

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



4-22- 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 Northlake Project; Project No. R2015-00408-(5); Permit Case Numbers: Vesting Tentative Tract Map No. TR073336; Conditional Use Permit No. 201500019; Environmental Review No. 201500030

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 now in our 28th year of volunteer work for the environment in Santa Clarita.

The Project

This project will authorize development of up to 345 acres of residential uses (3,150 units), 4.4 acres of commercial uses (67,000 square feet), 17.5 acres of industrial uses (305,000 square feet), 880.3 acres of parks and open space (including manufactured slopes), which we do NOT think should be counted as open space, and public facility uses. The approval also includes the 737-acre VTTM No. TR073336 area and associated External Map Improvements (Phase 1), and the remaining property for Phase 2 to be developed at a future time.

Insufficient Signage Notification

As far as we could determine, signs providing notification for the release of the NOP and the public hearing were posted only on the Ridge Route by the paint ball company entrance and by the North Lake Elementary School. These signs are not located in areas where most of the community would see them. Locating signs in obscure, rarely traveled areas such as these, gives the appearance that the County is trying to exclude the public from this process by not properly notifying them. These signs should be moved to a location at least at the entrance of the North Lake project so that people are informed of the proceedings in this matter.

Failure to provide adequate information

This document is entitled:

**NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT**

Yet several places in the Initial Study refer to a “draft Supplemental EIR” Which is it? This project and initial study should be re-noticed with the correct information included in the document.

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. This includes the North Lake Specific Plan on which this tract map is tiered. This document was not available at the time of the public hearing on the NOP, thus precluding full access to all documents needed to make informed comments. While we appreciate the Planning Department’s effort to get this document scanned and available to the public on line, it was still not posted until nearly three weeks into the comment period. It is still not available at any of the library locations.

The NOP fails to include the required Development Monitoring Plan Analysis. The DMS is still a part of the Los Angeles County General Plan and compliance is required for General Plan consistency. The Los Angeles County General Plan requires a Development Monitoring Plan analysis at this stage of the project, but no analysis was provided. It seems that the developer and the Regional Planning Department would like to upstage the Board of Supervisors and regard the DMS as having been eliminated. A DMS analysis should be conducted.

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 county¹. 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.

The NOP indicates that there will be “External Map Improvements”:

“As part of the project, External Map Improvements, including connection to existing utilities and relocation of existing utility lines, drainage facilities, and other infrastructure would occur outside of area specified as VITM No. 73336. These improvements would be defined further, and fully addressed, as part of the Draft Supplemental EIR.” (pg 2)

This information should be available now, since these improvements are integral to the viability of the project. Failure to disclose these impacts until a later time amounts to an illegal piece-mealing of the project. ***We therefore ask again that the NOP be re-noticed and all required information be made available to the public during the comment period.***

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.

¹ Gov Code Sec 66455.3, 66473.7(a)(3)

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 local water suppliers 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 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 development of 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.

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 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 or if the project will be supplied entirely by the State Water Project, and disclose the water quality, including specifically chloride levels and nitrates of those supplies. 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.

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

We agree that there may be sensitive species on site and ask that appropriate surveys be conducted and disclosed in the DEIR.

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 natural open space, NOT an invented future baseline of reduced housing from the original proposal. This project will add massively to local air pollution and greenhouse gas generation because it is located at a distance from all over development. While it will claim to reduce impacts by providing some local business locations, the reality is that people rarely are able to

live close to their work and at least one and probably two members of the household will commute. In addition, other workers will commute to the work areas so that they can remain in their current housing. These issues must be analyzed.

Cultural Resources

We recall news articles discussing bodies being dug up by a back hoe on the North Lake Project around 1997 or 1998. We request that a literature search, including news articles, be conducted and that cultural impacts be discussed.

Traffic

During the public hearing on this NOP, members of the public described numerous traffic issues, from insufficient ingress and egress for residents and workers to problems for emergency vehicle access. These problems would seem to indicate the need for a freeway on and off ramp to serve this project. Please address the ingress/egress problems described during this hearing. Please also provide a traffic scenario that includes a freeway on/offramp.

Noise and other impacts to proposed school

An industrial area within this project is proposed to be located adjacent to a school. This is a poor planning decision, not only because of the potential impact of noise, but also increased air pollution from industrial processes and commuter traffic. Children are considered sensitive receptors when determining permissible noise and air pollution levels. Impacts to the school should be evaluated and disclosed in the DEIR.

We recommend that:

- the school not be located next to the industrial area, and
- that a buffer be required between the industrial area and the residential areas.
- Also, the industrial area should be conditioned to exclude industries that produce high levels of air pollution or are high water
- Industrial and business uses should also be conditioned to require that their employees use public transportation to commute to work in order to avoid noise and air pollution generated by commuter traffic.

Solid Waste

The NOP indicated that trash generated by this project would possibly 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.

Conclusion

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 black ink, appearing to read "Lynne Plambeck". The signature is written in a cursive style with a large initial "L".

Lynne Plambeck
President

Attachments:

1. Newhall Land-Castaic Lake Water Agency Condemnation Settlement Agreement
2. Contract with Val Verde Civic Association regarding Chiquita Landfill