

**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



4-7- 15

Mr. Kim Szalay, Special Projects Section  
Department of Regional Planning, County of Los Angeles  
320 W. Temple Street, Room 1362  
Los Angeles, CA 90012  
Fax: (213) 626-0434 Email: specialprojects@planning.lacounty.gov

*Delivered via email*

Re: Comments on NOP for Entrada North, Project No. R2013-02833, Vesting Tentative Tract Map No. 071377, Conditional Use Permit No. 201300151, Oak Tree Permit No. 201300036 Parking Permit No. 201300010, Environmental Review No. 201300241

Dear Sirs:

Santa Clarita Organization for Planning and the Environment (SCOPE) is a California non-profit corporation focused on the Santa Clarita Valley and the watershed of the Santa Clara River. Founded in 1987, we are entering our 28<sup>th</sup> year of volunteer work for the environment in Santa Clarita.

**The Project**

This project will authorize subdivision of the Project Site into 4 multi-family lots for 780 condominiums; 20 mixed-use lots for 370 residential units and 975,000 square feet of commercial uses; 55 commercial lots for a total of 1,649,400 square feet of commercial uses; 1 public facility lot. It will also (a) development within a Significant Ecological Area (SEA-23) for proposed improvements including bank stabilization, and development for Planning Area PA-8C; and development within a Hillside Management Area as areas of the site contain slopes of 25% or greater; (c) grading exceeding 100,000 cubic yards; (d) residential development in the C-3 Unlimited Commercial zone. It will permit the removal of 23 of the 32 oak trees on site.

The site includes a heliport. We note that in 2011 this area was proposed for a sheriff station. That proposal received considerable public opposition as it would move sheriff services away from a centralized area in the valley and require longer service times for some areas. If this area is again being proposed for a sheriff's station, the public should be informed of this intention so that they are fully informed when making comments on the NOP.

**Failure to provide adequate information**

We begin by stating that several pieces of information that should have accompanied this NOP appear not to exist and were not made available to the public during the comment period. We therefore ask that this NOP be re-noticed and all required material be made available to the public during the comment period. While the NOP accurately and correctly described the Los

Angeles County General Plan requirement for a Development monitoring Plan analysis at this stage of the project, no analysis was provided. Upon questioning about this fact by Lynne Plambeck at the public hearing on the NOP, she was informed by planner, Sam Dea that no analysis had been performed.

SB221, passed in 2001, sometimes called the “show me the water laws” requires that a water supply assessment (WSA) be prepared within 95 days of the project application to the county<sup>1</sup>. A WSA was requested at the public hearing and Sam Dea replied that no Water Supply Assessment had yet been prepared. Failure to prepare this assessment in a timely manner limits the public’s ability to provide informed comments on the NOP.

This NOP should be retracted and re-issued once these two pieces of information are available to the public.

This project is also improperly described as infill development. It is currently farm fields and open space as is much of the surrounding area. The County has approved adjacent tracts, but those tracts are under legal challenge and no housing has yet been built. The County must describe the current baseline condition of the area.

Further, we note that the County indicated that it would not hold a hearing before the full planning commission during the draft EIR process. We request that such a hearing be held. The Commissioners are the decision makers in this process. A hearing only on the FEIR does not allow either the public or the Commission to fully air and hear each others concerns. Nor is there an opportunity to suggest changes at that late date.

### **Water Supply**

As the County is well aware, and as was brought up by many speakers during the public hearing, the state of California is in an unprecedented drought. The governor has just issued an order to cut back residential water supply by 25%. We therefore urge you to delay approval at this time due to lack of water.

We believe that you will not receive a truthful water supply report from Valencia Water Company, now illegally owned by Castaic Lake Water Agency and ask that you require an independent analysis of water supply for this project. As proof of the necessity of this requirement, we attach the agreement that was made between Newhall Land and Farming, the project proponent and Castaic Lake Water Agency during the “friendly” condemnation process completed over the Christmas holiday of 2012. You will note in sections 6.3, 6.4, 6.5, 6.8, 6.10, 6.11 of the attached agreement that Castaic Lake Water Agency promises to direct all necessary potable and non-potable (recycled) water to Newhall’s future projects. We assert therefore that you will not get an accurate statement of the water supply in the Santa Clarita Valley from these sources and must seek independent advice to ensure public health and safety.

The DEIR must indicate how much ground water recharge will be lost by this project. In a time of reduced water supply, ground water recharge impacts are a significant problem as they mean a loss of existing water supply.

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<sup>1</sup> Gov Code Sec 66455.3, 66473.7(a)(3)

We note that under California law riparian water rights cannot be transferred to urban uses. The Santa Clara River is not an adjudicated basin. Newhall Land and Farming therefore has NO RIGHT to water from fallowed farm land if that ground water is needed to supply existing residents due to drought cut backs or well closures from the spread of the ammonium perchlorate pollution plume.

State Water supply must be re-evaluated due to the fact that the Santa Clarita Valley received 0% of its state water entitlement in 2014 and will most likely receive the same amount this year. While the SCV does have some emergency storage supplies in Kern County, contracts regarding withdrawal limit the amount that can be withdrawn on a yearly basis. Emergency storage water should not be regarded as part of the overall supply as it has in previous years. The county should NOT rely on the 2010 Urban Water Management Plan, as circumstances have substantially changed regarding state water supply and pollution of the Saugus Aquifer.

The County should await the release of the State Water Supply Reliability report due now as well as the completion of the 2015 UWMP before proceeding on this project.

### **Water Quality**

#### **Ammonium Perchlorate pollution**

An independent water review should address the following facts and impacts on water supply for this project.

1. CLWA illegally owns and is operating Valencia Water Company in violation of the law
2. Pollution from the Whittaker Berrite project has spread in the Saugus Aquifer due to continued pumping from that source by Valencia Water Co. This has caused the closure due to ammonium perchlorate and VOCs of several additional wells including, V201 and V205 with pollution currently extending past the intersection of Valencia Blvd. and McBean Pky.
3. The clean up facilities put in place for Saugus Wells 1 and 2 have substantially reduced the production from those two wells.
4. There is NO data proving the existence of an additional 35,000AF of water available from the Saugus Aquifer for emergency water supply, nor does wells exist to provide this water.
5. Continued pumping of the Saugus Aquifer will continue to spread the pollution plume in a westerly direction.
6. The State the Dept of Health Services has recently reduced its Health Goal for ammonium perchlorate pollution to 1ppb in order to be protective of pregnant women and small children. Water quality data for all wells in the Valencia Water Co service area should be disclosed in this EIR to ensure that the company can meet that goal for this project while still providing clean water for existing residents.

#### **Chloride Pollution**

The baseline level of naturally occurring chloride in the Santa Clara River was set at 100mg/l in 1989. The Sanitation Districts have been aware of the need to reduce chloride levels in their treatment plant effluent since that time, but have taken no actions to remedy the problem to date, although a desalination system is currently in the planning stages.

Rising salt levels in the watershed of the Santa Clara River are a result of factors related to growth. These include an increase in salt due to increased generation by new residents in their homes and increased importation of State Water Project water required for those residents which is higher in chlorides than most local ground water<sup>2</sup> to accommodate urban expansion. These factors combined to produce unacceptable chloride levels in effluent released to the Santa Clara River from the two Santa Clarita Valley Sanitation plants.

The EIR must disclose the added chloride load created by this project and how it will be addressed.

In addition, the EIR must state which water wells will supply this project and disclose the water quality, including specifically chloride levels and nitrates of those wells. Alluvial ground water in this area is very high in chlorides as indicated by previous EIR disclosures on Valencia Water Company wells. If water high in chlorides will be used, the DEIR must disclose how this will affect the Sanitation District's ability to meet the 100mcl chloride standard. The Regional Board has required Newhall Land to meet this standard for new development. (See attached permit granted in 2012).

Will a deep waste water injection well be required for effluent created by this project? Where is that well proposed to be sited? If the injection well extends laterally under private property, all property owners should be notified.

### **Biology**

This project will permit the removal of 23 of the 32 oak trees on site. An alternative that seeks avoidance of oaks rather than destruction should be included in the DEIR. Oak species should be delineated and Valley oaks (*quercus lobata*) should be identified separately, as they are disappearing from the landscape.

This is a highly sensitive area of the river that is home to many endangered and California CESA and fully protected species, including the UTS, several birds and plant species. The biology section must disclose how these species will be impacted. Circumstances have changed from the 1998 approval of the NRMP, including the fact that that document has not adequately served as a protection to the species it was meant to protect. Therefore its mitigation requirements are obviously inadequate and the whole document should be re-opened.

### **Global Warming**

Carbon increases for removal of any trees, including oaks must be included in the Global Warming calculations.

Global warming impacts must be calculated from the existing baseline which is unimproved farm land, NOT an invented future baseline.

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<sup>2</sup> For example, water produced from the Valencia E wells that are under the influence of the releases from the Valencia Sanitation Plant produce water with chloride levels as high as 93mcl.

**Noise**

A heliport is proposed for this project. We do not understand why such a facility is required in a residential area. The noise levels this will create will not only affect adjacent residential development, but also impact species.

**Solid Waste**

The NOP indicated that trash generated by this project would be trucked to Chiquita Canyon Landfill. The Community of Val Verde was promised by contract (attached) that that landfill would be closed in 2019. The DEIR must address disposal alternatives for this project.

Thank you for your time and attention to our concerns. We request that we be provided a CD of the DEIR when it is released.

Sincerely,

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

Lynne Plambeck  
President

**Attachments:**

1. Newhall Land-Castaic Lake Water Agency Condemnation Settlement Agreement
2. RWQCB Newhall Ranch WDR Permit, 2012
3. Contract with Val Verde Civic Association regarding Chiquita Landfill