



**PUBLIC REQUEST TO ADDRESS  
THE BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS  
HOLLY J. MITCHELL  
LINDSEY P. HORVATH  
JANICE HAHN  
KATHRYN BARGER

**Correspondence Received**

Agenda #	Relate To	Position	Name	Comments
The following individuals submitted comments on agenda item:				
7.		<b>Oppose</b>	Amy Savarese	This will displace working class equestrian communities
			Candice Meneghin	A CEQA FEIR (Final Environmental Impact Report) requires a "Notice of Availability" to be published, informing the public that the final EIR is available for review and that a public hearing will be held to certify the EIR and potentially approve the project; this notice must be distributed to all agencies and individuals who commented on the Draft EIR during the public review period. Friends of the Santa Clara River commented on this project. No NOA was circulated in violation of CEQA.
			Catherine Flynn	
			Friends of the Santa Clara River	Please address endangered species, loss of oaks, nonconformity with other plans and air plan. Please continue for additional discussion. Did not receive notice of the FEIR release. A CEQA FEIR (Final Environmental Impact Report) requires a "Notice of Availability" to be published, informing the public that the final EIR is available for review and that a public hearing will be held to certify the EIR and potentially approve the project; this notice must be distributed to all agencies and individuals who commented on the Draft EIR during the public review period.
			Harriet Britt	
			Lloyd Carder	The Oak trees that will be lost is not acceptable. They need to be moved or saved from grading. This area once was full of oaks and cattle that brought many to the SCV. This has passed and now we value the few Oaks we have left. Many are dyeing due to construction or grading damage, so we must save each valued specimen.
			Lynne Plambeck	18 oaks to be removed, endangered species not addressed, sensitive SEA area. Please continue for additional discussion with public works. A CEQA FEIR (Final Environmental Impact Report) requires a "Notice of Availability" to be published, informing the public that the final EIR is available for review and that a public hearing will be held to certify the EIR and potentially approve the project; this notice must be distributed to all agencies and individuals who commented on the Draft EIR during the public review period.

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
7.		<b>Oppose</b>	lynne winner	This project will remove 18 mature oak trees yet there has not been a notice that the final EIR was submitted. These oaks have not been mapped and there has not been a reason as to why they are in the way. Please halt this project until further notice and information regarding the removal of these oaks, has been provided.  Lynne Winner
			Melodie L Hart	We need open space zoned for agricultural & equestrian activities. Once this is gone, it is gone forever. Families need to to have green space to relax. This so important for mental health to enjoy nature and decompress from constant noise from urban life. Please preserver some natural space for people to enjoy.
		<b>Item Total</b>	<b>9</b>	
<b>Grand Total</b>			<b>9</b>	



# Friends of the Santa Clara River

PO Box 7713    Ventura, California 93006    (805) 320-2265  
www.fscr.org

## SCOPE

**Santa Clarita Organization for Planning and the Environment**

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



12-16-24

Los Angeles County Board of Supervisors,  
Los Angeles County Public Works and all approving agencies  
Attention: Ebigalle Voigt  
P.O. Box 1460  
Alhambra, CA 91802-1460

Via e-mail to: Board members and uploaded to Board comment

**RE: The Old Road over Santa Clara River and the Southern Pacific Transportation Company  
Bridge, et al. Project LOS ANGELES COUNTY, CALIFORNIA DISTRICT 7 – LA  
BRLS-5953(601) & STPL-5953(682)  
Draft Environmental Impact Report/ Environmental Assessment Agenda Item 7**

### **Additional Comments Made Under the Revised Notice of Availability**

Dear Sirs and Madams:

The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following additional comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by the extended NOA date April 18<sup>th</sup>, within the EIR/EA comment period.

We incorporate by reference our previous comments submitted on April 11<sup>th</sup> 2024 and comments made by any resource or air quality agencies or organizations or individuals that expand on our comments.

These comments are based on new information from reports recently supplied to us. We restate our concern that none of the reports listed in the appendix and on which data the information in EIR and EA were based, were circulated with the EIR/EA, precluding accurate review and public input. These reports are apparently only provided upon request and apparently sometimes not even then. (We requested but did not receive the noise report.) **We ask that we be provided all these reports and that a two-week extension of the review period be granted so that we can review them.**

**First, we object to not being informed timely of the release of the final EIR so that we could provide additional comment to this project. A CEQA FEIR (Final Environmental Impact Report)**

requires a "Notice of Availability" to be published, informing the public that the final EIR is available for review and that a public hearing will be held to certify the EIR and potentially approve the project; this notice must be distributed to all agencies and individuals who commented on the Draft EIR during the public review period. We did not receive this notice.

### **Inaccurate traffic Analysis in Air Quality Report Leading to an Inaccurate conformity report**

The Air Quality Report with which we were provided only two days ago) was not circulated with the EIR/EA and not included on the website. It was not available until requested. Upon receipt of the report, purported to be the basis for data in the Consistency Analysis, we noted that it was unsigned and that there was no review date or reviewer signature. Was this report reviewed for accuracy as required? It is unusual for a Consulting firm to submit a report without a verifying signature.

The Air Quality report and therefor the Conformity Analysis both state that passenger traffic on the proposed project segment of the Old Road is mainly generated by Magic Mountain. This is completely incorrect. Amusement park attendees exit from either direction on Magic Mountain Parkway, which then leads directly into the park. Directions on the Six Flags Magic Mountain website for travelers from all localities and from both north and south state "Exit Magic Mountain Parkway. Turn left at the traffic signal at the bottom of the exit ramp going under the Freeway overpass. Proceed along Magic Mountain Parkway to the parking toll booths and the Park entrances."<sup>1</sup> There is no direction given to turn right onto the Old Road, and in fact doing so is out of the way and would require turning around. Only employees that access the park's northerly parking lots would use the Old Road for a short distance. But this portion of the Old Road was already expanded to three lanes many years ago as a result of the I-5/ Magic Mountain interchange upgrade.

In fact, the traffic on this section on the Old Road comes mainly from employees and trucks having to utilize the Old Road to access the western end of the Valencia industrial park via Rye Canyon Rd or employees having to access to back parking lot on Sky View drive (as noted in the report<sup>2</sup>. (See project map for these locations.) This fact is verified by the actual traffic study data in Table 1-2, page 6 of the Air Quality report done in 2018, though it is probably less now as stated in the report. Traffic on the Old Road is therefore usually scant except during commuting hours. (see picture on right, aerial by Daily News, March 18<sup>th</sup>, 2024). While the report estimates massive traffic increases, some of this will not occur. Traffic generated by Six Flags employees at Sky View (accessed by less than .1 miles on the Old Road from Magic Mountain Parkway) will not increase without park expansion, which is a limited possibility. That is also true of the Valencia Industrial Center. There are no nearby residents (see aerial photo in project location descript, and no local streets where traffic is causing congestion because this segment of the Old Road is mostly located next to empty fields. (See Project aerial, on the cover of the Air Quality report.) This information is not included in the project location description.



So, the question is, where is all this future traffic supposedly coming from? The EIR/EIS is quiet on this issue. It states that it is from SCAG "projected growth" However several large

<sup>1</sup> <https://www.sixflags.com/magicmountain/plan-your-visit/directions>

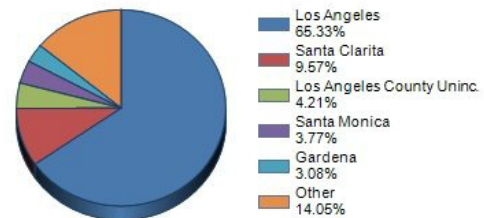
projects in the area have been delayed or withdrawn or would not be accessed by this expansion (i.e., Landmark Village, requested tract map delay to 2028, Entrada project withdrawn, see attachment 1). This project seems to be growth inducing. A chapter discussing growth inducement should be included in the EIR/EA

The project description also failed to mention that the I-5 is currently being expanded by two lanes, one in each direction, in this same area.<sup>3</sup> This project began many years ago and so may not have been subject to more recent air quality and greenhouse gas analysis required today.

The Conformity Analysis and Air Quality Report fail to mention numerous sources of truck traffic, including the Chiquita Canyon Landfill, the Valencia Sanitation Plant expansion and numerous now existing ware houses, and others that are for lease in the project location description. We surmise that this may have been an effort to support the report's low truck traffic analysis in order to avoid identifying it as a Project of Air Quality Concern requiring a Hot Spot Analysis.

The Conformity Analysis is based on a traffic analysis in the Air Quality Report that was completed in 2018<sup>4</sup>. While it is true that 2018 would give a more accurate traffic count for passenger vehicles where traffic was severely reduced during Covid, it is not accurate for truck traffic. Several warehouses<sup>5</sup> and a major expansion of the Chiquita Canyon Landfill which receives 90% of its diesel truck trash deliveries from elsewhere in Los Angeles County and Southern California – see diagram at right obtained from the Los Angeles County Department of Public Works website) and Valencia Sanitation plant were approved or built after that date and would not have been reflected in in the 2018 data, especially truck data. The Los Angeles County Department of Public Works is aware and has records of these approvals, since their office is involved in the permit process. We include records of these projects by reference and will produce them upon request. Failure to list these nearby projects that create diesel PM10 and PM2.5 emissions is an EIR/EA deficiency.

Report Period: December 2023  
Average Disposed: 6,322.02 Tons per Day



The Air Quality Report appears to have substantially understated truck traffic trips by choosing to obtain data from a single off ramp exiting from the Southbound direction to the Industrial Center<sup>6</sup> when the greater amount of traffic would be heading northbound from other areas in Los Angeles and the Port, and exiting at Magic Mountain, then turning right to access the Valencia Industrial area or proceeding to the Sanitation Plant, the Commerce Center, the commercial furniture store, the fire station and/or the Chiquita Landfill. Thus, the report was able, by using the 2018 date and a less used off-ramp, to substantially underestimate diesel truck traffic and avoid a Project of Air Quality Concern designation.

<sup>3</sup> <https://www.metro.net/projects/i-5-enhancements/>

<sup>4</sup> Air Quality Report, page 6 See note 1

<sup>5</sup> 104 warehouse listings in area at the time of writing this comment letter, see website:

<https://www.propertyshark.com/cre/industrial/us/ca/santa-clarita/valencia/?IncludeCoworking=false&CoworkingWorkspaceTypes=0&MapView=True&Zoom=10&Viewport=-119.18794389756575,34.217071697858586,-118.37495561631575,34.62037087129809&GeopickerType=viewport>

<sup>6</sup> Air Quality Report, page 6 See note 2

While some of this truck traffic may prefer to use the I-5 because it is faster now, if the Old Road is expanded and traffic speeds increased to 60 miles per hour as proposed, these trucks will undoubtedly find it shorter and faster to use the Old Road, thus substantially increasing diesel pollution on this road.

**We therefore request that an updated and accurate Air Quality Report be provided and re-circulated to all interested parties, along with a corrected Air Quality and traffic Analysis.**

### **Need for a Hot Spot Analysis**

A hot spot analysis for this project was not completed, however a hot spot analysis under 40 Code of Federal Regulations 93.123(b)—PM10 and PM2.5 Hot Spots, for the following reasons:

- The project is in a non-attainment zone for PM2.5 and Pm10.
- The project is longer than 1 mile (it is 2.2 miles).
- The Old Road is designated as a Major Highway under the County of Los Angeles General Plan, Mobility Element therefore this project is an expansion of a major highway<sup>7</sup>. The Conformity Analysis is itself internally inconsistent where it states on page one that a goal of the project is to conform with the Mobility Element which designates the Old Road as a Major Highway, but then states on page 3 regarding the need for a Hot Spot Analysis, that is not needed because the Old Road is not a ***not a major highway***.
- This is an expanded highway project that will have a significant increase in the number of diesel vehicles. Neither the Consistency Analysis nor the Air Quality Report currently state this, but we believe that is due to an incorrect traffic analysis using a traffic study location with lower truck counts and failure to identify nearby facilities using diesel trucks as described above. This must be corrected.
- When the facts above that were undisclosed in the EIR/EA and air quality report, are corrected and re-circulated, we believe that the data will show that this must be considered a project of air quality concern and requires a Hot Spot Analysis.

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### **Climate Change and GHG generation by the proposed project**

We continue to believe as stated in our previous comment letter, that this project fails to evaluate the “induced demand” as required by CalTrans guidelines, thus underestimating the VMT which in turn resulting in an underestimation of the GHG generation and air quality effects.

Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes.**

On December 15, 2022 California's air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan is nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan.

The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:

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<sup>7</sup> Air Quality Report page 3, lists one of the purposes of the project “To be consistent with the Los Angeles County Mobility Element, which identifies The Old Road as a 6-lane ***major highway***.” [emphasis added]

- The additional concrete<sup>8</sup> that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)
- The removal of 18 oaks<sup>9</sup>. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.
- Additional diesel truck trips that will be enabled by the lane expansion and the increasing the speed limit to 60 miles per hour.

We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is not required because the full impact as described above has not been calculated. Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed.**

### Biological Impacts

We note again that both USFWS and CDFW are cooperating agencies on this draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River We hope that they were not simply added as token checkboxes on legal requirements. We understand that consultation will be required under the Endangered Species Act.

The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction. The Santa Clara River is a major wildlife corridor. We urge CalTrans and Department of Public Works to abide by recent laws including SB790, Stern 2021.

While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act.<sup>10</sup> The southwestern pond turtle may occur in the project area.

#### Oaks

Oaks are an important and beloved native species, that are protected by County and City of Santa Clarita Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. We requested and received this report prior to making these additional comments. However, the report is deficient in that it doesn't provide a map of the oaks, the location of the oaks to be removed and photographs of the individual trees, all information normally included in oak reports and required for the County permitting

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<sup>8</sup> The chemical reactions involved produce even more carbon dioxide as a by-product. Making one kilogram of cement sends one kilogram of CO<sub>2</sub> into the atmosphere. Worldwide every year cement and concrete production generates as much as 9 percent of all human CO<sub>2</sub> emissions. Scientific American, Feb 1, 2023  
<https://www.scientificamerican.com/article/solving-cements-massive-carbon-problem/>

<sup>9</sup> In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove CO<sub>2</sub> from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter. EIR at page 386

<sup>10</sup> <https://www.fws.gov/press-release/2024-04/us-fish-and-wildlife-service-reopens-public-comment-period-proposal-list-both>

process. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

- **Failure to provide meaningful information about these important and rare trees to be removed from a County designated Significant Ecological Area is an EIR/EA deficiency.**

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years.<sup>11</sup>

### **Fish, Birds**

The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds.

This area is an identified nesting area for the Least Bell's Vireo and Willow Flycatcher, migratory birds that will require special mitigation to protect.

### **Other Reptiles, amphibians and plants**

We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County's possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don't see surveys for it in the document.

SouthCoast Wildlands, "Wildlands of the Santa Clara River<sup>12</sup>" can be accessed for locations of some of these animals.

The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California's endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate.

Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We

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<sup>11</sup> California Department of Food and Agriculture, 3288 Meadowview Road, Sacramento, CA 95832, USA.)

<sup>12</sup> <http://www.scwildlands.org/reports/wildlandsofthescrwatershed.pdf>



are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally, restore its ecological health and protection. Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate.

### **Conclusion**

As stated in our first letter, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through "Induced Demand", an impact which was not discussed in the EIR/EA. Additionally the project may not be needed at this time or at all due to reduced traffic. A new and more accurate traffic study and air quality analysis should be conducted.

The project will have severe biological impacts to endangered species in the area of the Santa Clara River which is also a County Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable.

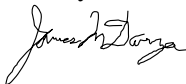
We believe this project is required to prepare and provide a Hot Spot Analysis for the reasons stated.

We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation, along with the technical reports that were listed, but not provided, in the Appendices.

Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS.

We look forward to working with the agencies to make this a better project.

Sincerely,



James M. Danza, MS, AICP  
Chair, Friends of the Santa Clara River



Lynne Plambeck, President  
Santa Clarita Organization for Planning and the Environment

# ATTACHMENT 1



January 24, 2023

Timothy Stapleton  
Principal Planner  
**LOS ANGELES COUNTY**  
**Department of Regional Planning**  
320 W. Temple Street, 13th Floor  
LOS ANGELES, CA 90012

SUB: VTTM 071377 Entrada North – Application Withdrawal

DEAR TIMOTHY,

We are in receipt of your notice regarding the inactivity of Project No. R2013-02833-(5) / Tentative Tract Map 071377. This letter is being sent to formally request the withdrawal of this case, as well as the associated entitlements below:

- CUP No. 201300151
- OTP No 201300036
- Parking Permit No 201300010

If you have any questions, please feel free to contact me at 661-255-4449.

Sincerely,

A handwritten signature in cursive script that reads "Alex Herrell".

Alex Herrell  
Vice President Entitlements  
The Newhall Land and Farming Company,  
a Subsidiary of Five Point Operating Company, LP

cc: Joshua Huntington

SEPTEMBER 13, 2022

FIVEPOINT  
25124 SPRINGFIELD COURT  
VALENCIA, CA 91355  
ATTN: ALEX HERRELL (ALEX.HERRELL@FIVEPOINT.COM)

Dear Mr. Herrell:

**PROJECT NO. 00-196-(5)  
VESTING TENTATIVE TRACT MAP NO. 53108-(5)  
NORTH OF THE SANTA CLARA RIVER AND WEST OF INTERSTATE 5  
NEWHALL ZONED DISTRICT  
TENTATIVE MAP EXPIRATION DATE DETERMINATION**

Your request for review and approval of additional time per Government Code Section 66452.6(a)(1) for an automatic extension of four (4) years for the recordation of Large Lot Parcel Map No. 82033 (July 6, 2022) has been reviewed and approved.

As noted in your request, the expiration date of Vesting Tentative Tract Map No. 53108-(5) was August 17, 2022. Discretionary Time Extensions 1 and 2 were approved by County Hearing Officer on July 19, 2022, extending the expiration date to August 17, 2024. The recordation of Large Lot Parcel Map No. 82033 and the obligation for off-site improvements pursuant to Government Code Section 66452.6(a)(1), authorizes an additional four (4) years to **August 17, 2028**. Additionally, at this time, four additional discretionary time extensions remain.

For questions or additional information, please contact Timothy Stapleton of the Subdivisions Section at (213) 974-6433, or by email at [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov). Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m. We are closed on Fridays.

Sincerely,



AMY J. BODEK, AICP  
Director of Regional Planning

AJB:DD:JH:TMS

K\_CP\_09.13.2022\_L\_PROJECT\_NO\_00-196-(5)\_ALEX HERRELL

## SCOPE

**Santa Clarita Organization for Planning and the Environment**

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



12-16-24

Los Angeles County Board of Supervisors

Los Angeles County Public Works

Attention: Ebigalle Voigt

P.O. Box 1460

Alhambra, CA 91802-1460

Via e-mail to: [TheOldRoadEIR@pw.lacounty.gov](mailto:TheOldRoadEIR@pw.lacounty.gov)

**RE: The Old Road over Santa Clara River and the Southern Pacific Transportation Company Bridge, et al. Project** LOS ANGELES COUNTY, CALIFORNIA DISTRICT 7 – LA  
BRLS-5953(601) & STPL-5953(682)  
**Draft Environmental Impact Report/ Environmental Assessment Agenda Item 7**

Dear Sirs:

Although we are a long-standing (35 years) and well-known Planning and Conservation group within the area of this project and Known to Los Angeles County Department of Public Works, we were not notified of this project directly, only becoming informed of it through a news article in the Daily News, late in the EIR process. We were thus deprived of commenting on the NOI. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely filled by April 11<sup>th</sup>, within the EIR/EIS comment period.

We have serious concerns about this project due to the under-estimation of traffic generation, greenhouse gases and air pollution by the environmental documentation and the habitat impacts caused by the bridge replacement in the Santa Clara River in a location where listed endangered species are located as well as the extreme loss of oaks, apparently including the historical heritage oak located near the north west corner of Magic Mountain Parkway and the Old Road. This intersection was already recently improved and should not include additional widening. We therefore request that the County/Metro/CalTrans and DOT add additional alternatives that would address and avoid these impacts.

We support the addition of a dedicated bike/pedestrian way only along with bridge repair, but not the additional roadway lanes due to the phenomenon of “induced demand” as described below. It is amazing to us that the County/Metro/Caltrans/DOT would propose these expensive and biologically harmful additions in an area where the I-5 freeway is already being expanded with additional lanes.<sup>1</sup> CalTrans has often stated in other venues that freeway lane expansions

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<sup>1</sup> <https://www.metro.net/projects/i-5-enhancements/>

are necessary to take traffic off on local roadways.<sup>2</sup> If this is the case as CalTrans has stated elsewhere in other documents, then the Old Road expansion is unnecessary.

We also support the dedicated trail/bikeway expansion as a safe means of non-vehicular travel to the industrial center and a recreational opportunity as long as this part of the project does not result in removal of oaks or other habitat destruction. We feel sure that such impacts can be avoided with careful planning. [Lynne, a bikeway is great – but with 3 lanes beside it? Seems a bit of a token gesture to me – just a comment here](#)

### **Incorrect Analysis of Induced traffic (adding additional lanes)**

According to the EIR/EIS

“Regarding operational emissions, the Build Alternative would result in lower gaseous criteria pollutant (NOX, CO, and ROG/VOC) emissions than the No-Build Alternative and Existing Conditions because of improvements in vehicle delay and turnover of the regional vehicle fleet. Slight increases in PM10 and PM2.5 emissions are attributed to fugitive dust associated with brake wear, tire wear, and resuspended road dust, which combined constitute over 90% of PM emissions from vehicle travel on roadways. (P.27)

This analysis is patently incorrect. According to a report by the CA Air Resources Board, as California continued to expand roadways. Total interstate and principal arterial lane miles in California increased from 58,258 in 2016 to 61,376 in 2019, or by 5.4 percent. While jurisdictions expand roadways for several reasons (e.g., to accommodate cars, freight, safety, carpooling, buses on shoulders), **the research literature shows that added roadway capacity often induces additional VMT and GHG emissions.**<sup>3</sup>[emphasis added]. The SCAG and MTC/ABAG regions added the most in total lane miles, while the KCOG, MCAG, and SACOG regions had the highest per capita lane mile increases from 2016 to 2019, which could increase GHG emissions and VMT in the long term.<sup>4</sup>

A paper entitled “Induced Vehicle Travel in the Environmental Review Process”, published by the National Center for Sustainable Transportation, a US DOT University Transportation Center states:

“ If we expand roadway capacity, more drivers will come, or so economic theory suggests and a substantial body of empirical research now shows. Despite strong evidence, the “induced travel” effect is often ignored, underestimated, or misestimated in the planning process, particularly in the assessment of the environmental impacts of roadway capacity expansions. Underestimating induced travel will generally lead to overestimation of the traffic congestion relief benefits a highway expansion project might generate, along with underestimation of its

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<sup>2</sup> See promotional video Caltrans District 7 proclaiming that widening the 5 Freeway will (starting minute 3:30) "reduce congestion and improve air quality." [https://www.youtube.com/watch?v=QGwS2D\\_WxKk](https://www.youtube.com/watch?v=QGwS2D_WxKk)

<sup>3</sup> S. Handy, M. Boarnet. 2014. Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions. Available at: [https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact\\_of\\_Highway\\_Capacity\\_and\\_Induced\\_Travel\\_on\\_Passenger\\_Vehicle\\_Use\\_and\\_Greenhouse\\_Gas\\_Emissions\\_Policy\\_Brief.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact_of_Highway_Capacity_and_Induced_Travel_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief.pdf)

<sup>4</sup> CA Air Resources Board, 2022 Progress Report | California’s Sustainable Communities and Climate Protection Act, page 13

environmental impacts. A major reason that induced travel tends to be underplayed in environmental analyses is that travel demand models do not typically include all of the feedback loops necessary to accurately predict the induced travel effect. We developed an online tool, based on elasticities reported in the literature, to facilitate the estimation of the induced vehicle travel impacts of roadway capacity expansion projects in California, with potential future expansion to other geographies. We describe the tool, apply it to five case study highway capacity expansion projects, and then compare the results with the induced travel estimates reported in the environmental impact analyses for those projects. Our results suggest that environmental analyses frequently fail to fully capture the induced vehicle travel effects of highway capacity expansion projects.”<sup>5</sup>

It appears that is exactly what has occurred in the EIR/EIS analysis for this project in order to justify its approval.

Further, this incorrect traffic analysis also invalidates the Air Quality and Greenhouse Gas sections as more pollutants will be created over time rather than less.

### **Inadequate Alternative analysis**

Alternatives are important to ensure that the best project is built and that the greatest number of societal needs are met. We have never reviewed an EIR/EIS such as this that provides only for the project itself or no project and believe this is an insufficient level of analysis. We ask that the County provide an appropriate array of alternatives to properly evaluate a project that will reduce impacts in this sensitive area, help meet the County’s climate action goals and reduce VMT and air pollution. They should include:

- A project where no additional lanes are added, but with the addition of a bike and pedestrian lane.
- A project where one additional lane is added that can be reversed with the flow of traffic.
- A project where only the bridge is replaced
- A project that reduces oak construction, especially the historical heritage oak located close to the north west corner of Magic Mountain Parkway and the Old Road.

Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area p.16

### [Wildlife impacts](#)

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<sup>5</sup> Volker, J. M. B., Lee, A. E., & Handy, S. (2020). Induced Vehicle Travel in the Environmental Review Process. *Transportation Research Record*. <https://doi.org/10.1177/0361198120923365>



# Friends of the Santa Clara River

PO Box 7713    Ventura, California 93006    (805) 320-2265  
www.fscr.org

## SCOPE

**Santa Clarita Organization for Planning and the Environment**

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



12-16-24

Los Angeles County Board of Supervisors,  
Los Angeles County Public Works and all approving agencies  
Attention: Ebigalle Voigt  
P.O. Box 1460  
Alhambra, CA 91802-1460

Via e-mail to: Board members and uploaded to Board comment

**RE: The Old Road over Santa Clara River and the Southern Pacific Transportation Company  
Bridge, et al. Project LOS ANGELES COUNTY, CALIFORNIA DISTRICT 7 – LA  
BRLS-5953(601) & STPL-5953(682)  
Draft Environmental Impact Report/ Environmental Assessment Agenda Item 7**

### **Additional Comments Made Under the Revised Notice of Availability**

Dear Sirs and Madams:

The Friends of the Santa Clara River and Santa Clarita Organization for Planning and the Environment (SCOPE) jointly submit the following additional comments. Our members live and recreate in the vicinity of this project and thus have knowledge and standing to make these comments. These comments are timely submitted by the extended NOA date April 18<sup>th</sup>, within the EIR/EA comment period.

We incorporate by reference our previous comments submitted on April 11<sup>th</sup> 2024 and comments made by any resource or air quality agencies or organizations or individuals that expand on our comments.

These comments are based on new information from reports recently supplied to us. We restate our concern that none of the reports listed in the appendix and on which data the information in EIR and EA were based, were circulated with the EIR/EA, precluding accurate review and public input. These reports are apparently only provided upon request and apparently sometimes not even then. (We requested but did not receive the noise report.) **We ask that we be provided all these reports and that a two-week extension of the review period be granted so that we can review them.**

**First, we object to not being informed timely of the release of the final EIR so that we could provide additional comment to this project. A CEQA FEIR (Final Environmental Impact Report)**



requires a "Notice of Availability" to be published, informing the public that the final EIR is available for review and that a public hearing will be held to certify the EIR and potentially approve the project; this notice must be distributed to all agencies and individuals who commented on the Draft EIR during the public review period. We did not receive this notice.

### **Inaccurate traffic Analysis in Air Quality Report Leading to an Inaccurate conformity report**

The Air Quality Report with which we were provided only two days ago) was not circulated with the EIR/EA and not included on the website. It was not available until requested. Upon receipt of the report, purported to be the basis for data in the Consistency Analysis, we noted that it was unsigned and that there was no review date or reviewer signature. Was this report reviewed for accuracy as required? It is unusual for a Consulting firm to submit a report without a verifying signature.

The Air Quality report and therefor the Conformity Analysis both state that passenger traffic on the proposed project segment of the Old Road is mainly generated by Magic Mountain. This is completely incorrect. Amusement park attendees exit from either direction on Magic Mountain Parkway, which then leads directly into the park. Directions on the Six Flags Magic Mountain website for travelers from all localities and from both north and south state "Exit Magic Mountain Parkway. Turn left at the traffic signal at the bottom of the exit ramp going under the Freeway overpass. Proceed along Magic Mountain Parkway to the parking toll booths and the Park entrances."<sup>1</sup> There is no direction given to turn right onto the Old Road, and in fact doing so is out of the way and would require turning around. Only employees that access the park's northerly parking lots would use the Old Road for a short distance. But this portion of the Old Road was already expanded to three lanes many years ago as a result of the I-5/ Magic Mountain interchange upgrade.

In fact, the traffic on this section on the Old Road comes mainly from employees and trucks having to utilize the Old Road to access the western end of the Valencia industrial park via Rye Canyon Rd or employees having to access to back parking lot on Sky View drive (as noted in the report<sup>2</sup>. (See project map for these locations.) This fact is verified by the actual traffic study data in Table 1-2, page 6 of the Air Quality report done in 2018, though it is probably less now as stated in the report. Traffic on the Old Road is therefore usually scant except during commuting hours. (see picture on right, aerial by Daily News, March 18<sup>th</sup>, 2024). While the report estimates massive traffic increases, some of this will not occur. Traffic generated by Six Flags employees at Sky View (accessed by less than .1 miles on the Old Road from Magic Mountain Parkway) will not increase without park expansion, which is a limited possibility. That is also true of the Valencia Industrial Center. There are no nearby residents (see aerial photo in project location descript, and no local streets where traffic is causing congestion because this segment of the Old Road is mostly located next to empty fields. (See Project aerial, on the cover of the Air Quality report.) This information is not included in the project location description.



So, the question is, where is all this future traffic supposedly coming from? The EIR/EIS is quiet on this issue. It states that it is from SCAG "projected growth" However several large

<sup>1</sup> <https://www.sixflags.com/magicmountain/plan-your-visit/directions>

projects in the area have been delayed or withdrawn or would not be accessed by this expansion (i.e., Landmark Village, requested tract map delay to 2028, Entrada project withdrawn, see attachment 1). This project seems to be growth inducing. A chapter discussing growth inducement should be included in the EIR/EA

The project description also failed to mention that the I-5 is currently being expanded by two lanes, one in each direction, in this same area.<sup>3</sup> This project began many years ago and so may not have been subject to more recent air quality and greenhouse gas analysis required today.

The Conformity Analysis and Air Quality Report fail to mention numerous sources of truck traffic, including the Chiquita Canyon Landfill, the Valencia Sanitation Plant expansion and numerous now existing ware houses, and others that are for lease in the project location description. We surmise that this may have been an effort to support the report's low truck traffic analysis in order to avoid identifying it as a Project of Air Quality Concern requiring a Hot Spot Analysis.

The Conformity Analysis is based on a traffic analysis in the Air Quality Report that was completed in 2018<sup>4</sup>. While it is true that 2018 would give a more accurate traffic count for passenger vehicles where traffic was severely reduced during Covid, it is not accurate for truck traffic. Several warehouses<sup>5</sup> and a major expansion of the Chiquita Canyon Landfill which receives 90% of its diesel truck trash deliveries from elsewhere in Los Angeles County and Southern California – see diagram at right obtained from the Los Angeles County Department of Public Works website) and Valencia Sanitation plant were approved or built after that date and would not have been reflected in in the 2018 data, especially truck data. The Los Angeles County Department of Public Works is aware and has records of these approvals, since their office is involved in the permit process. We include records of these projects by reference and will produce them upon request. Failure to list these nearby projects that create diesel PM10 and PM2.5 emissions is an EIR/EA deficiency.

Report Period: December 2023  
Average Disposed: 6,322.02 Tons per Day



The Air Quality Report appears to have substantially understated truck traffic trips by choosing to obtain data from a single off ramp exiting from the Southbound direction to the Industrial Center<sup>6</sup> when the greater amount of traffic would be heading northbound from other areas in Los Angeles and the Port, and exiting at Magic Mountain, then turning right to access the Valencia Industrial area or proceeding to the Sanitation Plant, the Commerce Center, the commercial furniture store, the fire station and/or the Chiquita Landfill. Thus, the report was able, by using the 2018 date and a less used off-ramp, to substantially underestimate diesel truck traffic and avoid a Project of Air Quality Concern designation.

<sup>3</sup> <https://www.metro.net/projects/i-5-enhancements/>

<sup>4</sup> Air Quality Report, page 6 See note 1

<sup>5</sup> 104 warehouse listings in area at the time of writing this comment letter, see website:

<https://www.propertyshark.com/cre/industrial/us/ca/santa-clarita/valencia/?IncludeCoworking=false&CoworkingWorkspaceTypes=0&MapView=True&Zoom=10&Viewport=-119.18794389756575,34.217071697858586,-118.37495561631575,34.62037087129809&GeopickerType=viewport>

<sup>6</sup> Air Quality Report, page 6 See note 2

While some of this truck traffic may prefer to use the I-5 because it is faster now, if the Old Road is expanded and traffic speeds increased to 60 miles per hour as proposed, these trucks will undoubtedly find it shorter and faster to use the Old Road, thus substantially increasing diesel pollution on this road.

**We therefore request that an updated and accurate Air Quality Report be provided and re-circulated to all interested parties, along with a corrected Air Quality and traffic Analysis.**

### **Need for a Hot Spot Analysis**

A hot spot analysis for this project was not completed, however a hot spot analysis under 40 Code of Federal Regulations 93.123(b)—PM10 and PM2.5 Hot Spots, for the following reasons:

- The project is in a non-attainment zone for PM2.5 and Pm10.
- The project is longer than 1 mile (it is 2.2 miles).
- The Old Road is designated as a Major Highway under the County of Los Angeles General Plan, Mobility Element therefore this project is an expansion of a major highway<sup>7</sup>. The Conformity Analysis is itself internally inconsistent where it states on page one that a goal of the project is to conform with the Mobility Element which designates the Old Road as a Major Highway, but then states on page 3 regarding the need for a Hot Spot Analysis, that is not needed because the Old Road is not a ***not a major highway***.
- This is an expanded highway project that will have a significant increase in the number of diesel vehicles. Neither the Consistency Analysis nor the Air Quality Report currently state this, but we believe that is due to an incorrect traffic analysis using a traffic study location with lower truck counts and failure to identify nearby facilities using diesel trucks as described above. This must be corrected.
- When the facts above that were undisclosed in the EIR/EA and air quality report, are corrected and re-circulated, we believe that the data will show that this must be considered a project of air quality concern and requires a Hot Spot Analysis.

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### **Climate Change and GHG generation by the proposed project**

We continue to believe as stated in our previous comment letter, that this project fails to evaluate the “induced demand” as required by CalTrans guidelines, thus underestimating the VMT which in turn resulting in an underestimation of the GHG generation and air quality effects.

Table 3-1 (Page 379) in this section lists several reports that address GHG reduction strategies. **None of these strategies include adding additional traffic lanes.**

On December 15, 2022 California's air board unanimously approved a sweeping state plan to battle climate change, creating a new blueprint for the next five years to cut carbon emissions, reduce reliance on fossil fuels and speed up the transition to renewable energy. Yet this plan is nowhere mentioned in the current EIR/EA. We believe that omission is due to this documents non-conformance with that plan.

The EIR/EA also leaves out several sources of GHG. These must be calculated and included in the analysis and mitigation. They include but are not limited to:

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<sup>7</sup> Air Quality Report page 3, lists one of the purposes of the project “To be consistent with the Los Angeles County Mobility Element, which identifies The Old Road as a 6-lane ***major highway***.” [emphasis added]

- The additional concrete<sup>8</sup> that will be required to replace bridge abutments and pavement. (The EIR states that Implementation of the Build Alternative would result in a net increase of approximately 43 acres of impervious area, a substantial amount in addition to the replacement of current paving. p.16)
- The removal of 18 oaks<sup>9</sup>. Please calculate the loss of carbon sequestration provided by these trees. Young trees do not replace to sequestration value of older trees.
- Additional diesel truck trips that will be enabled by the lane expansion and the increasing the speed limit to 60 miles per hour.

We do not concur with the conclusion on EIR/EA page 388 that no operational mitigation for Air Quality or GHG is not required because the full impact as described above has not been calculated. Further, the failure to calculate induced demand which will increase VMT may require additional mitigation for project impacts beyond operational impacts, but we cannot know this because the data was not included in the EIR. **These issues must be addressed.**

### Biological Impacts

We note again that both USFWS and CDFW are cooperating agencies on this draft EIR/EA, and urge CalTrans and County Public Works to ensure that these agencies are given full license to enforce restrictions that protect and benefit the essential wildlife flora and fauna of Santa Clara River We hope that they were not simply added as token checkboxes on legal requirements. We understand that consultation will be required under the Endangered Species Act.

The increasing reduction of freedom of movement for air, water and terrestrial animals is already causing risk to wildlife species health, biodiversity, and for an increasing number pushed to the point of extinction. The Santa Clara River is a major wildlife corridor. We urge CalTrans and Department of Public Works to abide by recent laws including SB790, Stern 2021.

While the EIR/EA preparer attached a letter from USFW Ventura Office in Appendix F that provides a list of endangered species in the area, it did not include the recent U.S. Fish and Wildlife Proposal to list both Species of Western Pond Turtle under the Endangered Species Act.<sup>10</sup> The southwestern pond turtle may occur in the project area.

#### Oaks

Oaks are an important and beloved native species, that are protected by County and City of Santa Clarita Ordinances. The project proposes to remove 18 oaks, mostly rare Valley Oaks, including two heritage oaks estimated to be over 300 years old. Yet no map of the oak trees to be removed was included in the EIR/EA so that avoidance suggestions by the public can be made. Although the EIR/EA states that an oak report was completed in 2019, it is not included in the Appendix as is the normal practice. We requested and received this report prior to making these additional comments. However, the report is deficient in that it doesn't provide a map of the oaks, the location of the oaks to be removed and photographs of the individual trees, all information normally included in oak reports and required for the County permitting

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<sup>8</sup> The chemical reactions involved produce even more carbon dioxide as a by-product. Making one kilogram of cement sends one kilogram of CO<sub>2</sub> into the atmosphere. Worldwide every year cement and concrete production generates as much as 9 percent of all human CO<sub>2</sub> emissions. Scientific American, Feb 1, 2023  
<https://www.scientificamerican.com/article/solving-cements-massive-carbon-problem/>

<sup>9</sup> In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove CO<sub>2</sub> from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter. EIR at page 386

<sup>10</sup> <https://www.fws.gov/press-release/2024-04/us-fish-and-wildlife-service-reopens-public-comment-period-proposal-list-both>

process. Thus, we cannot know if the report accurately discloses all oaks. This failure also precludes the public's ability to make suggestions as to avoidance. Additionally, we believe this report may have been completed for a different project since it was completed well before the signed 2022 MOU and is not included in the list of Technical Reports in Appendix B. There is no indication that any oak tree permits have been issued as required by the County for oak removals, nor has a hearing been scheduled for removal of heritage oaks as required by the County Oak Ordinance.

- **Failure to provide meaningful information about these important and rare trees to be removed from a County designated Significant Ecological Area is an EIR/EA deficiency.**

We maintain that more traffic will also have additional impacts to the vegetation, specifically trees in the river channel from the lane widening. Native Californian riparian and oak woodland trees play a vital role in the health of our floodplains. Phytoremediation, the benefit that trees give our climate by cleaning air, soil and water is lessened by a greater load than they can tolerate. They clean our air and balance climate via their contribution to the passage of air and water through the Santa Clara River riparian corridor and are an essential part of the river and the wildlife that have called it home for thousands of years.<sup>11</sup>

### **Fish, Birds**

The site is home to two listed endangered fish., the Unarmored Three-spined Stickleback and the Arroyo Chub. It may be the last population of UTS in existence. These species are affected by silted water and other water pollution, and of course would be exterminated by dewatering in the area. The EIR/EA does not fully discuss impacts to these endangered fish and how they will be protected if project construction proceeds.

This area is an identified nesting area for the Least Bell's Vireo and Willow Flycatcher, migratory birds that will require special mitigation to protect.

### **Other Reptiles, amphibians and plants**

We are concerned that surveys for these species did not follow required protocols since the EIR/EA does not fully disclose time of day and appears to rely on surveys only done in 2023. There is existing literature from other EIRs in the County's possession which indicate the presence of other listed species. We are particularly concerned about the pond turtle, whose status was just re-opened for review, since we don't see surveys for it in the document.

SouthCoast Wildlands, "Wildlands of the Santa Clara River<sup>12</sup>" can be accessed for locations of some of these animals.

The reach of the Santa Clara River over which this project passes, is not in isolation. Negative human effects on its ecology in this stretch, continue downstream and cause animals upstream to be disconnected. In addition to the species mentioned by USFWS, 25% of California's endemic plant species are in found in this region. Some may not yet be listed as threatened or endangered but only due to the fact that investment in studies is not as great as investment in human transportation or consumption needs. It is very likely that many plants, native to this area of the Santa Clara River are either no longer present or in swift decline. This rich native biodiversity is not limited only to plants, it is a system of animals, insects, watershed hydrogeology and climate.

Projects such as widening a lane of traffic from 2 to 3 lanes, may seem like an insignificant addition; but, in fact it is a part of the slow destruction of our natural ecological systems. We

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<sup>11</sup> California Department of Food and Agriculture, 3288 Meadowview Road, Sacramento, CA 95832, USA.)

<sup>12</sup> <http://www.scwildlands.org/reports/wildlandsofthescrwatershed.pdf>

are putting one of the richest areas of biodiversity in the world at risk. This biodiversity is not limited to only plants, it is a system of animals, insects, hydrogeology and more. Adding more and more opportunity for human sprawl that requires infrastructure to support cars, chemicals, use of natural resources to make and power them is the definition of how to endanger all these aspects of ecological diversity which ultimately harms humans too. Once this is gone, it is gone. Rivers themselves are becoming endangered. The Santa Clara River is already the Southern California's largest river system that remains in a relatively natural state. Relatively here, is a vital word. All conservation measures are needed to not only maintain that but more vitally, restore its ecological health and protection. Mitigation for this proposed work cannot be the simple pass for impacts that can damage more than mitigation may be able to rehabilitate.

### **Conclusion**

As stated in our first letter, we oppose the lane additions proposed by this project because they will only serve to increase traffic impacts in future years through "Induced Demand", an impact which was not discussed in the EIR/EA. Additionally the project may not be needed at this time or at all due to reduced traffic. A new and more accurate traffic study and air quality analysis should be conducted.

The project will have severe biological impacts to endangered species in the area of the Santa Clara River which is also a County Significant Ecological area. The number of heritage and rare Valley Oaks slated for removal is unacceptable.

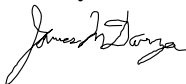
We believe this project is required to prepare and provide a Hot Spot Analysis for the reasons stated.

We request that these deficiencies be address and a new document recirculated. The new document should include a broader range of alternatives as well as the missing information that is normally provided in environmental documents, including but not limited to the initial study and the comment letters from agencies and the public on the Notice of Preparation, along with the technical reports that were listed, but not provided, in the Appendices.

Last, we do not think an EA was the appropriate Federal document for a project such as this based on the number of endangered species and the extent of the potential impacts on those species. Compliance with NEPA would require an EIS.

We look forward to working with the agencies to make this a better project.

Sincerely,



James M. Danza, MS, AICP  
Chair, Friends of the Santa Clara River



Lynne Plambeck, President  
Santa Clarita Organization for Planning and the Environment

# ATTACHMENT 1



January 24, 2023

Timothy Stapleton  
Principal Planner  
**LOS ANGELES COUNTY**  
**Department of Regional Planning**  
320 W. Temple Street, 13th Floor  
LOS ANGELES, CA 90012

SUB: VTTM 071377 Entrada North – Application Withdrawal

DEAR TIMOTHY,

We are in receipt of your notice regarding the inactivity of Project No. R2013-02833-(5) / Tentative Tract Map 071377. This letter is being sent to formally request the withdrawal of this case, as well as the associated entitlements below:

- CUP No. 201300151
- OTP No 201300036
- Parking Permit No 201300010

If you have any questions, please feel free to contact me at 661-255-4449.

Sincerely,

A handwritten signature in cursive script that reads "Alex Herrell".

Alex Herrell  
Vice President Entitlements  
The Newhall Land and Farming Company,  
a Subsidiary of Five Point Operating Company, LP

cc: Joshua Huntington



SEPTEMBER 13, 2022

FIVEPOINT  
25124 SPRINGFIELD COURT  
VALENCIA, CA 91355  
ATTN: ALEX HERRELL (ALEX.HERRELL@FIVEPOINT.COM)

Dear Mr. Herrell:


**PROJECT NO. 00-196-(5)  
VESTING TENTATIVE TRACT MAP NO. 53108-(5)  
NORTH OF THE SANTA CLARA RIVER AND WEST OF INTERSTATE 5  
NEWHALL ZONED DISTRICT  
TENTATIVE MAP EXPIRATION DATE DETERMINATION**

Your request for review and approval of additional time per Government Code Section 66452.6(a)(1) for an automatic extension of four (4) years for the recordation of Large Lot Parcel Map No. 82033 (July 6, 2022) has been reviewed and approved.

As noted in your request, the expiration date of Vesting Tentative Tract Map No. 53108-(5) was August 17, 2022. Discretionary Time Extensions 1 and 2 were approved by County Hearing Officer on July 19, 2022, extending the expiration date to August 17, 2024. The recordation of Large Lot Parcel Map No. 82033 and the obligation for off-site improvements pursuant to Government Code Section 66452.6(a)(1), authorizes an additional four (4) years to **August 17, 2028**. Additionally, at this time, four additional discretionary time extensions remain.

For questions or additional information, please contact Timothy Stapleton of the Subdivisions Section at (213) 974-6433, or by email at [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov). Our office hours are Monday through Thursday, 7:30 a.m. to 5:30 p.m. We are closed on Fridays.

Sincerely,



AMY J. BODEK, AICP  
Director of Regional Planning

AJB:DD:JH:TMS

K\_CP\_09.13.2022\_L\_PROJECT\_NO\_00-196-(5)\_ALEX HERRELL