



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

Correspondence Received

MEMBERS OF THE BOARD

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HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
Grand Total			0	

September 15, 2025

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Erica G. Aguirre
Principal Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Via U.S. Mail and email to EAguirre@planning.lacounty.gov

Re: Comments on the Draft Environmental Impact Report for the Trails at Lyons Canyon Project, SCH No. 2022060346

Dear Ms. Aguirre:

Advocates for the Environment submits the comments in this letter regarding the proposed Trails at Lyons Canyon Project (**Project**), located west of The Old Road and south of Sagecrest Circle in the unincorporated Los Angeles County (**County**). This Project proposes to construct 510 dwelling units with a mix of attached and detached for-sale condominium units, among other developments on the 233.49-acre Project Site.

We are a non-profit public-interest law firm that uses environmental law to improve the environment in California. We previously submitted comments regarding the Project on February 5, 2025. We have reviewed the Environmental Impact Report (**DEIR**) released in December 2024 and Final EIR released in July 2025, and submit comments regarding the sufficiency of the EIR's analysis under the California Environmental Quality Act (**CEQA**). The comments in this letter expand upon our original comment letter and are intended to supplement, but not replace, comments that were previously submitted to the County regarding this Project.

Inadequate Transportation Analysis

With the adoption of Senate Bill 743, the use of Vehicle Miles Traveled (**VTM**) became the mandatory method of CEQA traffic analysis, replacing the previous Level of Service (**LOS**) analysis. CEQA (Public Resources Code) § 21099(b)(2) prohibits considering LOS a significant impact. In contradiction of this restriction, the transportation impact methodology utilized a combination of LOS and VMT analysis, at least partially relying on LOS to form its significance determination. (DEIR, p. 4.17-10.) The County also inappropriately relied upon a LOS traffic analysis in Attachment B to the FEIR, "Additional Transportation Analysis." It was improper for the analysis to take LOS into account in the determination of the Project's transportation impact.

Further, the determination that it would be infeasible to implement more mitigation for the transportation impact was not supported by substantial evidence. The EIR determined that the mitigation measures for a Construction Traffic Management Plan (MM-4.17-1) and Transportation Demand Management (TDM) Program (MM-4.17-2) would be insufficient to reduce the Project's transportation impact to a less-than-significant level. Instead of considering additional mitigation to reduce the significant transportation impact found, the EIR concluded that the Project's impact would be significant and unavoidable.

However, when a lead agency determines that an impact would be significant, it is required to adopt the maximum feasible mitigation to reduce the impact to a less-than-significant level. Here, the County did not provide substantial evidence that further mitigation would be infeasible, nor did it consider any other mitigation measures to reduce the identified significant impact. There are other mitigation measures that could further reduce VMT, including, but not limited to: reducing the size or scope of the Project to reduce vehicle trips, improving walkability by adding sidewalks and other pedestrian infrastructure, and providing on-site amenities to reduce car trips.

Inadequate Analysis of Potential Flood Hazard Zone

The EIR's analysis of Threshold 4.10g under the Hydrology and Water Quality analysis was flawed and overly conclusory, without substantial evidence to support that any potential impact would be adequately avoided or mitigated. The Project would be constructed in a known flood hazard zone. The DEIR stated that "the property would be developed to remove the developed area from the Zone A and eliminate hazards associated with a flood zone." (DEIR, p. 4.10-38.) However, it does not provide any evidence to support the contention that development areas outside of Zone A would have less-than-significant impacts and that hazards would be eliminated to the degree necessary.

The Hydrology and Water Quality Analysis violated CEQA because the County did not support its findings of less than significant impact with substantial evidence, and the mitigation measures were improperly deferred. Further, the flood hazard analysis was not made with consideration of the increased impact of climate change on flooding, which is a reasonably foreseeable impact. Although a flood in a 100-year flood zone may be unlikely to occur or create environmental hazards on this project site, climate change exacerbates flooding risk and damage. Floods that previously would have a one-in-one-hundred chance of occurring each year are likely to occur more often now, due to climate change. This increase in probability was not accounted for in the EIR.

Inadequate Consideration of the Potential Impact of Flooding on Water Quality

There is evidence that the Project could result in substantial erosion and surface runoff from site flooding. With grading activities and removal of vegetation, soil becomes highly susceptible to erosion. This already high erosion risk caused by the Project's development is exacerbated by the fact that the Project Site could be impacted by on-site or nearby flooding.

Special Flood Hazard Areas (SFHAs) are 100-year flood zones with flood elevation levels of one foot or higher. 27 acres of the Project site are located in an SFHA, with the remainder of the site designated as either Zone D (possible flood hazard), or Zone X, characterized by "low risk of flooding." (DEIR, p. 4.10-5.) But the County failed to adequately analyze the risks of flooding in Zone D or Zone X, which, although low probability, would still carry a foreseeable environmental harm due to the Project.

Flood Zone X is defined as either: (1) a 100-year flood zone of depths less than one foot; (2) having drainage areas of less than 1 square mile; (3) protected from the 1% flood risk by levees; or otherwise (3) a 500-year flood zone.¹ Which means that even in areas designated as Zone X, there could still be a 1% annual risk of flooding on the Project site, although at lower flood elevations. While the flood elevation does impact potential flood damage, erosion can occur or be aggravated by rainfall alone, and being near a flood zone substantially increases the risk and extent of erosion on the Project Site and nearby communities. This would also increase the risk of surface runoff and associated water pollution.

The EIR did not acknowledge the potential flood concerns of the region as it pertains to erosion, nor did it adequately discuss the long-term impact of vegetation removal on increased erosion. It analysed only the immediate construction grading impact. The County did not propose any mitigation measures for the potential hydrology and water impact because it understated the potential impact of runoff and erosion, stating that the construction Best Management Practices (BMPs) would be sufficient to reduce erosion and runoff. While BMPs could reduce immediate discharge and dust creation, once vegetation is removed for grading, the stability of the soil decreases and there is a lasting risk of erosion and runoff that was not accounted for in the EIR.

Inadequate Analysis and Mitigation of Potential impact to the Mountain Lion

The EIR included an overly narrow analysis on the impact to the mountain lion. Despite being located in known mountain lion habitat and evidence of on-site mountain lion activity, the

¹ City of Lancaster Flood Map, downloaded from Federal Emergency Management Agency (FEMA) at <https://msc.fema.gov/portal/home>. Search: "Lancaster." Download Firm Panel 06037C0420F eff. 9/26/2008. [Defining Zone X and illustrating the flood zones in the area surrounding the Project Site.]

County found a less-than-significant impact based on the assumption that mountain lions are not expected to establish dens in the Project site due to proximity to existing human presence. While this may be true, it is a short-sighted framework of analysis that fails to see the full scope of development Projects like this one on mountain lion resources, habitat, and well-being.

This analysis also ignores the impact on non-reproducing mountain lions, which maintain distances four times closer to human habitat than females, and are likely the reason why evidence of mountain lions was found on the Project site despite proximity to existing neighborhoods. Regardless of the Project site's suitability for dens, mountain lions are currently present on the Project site. the EIR did not include adequate mitigation to reduce these impacts because it focused primarily on impact to breeding females rather than the Project's impacts on the entire population.

Moreover, the idea that female mountain lions will not establish dens near the Project Site, which the EIR identifies as evidence of reduced impact, may actually demonstrate continued and worsened impact to the local mountain lion population as individual mountain lions are forced further away from their habitat. Human encroachment is a major impact of development on mountain lions.² The EIR only considered direct harm to mountain lions, such as destruction of on-site habitat, rather than the even greater risk of harm from off-site habitat becoming unsuitable due to new proximity to human activity. The EIR's mountain lion survey, which only studied the Project site and not surrounding areas, acknowledged current mountain lion presence, as evidenced by tracks and scat throughout the Project site. The EIR also noted that reproductive females keep young in dens 600 meters from human disturbance such as roads and development.

The EIR acknowledged the Project would potentially divide a habitat corridor, which it adopted partial mitigation to address, but failed to consider that the Project development itself would also push back and reduce available mountain lion territory. The lack of dens on the Project site and low likelihood of new dens due to nearby existing neighborhoods does not demonstrate that mountain lion habitat would not be significantly impacted by the Project.

The undeveloped areas surrounding the proposed Project site, available for use as habitat and dens, may be abandoned by mountain lions due to increased proximity to development as a direct result of this Project. Thus, the mountain lion study should have increased the geographical scope to adequately account for the nature of mountain lion impact which extends at least 600 meters beyond the site itself, rather than solely focus on the Project site.

² Conservation Mag, "Protecting Southern California's Mountain Lions," https://conservationmag.org/en/wildlife/protecting-southern-californias-mountain-lions-battling-human-encroachment#google_vignette, accessed September 11, 2025.

Additionally, the EIR failed to adequately consider the impact of artificial lighting on mountain lions. The EIR briefly mentioned the impact of lighting on mammals generally, stating that mitigation measure MM-4.4-12 would adequately reduce this potential impact to the less-than-significant extent. MM-4.4-12 would “provide a lighting plan that would adhere to the Rural Outdoor Lighting District requirements.” (DEIR, p. 4.4-50.)

However, this does nothing to reduce indoor lighting at night, which is one contributing factor to mountain lions avoiding certain areas, including habitat that would otherwise be suitable. One study demonstrated that mountain lions generally avoid proximity within 500 meters of artificial lighting at night.³ Accordingly, this Project may disrupt and make unsuitable not only the habitat available on the project site, but also the surrounding 500 meters from any artificial lighting associated with the Project. MM-4.4-12 would be insufficient to reduce this impact, and the County should have considered additional mitigation for this impact.

Greenhouse Gas Threshold Not Supported by Substantial Evidence

The EIR relies on a GHG significance threshold of 2.42 metric tons per service population (MT/SP) that it claims was adopted as part of the Los Angeles County 2045 Climate Action Plan (CAP).⁴ That number does not appear in the CAP. It is calculated by dividing the purported target emissions for Los Angeles County in the year 2029 (3,466,190) by the estimated 2029 service population. (DEIR, p. 4.8-26, Table 4.8-5.) The EIR provides no rationale for the choice of the year 2029 for this calculation. Perhaps it was chosen because it’s the year that the Applicant expects to finish constructing the Project.

Emissions and emission targets are declining every year, but the Project’s GHG emissions will remain the same every year. The Project will probably be in operation for 30 years or more, so at some point after 2029, the Project’s emissions will exceed the efficiency metric. For example, the CAP’s target for 2035 is to reduce GHG emissions 50 percent below 2015 levels. (CAP, p. 2-10.) This would be a total of 2,765,578.⁵ If the service population stays the same, the Efficiency metric would be 1.93 MT/SP.⁶ The Project’s efficiency metric of 2.29 MT/SP (FEIR, p. 3-48) would substantially exceed this figure. The CAP also has an “aspirational goal” that the county will be carbon-neutral in 2045. (CAP, p. 2-10.) The Project will not be consistent with this goal, either.

³ Barrientos, et al, “Nearby night lighting, rather than sky glow, is associated with habitat selection by a top predator in human-dominated landscapes,” *Phil. Trans. R. Soc. B* 378: 20220370.
<https://doi.org/10.1098/rstb.2022.0370>, available at:

<https://pmc.ncbi.nlm.nih.gov/articles/PMC10613539/pdf/rstb.2022.0370.pdf>

⁴ https://planning.lacounty.gov/wp-content/uploads/2024/07/gp_2045_Climate_Action_Plan_June-2024.pdf

⁵ 2015 GHG emissions (CAP p. 2-8) of 5,531,155 * 50% = 2,765,578.

⁶ 2,765,578 / 1,432,169 = 1.93.

The Project's GHG emissions are significant when the Project's expected lifetime is taken into effect.

Underestimation of Wildfire Severity and Hazards

A lead agency is required to analyze and apply current scientific understanding as part of the substantial evidence standard. It is scientifically well accepted that climate change exacerbates the risks and severity of wildfires.⁷ However, the baseline fire risk used in the EIR averaged data which spans to the late 1800s, and had data limitations. (DEIR, p. 4.20-4.) Although future projections with climate change in mind may be too speculative to quantify, the EIR should have at least acknowledged the increased risk and hazards that are likely to occur beyond what can be inferred from historical data, especially because the data was averaged across such a long time span.

The EIR should have relied upon more recent fire data which could more accurately reflect the likelihood of fires in the region, both with and without the Project. Although the EIR considered the increased risk of fire due to new residents in the area, the likelihood that human activities would lead to wildfire was not adequately considered because the EIR did not take into account climate change as a factor for increasing the likelihood that human activity would lead to a severe and long-lasting fire.

Under Threshold 4.20e (Would the Project "expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?" DEIR p. 4.20-20), the EIR should have analyzed the increase in wildfire risk outside the Project's boundaries caused by the Project. It violated CEQA by failing to do so.

Failure to Account for Fire-related Particulate Matter in Air quality Analysis

One potential environmental impact of this project is increased wildfire impact, as discussed in the previous section of this comment letter. Wildfires increase particulate matter, which is a harmful air pollutant.⁸ The air quality hazards created by increased duration, severity,

⁷ See the following resources that support this contention: CARB, "Wildfires & Climate Change," <https://ww2.arb.ca.gov/wildfires-climate-change>, accessed September 11, 2025; World Weather Attribution, "Climate change increased the likelihood of wildfire disaster in highly exposed Los Angeles Area," <https://www.worldweatherattribution.org/climate-change-increased-the-likelihood-of-wildfire-disaster-in-highly-exposed-los-angeles-area/>, accessed September 11, 2025; UCLA, "Climate Change a Factor in Unprecedented LA Fires," <https://sustainablela.ucla.edu/2025lawildfires>, accessed September 11, 2025.

⁸ EPA, "California Prepares for Increased Wildfire Risk to Air Quality," <https://www.epa.gov/arc-x/california-prepares-increased-wildfire-risk-air-quality>, accessed September 11, 2025.

intensity, and prevalence of wildfires that would be caused by this project were not addressed in the air quality analysis section.

Insufficient Range of Reasonable Alternatives

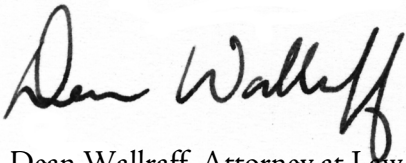
CEQA requires an EIR to “describe a range of reasonable alternatives” to “avoid or substantially lessen any of the significant effects of the project.” (14 CFR §15126.6.) The EIR determined that the Project would have a significant transportation impact. The County, as the lead agency, was required to conduct an adequate analysis of project alternatives that would reduce this significant impact. Only three alternatives were meaningfully considered, including a no project alternative, and three alternatives were rejected for infeasibility.

In the revisions to the EIR, the County indicated that the previously approved project has expired, rendering it an infeasible project alternative. Thus, there are even fewer alternatives considered to reduce the Project’s impact. Additionally, the County rejected the alternative for elimination of VMT significant impact based on the determination that there were only limited scenarios which could achieve a less-than-significant transportation impact, none of which would meet the basic Project objectives. (DEIR, p. 6-26.) However, the inclusion of this alternative sets up an all-or-nothing option, presenting an extreme and undesirable version of the Project without meaningfully considering an adequate and reasonable range of alternatives that would reduce VMT by any extent.

Conclusion

For the reasons given in this letter, the EIR is not in conformance with CEQA requirements. Notably, the EIR failed as an informational document for decision makers and the public, the significance analysis was inadequate, proposed mitigation measures were inadequate, and the County should have mitigated the Project’s impacts to the extent required by CEQA. We previously made a request under Public Resources Code, section 21092.2 to be put on the interest list. Please continue to keep me updated on the status and progress of this potential project approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Wallraff", is written over a light blue rectangular background.

Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment