

**Appendix A2 Notice of Preparation and NOP
Comments (Sylmar)**

NOTICE OF PREPARATION
OF AN ENVIRONMENTAL IMPACT REPORT (EIR) AND
NOTICE OF SCOPING MEETING
FOR THE SYLMAR COMMUNITY PLAN

Date: February 19, 2008

To: Affected Agencies, Organizations, and Interested Parties

From: City of Los Angeles Department of City Planning
Anita Cerna
6262 Van Nuys Blvd., Room 351, Van Nuys, CA 91401
(818) 374.5042
(818) 374.5070 (Fax)

Re: **Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and Notice of Scoping Meeting for the Sylmar Community Plan Project**

The City of Los Angeles Department of City Planning (Lead Agency) will prepare an EIR for the proposed Sylmar Community Plan Project. This Notice of Preparation (NOP) is being distributed to applicable responsible agencies, trustee agencies, and interested parties as required by the California Environmental Quality Act (CEQA). Comments from interested agencies are requested as to the scope and content of the environmental information that is pertinent to each agency's statutory responsibilities in connection with the proposed project.

Project Location: The Sylmar Community Plan Area (CPA) contains approximately 7,990 acres and is located about 23 miles north of downtown Los Angeles. The Community Plan is generally bounded by: the Los Angeles City Boundary line on the north and east, the City of San Fernando on the south and southwest, and the San Diego (I-405) and Golden State (I-5) Freeways on the west. The Granada Hills – Knollwood Community Plan area is located to the west of the I-405 and I-5 Freeways. The City of Santa Clarita and the Angeles National Forest are directly north of Sylmar. Figure 1 illustrates the regional and program site location. The CPA is shown in Figure 2.

Project Characteristics: The Sylmar Community Plan (Community Plan) is one of 35 Community Plans which comprise the Land Use Element of the General Plan, one of the seven state-mandated elements of the General Plan that also include noise, transportation, conservation and others. The Community Plan is intended to promote an arrangement of land uses, streets, and services in the Community Plan area to encourage economic vitality; social and physical well-being; and general health, safety, welfare and convenience of the people who live and work in the community

The project is the proposed New Community Plan Program, or restudy, of the Sylmar Community Plan, which is intended to:

- a. Guide development through 2030 and replace the existing 1997 Sylmar Community Plan;
- b. Refine and amend the existing 1996 General Plan Framework Element;
- c. Amend the Mobility Element of the General Plan with respect to policies pertinent to the Sylmar;
- d. Initiate Plan Amendments and Zone Changes necessary to implement the General Plan and accomplish the stated objectives of the Community Plan program (see below);
- e. Amend and establish Overlay Districts to portions of the Sylmar Community Plan, as necessary to implement the General Plan Framework and community plan policies;
- f. Refine and amend any applicable Citywide Elements of the General Plan as necessary.

The Community Plan is also intended to guide development by informing the general public of the City's broad planning goals, policies, and objectives, as well as specific development standards for the Community Plan area. The Community Plan would allocate land for the range of uses that the community will need through 2030, including land for housing, jobs and, recreation, and would improve the link between land use and transportation in a manner that is consistent with the General Plan Framework Element, the Citywide growth strategy. The Community Plan's goals, objectives, policies and programs are specific, action-oriented ideals that the City will promote for the duration of the Plan.

The Community Plan will implement changes to zoning, initiate amendments to land use plan designations and establish overlay zones, as appropriate. Plan amendments would potentially change or refine plan designations and footnotes and make changes to other Citywide Elements, as necessary. In concert with the proposed Plan amendments, new zones may be necessary to maintain Plan consistency (implemented by ordinance). The zones would serve to regulate development standards such as: heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking and design. Overlay zones, districts and other plans would additionally be established to regulate development that is consistent with the General Plan, enhance the unique character of neighborhoods and accommodate growth within the Sylmar Community Plan area. Areas of focused study will include, but not be limited to, San Fernando Road, Foothill Boulevard, Hubbard Street, Roxford Street, Polk Street and portions of Glenoaks Boulevard and Maclay Street. Granada Hills – Knollwood Community Plan will also be studied as part of its own restudy program.

Issues to Be Addressed In the EIR: Based on the project description and the Lead Agency's understanding of the environmental issues associated with the project, the following topics will be analyzed in detail in the EIR:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/ Traffic
- Utilities and Service Systems

Alternatives to be analyzed in the EIR will be defined based on their potential to reduce or eliminate significant environmental impacts associated with the proposed Community Plan project. The specific alternatives to be evaluated in the EIR may include, but are not limited to, the "No Project" alternative as required by CEQA and alternative land use configurations.

Submittal of Written Comments: The Lead Agency solicits comments regarding the scope and content of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies. In accordance with the time limits established by CEQA, please send your response at the earliest possible date, but no later than thirty days after receipt of this notice.

Please send your written/typed comments (including a name, telephone number, and contact information) to the following:

City of Los Angeles Department of City Planning
Anita Cerna
6262 Van Nuys Blvd., Room 351,
Van Nuys, CA 91401
(818) 374.5042
(818) 374.5070 (Fax)

Because of time limits mandated by state law, **written comments** must be provided to the City of Los Angeles at the earliest possible date, but **no later than 5 p.m. on March 20, 2008.**

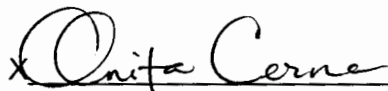
Notice of Scoping Meeting: Pursuant to California Public Resources Code §§21081.7, 21083.9, and 21092.2, the Lead Agency will conduct a public scoping meeting for the same purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

ALL INTERESTED PARTIES ARE INVITED TO ATTEND A PUBLIC SCOPING MEETING TO ASSIST IN IDENTIFYING ISSUES TO BE ADDRESSED IN THE EIR. ATTENDEES WILL HAVE AN OPPORTUNITY TO PROVIDE INPUT TO THE CONSULTANTS PREPARING THE EIR.

The public scoping meeting will be held on March 11, 2008 starting from 6:00 to 7:30 p.m. at the following location:

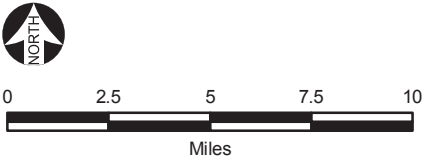
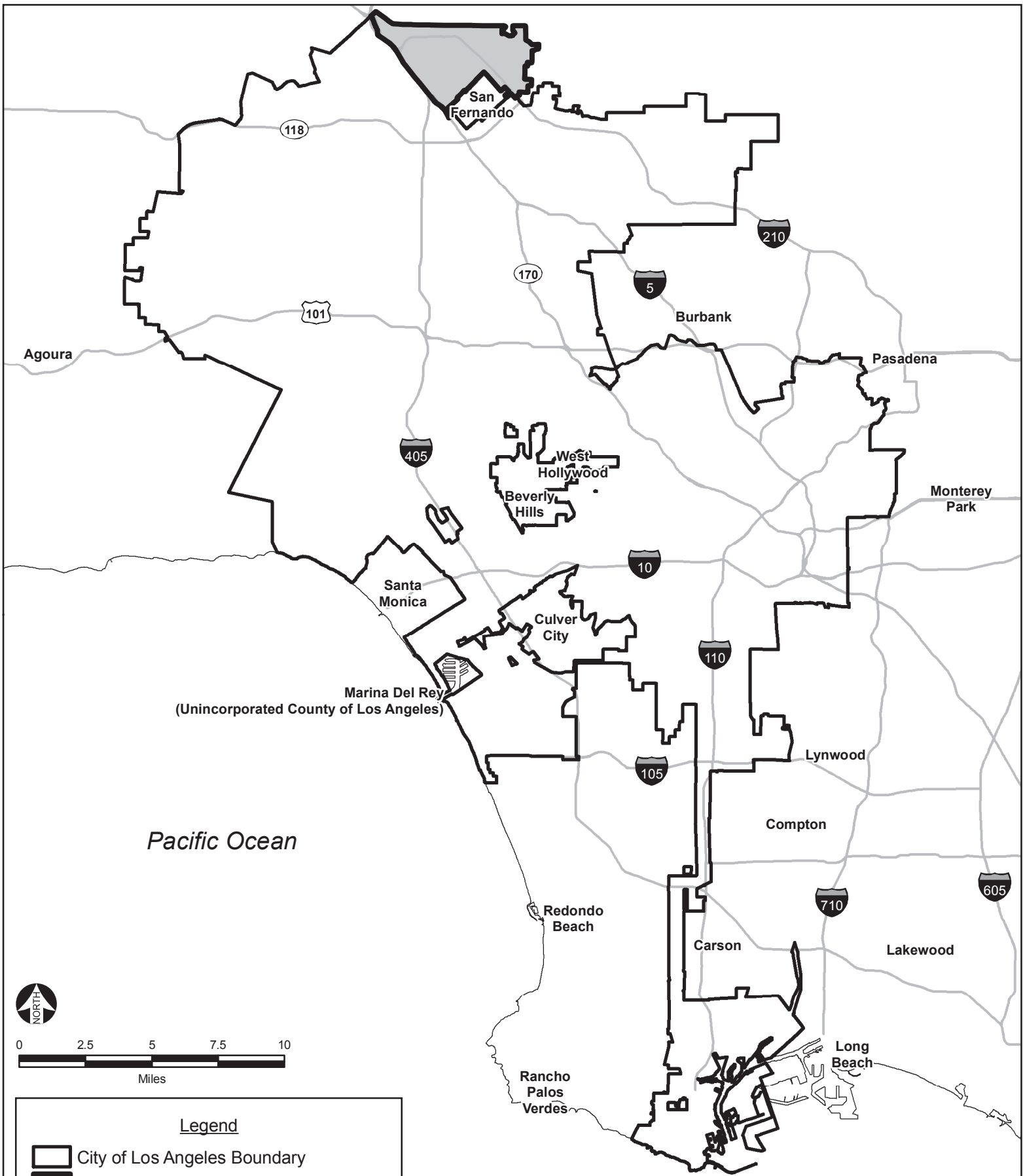
**Sylmar Branch Library
14561 Polk Street
Sylmar, CA 91342**

For additional information, please contact Anita Cerna at (818) 374.5042.

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Date: February 19, 2008

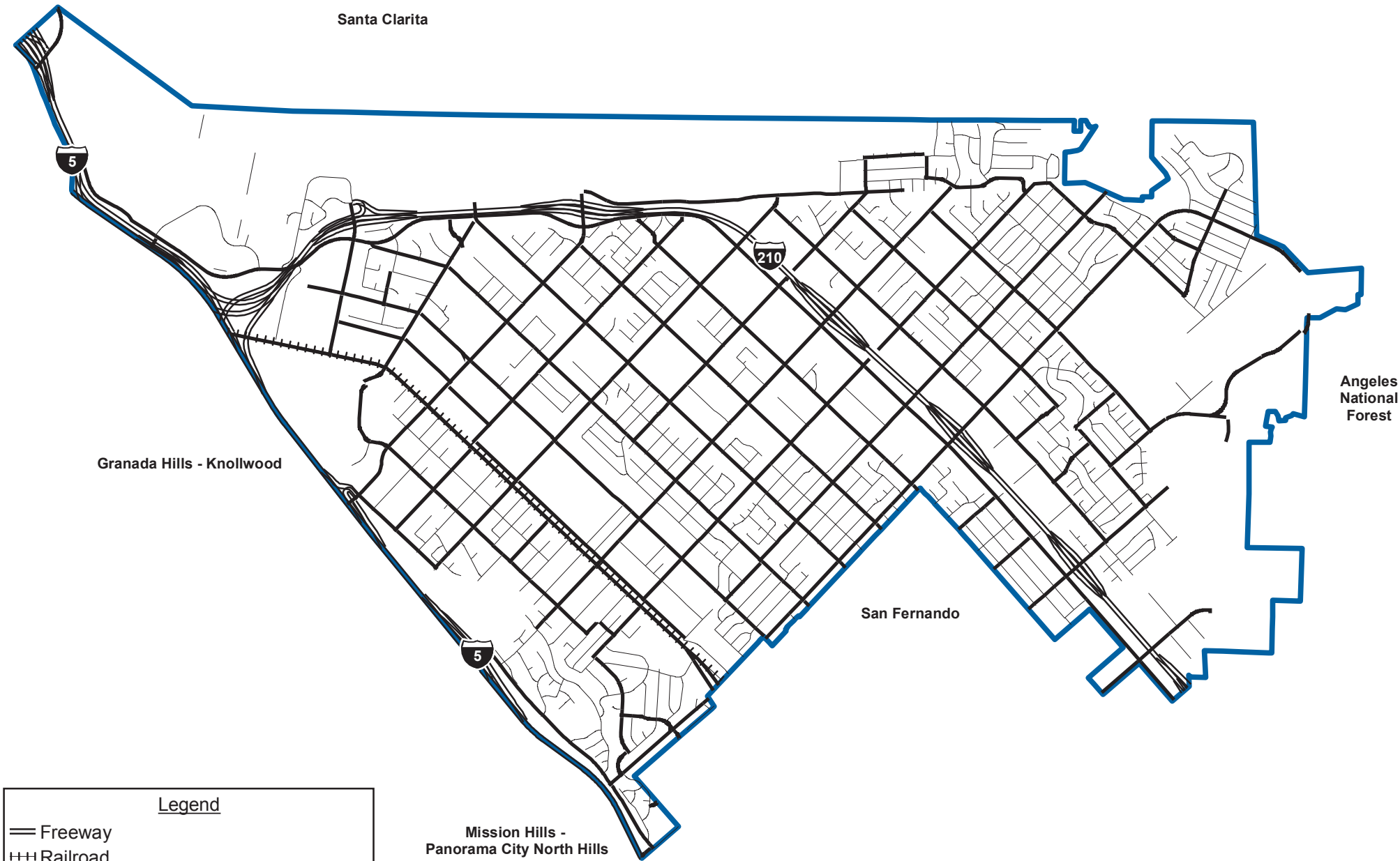
Anita Cerna:
City of Los Angeles Department of City Planning



Legend

- City of Los Angeles Boundary
- Sylmar Community Plan Area Boundary

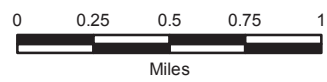
Source: City of Los Angeles, ESRI Streetmap and Christopher A. Joseph & Associates; January 2008.



Legend

- Freeway
- Railroad
- Major Street
- Local Street
- Sylmar Community Plan Area Boundary

Source: City of Los Angeles and Christopher A. Joseph & Associates; January 2008.



DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-3747

FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

IGR/CEQA No. 080224AL, NOP
Sylmar Community Plan Project
Vic. LA-005, LA-210
SCH # 2008021089

March 3, 2008

Ms. Anita Cerna
City of Los Angeles
Department of City Planning
6262 Van Nuys Blvd. Room 351
Van Nuys, CA 91401



Dear Ms. Cerna:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Sylmar Community Plan is one of 35 Community Plans which comprise the Land Use element of the General Plan, one of the seven state-mandated elements of the General Plan that also include noise, transportation, conservation and others.

The California Department of Transportation (Caltrans) as the State agency responsible for planning, operations, and maintenance of State highways, shares similar transportation goals with the City. In the spirit of mutual and collaborative planning, we offer our expertise in the areas of transportation modeling, mainline freeway analysis, system and corridor planning, environmental and community impact assessment, as well as identifying critical operational deficiencies affecting freeway congestion, speed, and delay.

For your information, please see excerpts below from the California Environmental Resource Evaluation System website http://ceres.ca.gov/planning/genplan/gp_chapter3.html#circulation that provides information regarding General Plans that you may find helpful:

“Caltrans is particularly interested in the transportation planning roles of local general plans and suggests that the following areas be emphasized.

- Coordination of planning efforts between local agencies and Caltrans districts.
- Preservation of transportation corridors for future system improvements; and
- Development of coordinated transportation system management plans that achieve the maximum use of present and proposed infrastructure.”

Circulation Element

It is widely known that Southern California highways are heavily congested especially during morning and evening peak periods. We realize that to improve mobility there is the need for capacity enhancing project as well as other innovative alternatives.

New development will increase use of local and regional roadways and the circulation element can identify strategies the City will pursue to maintain good levels of service. We request the City consider implementing a funding program to contribute to improvements on the State highway system, including impacted Interstate 5 (I-5), I-210, and on/off ramps. Usually, when local matching funds are offered improvements can be streamlined and/or expedited.

We request inclusion in the environmental review process of land use projects within the Sylmar Community Plan area and all projects that have the potential to significantly impact traffic conditions on State highways. To avoid delays and any misunderstandings in the traffic impact analysis, we request to be involved in its development.

The thresholds for significance on State highway facilities are different than those applied in the Los Angeles County Management Program (CMP). For State thresholds and guidance on the preparation of acceptable traffic studies, please refer to the Statewide Guide for the preparation of Traffic Impact Studies at:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

If significant impacts are anticipated on the State highway system the Department would work with the City and applicants to identify appropriate traffic mitigation measures.

Traffic mitigation alternatives may include vehicular demand reducing strategies, such as incentives for commuters to use transit i.e. park-and-ride lots, discounts on monthly bus and rail passes, vanpools, etc.

Land Use

As you are aware, there is a critical relationship between land use and transportation. The quality of the State transportation system operation can affect the quality of the local circulation system operation. During the past couple decades, population and economic growth has been strong in Los Angeles County. Projections show that this growth will continue.

We recommend that special attention be given to the jobs- and-housing balance concept. Communities with predominantly residential allocations should be encouraged to set aside areas for office, commercial/retail, and open space uses. Benefits of balanced communities include: reduction of long morning and evening commutes on State highways, shorter trips which in turn would reduce the consumption of fuel and air pollutants. It may also change direction of trips. Instead of most traffic traveling in one direction during peak periods, some trips may be diverted in the opposite direction. Other land use strategies may include Transit-Oriented Developments (TODs).

Housing

As we indicated previously, continued high growth is expected for Los Angeles County, which will have impacts to our State transportation facilities. For large development projects, we ask that efforts be made to provide affordable housing for young workers and seniors to ensure that substantial numbers of employees can afford to purchase homes and live in proposed projects. We also ask that project proponents be encouraged to provide job information on jobs provided along with housing development phases.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the Draft EIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-6696 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 080224AL.

Sincerely,

A handwritten signature in cursive script that reads "Elmer Alvarez". The signature is written in black ink and is positioned above the printed name.

ELMER ALVAREZ
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

TO: Ms. Anita Cerna
City of Los Angeles

From: Kelly Schmoker
Dept. of Fish and Game
626-335-4369

Comments on Sylmar Community
Plan NOP. Attachments and
original letter will follow in the
mail.

State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF FISH AND GAME**<http://www.dfg.ca.gov>

South Coast Region

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201



March 20, 2008

Ms. Anita Cerna
Department of City Planning
City of Los Angeles
6262 Van Nuys Boulevard, Suite 351
Van Nuys, CA 91401

**Notice of Preparation of a
Draft Environmental Impact Report for the
Development of the Sylmar Community Plan
SCH # 2008021089, Los Angeles County**

Dear Ms. Cerna:

The Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP), for a Draft Environmental Impact Report (DEIR) relative to impacts to biological resources. The City of Los Angeles will prepare a DEIR for the Sylmar Community Plan (CP), which will comprise 7,990 acres, located 23 miles north of downtown Los Angeles. The CP area is bounded by the Los Angeles City boundary to the north and east, the City of San Fernando to the south and southwest, and the San Diego (I-405) and Golden State (I-5) freeways to the west. The City of Santa Clarita and the Angeles National Forest are directly north of Sylmar. The CP will address the Land Use Element of the General Plan, and will address land uses, street arrangements, and public services through 2030.

To enable Department staff to adequately review and comment on the proposed project we recommend the following information, where applicable, be included in the Draft Environmental Impact Report:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats (Attachment 1). This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year.
 - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's Guidelines for Assessing Impacts on Rare Plants and Rare Natural Communities.
 - b. A complete, recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year

Ms. Anita Cerna
March 20, 2008
Page 2

- and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.
- c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, Section 15380).
 - d. The Department's Wildlife Habitat Data Analysis Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts.
- a. CEQA Guidelines, Section 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department and should be fully evaluated and provided. The analysis should also include a discussion of the potential for impacts resulting from such effects as increased vehicle traffic, outdoor artificial lighting, noise and vibration.
 - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, Section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
 - d. Impacts to migratory wildlife affected by the project should be fully evaluated including proposals to removal/disturb native and ornamental landscaping and other nesting habitat for native birds. Impact evaluation may also include such elements as migratory butterfly roost sites and neo-tropical bird and waterfowl stop-over and staging sites. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
 - e. Impacts to all habitats from City or County required Fuel Modification Zones (FMZ). Areas slated as mitigation for loss of habitat shall not occur within the FMZ.
 - f. Proposed project activities (including disturbances to vegetation) should take place

Ms. Anita Cerna
March 20, 2008
Page 3

- outside of **the** breeding bird **season** (February 1- **September 1**) to avoid take (including disturbances which would cause abandonment of active **nests** containing eggs **and/or** young). **If project activities cannot avoid** the breeding bird season, nest **surveys** should be conducted and active nests **should be avoided and provided** with a minimum buffer as determined by a biological **monitor (the Department recommends a minimum 500-foot buffer for all active raptor nests)**.
3. A range of alternatives should be analyzed to ensure that **alternatives to the proposed project** are fully considered and **evaluated**. A **range of alternatives which** avoid or otherwise minimize **impacts** to **sensitive** biological resources including wetlands/riparian habitats, **alluvial scrub, coastal sage scrub, Joshua tree woodlands, etc. should be** included. Specific **alternative** locations should also be evaluated in areas with lower resource **sensitivity** where appropriate.
 - a. Mitigation measures for project impacts **to sensitive plants, animals, and habitats should** emphasize evaluation and **selection** of alternatives which avoid or **otherwise minimize** project impacts. Compensation for unavoidable impacts through acquisition and **protection** of high quality habitat **elsewhere should be addressed** with **offsite** mitigation locations clearly **identified**.
 - b. The Department considers **Rare Natural Communities** as threatened habitats having **both** regional and **local** significance. **Thus, these communities should be fully avoided and otherwise protected** from project-related impacts (Attachment 2).
 - c. **The** Department generally does **not** support the use of **relocation, salvage, and/or transplantation** as mitigation for **impacts to rare, threatened, or endangered species**. Department studies have shown that these efforts are **experimental** in nature and largely unsuccessful.
 4. A California Endangered Species Act (CESA) Permit must be obtained, **if the project** has the potential to **result in "take" of species of plants or animals** listed under CESA, either during **construction or over the life of the project** **CESA Permits are issued to conserve, protect, enhance, and restore State-listed** threatened or endangered **species** and their habitats. Early **consultation** is encouraged, as significant modification to the proposed **project and mitigation** measures may be required in order to obtain a CESA Permit. **Revisions to the Fish and Game Code, effective January 1998, require that the** Department issue a separate CEQA document for the issuance of a CESA permit unless **the project CEQA document addresses all project** impacts to listed species and specifies a mitigation **monitoring and reporting program that will** meet the requirements of a CESA permit **For these reasons, the following** information is requested:
 - a. Biological **mitigation** monitoring and reporting proposals **should be** of **sufficient** detail and resolution **to satisfy the requirements for a CESA Permit**.
 - b. A Department-approved **Mitigation** Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant **Protection** Act.
 5. **The Department opposes the elimination** of watercourses (including **concrete channels**) **and/or the canalization of natural and manmade** drainages or conversion to **subsurface** drains. All wetlands and **watercourses**, whether **intermittent, ephemeral, or perennial**, must be **retained** and **provided** with substantial setbacks which **preserve** the riparian and aquatic **habitat values** and maintain their value to on-site and **off-site** wildlife populations.

Ms. Anita Cerna
March 20, 2008
Page 4

The Department recommends a minimum natural buffer of 100 feet from the outside edge of the riparian zone on each side of a drainage.

- a. The Department requires a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a SAA may be a project that is subject to CEQA. To facilitate our issuance of the Agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (Lead Agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Ms. Kelly Schmoker, Staff Environmental Scientist, at (626) 335-4369.

Sincerely,



 Terri Dickerson
Senior Environmental Scientist

cc: Ms. Helen Birss, Los Alamitos
Ms. Terri Dickerson, Laguna Niguel
Ms. Kelly Schmoker, Glendora
Mr. Scott Harris, Pasadena
HabCon-Chron
Department of Fish and Game
State Clearinghouse, Sacramento

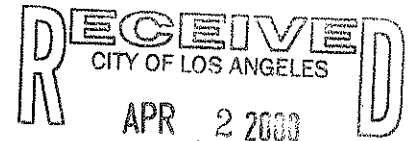
SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



March 24, 2008

Anita Cema
City of Los Angeles
Department of Planning
6262 Van Nuys Boulevard, Room 351
Van Nuys, California 91401



CITY PLANNING
VAN NUYS

**Notice of Preparation Comments
Sylmar Community Plan Project
Case Nos. CPC-2006-5569-CPU and ENV-2006-5624-EIR**

Dear Ms. Cema:

The final form and content of the Sylmar Community Plan (plan) will have great bearing on the creation of the Rim of the Valley Trail from the Pacoima Wash to the west side of Interstate 5. The plan will also play a crucial role in determining whether or not additional high density development with major landform alteration occurs on the west-facing slope of the Pacoima Canyon watershed just west of Lopez Canyon. We urge the City to incorporate all necessary measures in both the plan and the Draft Environmental Impact Report (DEIR) to maximize conditions conducive to a quality Rim of the Valley (ROV) Trail and the least amount of development legally possible in the undeveloped portions of the Pacoima Canyon watershed.

ROV Trail Corridor

Concerns about the ROV Trail Corridor will be addressed first beginning from Interstate 5. It is imperative that the plan show all possible sections of the trail corridor from I5 to the Mountains Recreation and Conservation Authority's (MRCA) existing trail through the Saddletree Ranch open space (just west of Stetson Ranch Park). The plan should go to great lengths to include potential methods of getting equestrians and pedestrians safely across the Foothill Boulevard bridge over I5.

The trail alignment from the east side of Foothill Boulevard to Saddletree Ranch has been moved a least twice to accommodate developer needs to the substantial detriment of the trail. The latest snafu is that the City approved dozens of residential units on top of a pair

of Los Angeles County trail easements. The houses are built and the County apparently relented in the past two weeks and agreed to accept different trail easements without demanding any substantive concessions. The DEIR must address this history to provide full disclosure to City decision makers. Even if a patchwork trail alignment has been put together for this section of the ROV Trail, and its connectors, with a combination of City and County easements, the plan and the DEIR must analyze and show what potential alternative sub-alignments would provide the best trail connections and user experience. Those alternative alignments must consider a route along the northern edge of the Cascades Golf Course. The owner of the course may not want that alignment, but if the plan shows the alternative(s) then the next time residential or commercial development is proposed to be intensified within the existing development footprint, or proposed for the now open golf course area, that superior trail exaction can be easily made. The current trail through the commercial development, under power lines, by houses and abutting a golf course is not an ideal trail alignment.

The Rim of the Valley Trail Corridor Master Plan includes a spur trail northward from the Cascades Golf Course into the greater Grapevine Canyon area. It is imperative that both the plan and the DEIR show a series of possible trail alignments from the primary east-west ROV Trail to several points along the northern plan boundary. Because the Cascades project has been modified so much, and because the development plans for private open space located within the City limits to the north is not public information, the DEIR analysis must include numerous alternatives to ensure that the minimum necessary trail alignment planning is advanced and that functional trail exactions can be easily obtained.

The section of the ROV Trail from Stetson Ranch Park to County-owned Olive View medical center area is unfortunately limited to a long, dusty, shade-free section of trail located parallel to and just north of the 210 Freeway. Although a northern route (around existing residential development) would encounter steep terrain, the plan should include such a conceptual route to keep open, and foster, the possibility of a section of trail with superior user experience attributes. Every square foot of the undeveloped private open space between the City boundary and the existing residential development should retain or be changed to the most restrictive zoning possible. This area is extremely steep and provides key viewshed, watershed and wildlife habitat. Any existing deed restrictions, Conditions of Approval or CEQA mitigation measures that prohibit or restrict development in these areas must be researched and fully disclosed in the both the plan and the DEIR.

The next section of the ROV Trail Corridor and trail alignment within the City boundary is

located just west of the Pacoima Wash. The entire section of natural area between existing residential development and the City boundary should be designated ROV Trail Corridor Alignment Zone in the plan. Terrain makes this a difficult section of trail to construct and every square foot of land that is made available will increase the probability of a high quality trail being constructed some day.

Pacoima Wash - Lopez Canyon Natural Area

The scenic and ecologically intact west-facing slope area of Pacoima Wash watershed is under constant development pressure. These National Forest-adjacent lands provide both critical viewshed to a large complex of public lands along the Pacoima Wash corridor and key informal trail connections from surrounding communities into the National Forest. Every square foot of the undeveloped private open space between the City boundary and the existing residential development should retain or be changed to the most restrictive zoning possible. Any existing deed restrictions, Conditions of Approval, or CEQA mitigation measures that prohibit or restrict development in these areas must be thoroughly researched and fully disclosed in the both the plan and the DEIR.

The issue of the single means of access from Maclay Avenue limiting additional development in this area must be fully analyzed and disclosed in the DEIR. Any documents or maps in the City files that forecast how development could, or already has been proposed to, extend eastward towards Lopez Canyon must be exhaustively collected and analyzed. All preliminary plans for road extensions must be shown in detail and analyzed in the DEIR. This issue is critical to expose to decision makers and for DEIR preparers to assess the potential impacts to the plan area.

The DEIR must recognize that every acre of that National Forest-adjacent habitat block is integrally connective to, and contributive to, the core habitat of the San Gabriel Mountains. We advocate any reduction in development density in these areas and encourage policies that require clustering as close and possible to existing paved roads.

Pacoima Wash and Other Flood Control Channels

The plan area includes the regionally significant public resource of the Pacoima Wash from Gavina Street downstream to the border of the City of San Fernando. All public and private lands along the wash should be under a special overlay zone that reflects the wash's value as a recreational corridor, habitat area, storm water cleaning resource, and major

Notice of Preparation Comments

Case Nos, CPC-2006-5569-CPU and ENV-2006-5624-EIR

Sylmar Community Plan Project

March 24, 2008

Page 4

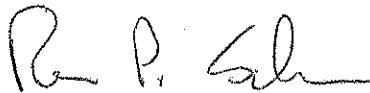
visual amenity. Both the plan and the DEIR must disclose in detail existing habitat along the wash and all both existing and potential public trail connections. Those connections would include public trailheads to get into the wash trail system.

Other flood control channel rights-of-ways also bisect the plan area from north to south. These public lands are critical for future trail connections, for storm water infiltration, and groundwater recharge. The DEIR must analyze these inherent values and assess whether the proposed plan is adequately protecting and facilitating the maximum multi-benefit public use of these lands. The new plan must show public trails along both sides of every flood control channel where adequate land exists. That is the only way of preserving such options even if they never happen because of legal or physical constraints.

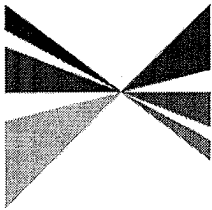
Please contact our staff if you need any assistance in demarcating any trail corridors in the hillside areas or along the flood control channels in and adjacent to the plan area.

Please address any questions and all future documents to Paul Edelman of our staff at the above letterhead address and by phone at 310-589-3200 ext. 128.

Sincerely,



RONALD P. SCHAFER
Chairperson



ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

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March 17, 2008

Ms. Anita Cerna

City of Los Angeles Department of Planning

6262 Van Nuys Boulevard, Room 351

Van Nuys, CA 91401

(818) 374-5042

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Sylmar Community Plan Project - SCAG No. I20080095

Dear Ms. Cerna,

Thank you for submitting the **Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Sylmar Community Plan Project - SCAG No. I20080095**, to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed the aforementioned NOP and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The proposed project will undertake a comprehensive update to the Sylmar Community Plan. CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. We expect the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies and provide supportive analysis as to why it is consistent, not-consistent, or not applicable to these policies.

Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) that may be applicable to your project are outlined in the attachment. The RCPG, RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. **Please provide a minimum of 45 days for SCAG to review the DEIR and associated plans when these documents are available.** If you have any questions regarding the attached comments, please contact Christine Fernandez at (213) 236-1923. Thank you.

Sincerely,

Sylvia Patsouras, Manager
Environmental Planning Division

DOCS#144639v1

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL
IMPACT REPORT FOR THE SYLMAR COMMUNITY PLAN - SCAG NO. I20080095**

PROJECT DESCRIPTION

The proposed project will undertake the comprehensive update of the Sylmar Community Plan. It will guide development through 2030 replacing the existing 1997 Community Plan and amend the existing 1996 General Plan Framework Element and Mobility Element. The Community Plan will implement changes to zoning and initiate plan amendments, such as establishing overlay districts and refining and amending applicable Citywide Elements of the General Plan.

The Sylmar Community Plan Area (CPA) contains approximately 7,990 acres and is located about 23 miles north of downtown Los Angeles. The Area is generally bounded by the Los Angeles City Boundary line on the north and east, the City of San Fernando on the south and southwest, and the San Diego (I-405) and Golden State (I-5) Freeways on the west. The City of Santa Clarita and the Angeles National Forest are directly north of Sylmar.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the General Plan Update.

- 3.01** *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.*

Regional Growth Forecasts

The DEIR should reflect the most current SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. The forecasts for your region, subregion, and cities are as follows:

Adopted SCAG Regionwide Forecasts

	2010	2015	2020	2025	2030
Population	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
Employment	8,729,192	9,198,618	9,659,847	10,100,776	10,527,202

Adopted Los Angeles Subregion Forecasts

	2010	2015	2020	2025	2030
Population	4,176,079	4,237,887	4,298,891	4,357,359	4,413,425
Households	1,393,635	1,460,680	1,528,771	1,596,055	1,663,002
Employment	2,031,342	2,095,758	2,157,226	2,213,427	2,265,209

Adopted Los Angeles Subregion Unincorporated Area Forecasts

	2010	2015	2020	2025	2030
Population	60,347	64,560	68,718	72,705	76,523
Households	14,752	15,750	16,763	17,760	18,750
Employment	24,241	24,932	25,582	26,169	26,686

Adopted City of Los Angeles Forecasts ¹

	2010	2015	2020	2025	2030
Population	4,090,125	4,147,285	4,203,702	4,257,771	4,309,625
Households	1,372,873	1,438,731	1,505,615	1,571,712	1,637,475
Employment	1,994,358	2,057,435	2,117,623	2,172,642	2,223,338

1. The 2004 RTP growth forecast at the regional, county and subregional level was adopted by RC in April, 2004. City totals are the sum of small area data and should be used for advisory purposes only.

The Draft 2008 RTP Baseline Growth Forecast (built upon subregion/local jurisdiction input) was released on November 1, 2007 by the Community, Economic and Human Development Committee (CEHD) along with the Draft 2008 RTP and RCP for public review and comment. You may wish to review these forecasts to determine compatibility with any Project Forecasts. The following 2035 forecasts are provided for your reference for the City of Los Angeles, Los Angeles Subregion, and SCAG Region. The forecasts for the intervening years (2010, 2015, 2020, 2025, and 2030) will be included in the 2008 RTP Baseline Growth Forecast.

2035 Forecasts¹	Population	Households	Employees
City of Los Angeles	4,415,773	1,616,578	1,994,134
Los Angeles Subregion - Unincorporated Area	66,428	15,699	27,124
Los Angeles Subregion	4,509,435	1,638,823	2,037,472
SCAG Region	24,056,000	7,710,000	10,287,000

1. Source: Draft 2008 RTP Baseline Growth Forecast
(http://scag.ca.gov/forecast/downloads/RTP_baseline_forecasts_1001.xls)

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- 3.04** *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*
- 3.05** *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.06** *Support public education efforts regarding the costs of various alternative types of growth and development.*
- 3.09** *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10** *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.*
- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the # of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*
- 3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*
- 3.15 *Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.*
- 3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*
- 3.17 *Support and encourage settlement patterns, which contain a range of urban densities.*
- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*
- 3.19 *Support policies and actions that preserve open space areas identified in local, state, and federal plans.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management goals to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
- 3.26 *Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.*

- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

AIR QUALITY CHAPTER

The **Air Quality Chapter** core actions related to the proposed project include:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community-based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulation can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

OPEN SPACE AND CONSERVATION CHAPTER

The **Open Space and Conservation Chapter** goals related to the proposed project include:

- 9.1 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region.*
- 9.2 *Increase the accessibility to open space lands for outdoor recreation.*
- 9.3 *Promote self-sustaining regional recreation resources and facilities.*
- 9.4 *Maintain open space for adequate protection to lives and properties against natural and manmade hazards.*
- 9.5 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.*
- 9.8 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The **Water Quality Chapter** goals related to the proposed project include:

- 11.02 *Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.*
- 11.05 *Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetland permits.*
- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

REGIONAL TRANSPORTATION PLAN

The **2004 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly

development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices.*

Principle 2: Foster livability in all communities.

- GV P2.1** *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2** *Promote developments, which provide a mix of uses.*
- GV P2.3** *Promote "people scaled," walkable communities.*
- GV P2.4** *Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people.

- GV P3.1** *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2** *Support educational opportunities that promote balanced growth.*
- GV P3.3** *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4** *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5** *Encourage civic engagement.*

Principle 4: Promote sustainability for future generations.

- GV P4.1** *Preserve rural, agricultural, recreational, and environmentally sensitive areas.*
- GV P4.2** *Focus development in urban centers and existing cities.*
- GV P4.3** *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4** *Utilize "green" development techniques.*

CONCLUSION

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

SCAG RCPG (RTP and/or CGV) Policies Growth Management Chapter		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
3.01	The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.02	In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.03	The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

February 22, 2008

Ms. Anita Cerna
City of Los Angeles
Department of City Planning
6262 Van Nuys Blvd., Room 351
Van Nuys, CA 91401



Dear Ms. Cerna:

Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Sylmar Community Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.urbemis.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address:
http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:AK

LAC080219-05AK

Control Number

Summary Points from Comment Cards
NOP Scoping Meeting 3/11/2008

- ◆ Can the “Tree City USA” standard be applied to Sylmar?
- ◆ Concerns of growth and infrastructure and quality of life issues
- ◆ Community is concrete and ugly; lacks flow, connection, business areas
- ◆ Parks and recreational areas are dry, old, ugly, and overpopulated
- ◆ Need to drive out of Sylmar to [go to the theatre, shopping, etc.]
- ◆ The speed of traffic is terrible [Esp. on Foothill between Balboa and Maclay]
- ◆ Bad street parking
- ◆ Sidewalks/multi-use walkways needed
- ◆ Use and beautify DWP Riverways for multi-use purposes
- ◆ Opposition to land use changes that will impact K-zoned lots
- ◆ Traffic and utility issues are not being properly addressed
- ◆ Are we going to get services that will accommodate the growth - police, fire, water, animal regulation?
- ◆ Polk Street shouldn't be a major highway - there are too many children/pedestrians walking along with rapid traffic and no safe sidewalks
- ◆ Too many billboards in the community
- ◆ Too much cement around the new developments
- ◆ Maclay/Gladstone - Major traffic
- ◆ No street cleaning services on Dronfield between Sayre and Astoria - also needs speed bumps for the speeding issue around the school
- ◆ Need guidelines for properties adjacent to the freeways
- ◆ Guidelines for signage to protect family values
- ◆ Sylmar needs a venue where “the young and the old can come out and enjoy the night”
- ◆ Dirt streets around Rancho Cascades need to be paved
- ◆ Need more horse trails that connect
- ◆ Roxford, SF Road, Polk, and Glenoaks should be widened and repaved
- ◆ Need better landscaping along the freeway
- ◆ Eliminate taco vendors
- ◆ Need police enforcement in the Sylmar parks
- ◆ Keep the K-overlay which allows us to have suburban horse keeping facilities
- ◆ Too much traffic for the streets to handle (Esp. Hubbard/210fwy)
- ◆ Building more and more housing on small lots is adding to the traffic problem

- ◆ Traffic signals are confusing on Hubbard at the 210E on-ramp (husband and wife both in accidents at this intersection)
- ◆ High rates Of speed on connecting side streets. Total disregard for stop signs and traffic lights.
- ◆ Noise pollution (from traffic, sub-woofers, and sound systems on the fwy)
- ◆ Coral 12 – Feeder Trails
 - Stetson Ranch/Glenoaks
 - Bledsoe – North to the Hills
 - Gladstone to the flood control
 - Roxford – North of Borden under fwy
 - Herrick past Roxford

Sylmar New Community Plan (NCP) Summary of EIR Scoping Comments (Comment Period 2/19/08 to 3/20/08)

Land Use

- CalTrans requests special attention to the jobs-and-housing balance concept to decrease commutes and traffic
- Concerns of growth and infrastructure and quality of life issues
- Need guidelines for properties adjacent to the freeways
- Keep the K-overlay which allows us to have suburban horse keeping facilities
- Concerns related to conflicts between horse-zoned properties and other uses--loss of horse uses
- Decrease potential development in the Pacoima Canyon watershed through use of overlay zones
- Eliminate taco vendors
- Approve only the least amount of development possible in the Pacoima watershed to limit development near Rim of the Valley Trail
- Solidify trail alignment and protect from changes due to development demands
- Place most restrictive designations on areas near Rim of Valley Trail, especially Pacoima Wash-Lopez Canyon to protect key views, habitat, and watersheds
- Need to drive out of Sylmar [to go to the theatre, shopping, etc.]
- Building more and more housing on small lots is adding to the traffic problem
- Opposition to land use changes that will impact K-zoned lots
- SCAG requests that EIR consider consistency with the 1997 General Plan Framework for the entire city of Los Angeles

Aesthetics

- Too much cement around the new developments, Community is concrete and ugly; lacks flow, connection, business areas
- City Design overlays, and architectural styles for area.
- Need better landscaping along the freeway
- Guidelines for signage to protect family values
- Too many billboards in the community

Recreation

- Maximize the quality of the Rim of the Valley Trail
- Need more horse trails that connect
- Use and beautify DWP Riverways for multi-use purposes
- Address previous history of trail alignment modifications due to development

Population and Housing

- Concerns related to increase in population
- Caltrans suggests focusing on pop/housing/jobs balance to ultimately reduce traffic impacts
- Suggested increase of affordable housing

Biological Resources

- DFG requests a recent identification and assessment of all locally endangered, threatened, and unique species and sensitive habitats
- DFG requests that a CESA permit be required if the project could potentially result in the "take" of species
- DFG request analysis of migratory species and impacts from changes in ornamental landscaping

- DFG requests analysis of any modifications to Fuel Modification Zones, no use of FMZ for mitigation areas
- DFG opposes any loss of water courses, including concrete channels
- DFG requests a Streambed Alteration Agreement (SAA) if any lake, stream bed, bank, or channel is impacted
- Can the “Tree City USA” standard be applied to Sylmar

Public Services

- Parks and recreational areas are dry, old, ugly, and overpopulated
- Investigate grey water use
- Need police enforcement in the Sylmar parks
- Services needed that will accommodate the growth – police, fire, water, animal regulation
- No street cleaning services on Dronfield between Sayre and Astoria

Transportation and Traffic

- Traffic and utility issues are not being properly addressed
- Too much traffic for the streets to handle (Esp. Hubbard/210fwy)
- Roxford, SF Road, Polk, and Glenoaks should be widened and repaved
- Sidewalks/multi-use walkways needed
- Polk Street shouldn't be a major highway – there are too many children/pedestrians walking along with rapid traffic and no safe sidewalks
- Citywide bike plan
- Maclay/Gladstone – Major traffic
- Needs speed bumps for the speeding issue around the school, Dronfield between Sayre and Astoria
- High rates of speed on connecting side streets. Total disregard for stop signs and traffic lights.
- Traffic signals are confusing on Hubbard at the 210E on-ramp
- Dirt streets around Rancho Cascades need to be paved
- Bad street parking
- The speed of traffic is terrible [Especially on Foothill between Balboa and Maclay]
- Caltrans states that analysis for impacts on state facilities must consider those standards/thresholds
- Caltrans wants to provide input on projects considered as part of the project buildout
- Caltrans--include TDM strategies as mitigation measures
- CalTrans suggest the implementation of a funding program to improve the State highway system

Hydrology and Water Quality

- Decrease potential development in the Pacoima Canyon watershed
- Requested analysis of all flood control channel right-of-ways

Air Quality

- SCAQMD--Identification of air pollutants that can contribute to health risk factors
- SCAQMD requests consistency with the CEQA Air Quality Handbook

Noise

- Noise pollution (from traffic, sub-woofers, and sound systems on the fwy)
- Need soundwalls on freeway

