

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



10-28-14

Tyler Montgomery
LA County Dept. of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Via email to tmontgomery@planning.lacounty.gov

Re: Notice of Preparation for Adlin Project # 00-136, VTT 52796 and associated approvals

Dear Mr. Montgomery:

Thank you for the opportunity to comment on this project. We request that we be provided a CD of the EIR when it is released.

First we note that, on your list of parties to be notified, the Friends of the Santa Clara River (660 Randy Dr., Newbury Park, 91320) is not listed. We urge you to ensure that they are notified of this project, since they have been involved in projects proposed for the watershed of Pico Creek.

While we generally concur with the findings of the initial study and the discussion areas proposed for the EIR, we believe that the initial study erroneously concluded that there would be no impact to water supply.

We are now in the third year of a drought that has impacted the entire state. The Santa Clarita Valley is currently under drought restriction water rationing that requires all residents to cut back on their water usage by 20%. It is hard to understand how the water agencies, especially Castaic Lake Water Agency, can have accurately projected sufficient water supplies, if we now must cut back while having less than HALF the population anticipated in the general plan update. One can only conclude that the modeling is inaccurate and must be re-evaluated. The water information in the Initial Study does not correctly describe this situation. The EIR should thoroughly address the water supply availability in the Santa Clarita Valley.

Neither has CLWA accurately disclosed the spread of the ammonium perchlorate pollution plume that has caused the closure of two additional water supply wells, V201 and V205. Both these wells previously supplied water to the Valencia Service area identified as the supplier for this project. Therefore a current Water Supply Assessment for this project should be requested and reviewed for accuracy by a County planner familiar with water issues. The issue of drinking water supply pollution by ammonium perchlorate and VOCs must be thoroughly addressed in the EIR. All well closures and the reduction in supply due to the closures should be included in the EIR. Any spread of the pollution plume that is being caused by continued pumping should be discussed.

Further, the Adlin project appears to be outside the service territory of both Castaic Lake Water Agency and Valencia Water Co. Castaic Lake Water Agency illegally acquired Valencia Water Company by means of an eminent domain proceeding in 2012 without receiving permission to expand their service area from the legislature as required by their enabling legislation. This acquisition is now under Court challenge. Certain other statutes were also violated so that ownership and regulatory oversight of Valencia Water Co. is now in doubt. Due to these facts, the California Public Utilities Commission revoked Valencia's Certificate of Public Convenience and Necessity. It is now unclear who has regulatory oversight of this agency and how water service to new customers will be provided. This issue must be addressed before any approvals relying on water service from Valencia Water Co. are granted. (CPUC Decision attached as Exhibit 1))

Other Areas of Concern Listed in the NOP

We believe the NOP accurately reflects the other areas of concern including high fire hazard impacts, biological impacts, development in an SEA, traffic, etc. We especially request that surveys for threatened and endangered species present in the area be conducted along the blue line streams. Avoidance of any impacts to blue line streams is the preferable alternative. We oppose further incursions into fire hazard areas not only because of the danger to future residents, but also due to the cost of defending such residents from the likely increased occurrence of wildfires. We believe the county must provide a cost of services study for such future development and begin to generate fees to ensure that adequate financing of fire services can be provided, if housing is permitted in such areas.

Thanks you for considering our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne Plambeck".

Lynne Plambeck
President

Attachment Decision, CPUC, Feb 27th, 2014