation sites and performance criteria. The DEIR biological mitigation measures are inadequate to compensate for the loss of 66 acres of habitat in the Santa Clarita Woodlands area. The protection of the open space is valuable but, it does not offset the direct permanent impacts to at least 66 acres of habitat.

5

In order for the open space component of the project and each of its DEIR alternatives to provide the DEIR represented habitat values, the DEIR must provide both permanent third party land protection mechanisms and adequate funding to manage the open space for intrusions, trash, and other adverse occurrences.

6

The DEIR objective to provide added fire flow is noble, but the DEIR provides no evidence that the requested amount is necessary. What evidence is provided that the adjacent development needs additional fire flow to warrant significant impacts? It appears that this project objective is designed to deflect objection to the project more than to supply defined needs.

7

The design of the One Valley One Vision Alternative is physically infeasible because of topographic and drainage constraints. For this reason alone the alternatives analysis is flawed and deficient.

8

As addressed in the DEIR, the One Valley One Vision Density Control Alternative would greatly reduce many of the significant project impacts produced by the proposed project. Those reductions would take the level of impact below the level of significant.

9

The Reduced Density Alternative avoids all substantial impacts and should be the project approved by the County. It is the only alternative without adequate impact reduction and public benefits.

10

The greenhouse gas emission baseline must not be adequate in the DEIR if 2,300,000 cubic yards of grading do not result in a significant green house gas production impact.

11

The DEIR is deficient because the project and alternatives do not include a public trail from Pico Canyon Road up Wickham Canyon to the proposed public open space lot. The DEIR is deficient because the wildlife movement effects on the proposed culvert size for the emergency access road to Verahda Court is not addressed. The DEIR is deficient because wildlife impacts from Verahada Court street lighting is not addressed.

12

The DEIR is deficient because it does not address the full fee simple dedication of the open space to a public park or open space agency as a prerequisite of tract map recordation. Such timely transfer is essential to preserve the ecological values of the open space described in the DEIR.

13

The DEIR is deficient because it does not address how irrigated perimeter slopes will adversely impact south coast horned lizards via sustaining Argentine ant populations.

14

The DEIR is deficient because it does not address in detail what County Flood Control District clean out requirements will be placed on the proposed storm water infiltration basins in regards to perpetual loss of wetland vegetation.

15

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,



IRMA MUNOZ  
Chairperson

## 2.5 RESPONSE TO LETTER C

### SANTA MONICA MOUNTAINS CONSERVANCY (SMMC)

**Irma Munoz, Chairperson**

Ramirez Canyon Park  
5750 Ramirez Canyon Road  
Malibu, CA 90265  
(January 11, 2016)

#### **RESPONSE TO COMMENT C-1.**

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

#### **RESPONSE TO COMMENT C-2.**

The commenter alleges that the Project development footprint of 53 acres, with an additional 13 acres of fuel modification, is a significant elimination of core Santa Susana Mountains habitat and would impair the ecological function of the lower Pico Canyon watershed. The comment does not define the lower Pico Canyon watershed; for the purpose of this response, it is assumed that the upper Pico Canyon watershed consists of Pico Canyon upstream of the Project site within the Santa Clarita Woodlands Park area, which would not be impacted by the proposed Project, and that the lower Pico Canyon watershed encompasses the Project site and Pico Canyon downstream to The Old Road. The lower Pico Canyon watershed is primarily a channelized flood control facility beginning in the northeast corner of the Project site and continuing downstream to the Old Road. There is a substantial retention basin at the northeast corner of Pico Canyon Road and Stevenson Ranch Parkway that provides ecological functions, and there is a short stretch (approximately 900 feet in length) of willow riparian woodland at the northwest corner of the same intersection, which possesses quality habitat. This willow riparian woodland is approximately one-quarter mile downstream from the Project development and would have no direct impact from the Project. Otherwise, the lower Pico Canyon watershed consists chiefly of a concrete-lined channel, including the catch basin located at the northeast portion of the Project site. Based on the December 2015 Regulatory Permit Application submitted to the US Army Corps of Engineers (USACE) and containing a formal jurisdictional delineation for the Project,<sup>2</sup> permanent impacts to Pico Canyon Waters of the U.S. are 0.11 acre (457 linear feet) with 0.04 acre (312 linear feet) of temporary impact. The existing catch basin would be relocated approximately 500 feet upstream from the current location, and there would be no impacts to the downstream willow riparian woodland or the downstream retention basin. Therefore, Project impacts to Pico Canyon are concluded to be less than significant with the implementation of Project mitigation measures and compliance with the USACE 404 and the California Department of Fish and Wildlife 1603 regulatory permits. The ecological sustainability of Pico Canyon would not be further compromised by the proposed Project.

Because the Project site is situated at the edge of urbanized Stevenson Ranch to the east and northeast, and the Santa Susana Mountains wildlife core habitat is located to the south and west, the Project site is not considered to be core habitat. The Project site is a peripheral component of the overall open space core

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<sup>2</sup> *Nationwide Permit Pre-Construction Notification Form, File No. SPL-2016-00022. Submitted December 14, 2015.*

habitat of the Santa Susana Mountains, and the Project site contributes to the core habitat's continued ecological functionality. The native vegetation communities on the Project site support a variety of wildlife whose home ranges include the open space areas to the south and west of the site. Project implementation would impact approximately 66 acres, the majority (about 38 acres) of which is either annual grassland or bush mallow scrub, as identified in **Table 4.3-2**, Impacts to Plant Communities in the Draft EIR. Project impacts to plant communities and the sensitive communities of thick-leaved yerba santa scrub (0.6 acre), giant wild rye grassland (0.7 acre), California bush sunflower scrub (1.3 acres), toyon chaparral (6.0 acres), and foothill ash scrub (1.8 acres) would be less than significant with the implementation of Mitigation Measure 4.3-3 to enhance or restore sensitive communities. The Project design incorporates undeveloped open space along the west and the south--the closest areas to existing open space--which would buffer the core habitat of the Santa Susana Mountains from the proposed residential development.

### **RESPONSE TO COMMENT C-3.**

The commenter is of the opinion that the proposed Project design and landform alteration would result in a potentially significant visual impact from Pico Canyon Road. The commenter contends that Pico Canyon Road is a scenic roadway and that the proposed Project would adversely affect the viewshed along this roadway, as landscaping would not block views of the residential development. Additionally, the commenter asserts that the rural setting entrance to Mentryville Park to the west would be substantially degraded.

The Draft EIR analysis of view impacts is based on the potential for the Project to result in changes to existing views within and near the Project site as perceived by the public (e.g., motorists and pedestrians on the surrounding roadways and pedestrians on Pico Canyon Road and Pico Canyon Trail). The Draft EIR acknowledges that a portion of the proposed residences would be visible along Pico Canyon Road. However, Pico Canyon Road is not designated by any State or local agency as a scenic roadway. As stated in **Section 4.1**, Aesthetics of the DEIR, there are no designated scenic highways with views of the Project site, and existing views are not otherwise called out as scenic or designated for protection by state or local agencies. The Project site is located approximately 1.6 miles west of I-5. According to Figure 9.7, Scenic Highways, of the Los Angeles County General Plan 2035 and the Scenic Highways Plan map in the 1990 Santa Clarita Valley Area Plan, a portion of I-5 southeast of the Project site is designated as an eligible scenic highway. Due to the distance and intervening topography, the Project site is not visible from the scenic highway segment. Thus, no views of the site are available from a scenic highway.

The Draft EIR analysis of lighting focuses on potential adverse light spillover effects on sensitive receptors (i.e., the single-family residential community, Southern Oaks, located directly east of the Project site) due to the use of artificial light during evening and nighttime hours. Artificial light may be generated from point sources as well as from indirect sources of reflected light. Artificial light from the Project would not be visible to sensitive receptors, as the most dominant source of nighttime lighting would be concentrated along streets in the interior of the development area, rather than along the edges of the site. The highest street and building pad elevation would be about 100 feet lower than the western ridgeline separating the Project site development area from the open space areas to the west, which is managed by the Mountains Recreation and Conservation Authority. Therefore, the Project would not substantially alter the lighting character in surrounding communities and open space areas because of intervening topography and mandatory compliance with the County's Rural Outdoor Lighting standards. As such, impacts related to lighting would be less than significant.

Of the 230 acres encompassing the entire Project site, the Project would preserve approximately 165 acres (71 percent) as undeveloped, natural areas within the southern and western portions of the Project site. The majority of the Project developed area would be west of Wickham Canyon, at lower elevations than the two hillside areas separating the Project site from Mentryville, minimizing view impacts from the public areas west of the Project site. Views of the proposed Project along Pico Canyon Road and from Pico Canyon Trail would be similar to those of the existing Southern Oaks community. The prominent ridgelines between Mentryville and developed areas would be left in their natural conditions. The Project applicant proposes to widen for a distance of less than 1,000 feet the segment of Pico Canyon Road that generally traverses the northern boundary of the Project site, in accordance with the approved alignment of the road. While the Project would extend the Stevenson Ranch suburban development west of the Southern Oaks community, the rural ambience along Pico Canyon Road leading to Mentryville would remain similar to current ambience. This is due to the undeveloped north side of the two-lane roadway, the undeveloped section of Pico Canyon paralleling the south side of the roadway, which creates a buffer of between 300 and 750 feet between the Project site and the roadway, and the fact that the Mentryville access road continues through undeveloped terrain for a half mile beyond the end of the public road. The proposed improvements are consistent with the County's designation of the roadway as a major arterial. Lastly, due to distance and topography, views of the Project site area not available from Mentryville Park, nor are these historical resources visible from the Project site.

#### **RESPONSE TO COMMENT C-4.**

The commenter states that the significant biological and visual resource impacts may be mitigated by avoiding the hillside topography and claims the current Project design does not meet the Project objective to place development on the site's most level terrain.

As concluded in **Section 4.1 Aesthetics** (Page 4.1-19), no potentially significant aesthetic impacts were identified and **Section 4.3, Biological Resources**, concludes that with incorporation of Project design features and the implementation of the Draft EIR mitigation measures, impacts associated with biological resources would be reduced to a less-than-significant level (Page 4.3-54). There are no unmitigated significant impacts to biological or visual resources.

In regard to hillside management, the proposed Project design would constrain density of development and result in the preservation of approximately 165 acres (71 percent of the site) as permanent natural open space. Grading would be engineered in accordance with the Los Angeles County Grading Manual, and existing drainage channels within Wickham and Pico Canyons would be primarily ungraded. Grading of the site would include hillside slopes to remediate existing geologic conditions and to create stable building pads and internal roadways. Manufactured slopes would have an average grade of 2 horizontal to 1 vertical, or 50 percent. The grading limits would extend off-site to the north and east to permit slope rounding and adequate transitions to natural terrain, encompassing an additional seven to eight acres off-site. The Project site contains 32.4 acres of slopes of 0-24.99 percent, 55.2 acres with slopes of 25-49.99 percent and 133.9 acres with slopes of 50 percent or greater. The flattest terrain is within the floodplain or floodway of Pico and Wickham Canyons, but hillside management criteria require that these drainages remain in their natural state to the greatest extent possible. Consequently, the Project grading design avoids the floodplains while incorporating the flatter areas of the Project site outside of the drainage areas. The October 15, 2015 Subdivision Committee Report found that the Project was consistent with the Hillside Management criteria.

**RESPONSE TO COMMENT C-5.**

The commenter claims that none of the proposed biological mitigation measures offer permanent or adequate mitigation value because they either defer mitigation or simply warn animals of destruction of their habitat. The commenter additionally claims that the preservation of 165 acres of open space is inadequate compensation for the loss of 66 acres of habitat.

The County does not agree with these comments. The 165 acres of natural open space (Mitigation Measure 4.3-2) would be contiguous with the Santa Clarita Woodlands open space to the west as well as the open space to the southeast of the Project site. In addition, portions of the habitat within the 165 acres are suitable for a variety of special-status wildlife species, including western spadefoot (*Spea hammondi*), silvery legless lizard (*Anniella pulchra pulchra*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), coast horned lizard (*Phrynosoma blainvillii*), rosy boa (*Charina trivirgata*), golden eagle (*Aquila chrysaetos*), Cooper's hawk (*Accipiter cooperii*) (foraging), Swainson's hawk (*Buteo swainsoni*) (foraging), white-tailed kite (*Elanus leucurus*) (foraging), prairie falcon (*Falco mexicanus*), turkey vulture (*Cathartes aura*), lesser nighthawk (*Chordeiles acutipennis*), greater roadrunner (*Geococcyx californianus*), hairy woodpecker (*Picoides villosus*), mountain bluebird (*Sialia currucoides*) (foraging), loggerhead shrike (*Lanius ludovicianus*) (foraging), California horned lark (*Eremophila alpestris actia*), coastal California gnatcatcher (*Polioptila californica californica*), western meadowlark (*Sturnella neglecta*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), grasshopper sparrow (*Ammodramus savannarum*), Bell's sage sparrow (*Artemisospiza belli belli*), spotted bat (*Euderma maculatum*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), hoary bat (*Lasiurus cinereus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), southern grasshopper mouse (*Onychomys torridus ramona*) and San Diego desert woodrat (*Neotoma lepida intermedia*), although these species have not been recorded from the Project site.

Mitigation Measure 4.3-1 provides for the reproduction and on-site establishment of the slender and Plummer's mariposa lily (*Calochortus clavatus* var. *gracilis* and *C. plummerae*). Mitigation Measures 4.3-3 provides for the rescue and on-site relocation of western spadefoot, should the species be discovered on the Project site. Mitigation Measure 4.3-4 provides that rosy boa, coast horned lizard, silvery legless lizard, and coastal whiptail, should they occur on the Project site, be collected and relocated to suitable habitat within nearby dedicated open space. Mitigation Measure 4.3-5 does provide advance warning for San Diego black-tailed jackrabbit to allow non-breeding individuals the opportunity to avoid the active construction area; breeding rabbits would be avoided until offspring have been reared allowed to leave the nest. Mitigation Measure 4.3-6 provides that nesting San Diego desert woodrat, should the species be found on the Project site, be avoided until the young have left the nest. If this is not possible, Mitigation Measure 4.3-7 provides that they be allowed the opportunity to reach a safe location outside of the grading envelope, with any remaining occupied nest to be transferred to suitable habitat within nearby open space. Mitigation Measure 4.3-8 provides for the safety of a variety of wildlife species including bats, should they occur on the Project site, by allowing their escape into suitable habitat within nearby dedicated open space and protecting active nesting areas during the nesting season. Mitigation Measure 4.3-9 requires the proponent to restore or enhance sensitive plant communities within previously disturbed habitat areas, either on-site or off-site, under a specific suite of requirements. Mitigation measure 4.3-10 provides for the establishment of regulatory jurisdictional resources to offset the loss of such resources. Mitigation Measure 4.3-11 requires the Project proponent to comply with the Migratory Bird Treaty Act by avoiding direct impacts to avian nest locations until such time as the nests are vacated. Lastly, Mitigation Measure 4.3-12 mandates that the Project proponent plant two replacement oak trees for the removed oak tree. The Draft EIR concludes that,

with incorporation of Project design features and the implementation of the above mitigation measures, impacts associated with biological resources would be reduced to a less-than-significant level.

**RESPONSE TO COMMENT C-6.**

The commenter suggests that the proposed 165 acres of open space would only represent habitat value if a third party were given permanent management responsibilities over the area, with the addition of funding to manage the open space.

The proposed open space area would be covered by a conservation easement for the preservation of the biological resources. The Project proponent is amenable to conveying the open space to an acceptable land steward, which would manage the area for the perpetuation of the biological resources. The opportunity for habitat enhancement within open space area would be retained by the Project proponent in order to implement some of the required mitigation.

The suggestion of third party open space management will be provided to the decision makers for consideration. The comment does not address a specific topic within the Draft EIR, and no further response is necessary.

**RESPONSE TO COMMENT C-7.**

The commenter suggests that the Draft EIR includes an objective to provide added fire flow, and is used to deflect objection of the Project more than to supply defined needs. The commenter is requesting evidence that the adjacent development needs additional fire flow to warrant significant impacts. This comment does not specify what impacts are considered significant. The Draft EIR concludes that there are no unmitigated significant impacts; consequently it is not possible to determine to what potential significant impact this comment refers.

Section 2.0, *Project Description*, of the Draft EIR, Objective 12, is to incorporate multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire hazards. As discussed on pages 4.7-29 through 4.7-33, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the fire protection measures proposed by the Project include a fuel modification plan which would incorporate a landscape plan that utilizes a plant palette consisting of fire retardant plants and native and appropriate non-native drought tolerant species in accordance with the LACFD guidelines; an emergency vehicle access road to the east, connecting with Verandah Court, and serving as a second point of emergency access and evacuation; two 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline within Pico Canyon with a secondary point of connection at Verandah Court; and overall compliance with the Los Angeles County Building and Fire Code along with all applicable department regulations and standards. Mitigation Measure 4.7-3 requires the Project proponent to fund any necessary upgrades to the surrounding water infrastructure to meet fire flow requirements, with the Valencia Water District designing and constructing the necessary upgrades at the Project proponent's expense. As discussed on page 4.7.20, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the Project site is located within Fire Zone 4, which is a Very High Fire Hazard Severity Zone (VHFHSZ). The regional natural vegetation in this area is highly prone to wildfires. Historically, large fires tend to burn in both Moderate Fire Hazard Zones and VHFHSZ every 20 to 25 years. In 2010, the Project site and surrounding areas burned during a wildfire. The Draft EIR does not state the adjacent development requires additional fire flow. However, the location of the proposed water tanks, which would be operated by the



Valencia Water Company, are to be located at an elevation of 1,800 feet, an elevation that is 1,000 feet higher than the closest existing water tank about 0.5 mile southeast of the Southern Oaks community. With the water tanks at a higher elevation, a higher fire flow is achieved meeting the Fire Department's required water pressure under a gravity flow system. With the existing water tank to the southeast of the Southern Oaks community at an elevation of 1,700 feet and the highest residential location with this community being 1,585 at the west end of Verandah Court and a distance of 1.1 mile, the proposed new water tanks at an elevation of 1,800 feet and only about 0.5 mile away would provide more reliable and adequate fire flow than currently available. As such, no further response in this regard is warranted.

### **RESPONSE TO COMMENT C-8.**

The commenter suggests the alternative analysis within the Draft EIR is flawed and deficient, as the "One Valley, One Vision" Alternative is physically infeasible due to topographic and drainage constraints. Section 5.0, *Alternatives*, of the Draft EIR, analyzes the "One Valley, One Vision" Alternative and the "One Valley, One Vision" Density-Controlled Alternative.

As discussed in Section 5.0, *Alternatives*, page 5-2, the "One Valley, One Vision" Alternative would be consistent with the 2012 "One Valley, One Vision" Plan with land use categories of RL 5 (Rural Land 5; 60 acres) and RL 20 (Rural Land 20; 170 acres). This Alternative could create up to 12 five-acre and eight 20-acre parcels with each lot's development potential up to 3.5 acres. The development potential area would result from the requirements for compliance with the Hillside Management regulations for safe manufactured slopes not exceeding 2:1 (50%). The resulting 20-parcel subdivision would have a development footprint, inclusive of fuel modification, of approximately 70 acres, which would not necessarily be clustered. No provision for water storage tanks would be included in this Alternative, and a secondary emergency access would not be needed or proposed. It is assumed that residential parcels may include individual equestrian facilities, which would be developed within the respective 5-acre and 20-acre parcels. Although no specific design has been developed, this alternative could be designed with building pads sited along ridgelines or other low relief topographic areas, with the remainder of the parcel consisting of non-buildable slopes or hillsides. The non-urban setting would provide for scattered home sites along ridgelines, which would become the basis for the access roads between parcels. With larger lot sizes, not all areas within each property would be buildable. As such, this alternative is technically feasible. No further response in this regard is warranted.

As discussed in Section 5.0, *Alternatives*, page 5-2, the "One Valley, One Vision" Density-Control Alternative could also create up to 20 parcels, but the land division design would cluster the parcels in a density-controlled project in the eastern portion of the Project site, taking access from stub street Verandah Court in the Southern Oaks community. Similar to the "One Valley, One Vision" Alternative above, the "One Valley, One Vision" Density-Control Alternative would be consistent with the 2012 "One Valley, One Vision" Plan with land use categories of RL 5 (Rural Land 5; 60 acres) and RL 20 (Rural Land 20; 170 acres). Lot sizes would average 15,000 square feet--comparable to the Southern Oaks community. The clustered design would allow for the overlap of individual fuel modification zones, reducing the overall development footprint. The resulting 20-parcel subdivision would have a development footprint, inclusive of fuel modification, of approximately 15 acres, which would be clustered with a common access street connecting to Verandah Court, eliminating connection with Pico Canyon Road. There would be no water storage tanks included in this Alternative, and a secondary emergency access would not be needed or proposed. Indigenous plant species planting of Wickham Canyon would not be a component of this Alternative. Unlike the "One Valley, One Vision" Alternative, the residential units would not be expected to include individual

equestrian facilities. Because of the smaller, 15,000-square-foot lot sizes, the Project design would not require the full 230.5 acres to comply with density standards and would retain an approximately 130-acre remainder parcel along the southern and western property. As such, this alternative is also technically feasible. No further response in this regard is warranted.

#### **RESPONSE TO COMMENT C-9.**

The commenter acknowledges the “One Valley, One Vision” Density-Control Alternative would greatly reduce many of the Project impacts, described by the commenter as significant, to a level of less than significant. As in Comment C-7 above, this comment does not specify what impacts are considered significant. The Draft EIR concludes that there are no unmitigated significant impacts; consequently it is not possible to determine to what potential significant impact this comment refers.

The County concurs that the “One Valley, One Vision” Density-Controlled Alternative would have lesser impact than the proposed Project. As discussed in Section 5.0, *Alternatives*, page 5-26 and Table 5-2, *Project Alternatives’ Ability to Meet Project Objectives*, the “One Valley, One Vision” Density-Controlled Alternative is the environmental superior alternative from among the other Alternatives. With 80 percent fewer residential units than the Project, the “One Valley, One Vision” Density-Control Alternative would have proportionally lesser impact than under the Project. However, this “One Valley, One Vision” Density-Control Alternative would not meet the objectives of incorporating multiple fire protection measures to safeguard the community from wildfire hazards, or to construct a significant number of new housing units to assist in providing for the County housing needs. In addition, the “One Valley, One Vision” Density-Control Alternative would not be a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the Alternative. This Alternative would also not meet the objective to construct a significant number of new housing units to assist in providing for the County housing needs. Further, as discussed in Section 4, *Environmental Impact Analysis*, the proposed Project would not result in any significant, unavoidable impacts with incorporation of the Project design features and after implementation of the prescribed mitigation measures. As such, no further response in this regard is warranted.

#### **RESPONSE TO COMMENT C-10.**

The commenter suggests that the Reduced Density Alternative avoids all substantial impacts and should be the project approved by the County. The commenter continues in stating that this Alternative is the only alternative without adequate impact reduction and public benefits. It is assumed that the commenter meant to write that the Reduced Density Alternative is the only alternative “with” adequate impact reduction. As discussed in Section 5.0, *Alternatives*, Table 5-2, *Project Alternatives’ Ability to Meet Project Objectives*, the Reduced Density Alternative would not meet the objective to construct a significant number of new housing units to assist in providing for the County housing needs. In addition, the Reduced Density Alternative would not be a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the Alternative. Further, as discussed in Section 4, *Environmental Impact Analysis*, the proposed Project would not result in any significant, unavoidable impacts with incorporation of the Project design features and after implementation of the prescribed mitigation measures. As such, no further response in this regard is warranted.

**RESPONSE TO COMMENT C-11.**

The commenter suggests the greenhouse gas emission analysis within the Draft EIR is inadequate, as the greenhouse gas impact from grading should result in a significant impact. Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, analyzes the greenhouse gas impact of the Project.

As discussed in Section 4.6, Greenhouse Gas Emissions, page 4.6-23, the SCAQMD recommends the amortization of construction emissions over a Project lifetime, which is defined as a 30-year period. In general, the SCAQMD has noted that “[b]ecause impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime Project GHG emissions.”<sup>3</sup> Greenhouse gas emissions from grading are primarily generated by trucks displacing the soil within the site. Soil would be balanced on the site and would not be imported or exported from the site. As a result, greenhouse gas emissions during the grading phase would not result in significant impacts because soil movement would be confined to the Project site, which results in a lack of haul trucks. Furthermore, as discussed on page 4.6-25, the Project’s greenhouse gas emissions, inclusive of construction-related greenhouse gas emissions, would be less than significant based upon the methodology and model created by CalEEMod. CalEEMod is based on outputs from OFFROAD2011 and EMFAC2011, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles. CalEEMod outputs construction-related GHG emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and CO<sub>2</sub>e (see discussion in **Section 4.7**, Greenhouse Gas Emissions of the Draft EIR). The construction grading emissions calculations are provided in Appendix F of the Draft EIR and are considered to be accurate.

**RESPONSE TO COMMENT C-12.**

The commenter indicates that the Draft EIR is deficient because no public trail is provided from Pico Canyon south through Wickham Canyon to the proposed Project open space. The commenter also states that the impacts to wildlife of the proposed street lighting and Wickham Canyon culvert are not addressed.

The County does not concur with these statements. The County recently completed a multi-year effort to update its General Plan, and included in that effort was the current Regional Trail System Map. Additionally, the multi-year planning effort for the “One Valley, One Vision” plan (Santa Clarita Valley Area Plan) included a regional study for public trails of the area. None of these documents envision a public trail within Wickham Canyon. Therefore, consideration of the impacts of such a trail is unnecessary. The public trail in this area is the Pico Canyon Trail, a segment of which is included in the proposed Project design and analyzed accordingly.

The proposed Project would incorporate an open space linkage between Pico Canyon Creek and Upper Wickham Canyon. This would be achieved by a soft-bottom channel under the secondary emergency access road created by an arched culvert over the Wickham Canyon drainage. All Project culverts are described as project design features (PDF) within **Section 4.8**, Hydrology and Water Quality (Page 4.8-15). The Wickham Canyon Creek Culvert (#2) is described as a 12’ wide by 12’ high arch bridge that would span over Wickham Canyon Creek along the proposed Verandah Court secondary emergency access road. This culvert is further discussed within Section 4.3, Biological Resources (Page 4.3-46), stating “The emergency secondary fire

<sup>3</sup> South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, (October 2008).

access road crossing of Wickham Canyon would be designed with a soft bottom with sufficient height and width to allow local wildlife movement to continue along the channel.”

No street lighting is proposed for this emergency access road because the road would not be used as a public street. The Project site is within the Rural Outdoor Lighting District, which would promote dark skies for the enjoyment and health of humans and wildlife. Nighttime lighting would comply with the Rural Outdoor Lighting District standards, including outdoor lighting being fully shielded and no lighting developed as part of the Project would cast directly outward into open space areas. These factors were analyzed within the Draft EIR. As such, impacts related to lighting would be less than significant.

#### **RESPONSE TO COMMENT C-13.**

The commenter indicates that the Draft EIR is deficient because it does not propose or analyze the dedication of the open space area to an open space agency or as a public park. As stated above in Response to Comment C-6, the Project proponent is amendable for the open space to be conveyed to an acceptable land steward to manage the dedicated conservation easement for the protection of the biological resources. The dedication of the open space area to an open space agency or as a public park is not an environmental impact requiring impact analysis. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR, as the comment relates more to approval conditions than environmental impacts. As such, no further response in this regard is warranted.

#### **RESPONSE TO COMMENT C-14.**

The commenter indicates that the Draft EIR is deficient because it does not address how irrigated perimeter slopes will adversely impact south coast horned lizards by sustaining Argentine ant populations. A final irrigation plan has not been prepared, but an assumption can be made that irrigation would be needed for fuel modification Zones A and B as well as individual yards and common area landscaping. The majority of these areas would be located within the interior of the Project footprint, but manufactured slopes would occupy the perimeter of the development.

Argentine ants may have substantial adverse effects on native vegetation, plant species, and some wildlife species in natural areas adjacent to urban development because their colonies can become quite large and dominate natural areas. These insects can spread where soil moisture is readily available and may spread at least 300 or more feet from irrigated urban areas. Large colonies of Argentine ants may greatly reduce the numbers of the coast horned lizard.

The vast majority of the perimeter around the development footprint would be fuel modification Zone C or manufactured slopes, all of which would consist of native vegetation and would have only temporary irrigation. While this non-irrigated buffer from irrigated landscape areas would reduce the potential for Argentine ant to spread into open space areas, it would not eliminate this possibility. Coast horned lizard has not been confirmed to be present on the Project site, but the potential for this species to occur is high because suitable habitat is present. Because there is the possibility for Argentine ant to spread into open space areas, the following requirement to monitor for the presence of Argentine ant has been added to Mitigation Measure 4.3-9 to read as follows:

**Mitigation Measure 4.3-9** Impacts to sensitive plant communities (i.e., Thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, Toyon Chaparral, and Foothill Ash Scrub) shall be mitigated using one or more of the following:

1. On-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and 2:1 for permanent impacts, subject to the approval of the County of Los Angeles.
2. Purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County of Los Angeles.

If mitigation is to occur on-site or off-site, habitat mitigation and monitoring plan shall be prepared and approved by the County Biologist prior to the issuance of a grading permit. The plan shall focus on the creation of equivalent habitats within disturbed habitat areas of the Project site or off-site. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components:

1. Description of existing sensitive habitats on the Project site;
2. Summary of permanent impacts to sensitive communities based on approved Project design;
3. Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation;
4. Detailed description of restoration or enhancement goals;
5. Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;
6. Provisions for mitigation site maintenance and control on non-native invasive plants;
7. Provision to monitor development perimeter for presence of Argentine ant and control if present; and
8. Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to the County of Los Angeles.

#### **RESPONSE TO COMMENT C-15.**

The commenter indicates that the Draft EIR is deficient because it does not address in detail what County Flood Control District clean-out requirements would be placed on the proposed storm water infiltration basins. These could have an impact through the potential loss of wetland vegetation. Stormwater flows from the site's impervious areas would be directed to a large, on-site water quality infiltration basin, within which stormwater would percolate into the underlying soil or evaporate into the atmosphere. Routine maintenance activities of the water quality basin by County Department of Public Works Flood Management Division are not typically described in detail at this stage of development, especially when the water quality basins do not currently exist and are generally to be located outside of jurisdictional "waters of the U.S." The

potential periodic maintenance activities within the drainage basins would generally be performed by means of hand and mechanical equipment to maintain baseline elevations and to reduce the impact on basin function as future vegetation growth occurs. In addition, minor repairs to damaged slopes, access road, and outlet structures could take place to maintain the drainage's structural integrity. There would be no perpetual loss of wetland vegetation, but rather periodic thinning of vegetation at a location where such wetland vegetation does not currently exist. Such maintenance activities are not considered a loss of wetland vegetation habitat, since no such habitat exists now and no credit for the creation of such wetland habitat is requested. No further discussion is required.